

TCEQ HRVOC Stakeholder Group
Meeting Topic: Flares & Site-Wide Caps
March 5, 2004
9:00 A.M.
Hilton Hobby Airport, Houston, Texas

Summary of Issues / Comments -

Opening Comments

- David Schanbacher, Chief Engineer, opened the meeting and introduced TCEQ staff.

Flares

- Ashley Forbes & Vincent Meiller led an open discussion on flare issues.
 - TCEQ staff is currently working on the internal process for the review and response of test plans for vents and quality assurance plans (QAPs) for monitoring of flares and cooling towers.
- A participant suggested submitting information for demonstration of exemptions with the QAP so it will be approved by the TCEQ.
 - TCEQ staff indicated that there are enforceability concerns associated with this method of documentation and it also may slow down the process of review and response to submitted QAPs.
- Discussion of calibration requirements for online analyzers.
 - Calibration requirements per EPA Performance Specification 9 (PS9) - Current rule requires PS 9 calibration for all constituents monitored. TCEQ staff is considering requiring PS 9 only for HRVOCs and perhaps other, less stringent requirements for other constituents for BTU and molecular weight.
 - There are provisions in the rule for modifications to PS9, but significant modifications may be better handled via rulemaking.
 - Need to consider whether PS9 is appropriate for flares. Further modifications to calibration procedures in PS9 may be needed, even for HRVOCs.
 - TCEQ staff would like comments on this concept.
- A participant had a question about calibration gases. Do they need to send calibration gases through the sampling system or just directly to the analyzer during system calibration?
 - TCEQ will review PS9 to determine specific requirements. While calibrating through the sampling system is preferred, it may not be specifically required.
- A participant asked if the time required for calibration counts towards down-time, stating that multiple blends could pose some problems.
 - Normal calibration is not counted as down-time; however, if there is a problem with calibration, then further calibration time is counted as down-time. This is a TCEQ interpretation.

- What do the participants consider to be a flare in temporary service?
 - Flares only used for scheduled maintenance, startup, shutdown
 - Flares used only 14 days per year
 - Flares used only 21 days per year
 - TCEQ needs more comments on temporary service flares in order to define and regulate any potential exemptions or applicability changes.
 - TCEQ needs to know approximately how many flares would be temporary service flares to determine how it would affect the cap. EPA commented on the importance of providing this information.
 - Industry needs to provide more information for TCEQ consideration.

- A participant mentioned that he would like to meet with TCEQ to discuss sample conditioning issues regarding reactive, non-VOC constituents.

- Discussion on differences between permitted flare efficiencies and the flare efficiencies in the HRVOC rules.
 - Both flare efficiencies are applicable so you have to comply with both requirements.

- Discussion on how to handle exempted, unmonitored vents to flares. Could the destruction efficiency of the flare be applied to the test results of these flares? While not specifically stated in the rule, it was intended that the emissions from the vents would take into account destruction efficiency of the flare.

- Discussion on the flare exemptions and exemption levels of other combustion control devices. TCEQ staff requested more input from stakeholders if there is something missing from the current *de minimis* levels and exemptions.

Site-Wide Cap Issues

- Randy Wood opened the discussion by requesting that the stakeholders provide input not only about problems they have identified but also suggested solutions to those problems. He also stressed the importance of conveying these concerns to TCEQ staff in the next two weeks to be considered in the current rules package.

- Susana Hildebrand and Chuck Mueller led the discussion on cap issues.

- TCEQ staff evaluated the current cap allocations and found significant questions to the approach used.

- TCEQ staff is currently assessing the value of emissions in the modeling that will be needed to reach attainment.

- Based on input from stakeholders, TCEQ staff is considering a two-tiered cap approach.
 - Long-term continuous emission rates

- short term limits (peaks)
- Considering basing cap allocations on production rates and / or capacity.
- There are presently two cap tables in the SIP and we project a new approach would also include two separate tables:
 - Harris County
 - Surrounding HGA Counties
- TCEQ staff is seeking input from industry regarding the different production sectors in HRVOC service.
- TCEQ staff is seeking input regarding issues specific to batch processes.
- A participant commented that it is better to define production sectors using SIC codes than SCC codes.
- TCEQ staff is seeking input from industry regarding permit issues that will affect the cap allocations.
- TCEQ is working on an interim cap approach. A cap and trade program cannot be implemented at this time due to the lack of monitored data.
- A participant suggested that TCEQ consult with brokerage firms when / if the TCEQ decides to implement a cap and trade program. He also suggested that the TCEQ not restrict trading to entire streams like the current NO_x program.
- A participant asked if a new cap would include fugitives.
 - There is already a reduction plan for fugitives.
 - The focus is on flares, vents, and cooling towers.
- A participant expressed concern about the geographic allocation of caps. Specifically, about too many emissions being allocated to a concentrated geographic area.
- A participant suggested that the short term cap be based on worst-case VOC emissions.
- A participant asked if the TCEQ plans to add additional compounds to the current list of HRVOCs.
 - The latest modeling to date supports reducing reactivity
 - No specific compound(s) has been identified to date.
 - Still working on the modeling, so this issue is not off the table.
- There will be an opportunity to comment on the cap allocations during the rulemaking process.
- EPA expressed concern about the uncertainty of a long term cap average for a short term

standard (1 hour, 8 hour), the variability of emissions if the cap is limited to several large industries and that a safety factor may be needed to account for variability in emissions from the largest companies.

- A participant asked if the cap compliance date will change if new cap allocations are proposed.
 - There has been no internal TCEQ discussion of extending this compliance date so far.
- TCEQ staff provided a handout with specific questions and issues to consider. TCEQ would like immediate feedback.
 - This list will also be available on the stakeholder web page and responses can be e-mailed to Ashley Forbes.
- Discussion on how emissions events would play into the short term cap.
- Discussion about pressure relief valves and vents.
 - There may be ways to address these emissions without attempting to quantify the emissions.
 - Command and control approach vs. monitoring each valve and vent.
 - Tighten up limits on existing vent gas rule.
- Next Stakeholder meeting is at the TCEQ offices in Austin, building F, Room 2210 on March 19th at 9:00 A.M.