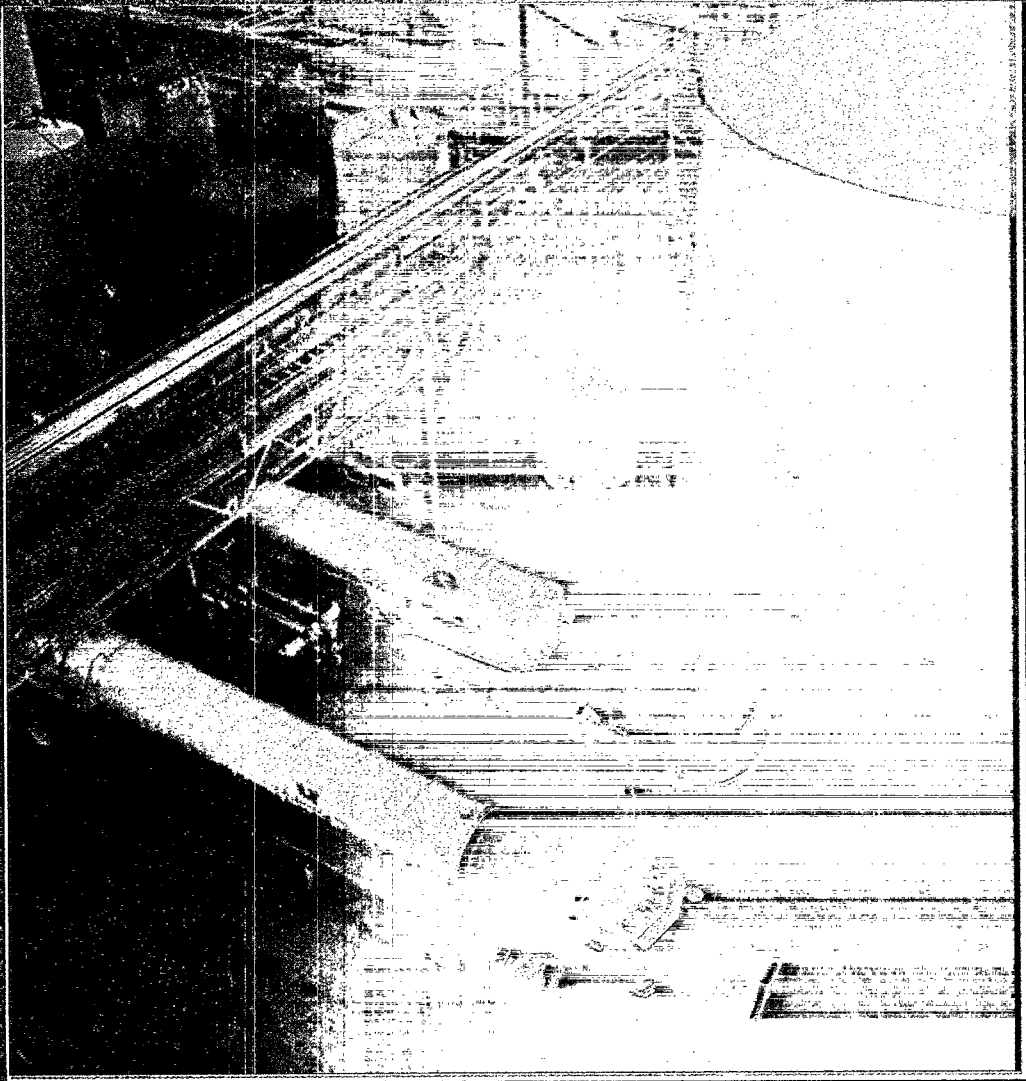
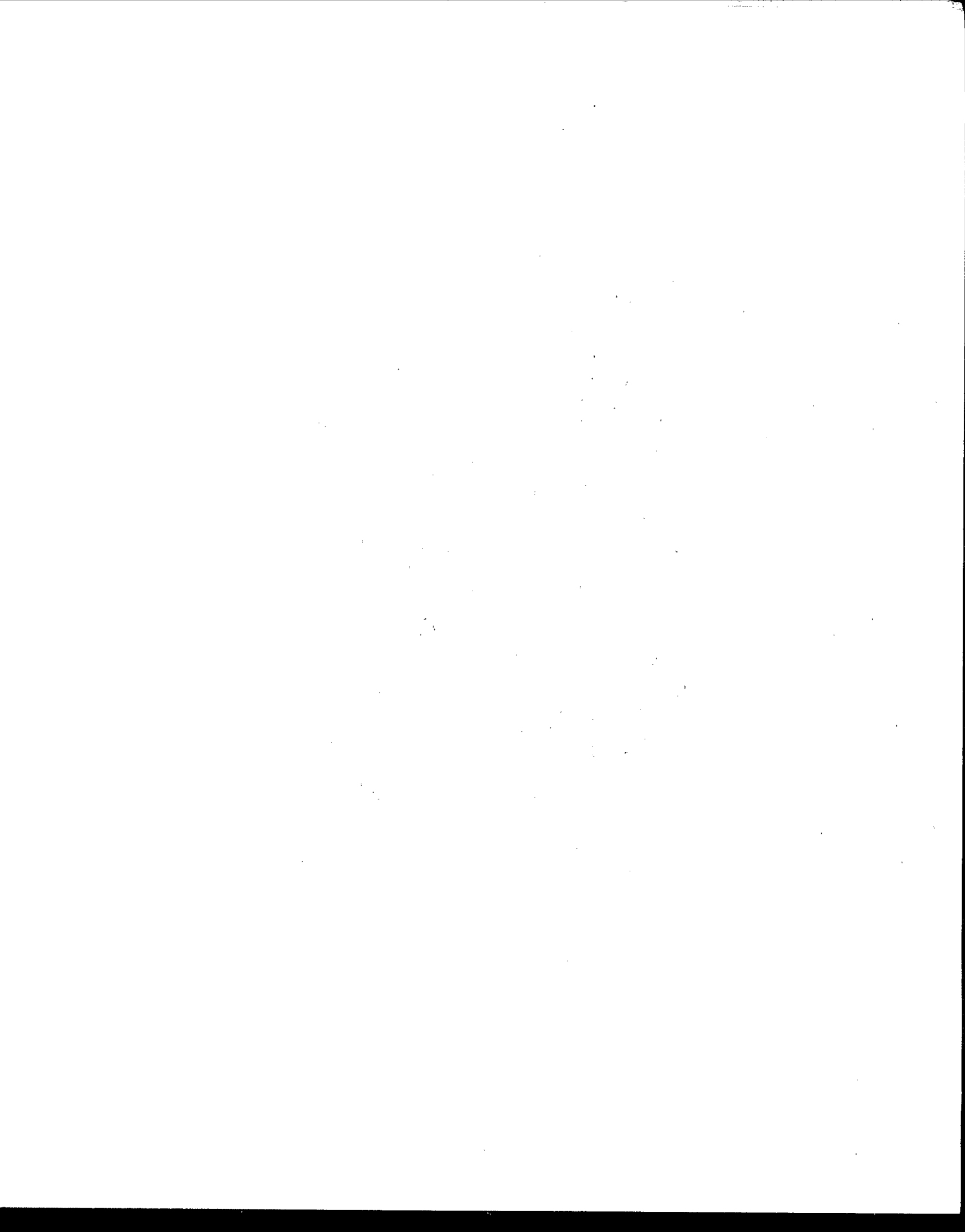




