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DATE: November 27, 1989

TO: Members of the Ad Hoc Workgroup on the API Fugitive Emission Factors Project and All Other Interested API Members

FROM: Lisa A. Thomas *JK*

On December 13, 1989, the API Title III Task Force will be sponsoring a workshop in Houston, Texas. The workshop is designed to discuss an API project to develop improved emission factors for fugitive sources applicable to SARA Title III Section 313 reporting. Specifically, the workshop is aimed for company personnel responsible for estimating Title III emissions and those responsible for collecting screening data in compliance with the Environmental Protection Agency's (EPA) benzene National Emission Standards for Hazardous Air Pollutants (NESHAPS) requirements and various State Volatile Organic Compound (VOC) regulations which require periodic inspections and maintenance of process equipment.

In brief, the project itself stems from the industry's concern about the accuracy of the existing refinery factors -- the AP-42 emission factors -- which EPA developed in the early 1980s. Because the current factors do not take into account emissions from refineries with Inspection and Maintenance (I&M) programs or those with modern sealing technology, the industry members who use uncorrected AP-42 factors will be over-estimating fugitive emissions reported annually to EPA. Thus, by improving the accuracy of the factors, this project will provide more realistic emissions reported to the Agency under Section 313.

This workshop involves two topics. The first is to explain how the existing data were used to develop the current factors. In addition, correlation equations derived from this data will be explained and attendees will learn how these equations may be used to estimate emissions until the improved emission factors are developed.

The second topic is to develop a workplan for updating the current emission factors. To accomplish this, we will need your help in collecting "screening" data -- measured pollutant concentrations taken on individual leaking components. A significant sampling of refinery screening data is critical to the success of this project.

To help develop this workplan, we request that you investigate the following questions before the workshop:

- Does your company or refinery record the individual VOC screening value? Or, does your company only keep "Leak/No Leak" information?

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- If your company records the numerical measurements, would it be willing to provide these records to API and its contractor for the analysis?
- If your company records only "Leak/No Leak" information, would it be willing during a pre-specified time period to record the readings and submit such data to API's contractor?
- What is the easiest method for recording and submitting the data (e.g., a data collection sheet, a computer readable floppy disk, or other electronically readable means)?

Additionally, the workshop will also cover such topics as:

- How to develop a data sampling scheme that is representative of the industry (e.g., number and size of components screened, I&M versus non-I&M refineries, inclusion of appropriate equipment for sampling;
- Appropriate test measurement methods (e.g., EPA Method 21);
- Numbers and qualifications of refinery staff needed to collect or record the new data;
- Start and completion dates for collecting the data.

In addition to the above questions, it would be very useful to bring to the meeting examples or summaries of data from refineries that collect numerical readings. This will give us a basis of comparison for formatting, the amount of detail, etc. Where necessary, we would make a limited number of copies to distribute at the meeting for this discussion only; at the end of the discussion, we would collect all copies of any material each company felt was sensitive. If your company is willing to make available such data, please call Lisa Thomas at (202) 682-8323.

The planning meeting will be held from 8:30 a.m. until 2:00 p.m. at the following address:

Fours Seasons (Houston Center)
1300 Lamar Street
Houston Texas
(713) 650-1300

All attendees are responsible for making their own hotel reservations by calling the Four Seasons directly. A block of rooms have been reserved at a room rate of \$85.00. To take advantage of this rate, you must mention you are attending the API meeting when making your reservation. For further information, please contact Lisa Thomas at the number above.

cc: Title III Task Force

A. Ducca

R. Strieter

G. Laffley