

## FACT SHEET

### Notice of Final Approval for an Alternative Means of Emission Limitation to Use a Continuous Leak Detection Sensor Network with Leak Identification Work Practices at Flint Hills Resources

#### Action

- On January 25, 2023, the U.S. Environmental Protection Agency (EPA) approved an alternative means of emission limitation (AMEL) request from Flint Hills Resources (FHR) LLC. The request covers Leak Detection and Repair (LDAR) requirements in the Standards of Performance and National Emission Standards for Hazardous Air Pollutants for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) and the Petroleum Refining Industry (40 CFR part 60 Subparts VV, VVa, GGG, GGGa, and part 63 Subparts H and CC).
- The AMEL applies to the Mid-Crude and Meta-Xylene process units at the FHR West Refinery located in Corpus Christi, Texas.
- The alternative replaces the manual component-by-component periodic EPA Method 21 monitoring requirements with a monitoring and documentation system comprised of continuously operating leak detection sensor networks (LDSN) and work practices that are detailed as a detection response framework (DRF).
- This AMEL will be a landmark use of continuous leak detection systems at a refinery. Continuous monitoring has the potential to detect leaks, especially large ones, much faster than the current practice of monitoring periodically using EPA Method 21. This potential reduction in large leaks alone would lead to less pollution and cleaner air for communities near these sites.

#### Background

- The Clean Air Act (CAA) provides the ability for regulated sources to seek approval of an AMEL, which must achieve emission reductions at least equivalent to the existing standards.
- Consistent with requirements of the CAA, in a notice published October 13, 2021, EPA provided an opportunity for the public to comment regarding the AMEL request. The comment period for this action closed on November 29, 2021.
- FHR submitted this AMEL request because the continuous monitoring system represents a cost savings to them.
- Based on EPA's analysis of the information provided in FHR's request, we have determined the AMEL will achieve emission reductions at least equivalent to compliance with the applicable Method 21 requirements.

#### For More Information

- Interested parties can download a copy of this final action from EPA's website at the following address: <https://www.epa.gov/stationary-sources-air-pollution/alternative-means-emission-limitation-leak-detection-and-repair>.
- Today's action and other background information are also available electronically at <https://www.regulations.gov/>, EPA's electronic public docket and comment system.
- For further information about this action, contact Mr. Neil Feinberg of EPA's Office of Air Quality Planning and Standards, at (919) 541-2214 or by email at [Feinberg.Stephen@epa.gov](mailto:Feinberg.Stephen@epa.gov).