



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

MAR 18 2013

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Ms. Sally Jones
Chevron USA, Inc.
HES Department
15 Smith Rd.
Midland, TX 79705

Dear Ms. Jones:

In your February 18, 2013, correspondence you asked to use deviations from the prescribed methods for testing a flare at Chevron's Buckeye carbon dioxide plant in Lovington, New Mexico. The flare is subject to the general control device provisions of 40 CFR, Part 60, Section 60.18, which require that the heating value of the flare fuel gas be determined from the gas components measured by Method 18. The flare gas exit velocity must also be determined from flow rate measurements using Methods 18 and 2, 2A, 2C, or 2D.

In Method 18, you propose to collect the gas samples in SUMMA canisters in place of Tedlar bags. You ask for this deviation to eliminate safety risks associated with sampling and transporting gases having high hydrogen sulfide (H_2S) concentrations. The waste gas routed to the flare during normal operations contains up to 3000 ppm H_2S . In place of Method 2A, 2C, or 2D, you propose using an existing ultrasonic flow meter that monitors the flare waste stream. This would also reduce exposure risks to personnel when testing.

We believe your request to use SUMMA canisters in place of Tedlar bags for measuring gas components by Method 18 to determine heat content is reasonable. We therefore approve your request to use this method deviation. The use of ultrasonic flow monitors to measure flow rate in place of Method 2, 2A, 2C, or 2D has been broadly approved for flares in a prior approval letter to BP America dated October 13, 2010. This approval letter is enclosed and is applicable in your case. The letter is also accessible through the Emission Measurement Center website at and is listed as document ALT-080. Since this approval of SUMMA canisters for Method 18 is applicable to other facilities wishing to use this option, we will be posting this letter on our web site at 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 "Connie Oldham".

Conniesue Oldham, Ph.D, Group Leader
Measurement Technology Group

Enclosure

cc: Foston Curtis (curtis.foston@epa.gov)
Charles Richey, Region 6 (richey.charles@epa.gov)
Robert Samaniego, NM DEP (Robert_Samaniego@nmenv.state.nm.us)



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OCT 13 2010

OFFICE OF
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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 August 2, 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 an ultrasonic flow meter in place of Method 2, 2A, 2C, or 2D to satisfy the volumetric flow rate and exit gas velocity requirements of §§60.18(f)(4) and 63.11(b)(7)(i). You note that a copy of the flow meter specifications and calibration certificate will be attached to the relevant test reports.

We approve your use of the ultrasonic 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 §§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)