

SANTA BARBARA COUNTY
AIR POLLUTION CONTROL DISTRICT
POLICIES AND PROCEDURES

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Topic:	<u>Planned and Unplanned Flaring Events</u>		
Distribution:	<u>Engineering Division Staff</u>		

This policy is intended to provide guidelines on inclusion in District permits of emissions resulting from planned and unplanned flaring events. Flaring events have been divided into five categories.

- (1) Planned continuous flaring events such as flare purge and pilot.
- (2) Planned frequent flaring event such as flaring from pigging. This category includes operations which result in intermittent flaring which occurs more than once per quarter.
- (3) Planned infrequent flaring events such as equipment depressurization for maintenance. This category includes operations occurring a maximum of four times per year.
- (4) Unplanned frequent flaring events such as releases from pressure relief valves or flaring of off-spec. gas. This category includes unplanned events which are projected to occur more than four times per year resulting from the same processing unit or equipment type.
- (5) Unplanned infrequent events including failures of processing equipment and compressors. This category includes events projected to occur a maximum of four times per year based on historical data from similar facilities.

An air quality impact analysis is done for all flaring event categories to verify compliance with air quality standards. Categories 1 & 2 are generally included in the normal operation air quality impact analysis. The remaining categories are modeled separately.

Emissions from categories 1 & 2 are counted in the peak hour, quarterly and annual emissions. Emissions from categories 3, 4 and 5 are counted in the quarterly and annual emissions increase and entire source emissions.

If BACT is triggered for the facility the BACT is required for all types of flaring events. BACT includes plant design and flare design and operation to minimize emissions and to minimize the extent and frequency of flaring. BACT may include redundant equipment to minimize breakdown potential leading

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to flaring, use of greater design pressure valves and improved handling of off-spec. gas as well as other measures.

All facilities must be designed such that planned flaring events do not result in projected standard violations. For flare gasses containing sulfur compounds, a scrubber or other chemical/physical means may be necessary to reduce the quantity of sulfur compounds, reduce the quantity of flare gas or reduce the frequency of flaring. If the air quality impact analysis of unplanned events shows projected standard violations, the applicant will be required to implement BACT and to participate in the development and implementation of procedures to reduce flaring in order to protect ambient air quality standards.

The notification, reporting and variance procedures of District Regulation V must be followed for all flaring events which (1) cause the project to exceed the annual flaring emissions included within the permit over any twelve-month period, (2) exceed 24 hours in duration, or (3) result in monitored ambient air quality standard violations.