United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	08/04/2022	
Media Program:	Air	
Regulatory Program(s)	SIP, Title V	
Company Name:	**Sasol Chemicals LLC**	
Facility Name:	**Lake Charles Chemicals Complex**	
Facility Physical Location:	2201 Old Spanish Trail	
(city, state, zip code)	Westlake, LA 70669	
County/Parish:	Calcasieu	
Facility Coordinates (Entrance):	30.250614, -93.273575	
Facility Phone Number	337-494-5119	
Facility Contact:	Mary Allyson Leger	Environmental Manager
	mary.idlett@us.sasol.com	
FRS Number:	110017418061	
Identification/Permit Number:	LDEQ Agency Interest Number 3271	
Media Identifier Number:	AFS # 22-019-00003	
NAICS:	325110 - Petrochemical Manufacturing	
SIC:	2869 - Industrial Organic Chemicals	
Personnel participating in inspection:		
James Haynes	EPA Region 6, Air Toxics Enforcement	Physical Scientist
Colleen McCarthy	EPA Region 6, Air Toxics Enforcement	Life Scientist
Dan Hoyt	EPA OECA, Air Enforcement Division	Environmental Engineer
Jon Morris	Providence Photonics	EPA Contractor
Michael Morris	Providence Photonics	EPA Contractor
Rusty Jack	Sasol Chemicals LLC	Environmental Specialist-Air
Kyle Evers	Sasol Chemicals LLC	Environmental Specialist-Air
Cedric Duncan	Sasol Chemicals LLC	Environmental Specialist-LDAR/BWON
Mary Allyson Leger	Sasol Chemicals LLC	Environmental Manager

EPA Lead Inspector Signature/Date	JAMES HAYNES Digitally signed by JAMES HAYNES Date: 2023.01.27 13:30:10 -06'00'	
	James Haynes	Date
Supervisor Signature/Date	JAMES LEATHERS Digitally signed by JAMES LEATHERS Date: 2023.01.27 17:03:37 -06'00'	
	James Leathers	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, James Haynes, U.S. Environmental Protection Agency ("EPA") Region 6 inspector, arrived at the Sasol Chemicals LLC ("Sasol") Lake Charles Chemicals Complex in Westlake, LA on August 4, 2022, to conduct an unannounced Clean Air Act ("CAA") inspection. I arrived with Ms. Colleen McCarthy, EPA Region 6 inspector, Mr. Dan Hoyt, EPA OECA-AED inspector, and two EPA contractors with Providence Photonics – Mr. Jon Morris and Mr. Michael Morris. We met with Sasol representatives Mr. Rusty Jack, Environmental Specialist-Air, Mr. Kyle Evers, Environmental Specialist-Air, and Mr. Cedric Duncan, Environmental Specialist-LDAR/BWON. I presented my inspector credentials to Mr. Jack and notified him of my intent to conduct a CAA Partial Compliance Evaluation ("PCE"). EPA contracted Providence Photonics to conduct flare observations using the Video Imaging Spectral Radiometry ("VISR") method. VISR uses a cooled, multi-spectral mid-wave infrared imager to measure relative concentrations of combustion gases to calculate a flare's combustion efficiency ("CE").

FACILITY DESCRIPTION

Sasol owns and operates the Lake Charles Chemicals Complex, a multi-product chemical manufacturing facility that manufacturers the primary ingredients in products such as detergents, shampoos, and cosmetics. Specifically, the Lake Charles Chemicals Complex produces chemicals such as ethylene, paraffins, industrial alcohols, alumina, and linear alkylbenzene.

Section II – OBSERVATIONS

On August 4, 2022, Mr. Jack provided me with an overview of the site operations and current conditions. Providence Photonics set up the imaging device outside the process area and began collecting CE data at the EOEG flare at 11:22 AM. We also collected CE data at the Guerbet Alcohol/ETO, ETO 1-3, Ziegler Alcohol, NPU, Ethylene, and LAB flares. Providence Photonics stopped collecting CE data at 04:26 PM. See Appendix 1. We conducted a closing conference with Sasol and exited the facility.

Section III – AREAS OF CONCERN

During the closing conference, I noted that the EOEG, Guerbet Alcohol, and Ethylene flares' CE was lower than expected. In general, achieving 96.5% CE correlates to approximately 98% destruction efficiency and good flare performance.

Section IV – FOLLOW UP

After EPA exited the facility, Sasol provided additional information on November 3 and 4, 2022.

Section V – LIST OF APPENDICES

Appendix 1 – VISR Flare Measurement Report

Appendix 1

VISR Flare Measurement Report

VISR Flare Measurement Report

Facility: Sasol
Lake Charles Chemical Complex

2201 Old Spanish Trail

Westlake, LA 70669

Calcasieu Parish, Louisiana

Prepared for

US Environmental Protection Agency

Region 6

1201 Elm Street, Suite 500

Dallas, TX 75270

PROJECT NO. 0010-004-007

PREPARED BY
Providence Photonics, LLC | 1201 Main Street, Baton Rouge, LA 70802

Table of Contents

Introduction

Through its contract 68HERC21D0007/Task Order 68HERC21F0185 with Eastern Research Group, Inc. (ERG), EPA Office of Enforcement and Compliance (OECA) and Region 6 retained Providence Photonics, LLC (Providence) to assist the inspection of the Sasol Lake Charles Chemical Complex (Sasol) plant located at 2201 Old Spanish Trail, Westlake, Louisiana, 70669. Providence measured the combustion efficiency (CE) and other performance metrics of eight flares at the Sasol facility using the Video Imaging Spectral Radiometry (VISR) method.

Background

The VISR method utilizes a multi-spectral mid-wave infrared imager to remotely and continuously measure relative concentrations of combustion gases. Based on these relative concentrations, flare CE is calculated. The VISR method provides continuous measurement of the following five flare performance metrics at 1-second data rate.

1. **Combustion Efficiency (0 to 100%):** Combustion efficiency (**CE**) is a measure of the relative concentration of hydrocarbon vs. carbon dioxide in the post combustion gas plume. If there is no hydrocarbon present in the post combustion gas plume, then CE is 100%.
2. **Smoke Index (0 to 10):** Smoke index (**SI**) is a unit-less number which indicates the degree of visible emissions within the combustion envelope. A SI of 0 means no visible emissions are present while a SI of 10 means the flare has heavy black smoke. While SI only represents the degree of visible emissions within the combustion envelope, it is generally correlated to opacity and a SI above 3 generally indicates that some visible emissions are likely present outside of the combustion envelope.
3. **Flame Footprint (m^2):** Flame footprint (**FF**) is a measure of the flame size in square meters. It is not necessarily correlated to the visible flame size as the FF is determined by the Infrared radiance, not the visible flame. Note that the orientation of the flame will impact the FF as the depth of the flame will change with viewing angle.
4. **Fractional Heat Release (MMBtu/Hr):** Fractional Heat Release (**FH**) is a measure of the heat released from flare combustion in the spectral bands monitored by the Mantis flare monitor. Although it is not a measure of the total heat release across the entire energy spectrum, FH is expected to be correlated to the total heat release.
5. **Flame Stability (0 to 100%):** Flame stability (**FS**) is a measure of the change in radiance measured by the Mantis flare monitor in a 1-second interval. A FS of 100% indicates a flame that has a constant radiance. A low FS value (generally lower than 80%) indicates a flame with significant radiance fluctuation within 1 second interval, suggesting a less stable flame. Variability on a longer time scale will not be described by the flame stability metric.

Appendix B provides additional information on the accuracy and precision of the VISR method. More information about the VISR method and its validation is provided at https://www.providencephotonics.com/flare-monitoring.

Summary of Inspection

Inspection Date: August 4th, 2022

Personnel: James Haynes (EPA Region 6), Colleen McCarthy (EPA Region 6), Daniel Hoyt (EPA OECA), Jon Morris (Providence), Michael Morris (Providence)

Facility: Sasol Lake Charles Chemical Complex
2201 Old Spanish Trail, Westlake, LA 70669

Results: ***Table 1*** below provides a summary of the VISR results. Complete results can be found in ***Appendix A***.

