

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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**SUMMARY OF NEIC LEAK DETECTION
AND REPAIR PROGRAM INVESTIGATIONS**

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INTRODUCTION

The Clean Air Act requires facilities with equipment in volatile organic compound (VOC) service to develop and implement a Leak Detection and Repair (LDAR) program to control fugitive VOC emissions.

Fugitive VOC emissions are regulated by 40 CFR Parts 60 and 61. Specific regulations and requirements for National Emission Standards for Hazardous Air Pollutants (NESHAP), New Source Performance Standards (NSPS), and additional VOC components are outlined in various subparts of 40 CFR Parts 60 and 61. State and local agencies normally incorporate the federal requirements by reference into the state and local air regulations, but may have their own LDAR requirements.

NESHAP and NSPS regulations require regulated facilities with equipment operating in VOC service to implement an LDAR program designed to reduce fugitive emissions. Requirements include equipment identification, a monitoring program, and recordkeeping and reporting. The leak monitoring requirements apply to all plant equipment containing 10% or greater VOC, including pumps, valves, compressors, and flanges. VOC components associated with storage tanks, loading/unloading areas, and transfer lines are also subject to monitoring requirements.

Facilities may choose to operate under alternative standards for valves allowing a 2.0% total valve leak rate for each unit. Component monitoring of valves in benzene service and valves in NSPS units can be conducted annually, as outlined in 40 CFR § 61.112 and 40 CFR § 60.483.

NEIC conducts comprehensive LDAR program investigations, often as part of multi-media compliance investigations, to determine compliance with LDAR program requirements. The NEIC LDAR on-site inspections are divided

into two parts: (1) monitoring of VOC components by NEIC personnel, and (2) evaluating facility monitoring procedures. NEIC monitors between 2,000 and 3,000 components at each inspected facility using procedures specified in EPA Reference Method 21* [Appendix]. This report provides an overview of the NEIC LDAR investigation methods and summarizes the results of recent NEIC LDAR program investigations.

* *As specified in 40 CFR Part 60 Appendix A*

NEIC LDAR PROGRAM INVESTIGATION METHODS

NEIC LDAR investigations include:

- Review of EPA and state files and documents
- Evaluation of the facility monitoring procedures
- On-site VOC component monitoring
- Data evaluation and report preparation

FILE AND DOCUMENT REVIEW

State and federal files are reviewed for information regarding facility operations/equipment, permits, inspections, and any enforcement actions. Quarterly VOC monitoring reports are reviewed and are used to select process units for monitoring.

EVALUATION

NEIC evaluates fugitive VOC monitoring procedures used by facilities or facility contractors. The evaluation includes:

- Determination of facility processes involving VOCs through discussions with facility personnel, including a detailed process description
- Review of facility/contractor monitoring procedures, including equipment calibration
- Review of VOC component inventory, leak logs, repair logs, emission reports
- Identification of specific components in VOC service

COMPONENT MONITORING

NEIC monitors a representative number of components in VOC service from process units, storage tanks, loading/unloading areas, transfer lines, and ancillary equipment using an organic vapor analyzer. Components monitored are selected using various criteria including:

- Equipment subject to NSPS and NESHAP requirements
- Past monitoring results
- Presence of "special" types of VOC equipment, such as railroad car and truck loading racks
- Type of VOC in service

DATA EVALUATION AND INVESTIGATION REPORT

Upon completion of the on-site inspection, NEIC evaluates the information/data obtained. This includes data collected during component monitoring to determine equipment leak rates. Leak rates determined by NEIC are compared to leak rates reported by the facility. An investigation report is then prepared and provided to Regional personnel.

SUMMARY OF THE NEIC LDAR PROGRAM INVESTIGATIONS

None of the facility LDAR programs evaluated by NEIC were in full compliance with regulatory requirements. Although the facilities inspected were located in various states and regions, the common deficiencies outlined below were identified. These deficiencies have most likely resulted in greater uncontrolled VOC emissions.

- VOC component leak rates determined by NEIC are greater than the leak rates reported by the majority of facilities for each process unit inspected. NEIC leak rates and facility reported leak rates for several process units are summarized below:

<u>Facility Reported Percent Leak Rate</u>	<u>NEIC Determined Percent Leak Rate</u>
2.7	18.7
1.6	6.1
3.5	15.4
0.73	8.4
1.6	6.7
4.0	13.0
1.3	6.9
0.72	5.4
1.7	6.3
4.1	13.0
0.8	6.1
0.8	7.7
0.4	7.2
4.4	2.9

Several process units monitored by NEIC were operating under the alternative standards for valves allowing a 2.0% valve leak rate for each unit. This allows facilities to monitor valves in benzene service and valves in NSPS units annually rather than quarterly. Facilities operating under this standard and monitored by NEIC exceeded the 2% allowable percentage of valves leaking.