HON Inspection Tool



**EPA Office of Compliance
Chemical Industry Branch**



EPA-305-B-97-006

September 1997

**Inspection Tool for
the Hazardous Organic NESHAP
(HON)**

**Volume I: Overview of Emission Points,
Control Technologies, and HON Provisions**

**U.S. Environmental Protection Agency
Chemical, Commercial Services, and Municipal Division
Washington, D.C. 20460**



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1.0 BACKGROUND AND PURPOSE OF THIS DOCUMENT

This inspection tool is consistent with the promulgated hazardous organic national emission standard for hazardous air pollutants (hazardous organic NESHAP, or HON). The final rule was published in the Federal Register on April 22, 1994 (59 FR 19402) and June 6, 1994 (59 FR 29196) with final revisions published on September 20, 1994 (59 FR 48175); January 27, 1995 (60 FR 5320); April 10, 1995 (60 FR 18020); December 12, 1995 (60 FR 63624); June 20, 1996 (61 FR 31435), December 5, 1996 (61 FR 64572), and January 17, 1997 (62 FR 2722).

Section 112 of the Clean Air Act directed the U. S. Environmental Protection Agency (EPA) to set national emission standards for hazardous air pollutants (NESHAP). Section 112(b) lists 188 hazardous air pollutants (HAP's). Section 112 also required the EPA to publish a list of categories of sources that emit HAP's and to develop regulations for these source categories. The synthetic organic chemical manufacturing industry (SOCMI) was subsequently listed as a source category emitting HAP's.

The hazardous organic NESHAP (HON) regulates emissions of 111 of the 188 listed organic HAP's from the SOCMI. In addition, the HON also lists 21 specific compounds that are polycyclic organic matter. The regulation can be found in the Code of Federal Regulations (40 CFR Part 63) in Subparts F, G, and H. Subpart F contains provisions for determining applicability of the HON, definitions, and general procedures for testing, compliance, reporting, and recordkeeping. The specific control, monitoring, reporting, and recordkeeping requirements are stated in Subpart G for process vents, transfer operations, storage vessels, and wastewater streams, and in Subpart H for equipment leak emissions. Subpart I provides the applicability criteria for non-SOCMI processes subject to the negotiated regulation for equipment leaks and requires compliance with Subpart H.

The purpose of this document is to assist federal, state, and local regulatory personnel with enforcement of the process vent, transfer operation, storage vessel, and wastewater provisions of Subpart G. The emissions averaging provisions of Subpart G and the equipment leak provisions of Subpart H are not included. For equipment leaks, refer to Inspection Manual:

Federal Equipment Leak Regulations for the Chemical Manufacturing Industry (EPA-305-B-96-005). Because the process vents provisions of the HON are similar to new source performance standards (NSPS) for SOCMI air oxidation reactors and distillation operations, this document will also be useful for enforcement of those NSPS. While this document does not describe the NSPS in detail, an appendix identifies key differences between the HON process vents provisions and the NSPS.