Date	Start Time (Local)	End Time (Local)	Site Description	Distance (m)	Temp (°C)	RH (%)	Avg Wind Speed (mph)	CE Avg (%)	SI Avg	FF Avg (m2)	FH Avg (MMBTU/HR)	FS Avg (%)
8/4/2022	11:22 AM	11:50 AM	EOEG	129	28	75	6 - 8	95.38	0.65	5.29	0.06	89.20
8/4/2022	12:09 PM	12:35 PM	Guerbet	119	28	62	4 - 6	94.18	0.55	11.20	0.17	95.77
8/4/2022	1:06 PM	1:23 PM	ETO 123	88	33	61	4 - 6	96.82	0.42	3.21	0.03	90.22
8/4/2022	1:30 PM	1:45 PM	Alcohol	131	38	61	4 - 6	98.27	0.53	50.97	0.95	98.20
8/4/2022	1:51 PM	1:54 PM	Thermal Oxidizer	82	33	61	4 - 6	99.37	0.21	11.04	0.05	92.19
8/4/2022	3:10 PM	3:25 PM	NPU	155	34	50	4 - 6	96.11	1.20	9.49	0.12	96.39
8/4/2022	3:43 PM	4:00 PM	Ethylene Flare	101	34	48	4 - 6	93.88	1.13	2.08	0.01	93.76
8/4/2022	4:09 PM	4:26 PM	LAB	93	34	48	2 - 4	94.71	0.45	3.90	0.04	94.80

Table 1: Summary VISR Results.

Observations

The following sections describe field observations and comparisons derived from the dataset.

Field Conditions

The inspections were conducted on August 4th, 2022. Each measurement with the VISR instrument was within the method limits for distance, as determined by the minimum plume pixels required by the QAPP. The ambient temperature ranged from 28°C to 33°C and winds were generally light, from 4-6 mph.

EOEG Flare

The EOEG flare performance data is plotted in ***Figures 1 and 2*** below. ***Figure 1*** shows Combustion Efficiency vs. Fractional Heat Release and ***Figure 2*** shows Combustion Efficiency vs. Smoke Index. There were no visible emissions from this flare, as indicated by the Smoke Index values < 3. Average Combustion Efficiency for this measurement was 95.38% and the average Smoke Index was 0.65.

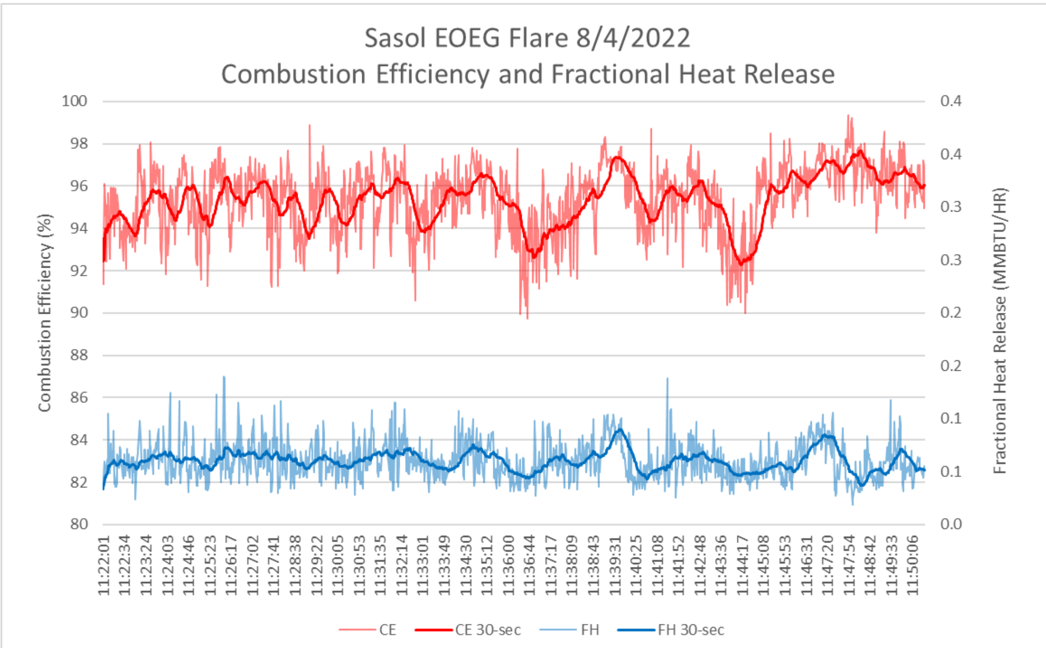


Figure 1: Combustion Efficiency and Fractional Heat Release for the EOEG flare on 8/4/2022.

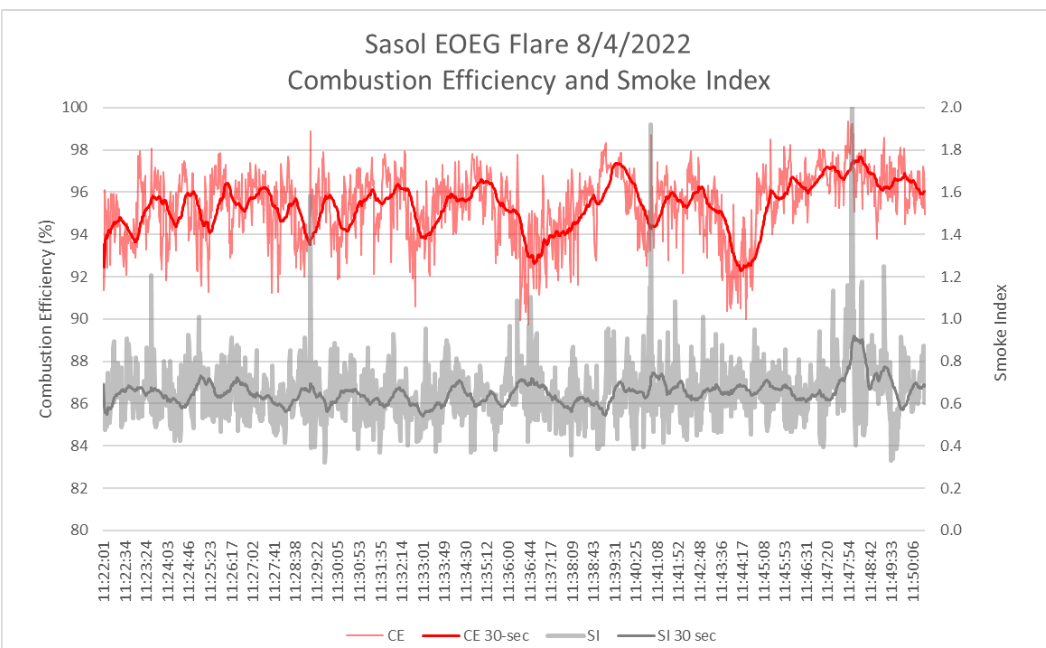


Figure 2: Combustion Efficiency and Smoke Index for the EOEG flare on 8/4/2022.

Guerbet Flare

Figure 3 shows Combustion Efficiency vs. Fractional Heat Release for the Guerbet flare and ***Figure 4*** shows Combustion Efficiency vs. Smoke Index. There were no visible emissions from this flare, as indicated by the Smoke Index values < 3. Average Combustion Efficiency for this measurement was 94.18% and the average Smoke Index was 0.55.

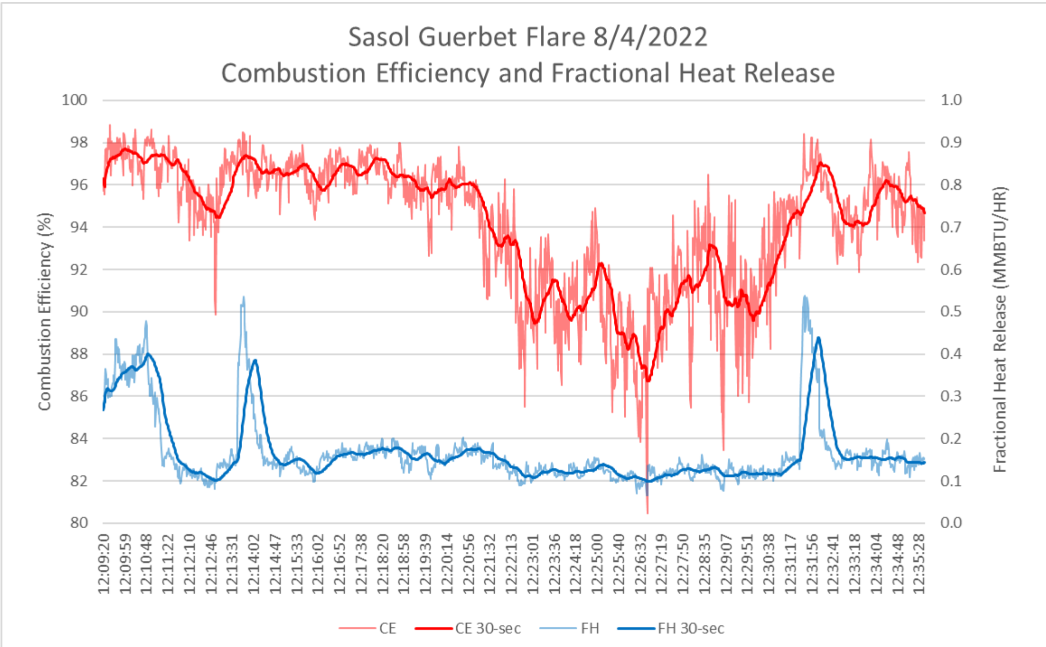


Figure 3: Combustion Efficiency and Fractional Heat Release for the Guerbet flare on 8/4/2022.