- **Inaccurate/incomplete VOC component inventories**
 - **Many regulated components are not identified/tagged for inclusion into the monitoring program**
 - **Equipment monitored not in VOC service (i.e. hot water, caustic, and steam lines)**

- **Incorrect/inconsistent monitoring procedures**
 - **Components in VOC service are not monitored**
 - **Inadequate monitoring equipment calibration procedures**
 - **Method 21 procedures not followed**

NEIC also identified inconsistencies within local LDAR regulations and deficiencies between local and federal regulations. Conflicting requirements within particular local regulations caused ambiguity in determining the number of leaking components at some facilities.

NEIC identified other sources of fugitive VOC emissions not subject to LDAR requirements. For example, gasket seals on rotary filters, not included in LDAR requirements, were found to be leaking VOCs at concentrations in excess of 10,000 parts per million.

APPENDIX

REFERENCE METHOD 21

be on a dry basis. Calculate the pollutant emission rate, as follows:

$$E = C_p F_p \frac{20.9}{20.9 - \%O_2} \quad \text{Eq. 20-6}$$

where:

E = Mass emission rate of pollutant, ng/J (lb/10⁶ Btu).

7.5.2 Calculation of Emission Rate Using Carbon Dioxide Correction. The CO₂ concentration and the pollutant concentration may be on either a dry basis or a wet basis, but both concentrations must be on the same basis for the calculations. Calculate the pollutant emission rate using Equation 20-7 or 20-8:

$$E = C_p F_p \frac{100}{\%CO_2} \quad \text{Eq. 20-7}$$

$$E = C_w F_w \frac{100}{\%CO_{2,w}} \quad \text{Eq. 20-8}$$

where:

C_w = Pollutant concentration measured on a moist sample basis, ng/sm³ (lb/scf).

%CO_{2,w} = Measured CO₂ concentration measured on a moist sample basis, percent.

8. Bibliography

1. Curtis, F. A Method for Analyzing NO_x Cylinder Gases-Specific Ion Electrode Procedure, Monograph available from Emission Measurement Laboratory, ESED, Research Triangle Park, NC 27711, October 1978.

2. Sigsby, John E., F. M. Black, T. A. Bellar, and D. L. Klosterman. Chemiluminescent Method for Analysis of Nitrogen Compounds in Mobile Source Emissions (NO, NO₂, and NH₃). "Environmental Science and Technology," 7:51-54. January 1973.

3. Shigehara, R.T., R.M. Neulicht, and W.S. Smith. Validating Orsat Analysis Data from Fossil Fuel-Fired Units. Emission Measurement Branch, Emission Standards and Engineering Division, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency, Research Triangle Park, NC 27711, June 1975.

METHOD 21—DETERMINATION OF VOLATILE ORGANIC COMPOUNDS LEAKS

1. Applicability and Principle

1.1 Applicability. This method applies to the determination of volatile organic compound (VOC) leaks from process equipment. These sources include, but are not limited to, valves, flanges and other connections, pumps and compressors, pressure relief devices, process drains, open-ended valves, pump and compressor seal system degassing vents, accumulator vessel vents, agitator seals, and access door seals.

1.2 Principle. A portable instrument is used to detect VOC leaks from individual sources. The instrument detector type is not specified, but it must meet the specifications and performance criteria contained in Section 3. A leak definition concentration based on a reference compound is specified in each applicable regulation. This procedure is intended to locate and classify leaks only, and is not to be used as a direct measure of mass emission rates from individual sources.

2. Definitions

2.1 Leak Definition Concentration. The local VOC concentration at the surface of a leak source that indicates that a VOC emission (leak) is present. The leak definition is an instrument meter reading based on a reference compound.

2.2 Reference Compound. The VOC species selected as an instrument calibration basis for specification of the leak definition concentration. (For example: If a leak definition concentration is 10,000 ppmv as methane, then any source emission that results in a local concentration that yields a meter reading of 10,000 on an instrument calibrated with methane would be classified as a leak. In this example, the leak definition is 10,000 ppmv, and the reference compound is methane.)