This document is organized in two volumes. Volume I contains descriptions of the background information on emission points and control technologies. These descriptions cover process vents,

Volume I. Overview of Emission Points, Control Technologies and HON Provisions

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transfer operations, storage vessels, and wastewater provisions. Within Volume I, there are sections on an overview of the HON, applicability of the rule, descriptions of emission points, descriptions of emission control technologies, and descriptions of the relevant provisions. Volume II contains checklists to assist the inspector during the actual inspection.

Five appendices are included in this document. Appendix A lists Code of Federal Regulations citations for the HON, the NESHAP General Provisions, test methods required by the HON, and the air oxidation and distillation NSPS. This will allow inspectors to easily locate the complete text of these rules. Appendix B contains a comparison of the HON process vents provisions with those in the NSPS for distillation, air oxidation, and reactors. Appendix C illustrates the calculation of total resource effectiveness (TRE) index value for process vents. The TRE index value is used to determine whether process vent emissions must be controlled. Appendix D lists the information on wastewater that must be reported in the Notification of Compliance Status. Appendix E has a conversion table for all exemptions, cutoffs, and other numbers referenced in the rule. The table gives english units for all of these values.

2.0 OVERVIEW OF THE HAZARDOUS ORGANIC NESHAP

The HON regulates emissions from five kinds of emission points at SOCOMI sources: (1) process vents, (2) transfer operations, (3) storage vessels, (4) air emissions from wastewater streams and wastewater collection and treatment operations, and (5) equipment leaks. The organization of the regulation is shown in Table 2-1.

2.1 SUBPART F

Section 63.100 contains provisions to determine which chemical manufacturing processes at a plant are subject to the HON. Table 1 of Subpart F contains a list of SOCOMI chemicals, and Table 2 of Subpart F contains a list of organic HAP's regulated by the HON. In general, if a process both (1) produces one of the listed SOCOMI chemicals and (2) either uses as a reactant or produces a listed organic HAP in the process, then that process is subject to the HON. Section 63.100 contains additional details for determining applicability in situations where a process makes multiple products. If a chemical manufacturing process is subject to the HON, then the emission points associated with that process are regulated. Details on how to determine which storage vessels, transfer racks, and distillation units are part of a chemical manufacturing process are also contained in §63.100.

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Definitions of terms used in Subparts F, G, and H are contained in §63.101. Sections 63.102 and 63.103 contain general standards, compliance, recordkeeping, and reporting provisions and override certain portions of the NESHAP General Provisions (40 CFR 63, Subpart A). These sections specify general performance test conditions, require records to be maintained for 5 years, and clarify where reports required under Subparts G and H are to be sent. Section 63.104 contains requirements for heat exchange systems and §63.105 contains requirements for maintenance wastewater.

2.2 SUBPART G

Subpart G contains the standard for process vents, transfer operations, storage vessels, and wastewater. It includes emissions averaging provisions. The first section of Subpart G (§63.110) contains applicability provisions that clarify potential overlaps between the HON and other subparts that regulate process vents, transfer operations, storage vessels, wastewater, and equipment leaks. The second section (§63.111) contains definitions.

Section 63.112 provides an equation representing a site-specific allowable overall emission limit for each source. The "source" is the combination of all emission points subject to the HON at a

TABLE 2-1. ORGANIZATION OF HON

Section Number ^a	Title of Section
Subpart F -- National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry	
63.100	Applicability and designation of source.
63.101	Definitions.
63.102	General standards.
63.103	General compliance, reporting, and recordkeeping provisions.
63.104	Heat exchange system requirements.
63.105	Maintenance wastewater requirements.
63.106	Delegation of authority.
Subpart G -- National Emission Standards for Organic Hazardous Air Pollutants from Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater.	
63.110	Applicability.
63.111	Definitions.
63.112	Emission standard.
63.113	Process vent provisions.
63.114	Process vent provisions - monitoring requirements.
63.115	Process vent provisions - methods and procedures for process vent group determination.
63.116	Process vent provisions - performance test methods and procedures to determine compliance.
63.117	Process vents provisions - reporting and recordkeeping requirements for group and TRE determinations and performance tests.
63.118	Process vents provisions - periodic reporting and recordkeeping requirements.
63.119	Storage vessel provisions - reference control.
63.120	Storage vessel provisions - procedures to determine compliance.
63.121	Storage vessel provisions - alternative means of emission limitation.
63.122	Storage vessel provisions - reporting.
63.123	Storage vessel provisions - recordkeeping.
63.124	Reserved.
63.125	Reserved.
63.126	Transfer operations provisions - reference control technology.
63.127	Transfer operations provisions - monitoring requirements.
63.128	Transfer operations provisions - test methods and procedures.
63.129	Transfer operations provisions - reporting and recordkeeping for performance tests and notification of compliance status.
63.130	Transfer operations provisions - periodic recordkeeping and reporting.

