

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To:	PST Reimbursement Standard Operating Procedures	Date:	May 23, 2008
From:	Frederick Meyers, Manager, PST Reimbursements Section		
Subject:	Reimbursement of Fuel Costs for the Operation of Vapor Control Units		

Guidance is provided for determining the reimbursable amount of fuel costs for the operation of vapor control units such as thermal or catalytic oxidizers.

I. APPLICABLE TCEQ RULE

1. Rule governing the determination of the type of permit and allowable operating parameters of a control unit is in TAC 30, Section 106, Subsection X, "Exemptions from Permitting". Specifically, Section 106.533 "Remediation".

II. DEFINITIONS

1. Facility (Section 106.533(b)(5) – For reimbursement purposes, an identifiable structure, device, equipment or enclosure that contains a stationary source.
2. Off-site receptor (Section 106.533(b)(6) - Any recreation area, residence, commercial/industrial facility, or other normally occupied structures not used solely by the owner or operator of the facilities or the owner of the site upon which the facilities are located. Measurements of distances to determine compliance with this distance restriction must be taken toward structures that are in use as of the date the notification is filed with the commission.
3. Elevated vents (Section 106.533(c)(4) - The height of any vents associated with the remediation must be at least 10 feet above the ground level.
4. Multiple facilities at a site (Section 106.533(c)(5). Any individual facilities not separated by a distance of at least 100 feet must be combined and treated as a single facility for purposes of meeting the conditions of Section 106.533.

III. ALLOWABLE EMISSION REQUIREMENTS

1. Section 106.533 (d)(1) emission requirements for facilities with an **off-site receptor less than 100 feet from the compound (use the center point of the compound)**:
 - a. total petroleum hydrocarbons (TPH) must not exceed 0.1 pound per hour (lb/hr);
 - b. the benzene component must not exceed 0.01 lb/hr;
 - c. the hydrogen sulfide component must not exceed 0.01 lb per hour.
2. Section 106.533 (d)(1) emission requirements for facilities with an off-site receptor is **100 feet or greater from the compound (use the center point of the compound)**:
 - a. TPH must not exceed 1.0 pound per hour (lb/hr);

- b.** the benzene component must meet emissions and distance requirements of Section 106.262 as follows:
 - 1.** => 100 ft and <200 Feet 0.015 lb/hr
 - 2.** => 200 ft and <300 Feet 0.021 lb/hr
 - 3.** => 300 ft and <400 Feet 0.028 lb/hr
 - 4.** => 400 ft and <500 Feet 0.037 lb/hr
 - 5.** =>500 as per Section 106.262
- c.** the hydrogen sulfide component must meet emissions and distance requirements of Section 106.262

IV. DATA REQUIREMENTS FOR DETERMINATIONS

- 1.** Tabulated monthly analytical results of the influent gases for benzene and total petroleum hydrocarbons (TPH).
- 2.** Tabulated weekly bulk TPH readings from influent gases (such as PID measurements).
- 3.** Tabulated operational time readings of the control unit over the month period.
- 4.** Calculations in lb/hr for benzene and TPH, on a monthly basis using the monthly analytical data and control unit runtime.
- 5.** Location map showing control unit location, property boundary and nearest offsite receptors current at the time of PI-7 permit submittal.
- 6.** A correctly completed and submitted PI-7 permit.

V. REIMBURSEMENT GUIDANCE

- 1.** Situation where the offsite receptors are located within 100 feet of the compound as stated on the PI-7 permit. Assume 12 months of operation are approved and the unit continuously operates.
 - a.** Full reimbursement when influent vapors continually exceed 0.1 lb/hr benzene or 1.0 lb/hr TPH on a monthly basis.
 - b.** When influent vapors do not exceed 0.1 lb/hr benzene or 1.0 lb/hr TPH for more than three months in a row, fuel costs accrued on month four and thereafter are disallowed until influent levels rise again above the permit levels.
 - c.** If the system operates discontinuously over a period of time, reimbursement of fuel costs will be made on a month to month basis. The three month allowance for running the unit below PI-7 levels still applies.
- 2.** Situation where offsite receptors are located 100 feet or more of the compound as stated on the PI-7 permit.
 - a.** Full payment of fuel costs are allowed when influent vapors continually exceed emissions and distance requirements of Section 106.262.
 - b.** When influent vapors are below emissions and distance requirements of Section 106.262 for more than three continuous months, fuel costs accrued on month four and thereafter are disallowed until influent levels rise again above the permit levels.