2.3 Calibration Gas. The VOC compound used to adjust the instrument meter reading to a known value. The calibration gas is usually the reference compound at a concentration approximately equal to the leak definition concentration.

2.4 No Detectable Emission. Any VOC concentration at a potential leak source (adjusted for local VOC ambient concentration) that is less than a value corresponding to the instrument readability specification of section 3.1.1(c) indicates that a leak is not present.

2.5 Response Factor. The ratio of the known concentration of a VOC compound to the observed meter reading when measured using an instrument calibrated with the reference compound specified in the application regulation.

2.6 Calibration Precision. The degree of agreement between measurements of the same known value, expressed as the relative percentage of the average difference be-

tween the meter readings and the known concentration to the known concentration.

2.7 Response Time. The time interval from a step change in VOC concentration at the input of the sampling system to the time at which 90 percent of the corresponding final value is reached as displayed on the instrument readout meter.

3. Apparatus

3.1 Monitoring Instrument.

3.1.1 Specifications.

a. The VOC instrument detector shall respond to the compounds being processed. Detector types which may meet this requirement include, but are not limited to, catalytic oxidation, flame ionization, infrared absorption, and photoionization.

b. Both the linear response range and the measurable range of the instrument for each of the VOC to be measured, and for the VOC calibration gas that is used for calibration, shall encompass the leak definition concentration specified in the regulation. A dilution probe assembly may be used to bring the VOC concentration within both ranges; however, the specifications for instrument response time and sample probe diameter shall still be met.

c. The scale of the instrument meter shall be readable to ± 2.5 percent of the specified leak definition concentration when performing a no detectable emission survey.

d. The instrument shall be equipped with an electrically driven pump to insure that a sample is provided to the detector at a constant flow rate. The nominal sample flow rate, as measured at the sample probe tip, shall be 0.10 to 3.0 liters per minute when the probe is fitted with a glass wool plug or filter that may be used to prevent plugging of the instrument.

e. The instrument shall be intrinsically safe as defined by the applicable U.S.A. standards (e.g., National Electric Code by the National Fire Prevention Association) for operation in any explosive atmospheres that may be encountered in its use. The instrument shall, at a minimum, be intrinsically safe for Class 1, Division 1 conditions, and Class 2, Division 1 conditions, as defined by the example Code. The instrument shall not be operated with any safety device, such as an exhaust flame arrestor, removed.

f. The instrument shall be equipped with a probe or probe extension for sampling not to exceed $\frac{1}{4}$ in. in outside diameter, with a single end opening for admission of sample.

3.1.2 Performance Criteria.

(a) The instrument response factors for each of the VOC to be measured shall be less than 10. When no instrument is available that meets this specification when calibrated with the reference VOC specified in the applicable regulation, the available instrument may be calibrated with one of the VOC to be measured, or any other VOC, so

long as the instrument then has a response factor of less than 10 for each of the VOC to be measured.

(b) The instrument response time shall be equal to or less than 30 seconds. The instrument pump, dilution probe (if any), sample probe, and probe filter, that will be used during testing, shall all be in place during the response time determination.

c. The calibration precision must be equal to or less than 10 percent of the calibration gas value.

d. The evaluation procedure for each parameter is given in Section 4.4.

3.1.3 Performance Evaluation Requirements.

a. A response factor must be determined for each compound that is to be measured, either by testing or from reference sources. The response factor tests are required before placing the analyzer into service, but do not have to be repeated at subsequent intervals.

b. The calibration precision test must be completed prior to placing the analyzer into service, and at subsequent 3-month intervals or at the next use whichever is later.

c. The response time test is required prior to placing the instrument into service. If a modification to the sample pumping system or flow configuration is made that would change the response time, a new test is required prior to further use.

3.2 Calibration Gases. The monitoring instrument is calibrated in terms of parts per million by volume (ppmv) of the reference compound specified in the applicable regulation. The calibration gases required for monitoring and instrument performance evaluation are a zero gas (air, less than 10 ppmv VOC) and a calibration gas in air mixture approximately equal to the leak definition specified in the regulation. If cylinder calibration gas mixtures are used, they must be analyzed and certified by the manufacturer to be within ± 2 percent accuracy, and a shelf life must be specified. Cylinder standards must be either reanalyzed or replaced at the end of the specified shelf life. Alternately, calibration gases may be prepared by the user according to any accepted gaseous standards preparation procedure that will yield a mixture accurate to within ± 2 percent. Prepared standards must be replaced each day of use unless it can be demonstrated that degradation does not occur during storage.