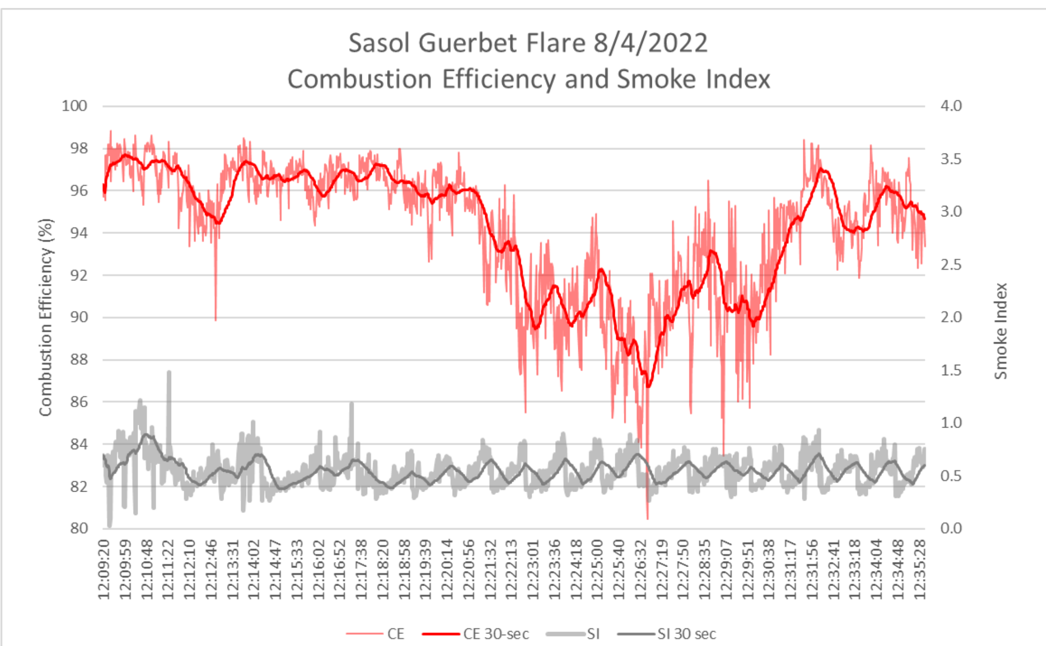


Figure 4: Combustion Efficiency and Smoke Index for the Guerbet flare on 8/4/2022.

ETO 123 Flare

Figure 5 shows Combustion Efficiency vs. Fractional Heat Release for the ETO 123 flare and ***Figure 6*** shows Combustion Efficiency vs. Smoke Index. There were no visible emissions from this flare, as indicated by the Smoke Index values < 3. Average Combustion Efficiency for this measurement was 96.82% and the average Smoke Index was 0.42.

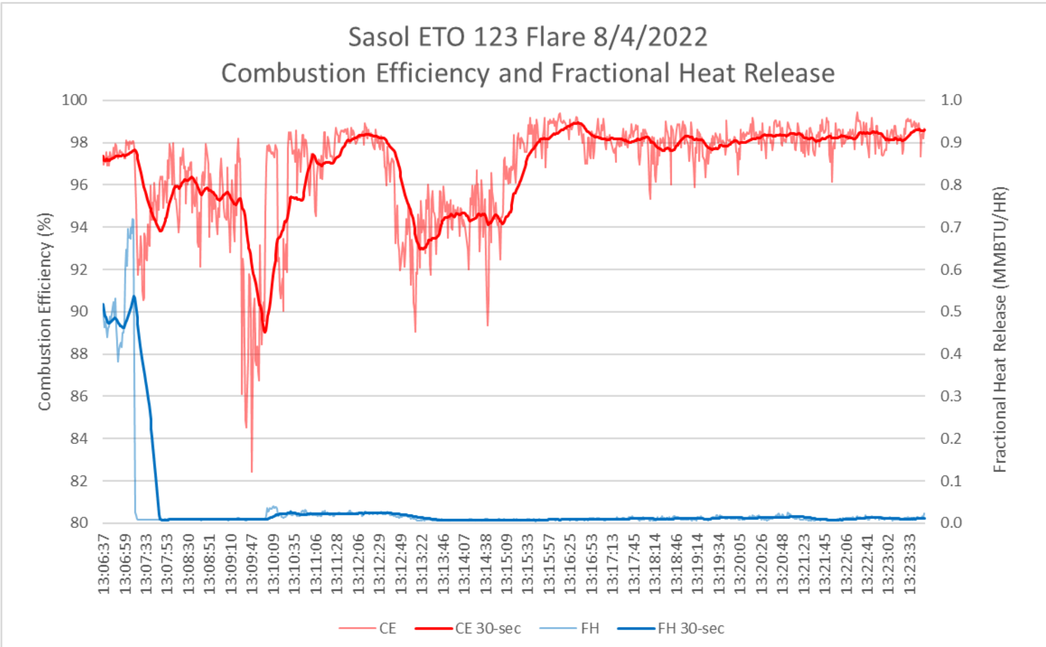


Figure 5: Combustion Efficiency and Fractional Heat Release for the ETO 123 flare on 8/4/2022.

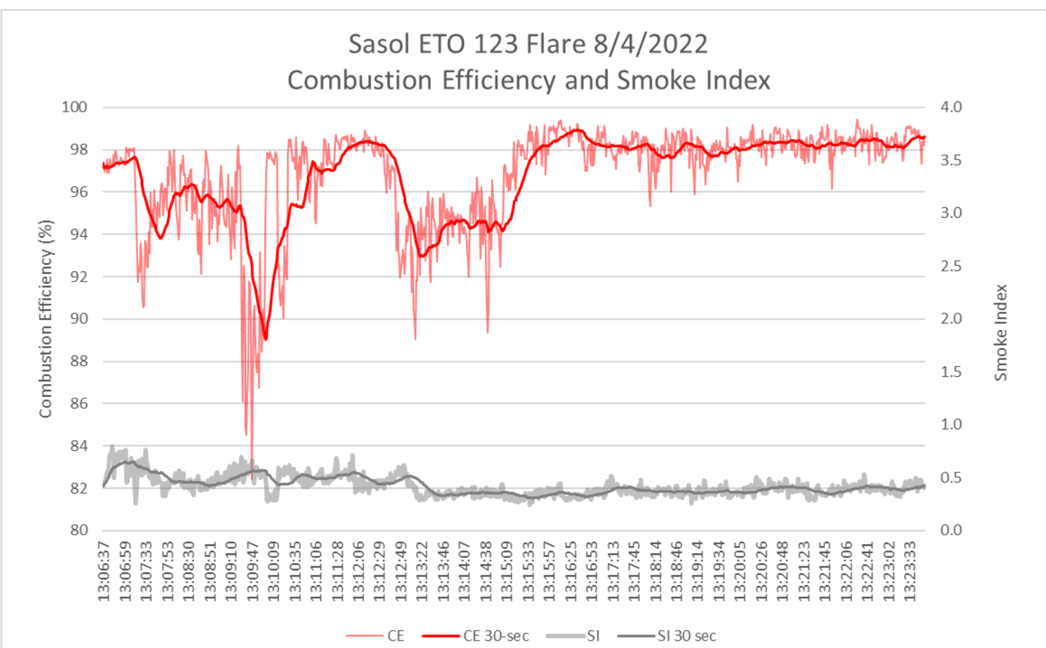


Figure 6: Combustion Efficiency and Smoke Index for the ETO 123 flare on 8/4/2022.

