

TCEQ HRVOC Stakeholder Group
Meeting Topics: HRVOC Fugitives & Cooling Tower Issues
March 19, 2004
9:00 A.M.
TCEQ Bldg. F, Room 2210, Austin, Texas

Summary of Issues / Comments -

Fugitives

- A participant stated that the term “components” should be changed back to “valves” in §115.352.
 - Suggested changes to the general fugitive rules in Subchapter D will be considered but are not currently on the same rulemaking track as the HRVOC rules for the HGA 1-Hour SIP Attainment Demonstration.
- A participant expressed concern about rule language regarding ‘accessible’ and ‘non-accessible’ valves.
- A participant suggested that TCEQ staff review rule language for difficult to monitor - meters vs. feet as the measurement. Try to be consistent with federal definitions.
- A participant questioned the flexibility of the rule regarding large leaks (>10,000). If the first attempt to repair is within 7 days and the leak is reduced, does the owner or operator have 15 additional days to bring the leak down below 500?
 - The rule does not currently provide that flexibility.
- Discussion about delay of repair (DOR).
- Several participant asked what sections of the rule will be open for comment and someone suggested opening the entire HRVOC rule for comment.
 - Only sections that need to be revised will be open for comment. The purpose of the stakeholder meetings is to identify the issues that need to be addressed in the rule.
- Discussion about the table in §115.788(a)(2)(B) regarding the number of components and the types of components to be sampled for the LDAR program.
- A participant asked if emissions events are part of the cap.
 - Not in the current rule, but the TCEQ plans to include emissions events in the cap in the rule proposal.
- EPA expressed concern about the TCEQ’s ability to project the benefits of the HRVOC fugitives rules.
- A participant stated that the focus of the meeting should be on overall emissions and

reduction of emissions.

- Discussion on the correlation equation and factors for VOCs vs. HRVOCs. A participant stated that by using VOC, the impact for HRVOCs is overstated.
 - EPA mentioned that the (TexAQS) aircraft data indicates that VOCs are under-reported.
- Discussion on actual emissions vs. permit requirements.
- Discussion on the Audit provisions in §115.788
 - The audit is not supposed to be side-by-side with the regular monitoring company.
 - TCEQ staff is looking at ways to provide clarification in the rule.
 - A participant asked if they should wait to repair a leak discovered by the regular monitoring company until the auditor has inspected the facility.
 - Leaks should be repaired as soon as practicable.
 - Monitoring and audits are two separate 'snapshots' in time.
 - A participant suggested that the TCEQ relax the audit requirements once an account has had several 'good' audits.
 - A participant inquired about the amount of SIP credit the TCEQ has taken for the audit provision.
 - Credit is taken for the overall HRVOC rule and it isn't necessarily specific down to the rule cite.
 - A participant suggested striking the requirement for 15 day notification since the report is due in 30 days.
 - A participant suggested extending the reporting time to 45 days.
 - The audit and how it relates to §101 was briefly discussed.
 - The audit provides no shield from reporting emissions events in §101.
 - What are the consequences if the 3rd party auditor finds a certain number more leaks than the regular contractor?
 - The longer the time between the audit and the regular monitoring, the greater probability of new leaks.
 - TCEQ staff does not expect duplicate results. The objective is to identify problems where there are significantly different findings.
 - A participant asked if they need to keep the audit and the regular monitoring information in separate databases.

Cooling Towers

- A participant brought up a scenario regarding jacketed reactors and suggested that they be considered for applicability / exemption.
- A participant requested that staff evaluate the HRVOC sensitivity level regarding speciation.
- Discussion about different conventions regarding detection limits (BDL, ½ DL, 0.0).
- EPA expressed concerns about the definition of 'strippable VOC'

- Discussion on flow monitoring for large towers.
 - A participant asked if there is any instrumentation available to provide +/-5.0%
 - Clamp-on ultrasonic 'cyclone' is available.
- Discussion regarding sampling locations.
- A participant requested that the TCEQ spells out in the rule that “continuous” monitoring refers to the NSPS definition of every 15 minutes.
- Discussion about calibration requirements.
 - flare calibration requirements are more flexible because calibration of flares creates more monitoring downtime (per a strict interpretation of PS-9); it does not create as much monitoring downtime in cooling towers.
- A participant suggested that the requirement to submit a QAP for new cooling towers 60 days prior to being brought into service should be changed/removed.

Cap Update

- An outline of 4 options for site-wide cap development was distributed to the stakeholders for consideration and discussion.

Closing Remarks

- Several stakeholders requested an opportunity to review draft rule language prior to proposal.