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**February Lunch Presentation**

**Speaker:** James Dorsey, Director of Strategy - Siemens Analytical Products & Solutions

James will be speaking on the TDLR IHB (Industrialized Housing and Buildings) Rules. He will be accompanied by Brian Ledbetter, Kelly Kelly, and Yvonne Feinleib, all of whom are TDLR Program Specialists and will be standing by to help address questions from the viewers.

**BIO:** James has 38 years experience in Process Automation, Analytics, and Power Systems. James recently accepted the position of Director of Strategy for Siemens Process Analytics & Solutions. Formerly, James had direct responsibility of Siemens Solutions Business Operations (Sales Support, Project Management, Engineering, Production, and FEED teams). Prior to joining Siemens, James served 23 years with ENGlobal Corporation in several key leadership roles in both operation/production and business management. In 2005, he developed and patented the Integrated Rack system; this system enhances automation and analyzer system’s packaging to reduce overall cost of ownership and power consumption.

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**Next Meeting Date:** February 20, 2019

**Place:** Monument Inn Restaurant  
4406 Independence Parkway  
La Porte, TX 77571

**Time:** Arrival/Check-In: 11:15 - 11:45 AM  
Lunch & Presentation: 11:45 - 1:00 PM

**Speaker:** James Dorsey (Siemens)

**Topic:** TDLR Industrialized Housing and Buildings

**RSVP:** To RSVP please email Court Sullivan (court.sullivan@us.yokogawa.com) by February 18th.
With regard to calibration checks for NHV, a request was made to use ± 10 percent agreement of the total calibration cylinder NHV as an alternative to the PS 9 requirement that specifies calibration and calibration check individual compound agreement ± 10 percent with cylinder certified tag values for each individual compound. This request was made to use an alternative for broad application to affected facilities which use Gas Chromatograph (GC) and/or Mass Spectrometer (MS) technology for composition and corresponding NHV determinations required under Subpart CC. The following are specific alternatives to the quality assurance procedures required in PS 9 and §§63.671(e)(2) and (e)(3) when you demonstrate compliance with Subpart CC:

1) Single daily mid-level calibration check error to be calculated based on the total NHV of a certified calibration gas mixture. The instrument response for NHV shall not vary by more than 10 percent from the total NHV of the certified calibration gas mixture. 2) Quarterly multi-point calibration (see Table 13 of Subpart CC) error to be calculated against the total NHV of the certified calibration gas mixtures (i.e., low-, mid-, high-level). The average instrument response for total NHV shall not vary by more than 10 percent from the total NHV of any of the certified gas mixtures. The rationale for proposing these alternative procedures is based on the premise that NHV is the parameter utilized to determine Subpart CC flare combustion efficiency requirement. These alternative procedures also simplify the calibration procedures for sites that elect to use them.

EPA has approved the above stated request to use the relative percent error of the total NHV measured versus the certified cylinder tag value for total NHV as the measure of agreement for both the daily calibration and quarterly multi-point audits when using GC or MS for flare fuel feed NHV requirements in Subpart CC with the following provisos: 1) Certified gas standards must be prepared consistent with the requirements in §63.671(e)(2). 2) You must use certified calibration gases that meet the requirement in Section 7 .1 of PS 9 for daily calibration checks. 3) You must use performance audit gases that meet the requirements in Section 7 .2 of PS 9 for your quarterly multi-point calibration audits. 4) The measured NHV relative error for quarterly multi-point calibration audits must be within 10 percent of the certified cylinder gas tag value for NHV. This requirement replaces the compound-specific relative error requirement for daily calibration in Section 10.2 of PS 9.

Recent approval from EPA for alternatives to requirements in 40 CFR 63, Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (Subpart CC), and by reference, 40 CFR 60, Appendix B, Performance Specification 9 (PS 9) for determining Net Heating Value (NHV).
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CALENDAR OF EVENTS

2019 Events

February Meeting w/Speaker James Dorsey (Feb 20 @ Monument Inn Restaurant)

64th ISA Analysis Division Symposium (May 5-9 @ Galveston Convention Center)

June Meeting w/Speaker (Jun 19 @ Monument Inn Restaurant)

August Meeting w/Speaker (Aug 21 @ Monument Inn Restaurant)

October Meeting w/Speaker (Oct 16 @ Monument Inn Restaurant)

December Annual Christmas Dinner Meeting (Dec 18 @ Monument Inn Restaurant)

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