SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
PLANNING AND RULES
21865 Copley Dr, Diamond Bar, CA 91765
Zoya BANAN, PhD

FEB 20, 2024

Topic / Ref. : Proposed Amended Rule 1118 Comments

Zoya,

Air Liquide appreciates the opportunity to comment on Proposed Amended Rule 1118, Control of Emissions from Refinery Flares. We particularly appreciate the cooperative process used to craft this rule which will lead to reduced emissions from flaring.

We urge the district to be mindful of the impact refinery rules have on non-refinery third parties which operate facilities that provide goods and services to a host refinery. Air Liquide operates a hydrogen production facility located within the Chevron USA El Segundo refinery. We are not nearly as heavily resourced as our host facility but are subject to the same rigorous standards and experience a disproportionate impact from the rules intended to reduce emissions and community health effects from refineries.

Paragraph (j)(10) creates a new mandate for flow meters to be installed at facilities with hydrogen clean service flares effectively replacing the previous methodology of calculated flows based on valve positions which was allowed for clean service flares, and continues to be allowed for non-hydrogen clean service flares. We note that the draft staff report does not include an economic analysis of this. The installation of a flowmeter is a non-trivial alteration to a critical safety system that requires extensive planning, design, and the purchase of custom equipment with long lead times. Installation has to be coordinated with the host facility and is expected to be done in conjunction with a curtailment or full shutdown of the host facility. Forcing a curtailment or shutdown of a refinery outside of the normal maintenance cycle can have significant local macroeconomic impacts. These impacts are also not mentioned in the staff report.

We suggest that instead of requiring a flowmeter to be installed within six months of rule adoption, that the District require one to be installed during the next maintenance turnaround, no later than five years from the date of rule adoption. This is consistent with language used by the Bay Area Air Quality Management District in their rule 13-5 regarding meters on process vents.

The term “flare tip velocity” is borrowed from 40 CFR Part 63 Subpart CC and is only defined in the context of a conventional elevated flare. The term is undefined and meaningless with respect to a multi-burner enclosed ground flare. We recommend that the district clarify the definition and state that it only applies to conventional flares.

Paragraph (j)(5) implies that all facilities with flares are subject to 40 CFR Part 63 Subpart CC. However, our facility is not subject to this federal requirement on our flare due to the lack of organic hazardous air pollutants present in our process. Further, (j)(5)(B)(2) implies that all flare operators are refineries which is inconsistent with PAR 1118's purpose, applicability, and definitions. We suggest a clarification that this paragraph only applies to general service flares.

Sincerely,

Eric KLEINSCHMIDT
Senior Environmental Specialist