Alcohol Flare

Figure 7 shows Combustion Efficiency vs. Fractional Heat Release for the Alcohol flare and ***Figure 8*** shows Combustion Efficiency vs. Smoke Index. There were no visible emissions from this flare, as indicated by the Smoke Index values < 3. Average Combustion Efficiency for this measurement was 98.27% and the average Smoke Index was 0.53.

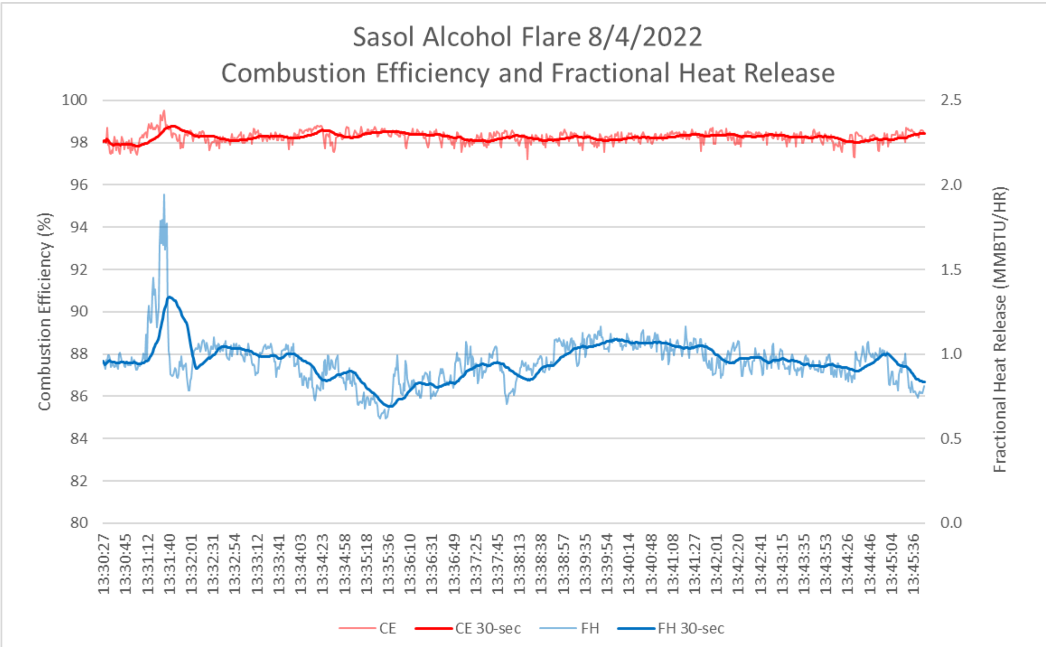


Figure 7: Combustion Efficiency and Fractional Heat Release for the Alcohol flare on 8/4/2022.

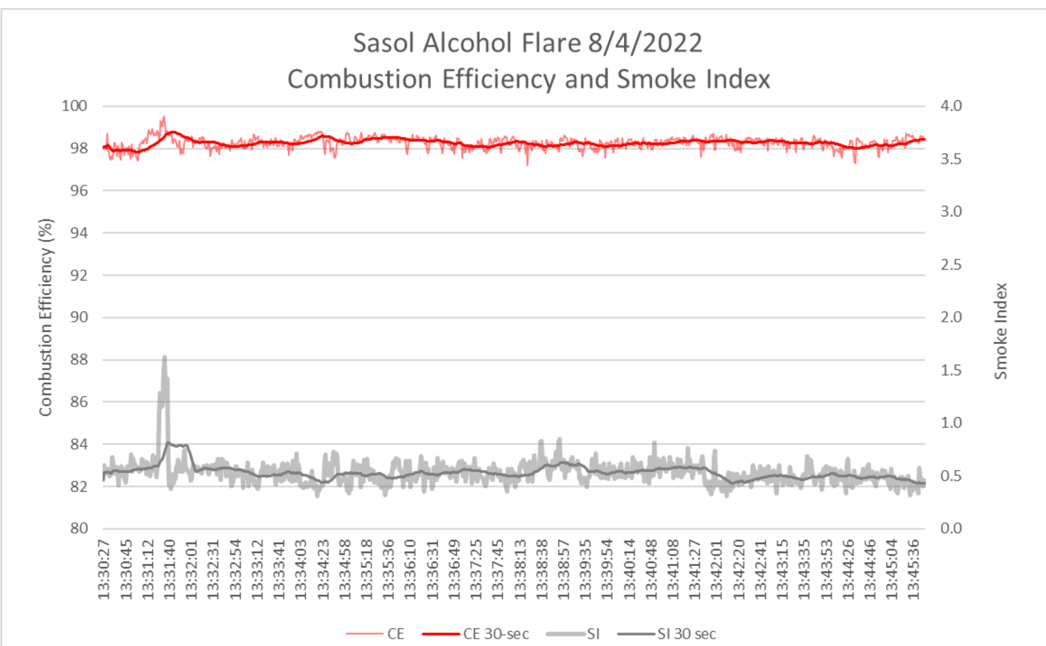


Figure 8: Combustion Efficiency and Smoke Index for the Alcohol flare on 8/4/2022.

Thermal Oxidizer

Figure 9 shows Combustion Efficiency vs. Fractional Heat Release for the Thermal Oxidizer and ***Figure 10*** shows Combustion Efficiency vs. Smoke Index. There were no visible emissions from this unit, as indicated by the Smoke Index values < 3. Average Combustion Efficiency for this measurement was 99.37% and the average Smoke Index was 0.21.

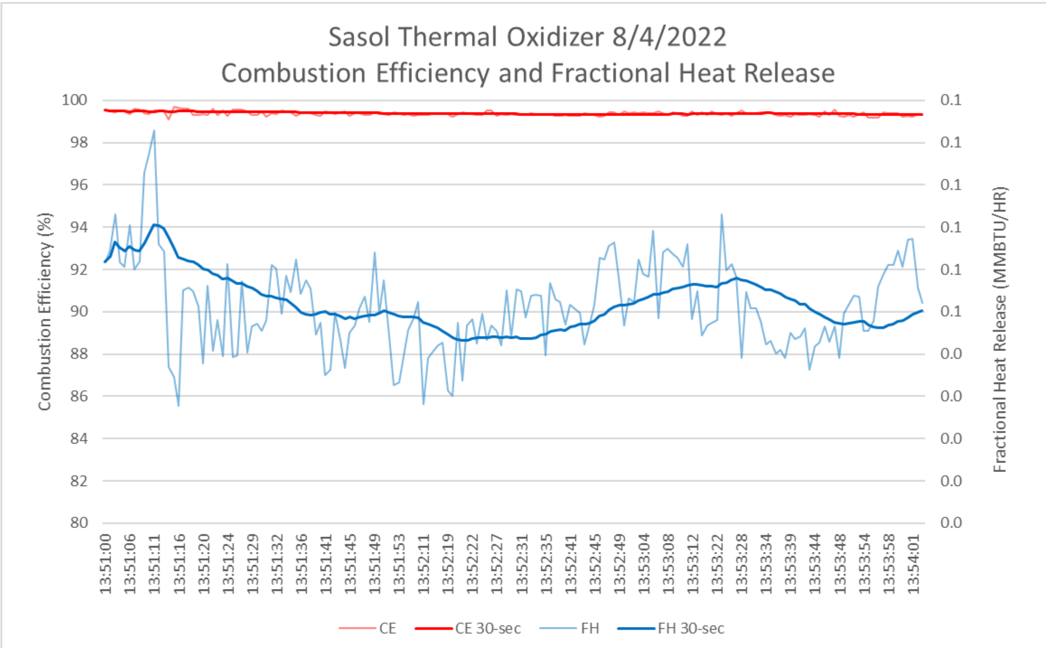


Figure 9: Combustion Efficiency and Fractional Heat Release for the thermal oxidizer on 8/4/2022.