Calibrations may be performed using a compound other than the reference compound if a conversion factor is determined for that alternative compound so that the resulting meter readings during source surveys can be converted to reference compound results.

4. Procedures

4.1 **Pretest Preparations.** Perform the instrument evaluation procedures given in Section 4.4 if the evaluation requirements of Section 3.1.3 have not been met.

4.2 **Calibration Procedures.** Assemble and start up the VOC analyzer according to the manufacturer's instructions. After the appropriate warmup period and zero internal calibration procedure, introduce the calibration gas into the instrument sample probe. Adjust the instrument meter readout to correspond to the calibration gas value.

NOTE: If the meter readout cannot be adjusted to the proper value, a malfunction of the analyzer is indicated and corrective actions are necessary before use.

4.3 Individual Source Surveys.

4.3.1 **Type I—Leak Definition Based on Concentration.** Place the probe inlet at the surface of the component interface where leakage could occur. Move the probe along the interface periphery while observing the instrument readout. If an increased meter reading is observed, slowly sample the interface where leakage is indicated until the maximum meter reading is obtained. Leave the probe inlet at this maximum reading location for approximately two times the instrument response time. If the maximum observed meter reading is greater than the leak definition in the applicable regulation, record and report the results as specified in the regulation reporting requirements. Examples of the application of this general technique to specific equipment types are:

a. **Valves—**The most common source of leaks from valves is at the seal between the stem and housing. Place the probe at the interface where the stem exits the packing gland and sample the stem circumference. Also, place the probe at the interface of the packing gland take-up flange seat and sample the periphery. In addition, survey valve housings of multipart assembly at the surface of all interfaces where a leak could occur.

b. **Flanges and Other Connections—**For welded flanges, place the probe at the outer edge of the flange-gasket interface and sample the circumference of the flange. Sample other types of nonpermanent joints (such as threaded connections) with a similar traverse.

c. **Pumps and Compressors—**Conduct a circumferential traverse at the outer surface of the pump or compressor shaft and seal interface. If the source is a rotating shaft, position the probe inlet within 1 cm of the shaft-seal interface for the survey. If the housing configuration prevents a complete traverse of the shaft periphery, sample all accessible portions. Sample all other joints on the pump or compressor housing where leakage could occur.

d. **Pressure Relief Devices—**The configuration of most pressure relief devices prevents

sampling at the sealing seat interface. For those devices equipped with an enclosed extension, or horn, place the probe inlet at approximately the center of the exhaust area to the atmosphere.

e. **Process Drains—**For open drains, place the probe inlet at approximately the center of the area open to the atmosphere. For covered drains, place the probe at the surface of the cover interface and conduct a peripheral traverse.

f. **Open-Ended Lines or Valves—**Place the probe inlet at approximately the center of the opening to the atmosphere.

g. **Seal System Degassing Vents and Accumulator Vents—**Place the probe inlet at approximately the center of the opening to the atmosphere.

h. **Access Door Seals—**Place the probe inlet at the surface of the door seal interface and conduct a peripheral traverse.

4.3.2 Type II—"No Detectable Emission".

Determine the local ambient concentration around the source by moving the probe inlet randomly upwind and downwind at a distance of one to two meters from the source. If an interference exists with this determination due to a nearby emission or leak, the local ambient concentration may be determined at distances closer to the source, but in no case shall the distance be less than 25 centimeters. Then move the probe inlet to the surface of the source and determine the concentration described in 4.3.1. The difference between these concentrations determines whether there are no detectable emissions. Record and report the results as specified by the regulation.

For those cases where the regulation requires a specific device installation, or that specified vents be ducted or piped to a control device, the existence of these conditions shall be visually confirmed. When the regulation also requires that no detectable emissions exist, visual observations and sampling surveys are required. Examples of this technique are:

(a) **Pump or Compressor Seals—**If applicable, determine the type of shaft seal. Perform a survey of the local area ambient VOC concentration and determine if detectable emissions exist as described above.