TABLE 2-1. ORGANIZATION OF HON

Section Number ^a	Title of Section
63.131	Reserved.
63.132	Process wastewater provisions - general.
63.133	Process wastewater provisions - wastewater tanks.
63.134	Process wastewater provisions - surface impoundments.
63.135	Process wastewater provisions - containers.
63.136	Process wastewater provisions - individual drain systems.
63.137	Process wastewater provisions - oil-water separators.
63.138	Process wastewater provisions - (performance standards for treatment processes managing Group 1 wastewater streams and/or residuals removed from Group 1 wastewater streams).
63.139	Process wastewater provisions - control devices.
63.140	Process wastewater provisions - delay of repair.
63.141	Reserved.
63.142	Reserved.
63.143	Process wastewater provisions - inspections and monitoring of operations.
63.144	Process wastewater provisions - test methods and procedures for applicability and Group 1/Group 2 determinations (determining which wastewater streams require control).
63.145	Process wastewater provisions - test methods and procedures to determine compliance.
63.146	Process wastewater provisions - reporting.
63.147	Process wastewater provisions - recordkeeping.
63.148	Leak inspection provisions.
63.149	Control requirements for certain liquid streams in open systems within a chemical manufacturing process unit.
63.150	Emissions averaging provisions.
63.151	Initial Notification.
63.152	General reporting and continuous records.
Subpart H -- National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.	
63.160	Applicability and designation of sources.
63.161	Definitions.
63.162	Standards: General.
63.163	Standards: Pumps in light liquid service.
63.164	Standards: Compressors.
63.165	Standards: Pressure relief devices in gas/vapor service.
63.166	Standards: Sampling connection systems.

TABLE 2-1. ORGANIZATION OF HON

Section Number ^a	Title of Section
63.167	Standards: Open-ended valves or lines.
63.168	Standards: Valves in gas/vapor service and in light liquid service.
63.169	Standards: Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service.
63.170	Standards: Surge control vessels and bottoms receivers.
63.171	Standards: Delay of repair.
63.172	Standards: Closed-vent systems and control devices.
63.173	Standards: Agitators in gas/vapor service and in light liquid service.
63.174	Standards: Connectors in gas/vapor service and in light liquid service.
63.175	Quality improvement program for valves.
63.176	Quality improvement program for pumps.
63.177	Alternative means of emission limitation: General.
63.178	Alternative means of emission limitation: Batch processes.
63.179	Alternative means of emission limitation: Enclosed-vented process units.
63.180	Test methods and procedures.
63.181	Recordkeeping requirements.
63.182	Reporting requirements.
Subpart I -- National Emission Standards for Organic Hazardous Air Pollutants for Certain Processes Subject to the Negotiated Regulation for Equipment Leaks.	
63.190	Applicability and designation of source.
63.191	Definitions.
63.192	Standard.
63.193	Delegation of Authority.

^a Section numbers of 40 CFR Part 63.

plant site (contiguous area under common control). The standard requires sources to meet the allowable emission limit; however, the equation in §63.112 is not used to determine compliance with the standard, and source owners or operators are not required to calculate their allowable emission limit. As provided in §63.112(c), the owner or operator of an existing source must demonstrate compliance using one of two approaches: the point-by-point compliance approach or the emissions averaging approach. As provided in §63.112(d), the owner or operator of a new source must demonstrate compliance using the point-by-point approach. Emissions averaging is not allowed for new sources.

Under the point-by-point approach, the owner or operator would apply control to each "Group 1" emission point. A Group 1 emission point is a point which meets the control applicability criteria, and the owner or operator must reduce emissions to specified levels; whereas a Group 2 emission point is one that does not meet the criteria and no emission reduction is required. These Group 1 and Group 2 emission points are defined in §63.111. Owners or operators selecting the point-by-point compliance approach must comply with the process vent provisions in §63.113 through §63.118, the storage vessel provisions in §63.119 through §63.123, the transfer operation provisions in §63.126 through §63.130, and the wastewater provisions in §63.132 through §63.149. These sections include applicability criteria, emission limits, equipment and work practice standards, testing, monitoring, recordkeeping, and reporting provisions. The specific criteria for Group 1/Group 2 determinations and required control levels for process vents, transfer operations, storage vessels, and wastewater streams are listed in Section 7 of this volume.

Under the emissions averaging approach, an owner or operator may elect to control different groups of emission points within the source to different levels than specified in §63.113 through §63.147 and §63.149, as long as the overall emissions do not exceed the overall allowable emission level. An owner or operator can choose not to control a Group 1 emission point (or to control the emission point with a less effective control technique) if the owner or operator over-controls another emission point within the source. Emission "debits" (in Mg of HAP emissions) are generated for each Group 1 emission point that is uncontrolled or under-controlled. Emission "credits" (also in Mg) are generated for over-controlled points. Credits can be generated if a Group 2 point is controlled, or if a Group 1 point is controlled by a distinct technology that EPA approves as having a greater efficiency than the level of control required for Group 1 points. Credits have to equal or exceed debits for a source to be in compliance. Section 63.150 of the rule contains additional emission averaging requirements and detailed equations for calculating debits and credits. The preamble of the final rule (April 22, 1994, 59 FR 19402) describes, in more detail, the emissions averaging requirements.

