



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

APR 5 2013

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

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Dear Mr. Comey:

The Environmental Protection Agency approved your previous request dated August 2, 2010, to use an ultrasonic flow meter in place of Method 2, 2A, 2C, or 2D to measure the flow rate for determining flare exit velocity at facilities subject to the general flare requirements of 40 CFR 60.18 and 63.11(b). This approval was broadly applicable and extended to other similar flares subject to these requirements. In your March 25, 2013, letter you ask that we include optical flow meters in this approval.

Your company would like to install optical meters in the future, and you note that they will be installed, calibrated, operated, and maintained according to the manufacturer's specifications. These monitors will also meet the flare flow monitoring requirements of 40 CFR 60.107a(f) of Subpart Ja, Standards of Performance for Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After May 14, 2007, which has location, sensitivity, inspection, and recalibration requirements.

Your request to use ultrasonic flow meters that are calibrated and maintained to measure the flare flow rate is an acceptable alternative to Method 2, 2A, 2C, or 2D. This letter expands the prior approval of ultrasonic flow meters to include optical flow meters. Optical and ultrasonic flow meters are acceptable for measuring flare gas flow rate under the provisions of 40 CFR 60.18(f)(4) and 63.11(b)(7)(i), provided the calibrations are maintained within the manufacturer's recommended frequency. For documentation purposes, calibration sheets must be included in test reports to verify that meter calibration is current. Since this alternative method approval 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 (curtis.foston@epa.gov)
Charles Ritchey, Region 6 (ritchey,charles@epa.gov)
John Smith, TCEQ (JoSmith@tceq.state.tx.us)