

Monitoring Guidance for Fugitive Leaks
(VOC and/or HAPs)

How emissions were determined is the key to establishing monitoring. Usually, fugitive leaks are calculated based on an emission factor for each component, the number of components, and the concentration of the pollutant inside the component. A possible approach for monitoring includes the following. Leak detection monitoring does not warrant a reduction in the emissions due to its infrequent occurrence and the intention to ensure that the emission factors used to calculate emissions remain valid.

1. **Operational requirements**
 - a. **Limit weight percent of pollutant in key containers or pipeline, based on values used in calculation.**
 - b. **Repair component leaks (>10,000 ppm) within 30 days of discovery.**
2. **Monitoring**
 - a. **Annual chemical analysis of fluid.**
 - b. **Annual inspection of components in VOC service (VOC weigh >10) and within 15 days of any maintenance/repair that affects components.**
3. **Methods**
 - a. **Check for vapor leaks, using soap solution or portable analyzer (per 40CFR60, method 21).**
 - b. **If soap solution is used, apply it over each component and check for bubbles. If bubbles appear, use a portable analyzer to determine if the leak is greater than 10,000 ppm, following procedures in method 21 40CFR60.**
 - c. **Check for liquid leaks by looking for dripping liquid.**
4. **Recordkeeping**
 - a. **Place a visible tag on all components that have a liquid leak or a vapor leak greater than 10,000 ppm until those components are repaired.**
 - b. **Keep a log of the following:**
 - 1) **Component identification or description and location;**
 - 2) **The date the leak was detected;**
 - 3) **The dates of the attempts to repair;**
 - 4) **Designation of "Repair delayed" and the reason for delay if the leak is not repaired within 30 days after discovery of the leak; and**
 - 5) **Date of successful repair of leak.**
5. **Reporting**
 - a. **Report the number of leaking components discovered.**
 - b. **Report the number of leaking components that were not repaired within 30 days.**
 - c. **Report the duration of the leaks that exceeded 30 days.**

MONITORING FOR VOC/HAP FUGITIVES