2.3 SUBPART H

Subpart H contains the standard for equipment leaks. Equipment regulated includes pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, and instrumentation systems in organic HAP service. A piece of equipment is in organic HAP service if it contains or contacts a fluid that is at least 5 percent organic HAP by weight. The applicability of Subpart H and definitions are contained in §63.160 and §63.161, respectively. Sections 63.162 through 63.179 contain the standards for the various kinds of equipment and alternative means of emission limitation. These include leak detection and repair provisions and other control requirements. Sections 63.180 through 63.182 contain test methods and procedures, and reporting and recordkeeping provisions.

2.4 SUBPART I

Subpart I provides the applicability criteria for the non-SOCMI processes subject to the negotiated regulation for equipment leaks. Regulated equipment is the same as that for Subpart H: pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, and instrumentation systems in organic HAP service. The applicability criteria for Subpart I and the definitions are specified in §63.190 and §63.191, respectively. Section 63.192 contains the standard which requires compliance with Subpart H.

2.5 GENERAL REPORTING

Sections 63.151 (Initial Notification) and 63.152 (General Reporting) of Subpart G require sources to submit the following five types of reports:

1. Initial Notification,
2. Implementation Plan (for new sources if an operating permit application has not been submitted),
3. Notification of Compliance Status,
4. Periodic Reports, and
5. other reports.

Sources subject to the HON are also subject to the NESHAP General Provisions (40 CFR Part 63 Subpart A), which include additional reporting requirements. Table 3 of Subpart F of the HON identifies which parts of the General Provisions apply to HON sources and Section 4 of this report outlines the requirements of the General Provisions as they apply to the HON.

Records of reported information and other information necessary to document compliance with the regulation are required to be kept for 5 years. A few records pertaining to equipment design would be kept for the life of the equipment.

2.5.1 Initial Notification

The purpose of the Initial Notification is to establish an early dialogue between the source and the regulatory agency, allowing both to plan for compliance activities. The notice is due August 20, 1994 for existing sources. For a new source with an initial startup on or after July 21, 1994, the application for approval of construction or reconstruction required by §63.5(d) of subpart A must be submitted instead of the Initial Notification. This application is due as soon as practicable before commencement of construction or reconstruction but no earlier than July 21, 1994.

For a new source with an initial startup before July 21, 1994, the Initial Notification is due on July 21, 1994 but the application described in §63.5(d) of subpart A is not required.

The notification must list the chemical manufacturing processes at the source that are subject to Subpart G, and which provisions may apply (e.g., process vents, transfer operations, storage vessel, and/or wastewater provisions). A detailed identification of emission points is not required. The Initial Notification must include a statement of whether the source can achieve compliance by the specified compliance date, but a request for a compliance extension may be submitted later (by 120 days before the compliance date - see Section 3.3.4 for a description of the compliance

dates). Section 11 of Volume II of this document has a checklist of items required in the Initial Notification.

2.5.2 Implementation Plan

The Implementation Plan details how the source plans to comply with Subpart G. The plan identifies Group 1 and Group 2 emission points, and specifies the control technique that will be applied to each Group 1 emission point. Implementation Plans are only required for new sources that have not submitted an operating permit application or for emission points to be included in an emissions average. An operating permit application would contain all of the information required in the Implementation Plan, therefore, it would be redundant to require sources to submit both.

For points included in emission averages, existing sources must submit the Implementation Plan 18 months prior to the compliance date; for emission points not included in an emissions average, the Implementation Plan is due 12 months prior to the compliance date. For a new source with an initial startup on or after July 21, 1994, the Implementation Plan must be submitted with the application for approval of construction or reconstruction (i.e., as soon as practical before commencement of construction or reconstruction but no earlier than July 21, 1994).

For a new source with an initial startup before July 21, 1994, the Implementation Plan was due July 21, 1994.

2.5.3 Notification of Compliance Status

The Notification of Compliance Status must be submitted within 150 days after the source's compliance date. The date of compliance for existing sources is 3 years after the date of promulgation. The date of compliance for new sources is the date of promulgation or the startup date, whichever is later. The Notification of Compliance Status contains the information necessary to demonstrate that compliance has been achieved, such as the results of performance tests for process vent and transfer control devices, process vents TRE determinations, and monitoring system performance evaluations.

Sources with a large number of emission points are likely to submit results of multiple performance tests. For each test method used for a particular kind of emission point (e.g., a process vent), one complete test report must be submitted. For additional tests performed for the same kind of emission point using the same method, the results must be submitted, but the complete test reports may be kept at the plant.

Another type of information to be included in the Notification of Compliance Status is the specific range for each monitored parameter for each emission point, and the rationale for why this range indicates proper operation of the control device. (If this range has already been established in the operating permit, it need not be repeated in the Notification of Compliance Status). As an example, for a process vent controlled by an incinerator, the notification would include the site-specific minimum firebox temperature that will ensure proper operation of the incinerator, and the data and rationale to support this minimum temperature.

