

Flares BACT Table: Natural Gas Pilot, Process, SSM: for VOC (Units FL-400, FL-401, FL-402, FL-403, FL-404)

Control Technologies →→→				
	Natural Gas and Fuel Requirements	Good Combustion, Operating, and Maintenance Practices	Flare Design	Flare Gas Recovery Systems
Identified Air Pollution Control Technologies	AQB: Existing BACT for fuels refinery-wide is in place at Conditions A106.D and A110.A. These shall remain in place.	Applicant: Good combustion and operating practices are a standard control practice for improving the combustion efficiency of the flares. Good combustion practices include proper operation, maintenance, and tune-up of the flares at least annually per the manufacturer's specifications.	Applicant: Good flare design can be employed to destroy large fractions of the flare gas. Good flare design includes pilot flame monitoring, flow measurement, monitoring/control of waste gas heating value.	Applicant: Flare gas recovery systems (FGRS) could potentially be implemented to further reduce VOC from 98% to close to 100% percent. This would require a 2-compressor sytem with design capacity of 100,000 scf/h to minmally cover flows from FL-400 and FL-404 combined. The 100% level is not guarenteed.
Feasibility Evaluations	Yes, is existing.	Applicant: Included in RBLC. AQB: In addition the flares have been and will continue to be subject to NSPS Ja monitoring (Standards of Performance for Petroleum Refineries).	Applicant: Included in RBLC. AQB: Gas flows to the flares will be monitored continuously.	AQB: Not included in RBLC.
Technically feasible?	Yes	Yes	Yes	No
Other	N/A	AQB: The flares (FL-400 to FL-404) will meet all applicable requirements in NSPS Ja. Destruction efficiency will be 98% for VOCs. The applicant has provided SSM emission calculations and figures for the flares.		
Evaluate Energy, Environment, Indirect economic	N/A is BACT	N/A is BACT	N/A is BACT	Applicant: Not economically feasible on per ton basis for the additional 2%.
Economic analysis	N/A is BACT	N/A is BACT	N/A is BACT	Not required for BACT.
BACT Selection	Yes	Yes	Yes	No

RBLC = US EPA's RACT-BACT-LAER Clearing House