

Tracer ES&Times

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Air Quality Compliance Update

Recent developments regarding California's Greenhouse Gas (GHG) regulations include:

- EPA is granting California's waiver request that will allow the state to regulate GHG emissions from new motor vehicles, beginning with the current model year.
- The California Air Resources Board (ARB) has issued a notice of public hearing to consider proposed amendments to the new passenger motor vehicle GHG emission standards (scheduled for consideration on September 24-25, 2009).
- The ARB has adopted a regulation that will require capture of methane from landfills throughout the state. Approximately 218 of the state's 367 municipal solid waste landfills may be subject to the new regulation. About 14 of these sites may need to design and install new gas collection systems by 2012.
- The ARB has adopted the first in the nation approach to cooler cars by requiring new cars sold in California to have windows that reflect or absorb heat-producing rays from the sun (starting 2012).

Our next issue will address what is happening with regard to some Early Action Measures under AB32. For further information please visit <http://www.arb.ca.gov/cc/cc.htm> or contact Mr. Greg Hauser at (760) 744-9611 x106. ✓

Air Monitoring

Maintenance is Key to CEMS Programs

Nearly all Continuous Emissions Monitoring Systems (CEMS) often found in industrial facilities are generally the result of permit requirements.

A vigorous maintenance program of required CEMS is highly recommended. Strong and proactive maintenance programs on such monitoring systems reduce the amount of instrument downtime. The benefits of this are threefold.

1. Reduction of Enforcement Liability

Permit conditions generally have data recovery standards built in. Excessive downtime could lead to enforcement in the form of Notices of Violation (NOVs), or the need to obtain variances to avoid NOVs. Those defensive actions can be very expensive.

2. Reduction in Emissions Fees

During CEMS system downtime, emissions are calculated by other methods (fuel usage, etc.). These methods generally produce higher emissions assessments, which lead to higher emissions fees and/or excess emissions fees.

3. Extension of Instrument Life

Strong maintenance extends the life of analytical instruments preserving the need to invest more capital.

Tracer ES&T can assist with the design, operation and maintenance of CEMS programs. Our program approach is aimed at optimizing performance and minimizing costs.

For additional information regarding CEMS maintenance programs, contact Paul Schafer of Tracer ES&T, (760) 744-9611 x111. ✓

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Risk Group Update

Follow-up to April/May 2009 Article of “Ammonia Refrigeration System Pressure Relief Valves and Condensers – To Install or Not to Install?”

The Tracer ES&T Times April/May 2009 Article of “Ammonia Refrigeration System Pressure Relief Valves and Condensers – To Install or Not to Install?” referenced the 1999 publication of the International Institute of Ammonia Refrigeration (IIAR) IIAR/ANSI 2 Standard. An update to this Standard was published in May 2008 and provides an interpretation of the standard that is more cohesive to the existing ASHRAE Standard 15, which also references requirements for Evaporative Condenser Hydrostatic Overpressure Protection. The purpose of this update to the Standard was to “prevent any misinterpretation of the Standard by inspectors and other regulatory officials using both documents.” Tracer ES&T would like to provide the updated wording of the Standard as is stated in the May 2008 published version. The updated International Institute of Ammonia Refrigeration (IIAR) IIAR/ANSI 2 states (in section 7.2.1.4) “Where the refrigerant coil inlet and outlet lines of evaporative condensers can be isolated, the condenser shall be protected from refrigerant hydrostatic pressure per 11.4”.

Section 11.4.1 of Standard states:

“The manual isolation for any purpose of equipment and piping sub-section(s) shall be undertaken by trained technician(s) taking all necessary precautions to protect against all overpressure due to hydrostatic expansion of trapped liquid refrigerant.”

“Note: This typically involves the implementation of energy control procedures and training in compliance with OSHA 29 CFR 1910.147 [ref.4.2.3.5]”

Therefore, if a facility uses trained technicians to isolate the condensers, they are not required to have pressure relief valves installed on the condensers; however, if the possibility exists that an untrained person may isolate the condensers improperly, the installation of pressure relief valves is the safest route. In either case, as per the above Standard, OSHA 29 CFR 1910.147 for lockout/tagout procedures must be implemented for condenser isolation. ✓

OOPS !!

In our July/August newsletter front-page article “UST or Not to Be” we said the upgrade deadline was December 22, 1988; it was actually December 22, 1998.

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Do you have questions about an article appearing in Tracer ES&Times?

Call us at (760) 744-9611.

Upcoming Events...



RETA's 100th National Conference

October 13 — 16, 2009, Monterey, CA

Watch for Tracer ES&T's Booth #108

Lee Pyle will be speaking on
"You're a Contractor—What is Your Responsibility?"

go to: <http://www.reta.com/convention/2009/>



RETA LA Chapter 2

*Meets the 3rd Wednesday
of each month*

Next meeting is September 16th (5:30 p.m.)
at United Refrigeration in Buena Park

Speaker: **Steve Yagla**
of H.A. Phillips & Company

Topic: **Phillips Liquid Transfer Systems**

For details contact
Mike Somsak, President LA Chapter 2
(714-630-3784)



RETA

Inland Empire Chapter

*Meets the 2nd Tuesday
of each month*

Next meeting is September 8th (6-8 p.m.)

Speaker: **Errol Briggerman**
of Vons Santa Fe Springs DC

Topic: **"How to Keep the Ammonia In Your
System – Good Maintenance Practices"**

For details contact
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Tracer ES&T Anniversaries

Some of the Tracer ES&T staff have been together through several name changes: Tracer Technologies, Team Environmental Services, and now, Tracer ES&T. Our staff is the foundation for this company and we appreciate their effort and dedication.

12 Years	Dan Vossler	(10/16/97)
5 Years	John Fox	(09/20/04)
3 Years	Kim Wolfe	(10/02/06)
1 Year	Hahn Nguyen	(09/08/08)