Section 11 of Volume II of this document has a checklist of items required in the Notification of Compliance Status.

2.5.4 Periodic Reports

Periodic Reports are required to demonstrate that the standards continue to be met and that control devices are operated and maintained properly. Generally, Periodic Reports will be submitted semiannually. However, if monitoring data are insufficient, or if monitoring results show that the parameter values for an emission point are outside the established range for more than the excused number of days specified in §63.152, the Administrator (or delegated regulatory authority) may request that the owner or operator submit quarterly reports for that emission point. After 1 year, the source can return to semiannual reporting, unless the regulatory authority requests continuation of quarterly reports.

Periodic Reports specify periods when the daily average values of continuously monitored parameters are outside the ranges established in the Notification of Compliance Status or operating permit. For some kinds of emission points and controls, periodic (e.g., monthly, quarterly, or annual) inspections or measurements are required instead of continuous monitoring. Records that such inspections or measurements were done must be kept; results are included in Periodic Reports only if a problem is found. Periodic reports may also include information on startups, shutdowns, and malfunctions if any occurred during the reporting period. Details of the information required are specified in §63.10(d)(5) of Subpart A.

The first periodic report is due no later than 8 months after the date the notification of compliance status is due. All other semiannual reports are due no later than 60 days after the end of each 6 month period. Quarterly reports, if required, are due 60 days after the end of each quarter. Section 11 of Volume II of this document has a checklist of items required in the periodic reports.

2.5.5 Other Reports

There are a very limited number of other reports. Where possible, Subpart G is structured to allow all information to be reported in the semiannual (or quarterly) Periodic Reports. However, in a few cases it is necessary for the source to provide information to the regulatory authority shortly before or after a specific event. For example, for storage vessels, notification prior to internal tank inspections is required to allow the regulatory authority the opportunity to have an observer present. The semi-annual start-up, shutdown, and malfunction reports may be submitted on the same schedule as the Periodic Reports.

2.6 USE OF CONTINUOUS MONITORING TO DETERMINE COMPLIANCE

This section summarizes the basic approaches for determining compliance for Group 1 emission points where continuous monitoring is required. As described in Section 7 of this document, performance tests and continuous monitoring of control device operating parameters are required for most kinds of devices used to control Group 1 emission points. For wastewater streams, it is necessary to have monitoring information on the treatment processes (e.g., steam stripper) as well as on the control device receiving the gas stream vented from the treatment process or waste management unit. Compliance with the 98 percent reduction or 20 ppmv outlet concentration requirement is determined by performance testing. Results of the tests are reported in the Notification of Compliance Status. Continuous parameter monitoring results are not used to determine compliance with the percent reduction or emission limit; however, monitoring results are used to determine compliance with operating requirements.

Each source must establish site-specific ranges for monitored parameters that will demonstrate proper operation of each control device for which continuous monitoring is required. These site-specific ranges can be set through performance testing supplemented by engineering assessments and manufacturers' recommendations (the performance test is not required to be conducted over the entire range of permitted parameter values). The justification for the site-specific range is included in the operating permit application or Notification of Compliance Status. The ranges are then incorporated in the sources' operating permit. Each source must continuously monitor and record the operating parameter(s) for each control device and report any daily average value of an operating parameter that is outside the established range as well as any days when insufficient monitoring data are collected. These excursions are reported in the quarterly or semiannual reports described in Section 2.5.4. If, during a reporting period, a monitored operating parameter is outside the established range or insufficient data are collected for more than the number of days specified in §63.152(c) of Subpart G, this is considered a violation of the operating permit requirements.

An owner or operator may request approval to use alternatives to continuous operating parameter monitoring, as allowed by §63.151(g) of Subpart G. Continuous monitoring is not required for storage vessels or for some treatment processes for wastewater streams. The compliance determination approaches for storage and wastewater are described in Sections 7.3.4 and 7.4.5 of this document, respectively.

3.0 APPLICABILITY OF THE RULE

In determining the applicability of the HON, the first step is to determine whether the facility is a major source for Hazardous Air Pollutants (HAP's). The second step is to determine which chemical manufacturing process units (CMPU's) at a plant site are subject to the HON. The third step is to identify the equipment within those CMPU's subject to the HON. Next, the source must be designated as a new source or an existing source. The final step in determining the applicability of the rule is to determine which emission points within the CMPU satisfy the HON definitions of process vent, storage vessel, transfer rack, and wastewater stream. This chapter will explain in more detail the first four steps. The sources Title V permit application and Title V permit will address much of the material concerning applicability of the HON to the source. The final step of determining applicability to specific emission points is addressed in Section 7.

3.1 IDENTIFICATION OF SOCFI PROCESS UNITS

For the HON to apply to a plant site, it has to be a major HAP source as defined in Section 112(a) of the Act, i.e., any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit, considering controls, in the aggregate, 10 tons per year (tpy) or more of any hazardous air pollutant or 25 tpy or more of any combination of hazardous air pollutants. For the HON to apply to a CMPU, the CMPU must meet three criteria. First, the CMPU must be a SOCFI unit, which means a SOCFI chemical in Table 1 of Subpart F is the primary product made in the unit. Second, organic HAP's regulated by the HON, which are listed in Table 2 of Subpart F, have to be used as a reactant or manufactured in the CMPU. Finally, the plant site where the CMPU is located has to be a major HAP source.

