American Petroleum Institute
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November 17, 2000

Sally Shaver, Director
Emissions Standards Division
Office of Air Quality Planning and Standards (OAQPS)
Environmental Protection Agency
411 West Chapel Hill Street
Durham, NC 27701

David Mobley, Director
Emissions, Monitoring, and Analysis Division
OAQPS
EPA
79 TW Alexander Drive
Building 4201
Research Triangle Park, NC 27709

Dear Ms. Shaver and Mr. Mobley:

As you may know, API has been working with EPA and the Department of Energy (“DOE”) over the last few years to progress the development of more cost effective methodologies for the control of fugitive emissions from refineries. Our approach, termed "Smart LDAR," involves more quickly identifying the high fugitive emitting components. Currently, we are using a Gas Imaging system developed by Sandia Laboratories. We intend to propose this new approach as an alternative to the current procedure using EPA’s Reference Method 21. API would like to meet with you soon to provide an update on the project status, and to initiate the regulatory process for EPA’s acceptance of this technology as a voluntary alternative to the current practice.

API has enclosed several reports supporting the acceptance of this new approach for fugitive emissions control. The first includes the results from an analysis using EPA's Monte Carlo modeling analysis which demonstrates the mass emission detection rates and monitoring frequencies that will provide equivalent or better reductions in fugitive emissions using the Gas Imaging technology compared to the current monitoring programs using Method 21. Also enclosed are reports on a successful refinery test of the Gas Imaging technology, an analysis of the largest database of fugitive emissions monitoring data supporting a shift in focus toward the high leaking components, and documentation on the Gas Imaging technology provided by Sandia Laboratories. This technology is continuing to undergo improvement by Sandia Labs in Livermore, California and testing of a "hand-held" portable unit at a refinery is scheduled for early 2001.

While we recognize that additional data may be required to allow EPA to determine that Smart LDAR is an appropriate equivalent to Method 21, we wanted to provide EPA with our results, so that EPA's regulatory "equivalency" evaluation could begin. Moreover, we would like to discuss with you what specific regulatory changes will be required to allow for the optional use of the Smart LDAR approach as an alternative to the existing fugitive monitoring technique.

We look forward to meeting with you to facilitate acceptance of this important technological development. We will be contacting your office soon to set up a meeting.

Sincerely,

Karin Ritter

Enclosures
Copies to, on next page

No Enclosures

c: Eric Schaeffer, Director
US Environmental Protection Agency
Office of Regulatory Enforcement
Office of Enforcement and Compliance Assurance

Timothy Fields, Assistant Administrator
US Environmental Protection Agency
Office of Solid Waste and Emergency Response

Jerry Clifford, Deputy Regional Administrator
US Environmental Protection Agency
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