

To the Texas Commission on Environmental Quality- Informal Comments

REF: "Texas Commission on Environmental Quality, Flare Task Force Draft Report", September 3, 2009

The Lubrizol Corporation, a specialty chemical manufacturer, welcomes the opportunity to present informal comments on the proposed Flare Task Force Draft Report. It is our understanding that the task force is recommending the installation of additional monitoring potentially including speciation of flared vent gases for routine process waste gas streams. Based upon our understanding of the available technology, this will require the installation of chromatographs, calorimeters and flowmeters. Where the flare is used as a backup device for a thermal oxidizer, additional instrumentation will be required including vent valve position detectors.

Lubrizol is concerned that the expense associated with the installation of the additional monitoring equipment far outweighs any potential benefits, especially after factoring in additional monitoring required to verify compliance with the proposed requirements. For example, to ensure continuous compliance with the proposed monitoring requirements, each flare would necessitate the installation of two chromatographs, one in service and the second on standby in event of malfunction of the first. The installation and programming required for two chromatographs results in the equipment expenditure as well as expenditures for a climate controlled field building, and other structures necessary for the installation of additional monitoring equipment. The addition of flowmeters, a calorimeter, and valve detection switches results in an additional expense.

The above estimates cover the initial capital expenses for the increased monitoring; there are, additionally, increased operating costs associated with calibrations, servicing, spare parts, and the associated skilled technician labor. It is safe to assume that for every two flares requiring increased monitoring, an additional instrument technician will need to be available to maintain all of the required equipment.

Considering these expenses, Lubrizol encourages the agency to consider a phased approach where those flares responsible for a majority of the VOC emissions are regulated initially with increased monitoring requirements. An additional consideration is the creation of exemptions from increased monitoring requirements to those flares operating less than 720 hours per year with less than 25 lbs/hr emissions while operating.

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