Identification of the primary product of a CMPU may not be obvious. In the chemical manufacturing industry, most facilities consist of integrated operations involving some combination of refinery processes, SOCFI processes, polymers and resins processes, agricultural chemical production, pharmaceutical production, and specialty chemical production. Thus, a CMPU may

produce multiple chemicals including valuable co-products and materials that will be used as reactants for downstream units. Also, some CMPU's are designed and operated as flexible operation units, that is, the equipment is used to make different chemicals at different times during the year. Determining applicability of a rule and what equipment is subject to the rule is complex and requires detailed information about the facility and its operations.

To address this complexity, the rule includes procedures for determining the primary product of a CMPU. The rule also exempts certain units and equipment from all requirements. Specifically, the HON does not apply to the following processes:

- Research and development facilities, even if they are located at the same plant site as the CMPU that is subject to the HON;

Section 3.0 Applicability of the Rule		
3.1	Identification Of Socmi Process Units	I-12
3.2	Determination Of The Hon Source	I-13
3.3	Determination Of New Source Vs. Existing Source	I-14
3.3.1	New Sources	I-14
3.3.2	Existing Sources	I-15
3.3.3	Other Process Changes	I-15
3.3.4	Compliance Dates	I-16

- Petroleum refining and ethylene process units, even if they supply feedstocks that are SOCMCI chemicals to CMPU's that are subject to the HON;
- CMPU's located in coke by-product recovery plants; and
- Solvent reclamation, recovery, or recycling operations at hazardous waste treatment, storage, and disposal facilities (TSDF) that are not part of a SOCMCI unit.

Table 3-1 of Volume II is a checklist for determining whether a CMPU is subject to the HON. Table 3-2 of Volume II contains questions for determining the primary product and applicability for flexible operation units in particular. Table 3-3 of Volume II addresses determination of primary product in all other cases.

3.2 DETERMINATION OF THE HON SOURCE

The source to which the HON applies is defined as the collection of the following emission points within SOCMCI CMPU's:

- Process vents;
- Storage vessels;
- Transfer racks;
- Wastewater and the associated treatment residuals; and
- Pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, instrumentation systems, surge control vessels, and bottoms receivers (equipment leaks).

However, certain emission points are exempted from the rule. The HON does not apply to the following points:

- Equipment that is located with a CMPU subject to the HON but does not contain organic HAP's;
- Vents from CMPU's that are designed and operated as batch operations;
- Stormwater from segregated sewers;
- Water from fire-fighting and deluge systems in segregated sewers;
- Spills;
- Water from safety showers;
- Water from testing of deluge systems;
- Water from testing of firefighting systems;

- Vessels storing organic liquids that contain organic HAP's only as impurities;
- Loading racks, loading arms, and loading hoses that only transfer liquids containing organic HAP's only as impurities;
- Loading racks, loading arms, and loading hoses that vapor balance during all loading operations; and
- Equipment as defined in § 63.101 of subpart F that is intended to operate in organic HAP service for less than 300 hours per calendar year.

In large chemical manufacturing facilities, it is often difficult to determine where one process unit ends and the next begins. For example, a storage vessel may contain a chemical that is the product of one CMPU and the raw material for another CMPU. A transfer rack may load the products of several CMPU's, some that are SOCOMI and others that are not. Distillation columns may be used to purify a product for sale or to remove inhibitors and impurities from a raw material. To clarify the applicability of the HON in these situations, the rule includes procedures for assigning storage vessels, transfer racks, and distillation columns to the appropriate CMPU. In order to determine the boundaries of the CMPU, the storage vessels, transfer racks, and distillation columns are assigned to the CMPU according to the predominant use of each one. Tables 4-2, 4-5 and 4-8 of Volume II are checklists for these procedures.

3.3 DETERMINATION OF NEW SOURCE VS. EXISTING SOURCE

Once the HON source has been identified, it must be classified as a new or existing source because the rule contains different requirements for new versus existing sources. Many of these requirements pertain only to specific kinds of emission points and are therefore discussed in later sections of this document. This section addresses the definitions, MACT requirements, and compliance dates for new sources, existing sources, and other process changes.

3.3.1 New Sources

A source is subject to the HON's new source MACT requirements if it meets the criteria for a new source or a reconstructed source. A source would be a new source if all of the following criteria are true:

- An entire CMPU or group of CMPU's is being added (The addition of a single emission point, e.g., a storage vessel, cannot be a new source regardless of the magnitude of emissions from the vessel);
- The additional CMPU produces a SOCOMI chemical listed in Table 1 of Subpart F and uses as a reactant or produces an organic HAP listed in Table 2 of Subpart F;
- The additional CMPU meets the definition of construction in 40 CFR 63.2, Subpart A (i.e., fabrication, erection, or installation);
- Construction of the additional CMPU started after December 31, 1992; and

- The additional CMPU has the potential to emit 10 tpy or more of a single HAP or 25 tpy or more of any combination of HAP's.