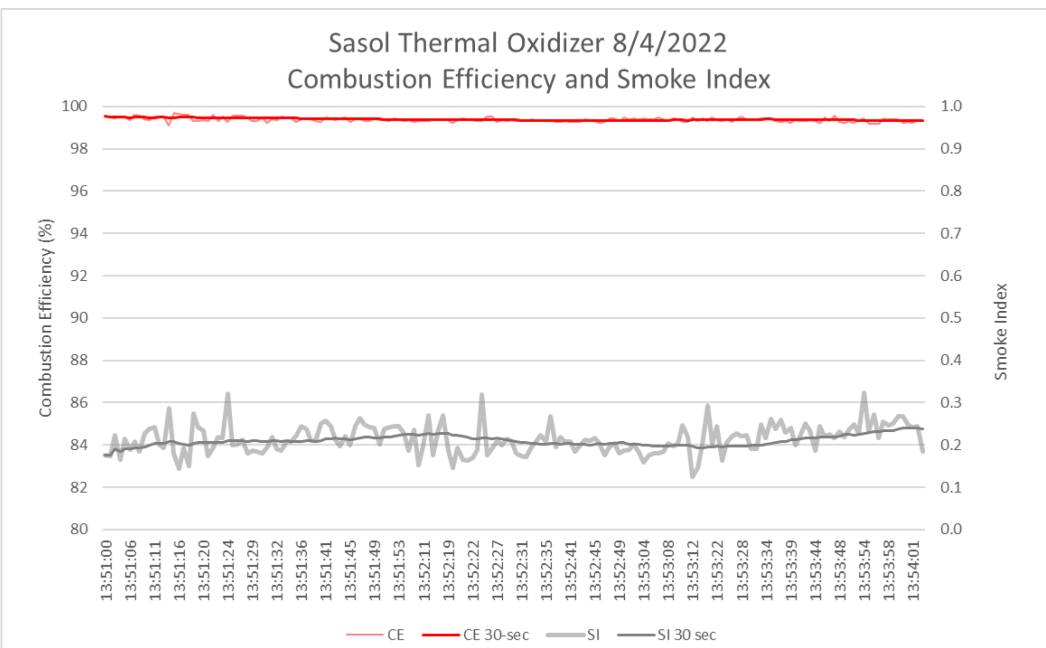


Figure 10: Combustion Efficiency and Smoke Index for the thermal oxidizer on 8/4/2022.

NPU Flare

Figure 11 shows Combustion Efficiency vs. Fractional Heat Release for the NPU flare and ***Figure 12*** shows Combustion Efficiency vs. Smoke Index. There were no visible emissions from this flare, as indicated by the Smoke Index values < 3. Average Combustion Efficiency for this measurement was 96.11% and the average Smoke Index was 1.20.

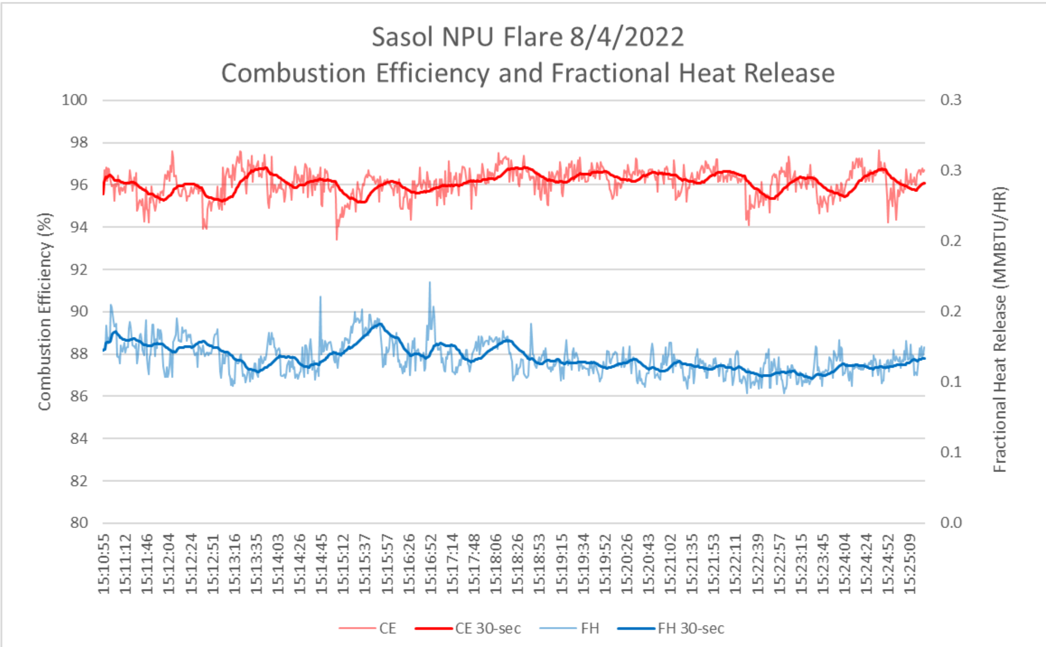


Figure 11: Combustion Efficiency and Fractional Heat Release for the NPU flare on 8/4/2022.

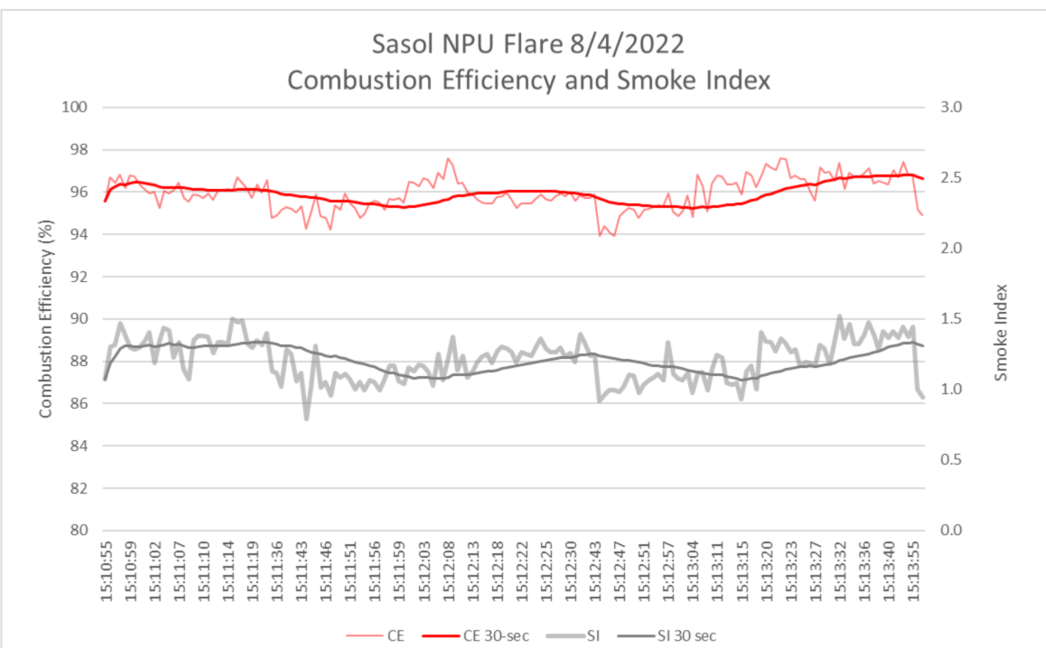


Figure 12: Combustion Efficiency and Smoke Index for the thermal oxidizer on 8/4/2022.

Ethylene Flare

Figure 13 shows Combustion Efficiency vs. Fractional Heat Release for the Ethylene flare and ***Figure 14*** shows Combustion Efficiency vs. Smoke Index. There were no visible emissions from this flare, as indicated by the Smoke Index values < 3. Average Combustion Efficiency for this measurement was 93.88% and the average Smoke Index was 1.13.

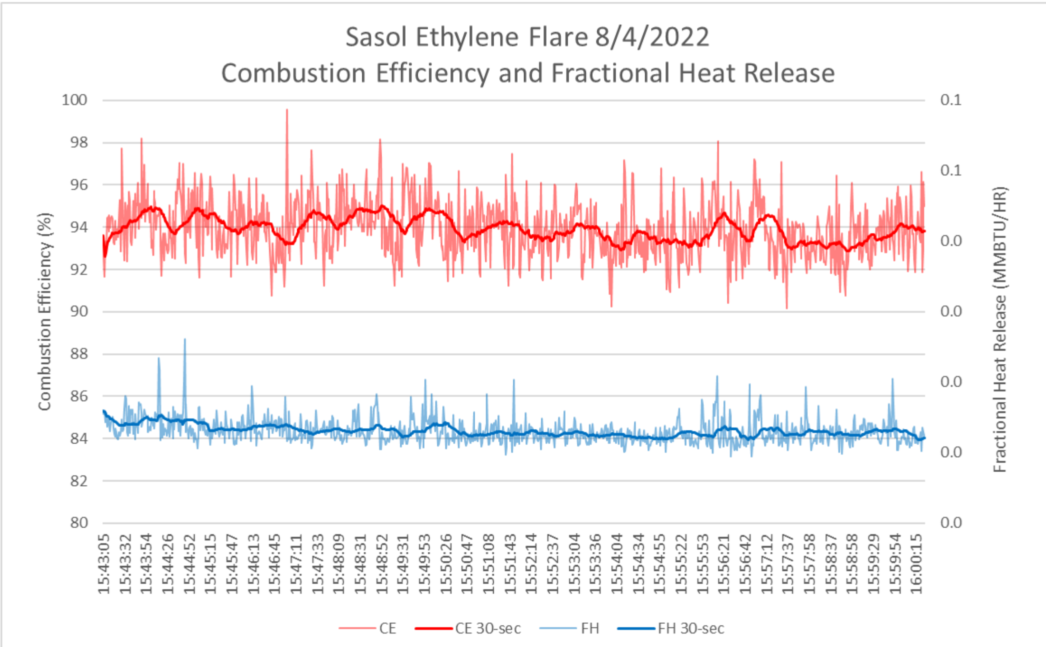


Figure 13: Combustion Efficiency and Fractional Heat Release for the Ethylene flare on 8/4/2022.