(b) **Seal System Degassing Vents, Accumulator Vessel Vents, Pressure Relief Devices—**If applicable, observe whether or not the applicable ducting or piping exists. Also, determine if any sources exist in the ducting or piping where emissions could occur prior to the control device. If the required ducting or piping exists and there are no sources where the emissions could be vented to the atmosphere prior to the control device, then it is presumed that no detectable emissions are present. If there are sources in the ducting or piping where emissions could be vented or sources where leaks could occur,

the sampling surveys described in this paragraph shall be used to determine if detectable emissions exist.

4.3.3 **Alternative Screening Procedure.** A screening procedure based on the formation of bubbles in a soap solution that is sprayed on a potential leak source may be used for those sources that do not have continuously moving parts, that do not have surface temperatures greater than the boiling point or less than the freezing point of the soap solution, that do not have open areas to the atmosphere that the soap solution cannot bridge, or that do not exhibit evidence of liquid leakage. Sources that have these conditions present must be surveyed using the instrument techniques of 4.3.1 or 4.3.2.

Spray a soap solution over all potential leak sources. The soap solution may be a commercially available leak detection solution or may be prepared using concentrated detergent and water. A pressure sprayer or a squeeze bottle may be used to dispense the solution. Observe the potential leak sites to determine if any bubbles are formed. If no bubbles are observed, the source is presumed to have no detectable emissions or leaks as applicable. If any bubbles are observed, the instrument techniques of 4.3.1 or 4.3.2 shall be used to determine if a leak exists, or if the source has detectable emissions, as applicable.

4.4 **Instrument Evaluation Procedures.** At the beginning of the instrument performance evaluation test, assemble and start up the instrument according to the manufacturer's instructions for recommended warmup period and preliminary adjustments.

4.4.1 **Response Factor.** Calibrate the instrument with the reference compound as specified in the applicable regulation. For each organic species that is to be measured during individual source surveys, obtain or prepare a known standard in air at a concentration of approximately 80 percent of the applicable leak definition unless limited by volatility or explosivity. In these cases, prepare a standard at 90 percent of the saturation concentration, or 70 percent of the lower explosive limit, respectively. Introduce this mixture to the analyzer and record the observed meter reading. Introduce zero air until a stable reading is obtained. Make a total of three measurements by alternating between the known mixture and zero air. Calculate the response factor for each repetition and the average response factor.

Alternatively, if response factors have been published for the compounds of interest for the instrument or detector type, the response factor determination is not required, and existing results may be referenced. Examples of published response factors for flame ionization and catalytic oxida-

tion detectors are included in Bibliography.

4.4.2 **Calibration Precision.** Make a total of three measurements by alternately using zero gas and the specified calibration gas. Record the meter readings. Calculate the average algebraic difference between the meter readings and the known value. Divide this average difference by the known calibration value and multiply by 100 to express the resulting calibration precision as a percentage.

4.4.3 **Response Time.** Introduce zero gas into the instrument sample probe. When the meter reading has stabilized, switch quickly to the specified calibration gas. Measure the time from switching to when 90 percent of the final stable reading is attained. Perform this test sequence three times and record the results. Calculate the average response time.

5. Bibliography

1. DuBose, D.A., and G.E. Harris. Response Factors of VOG Analyzers at a Meter Reading of 10,000 ppmv for Selected Organic Compounds. U.S. Environmental Protection Agency, Research Triangle Park, NC. Publication No. EPA 600/2-81-051. September 1981.

2. Brown, G.E., et al. Response Factors of VOC Analyzers Calibrated with Methane for Selected Organic Compounds. U.S. Environmental Protection Agency, Research Triangle Park, NC. Publication No. EPA 600/2-81-022. May 1981.

3. DuBose, D.A., et al. Response of Portable VOC Analyzers to Chemical Mixtures. U.S. Environmental Protection Agency, Research Triangle Park, NC. Publication No. EPA 600/2-81-110. September 1981.

METHOD 22—VISUAL DETERMINATION OF FUGITIVE EMISSIONS FROM MATERIAL SOURCES AND SMOKE EMISSIONS FROM FLARES

1. Introduction

This method involves the visual determination of fugitive emissions, i.e., emissions not emitted directly from a process stack or duct. Fugitive emissions include emissions that (1) escape capture by process equipment exhaust hoods; (2) are emitted during material transfer; (3) are emitted from buildings housing material processing or handling equipment; and (4) are emitted directly from process equipment. This method is used also to determine visible smoke emissions from flares used for combustion of waste process materials.

This method determines the amount of time that any visible emissions occur during the observation period, i.e., the accumulated emission time. This method does not require that the opacity of emissions be determined.