



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

APR 22 2010

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Kenneth R. Comey, III
BP America, Inc.
Environmental Compliance & Advocacy Team
12317 Aralia Ridge Dr.
Austin, TX 78739-1940

Dear Mr. Comey:

In your March 30, 2010 letter, you requested permission to use an alternative procedure to measure the flow rate of gas exiting the flares from refinery, terminal, chemical plant, or other flares subject to 40 CFR Part 60.18 and 63.11(b). You would like to use a mass flow meter in place of Method 2, 2A, 2C, or 2D to satisfy the volumetric flow rate and exit gas velocity requirements of Sections 60.18(f)(4) and 63.11(b)(7)(i). A copy of the flow meter specifications and calibration certificate will be attached to the relevant test reports.

We approve your use of the mass flow meter in place of Method 2, 2A, 2C or 2D to measure the flare flow rate for exit velocity at regulated flares as long as the calibration certification is in compliance with the manufacturer recommended frequency. You may use this alternative at flares subject to the applicable provisions in Sections 60.18(f)(4) and 63.11(b)(7)(i). Since this alternative method is applicable to other similar facilities in this source category, we will be posting this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have questions or would like to discuss the matter further, please call Foston Curtis at (919) 541-1063, or you may e-mail him at curtis.foston@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Conniesue B. Oldham".

Conniesue B. Oldham, Ph.D., Group Leader
Measurements Technology Group

cc: Foston Curtis (E143-02)
Kishor Fruitwala, Region 6