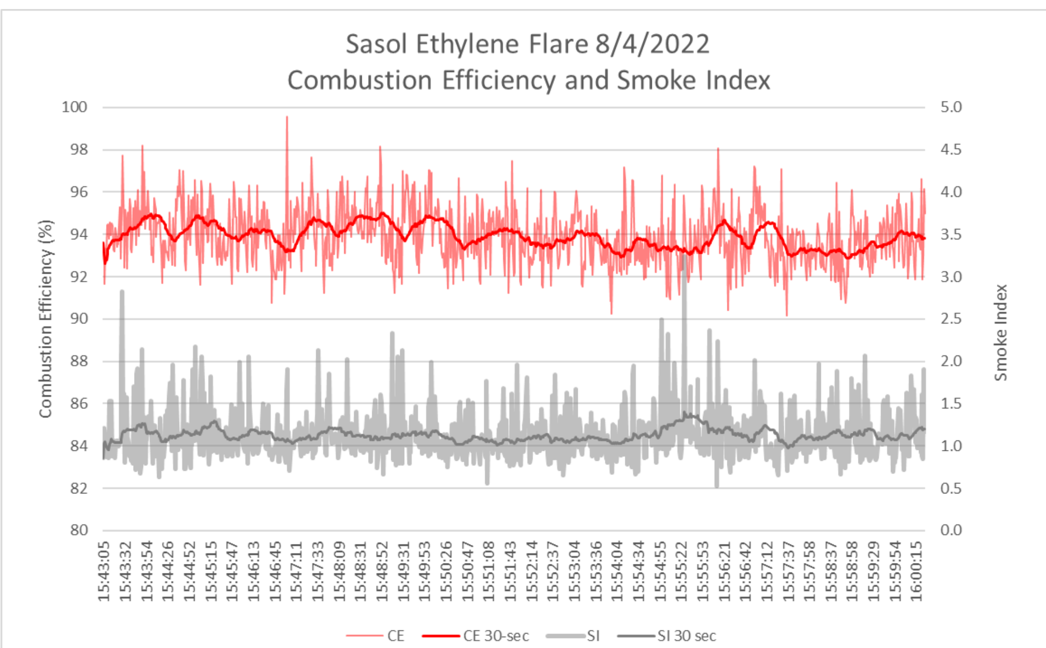


Figure 14: Combustion Efficiency and Smoke Index for the Ethylene flare on 8/4/2022.

Lab Flare

Figure 15 shows Combustion Efficiency vs. Fractional Heat Release for the Lab flare and ***Figure 16*** shows Combustion Efficiency vs. Smoke Index. There were no visible emissions from this flare, as indicated by the Smoke Index values < 3. Average Combustion Efficiency for this measurement was 94.71% and the average Smoke Index was 0.45.

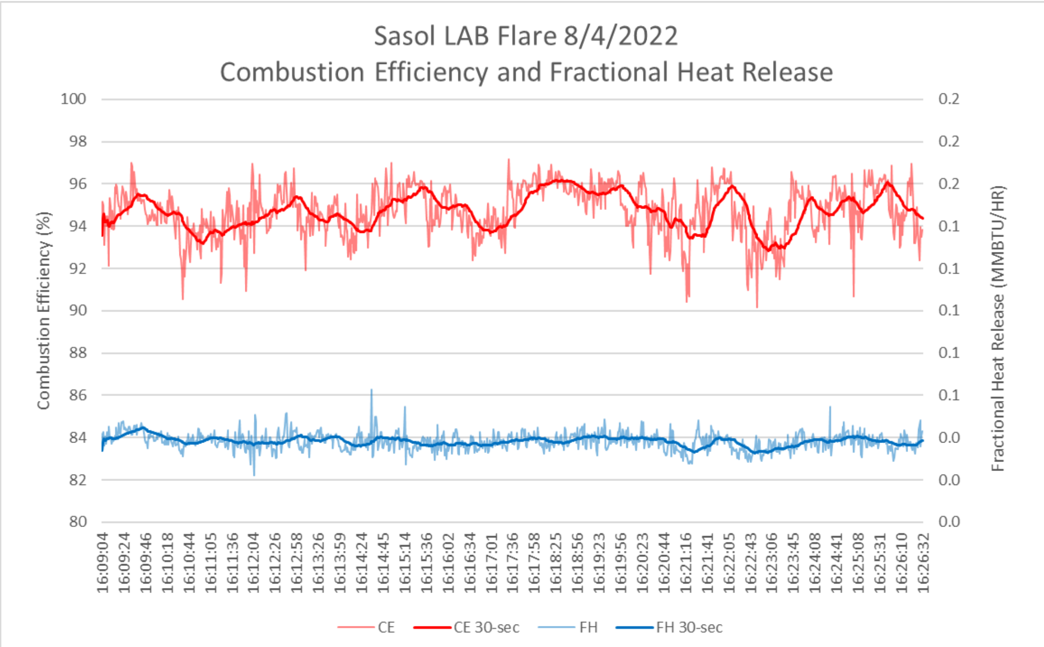


Figure 15: Combustion Efficiency and Fractional Heat Release for the Lab flare on 8/4/2022.

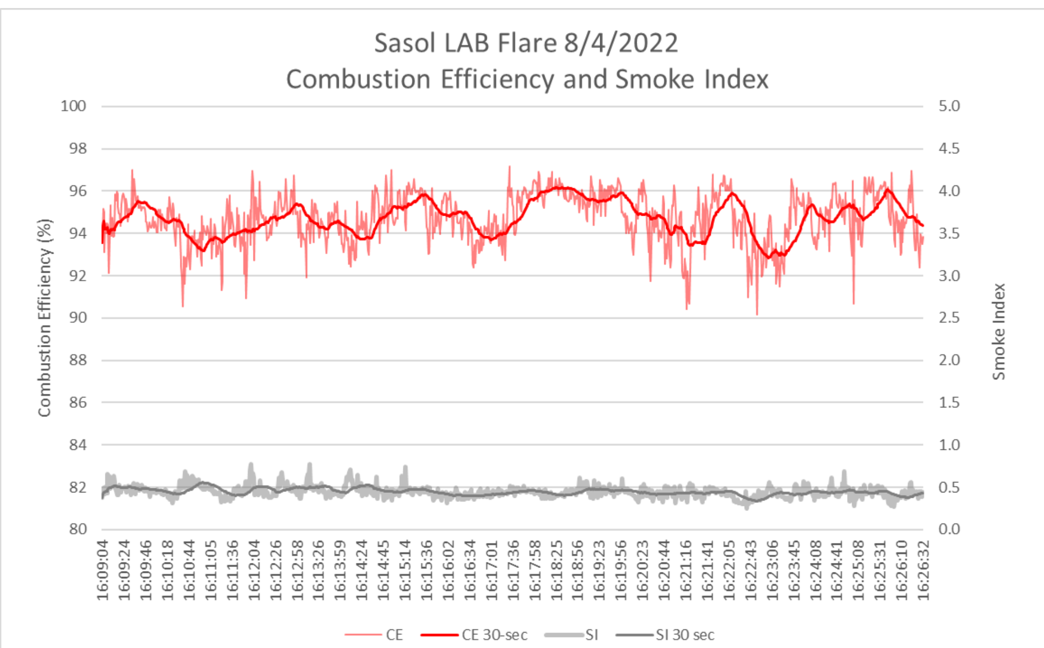


Figure 16: Combustion Efficiency and Smoke Index for the Lab flare on 8/4/2022.

Electronic Data Generated from the Test

The following electronic data are submitted to the US EPA Region 6 as part of this report:

- A Microsoft Excel file containing second-by-second results from the VISR instrument and averages for each measurement period.
- FLIR video recording of each flare during the inspection.

References

1. Yousheng Zeng, Jon Morris & Mark Dombrowski (2015) Validation of a new method for measuring and continuously monitoring the efficiency of industrial flares, Journal of the Air & Waste Management Association, 66:1, 76-86, DOI: 10.1080/10962247.2015.1114045

2. Yousheng Zeng, Jon Morris. (2019, April 2nd). *Precision and Accuracy of the VISR Method for Flare Monitoring*. Air Quality Measurement Methods and Technology, Durham, North Carolina, United States.

Appendix A: Results

Date/Time			Site Description		Conditions				Efficiency (%)				Smoke Index (0-10)				Flare Footprint (m^2)				Fractional Heat (MMBTU/HR)				Flame Stability (%)			
Date	Start Time (CST)	End Time (CST)	Site	Description	Distance (m)	Temp (°C)	RH (%)	Wind Speed (mph)	CE Avg	CE Min	CE Max	SD	Avg	Min	Max	SD	Avg	Min	Max	SD	Avg	Min	Max	SD	Avg	Min	Max	SD
8/4/2022	11:22 AM	11:50 AM	Sasol	EOEG	129	28	75	6 - 8	95.38	89.75	99.37	1.59	0.7	0.3	2.0	0.1	5.3	2.4	10.2	1.1	0.060	0.018	0.140	0.017	89.2	61.0	99.9	6.8
8/4/2022	12:09 PM	12:35 PM	Sasol	Guerbet	119	28	62	4 - 6	94.18	80.46	98.85	3.14	0.5	0.0	1.5	0.2	11.2	5.9	30.9	3.1	0.166	0.065	0.538	0.083	95.8	76.1	100.0	2.9
8/4/2022	1:06 PM	1:23 PM	Sasol	ETO 123	88	33	61	4 - 6	96.82	82.42	99.43	2.40	0.4	0.2	0.8	0.1	3.2	1.0	36.4	5.5	0.032	0.005	0.719	0.101	90.2	36.3	100.0	6.6
8/4/2022	1:30 PM	1:45 PM	Sasol	Alcohol	131	38	61	4 - 6	98.27	97.23	99.53	0.27	0.5	0.3	1.6	0.1	51.0	29.8	65.8	6.2	0.954	0.617	1.946	0.138	98.2	90.4	100.0	1.1
8/4/2022	1:51 PM	1:54 PM	Sasol	Thermal Oxidizer	82	33	61	4 - 6	99.37	99.11	99.68	0.10	0.2	0.1	0.3	0.0	11.0	7.3	16.4	1.6	0.051	0.028	0.093	0.011	92.2	73.9	99.9	5.7
8/4/2022	3:10 PM	3:25 PM	Sasol	NPU	155	34	50	4 - 6	96.11	93.42	97.62	0.66	1.2	0.8	1.7	0.1	9.5	7.3	12.3	0.9	0.117	0.092	0.171	0.012	96.4	83.2	100.0	1.8
8/4/2022	3:43 PM	4:00 PM	Sasol	Ethylene Flare	101	34	48	4 - 6	93.92	90.17	99.58	1.33	1.1	0.5	3.2	0.3	2.1	1.7	3.3	0.2	0.013	0.009	0.026	0.002	93.8	81.2	100.0	3.3
8/4/2022	4:09 PM	4:26 PM	Sasol	LAB	93	34	48	2 - 4	94.71	90.16	97.16	1.18	0.4	0.2	0.8	0.1	3.9	2.5	5.7	0.4	0.038	0.022	0.063	0.004	94.8	72.3	100.0	3.5

Table 2: Complete VISR Results.

Appendix B: Validation of the VISR method

Precision and Accuracy of the VISR Method for Flare Monitoring

Extended Abstract: ME92
Presented at the conference:
Air Quality Measurement Methods and Technology
April 2-4, 2019
Durham, NC

Jon Morris, Yousheng Zeng, and Srikanth Mutyala
Providence Photonics, Baton Rouge, Louisiana

Introduction

Industrial flares represent a large category of air emission sources for Volatile Organic Compounds (VOC), air toxics, and greenhouse gases (GHG)[1-4]. Depending on their combustion efficiency (CE), the emissions of these air pollutants can be significantly different. Despite the large contribution of flares to air emission inventories, flares are the only source category for which no EPA test or monitoring methods can be applied to directly measure their efficiency or emission rates. As a result, flare emissions in air emission inventories may carry significant uncertainties.

A method based on Video Imaging Spectral Radiometry (VISR) has been developed for testing or continuously monitoring combustion efficiency (CE) of industrial flares[5]. To validate the VISR method, tests were conducted at flare test facilities of Zeeco, Inc. (Zeeco) and John Zink Hamworthy Combustion (John Zink), both located in Tulsa, Oklahoma, in September and October 2016, respectively. The test at Zeeco included both an air assisted flare and a steam assisted flare. Twenty-eight flare conditions were tested, 14 for the air flare and 14 for the steam flare. This test is referred to as the "Zeeco Test" in this paper.

The test at John Zink was part of a program sponsored and organized by the Petroleum Environmental Research Forum (PERF), an industry consortium. PERF project 2014-10 Direct Monitoring of Flare Combustion Efficiency was created and funded by participating PERF companies to provide a test platform for various developers/vendors of flare remote sensing technologies (Invitees) to participate in a blind test to evaluate the effectiveness of each technology. The blind test was administered by John Zink. Testing began on October 17th, 2016 and continued for 10 days, concluding on October 27th, 2016. The flare tip used was the John Zink model EEF-QSC-36, which was the same flare tip used during the 2010 TCEQ Flare Study[4]. A test protocol was developed which identified a series of test conditions to evaluate various factors that could affect flare CE measurement. Only limited logistical and environmental factors were shared with the Invitees (i.e., distance from the flare, view angle with respect to flame orientation due to wind, sun in/out of the field of view, daytime/nighttime testing). Information regarding flare operations such as the type of fuel gas used, firing rates, steam rates or any other flare operating parameters was concealed from Invitees. A total of 45 test points was evaluated over the 10 days of testing. Extractive sampling was performed on each test point as the control method for flare CE measurement. The results of the extractive sampling were not provided to Invitees until Invitees submitted their won results based on their respective measurement technology. This test is referred to as the "PERF Test" in this paper.

In this paper, the precision and accuracy of the VISR method are evaluated based on the test campaigns described above.

Methods and experimental setup

The VISR flare monitor is a remote monitoring device that can be positioned at any distance as long as the flare to be monitored is in the line of sight and there are a sufficient number of pixels of the flare flame image in the VISR monitor. The distances from flare to the VISR monitor in the experiments reported here were in the range of 174 feet to 650 feet. To evaluate the performance of the VISR method, an extractive sampling system was used as a reference method. A sample extraction apparatus was suspended by a crane over the flare plume to extract combustion product gases. The sample was transported through a heated sampling line to a sample manifold in a testing trailer. The sample manifold was connected to analyzers for oxygen (O_2), carbon dioxide (CO_2), carbon monoxide (CO), and hydrocarbon (HC). The methods for measuring O_2, CO_2, CO, and HC were EPA Method 3A, 3A, 10, and 25A, respectively. The level of O_2 was used to confirm that the sampling probe was in the flare plume. The concentrations of CO_2, CO, and HC were used to calculate flare CE per method used in the 2010 TCEQ flare study[3].

These test campaigns covered a wide range of process conditions: two steam flares and one air flare; multiple vent gas compositions (natural gas, propane, propylene, hydrogen, in pure form or mixed with nitrogen; vent gas flow range from 10 lb/hr to 10,000 lb/hr; various steam and air assist levels resulting in combustion zone net heating value (NHVcz) in a range of 120 to 1,250 Btu/scf for the steam flares and net heating value dilution parameter (NHVdil) in a range of 6.7 to 244 Btu/ft^2 for the air flare.

The test campaigns also covered a wide range of environmental conditions: distance ranging from 174 ft. to 650 ft.; different wind speed and direction (crosswind, wind oriented towards VISR device, and wind oriented away from VISR device); daytime vs. nighttime; various sky conditions (blue sky, cloudy, moving clouds); the Sun in or out of field of view; rain, and fog.

Results and Discussions

Precision

Precision is a measure of how the results of multiple measurements by the same method scatter while the target of the measurement holds steady. This is difficult to assess for flare measurements because even when the flare operating conditions are held steady (as they were in each test point of the PERF Test), the flare CE may change due to changes in environmental conditions. Analyte spiking or quadruplet sampling described in EPA Method 301 would help to isolate the measurement method precision from the fluctuation of the target itself[6]. However, these methods are not feasible for flare measurement. Nevertheless, the measurement precision can still be evaluated using the data from the PERF test. For each PERF test condition, 4 segments of measurement were made by the extractive method and 3 segments of measurement were made by VISR while the flare operating conditions were held constant (although flare CE did fluctuate due to changes in environmental conditions). The standard deviation (SD) and relative standard deviation (RSD) can be calculated based on these replicate measurements. **Table 1** is a summary of the SD and RSD for both the VISR method and the extractive method used in the PERF Test. As shown in **Table 1**, the RSD for the VISR method is in a range of 0.07% to 1.98% with an average of 0.62%. The variation of the VISR method appears to be slightly better than the extractive method from the perspective of both the average and the range of the RSD values, suggesting that the precision of VISR is at least as good as the extractive method. Note that in both cases, the variation due to changing environmental conditions is included in the RSD as there is no practical method to separate it. Despite the inclusion of environmental changes, the RSD is more than an order of magnitude smaller than 20% as required in EPA Method 301 (Section 9.0)[6]. If a more stringent criteria is used in which the 20% limit on RSD is applied to the most relevant range of 90-100 % CE measurement (i.e., in the span of 10 % CE measurement), the criteria would be SD < 2 % CE (20% of 10% = 2 % CE). As shown in **Table 1**, the highest SD is 1.84 measured as % CE, which is lower than the SD of 2 % CE measurement and therefore satisfies the more stringent criteria.

Table 1. Relative Standard Deviation (RSD) of VISR and extractive method per PERF Test

Method	CE Avg.	CE Range	SD Avg.	SD Range	RSD Avg.	RSD Range
VISR	96.47	80.61-99.91	0.59	0.07-1.84	0.62%	0.07-1.98%
Extractive	96.41	83.50-100.00	0.83	0.00-2.61	0.88%	0.00-2.72%

The Zeeco Test did not include multiple replicated measurements under each test condition. Therefore, a precision analysis is not performed on that data.

Accuracy

The accuracy of the VISR method is evaluated based on the Zeeco Test and PERF Test. In these two tests, the flare CE was measured by both the VISR method and the extractive method. The extractive method was used as the control (reference) method. Strictly speaking, what can be assessed is the agreement between the two methods, not the accuracy of either method because the true flare CE is unknown. The agreement between the two methods can be evaluated using a statistical method. One such method is to use t-test on the differences between the paired CE measurements by VISR and extractive methods. This method is the same as the method used in EPA Method 301 to determine if there is a difference caused by different sample storage time[6] (it should be noted that the methods for bias described in Method 301 are not directly applicable because they are specifically designed for analyte/isotopic spiking or quadruplet sampling systems, which are not feasible for flare measurement). The value of the t-statistic is calculated using the following equation.

$$t = \frac{|d_m|}{\frac{SD_d}{\sqrt{n}}}$$

Where d_m and SD_d are the mean and the standard deviation of the difference of the paired samples (VISR and extractive sample), and n is the total number of samples. The resulted t-statistic value is compared to the critical value of the t-statistic with a 95 percent confidence level and n-1 degree of freedom. If the resulted t-statistic value is less than the critical value, the difference between the VISR method and the extractive method is not statistically significant, i.e., the two methods are statistically the same. The results of the t-statistical analysis for both Zeeco and PERF tests are summarized in **Table 2**. The number of samples (tests) in **Table 2** is less than the number of tests actually conducted because some tests were designed for other purposes (e.g., smoke test) and they are not included in the evaluation of the agreement between VISR and extractive methods.

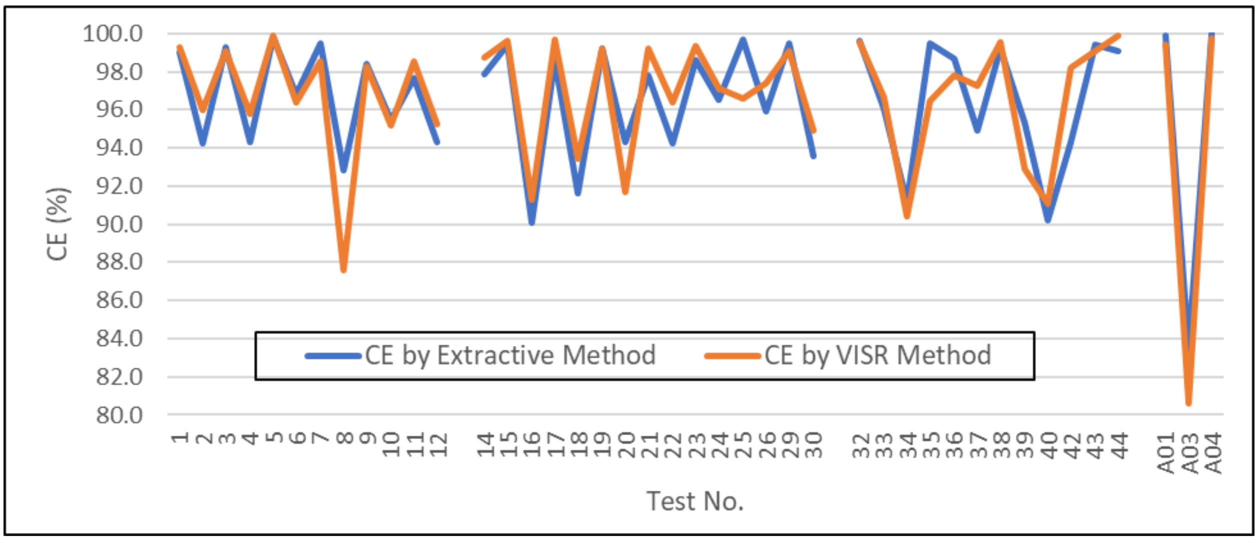
Table 2. t-Test to determine if the VISR method is different from the extractive method

	Zeeco Test (Steam Flare)	**Zeeco Test (Air Flare)**	**PERF Test**
No. of Samples, n	11	9	42
Mean Difference, d_m (% CE)	0.30	-0.21	0.07

Standard Deviation, SD_d (% CE)	1.32	0.65	1.69
t-Statistic Value	0.756	0.967	0.254
Degree of Freedom	10	8	41
t_95 Critical Value	2.228	2.306	2.020
Statistically Different?	No	No	No

As demonstrated in **Table 2**, statistically there is no difference between the flare CE measured by the VISR method and by the extractive method. The agreement between the two measurement methods can also be illustrated in **Figure 1** using the results from the PERF Test.

Figure 1. Flare CE measured by VISR method and extractive method – PERF Test results



Conclusion

Industrial flares can now be measured or continuously monitored by the VISR method for their performance, i.e., combustion efficiency (CE). The VISR method is a remote sensing method and can be deployed easily and practically. The VISR method transforms flare testing/monitoring from most difficult task (impossible in many cases) to a task that is easier than most conventional air emission testing methods. With the significant potential benefits that the VISR method can bring, it is important to characterize and understand the precision and accuracy of this method.

Through a large number of tests under various process and environmental conditions, a high precision and accuracy have been demonstrated for the VISR method. The relative standard deviation (RSD) is in the range of 0.07-1.98% with an average RSD of 0.62% for flare CE in the range from 80 to 100%. The average RSD of 0.62% is more than an order of magnitude smaller than the minimum precision target of 20% RSD set in EPA Method 301. The highest SD is only 1.84 measured as % CE.

The flare CE measured by the VISR method is in excellent agreement with the flare CE measured by the extractive method. The mean difference between the two methods is in the range of -0.21 to 0.30 measured in % CE. The t-statistic value in each of the three test groups are well below its corresponding t-test critical value, passing the t-test with a substantial margin. Keep in mind that the extractive method is suitable only in research. It is virtually impossible to deploy the extractive method to elevated flares at industrial production facilities. Having a method that can be easily deployed to industrial sites and produce highly time-resolved and accurate flare measurement results is a significant advancement.

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