A source would be a reconstructed source if all of the following were true:

- Changes to the source meet the definition of reconstruction in 40 CFR 63.2, Subpart A (i.e., the source is changed to such an extent that the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost required to construct a comparable new source); and
- The reconstruction started after December 31, 1992.

3.3.2 Existing Sources

A source is subject to the HON's existing source MACT requirements if it does not meet the criteria in Section 3.3.1 for a new source or reconstructed source. Examples of existing sources could include CMPU's that were already in operation prior to December 31, 1992; addition of an individual emission point such as a storage vessel or transfer rack; and addition of a CMPU with emissions below the 10 tpy/25 tpy threshold.

3.3.3 Other Process Changes

As is common in any manufacturing facility, chemical plants are characterized by frequent changes in operations. Cost concerns, market needs, and product improvement efforts mean individual equipment and often entire process units, may be changed or added to an existing plant site. As defined in the HON, process changes include, but are not limited to:

- Changes in production capacity, feedstock type, or catalyst type; and
- Replacement, removal, or addition of recovery equipment.

Process changes do not include:

- Process upsets;
- Unintentional temporary process changes; and
- Changes that are within the equipment configuration and operating conditions documented in the Notification of Compliance Status.

Section 3.3.1 listed the criteria for determining whether additions or changes would be considered new or reconstructed sources. It is also possible that an addition or change would satisfy neither set of criteria. If a change did not exceed the 50 percent fixed capital cost to be a reconstruction or the 10 tpy/25 tpy emission potential to be a new source, the added or changed equipment might still be subject to the HON. For example, an owner or operator may switch from using a non-HAP raw material to using a HAP as a raw material. Or, a change in catalyst type could increase capacity thereby causing an increase in emissions above the 10 tpy/25 tpy threshold. In such cases, if the addition or change did not satisfy the criteria for new or reconstructed source, but the additions or changes were made to part of the HON source, the added or changed equipment would be subject to the HON's existing source MACT requirements.

3.3.4 Compliance Dates

Table 3-1 lists the compliance dates for existing, new, and reconstructed sources and for additions or changes that are not subject to new source requirements. For compliance with the equipment leak provisions in Subpart H, process units have been placed in five groups with different compliance dates. Group designations are listed in Table 1 of Subpart F.

TABLE 3-1. COMPLIANCE DATES FOR EXISTING, NEW, AND RECONSTRUCTED SOURCES

Kind of Emission Point	At Existing Sources	In a New or Reconstructed Source ^a	Part of a Change or Addition that is not Subject to New Source Requirements
Process vents, storage vessels, transfer racks	4/22/97	New source construction or reconstruction begun after 12/31/92 and before 8/27/96: New source MACT upon initial startup or 4/22/94, whichever is later. ^b	Existing source MACT upon initial start-up or by 4/22/97, whichever is later.
		New source construction or reconstruction begun after 8/26/96: New source MACT upon initial startup or 1/17/97, whichever is later.	Special case: If a deliberate process change to an existing CMPU causes a Group 2 point to become a Group 1 point, the owner or operator may request a longer compliance schedule in accordance with §63.100(f)(4)(ii)(B) and (m). However, the compliance date cannot be later than 3 years after the point becomes Group 1.
Process wastewater, equipment subject to §63.149, maintenance wastewater, and heat exchange systems	4/22/99 ^c	New source construction or reconstruction begun after 12/31/92 and before 8/27/96: New source MACT upon initial startup or 180 days after 1/17/97, whichever is later.	Existing source MACT upon initial start-up or by 4/22/97, whichever is later.
		New source construction or reconstruction begun after 8/26/96: New source MACT upon initial startup or 1/17/97, whichever is later.	Special case: The special case listed above applies to process wastewater.
Equipment leaks ^d	Group I: 10/24/94	New source construction or reconstruction begun after 12/31/92 and before 8/27/96: New source MACT upon initial startup or 4/22/94, whichever is later. ^b	Existing source MACT upon initial start-up or by April 22, 1997, whichever is later.
	Group II: 1/23/95		
	Group III: 4/24/95		
	Group IV: 7/24/95		
	Group V: 10/23/95		
		New source construction or reconstruction begun after 8/26/96: New source MACT upon initial startup or 1/17/97, whichever is later.	Special case: If a deliberate process change to an existing CMPU causes a surge control vessel or bottoms receiver to become subject to §63.170 or a compressor to become subject to §63.164, the owner or operator may request a longer compliance schedule in accordance with §63.100(f)(4)(ii)(B) and (m). However, the compliance date cannot be later than 3 years after the change.

^a Sources constructed or reconstructed after December 31, 1992.

^b Compliance must be achieved by 1/17/97 with the HON as revised on 1/17/97.

^c If a process wastewater stream is used to generate credits in an emissions average according to §63.150, it must be in compliance by 4/22/97. If a process wastewater stream or equipment subject to §63.149 is subject to Subpart G due to nitrobenzene, it must be in compliance by 1/18/2000.

^d The compliance date for compressors depends on site specific conditions, see §63.100(k)(4), (k)(5), and (k)(6). The compliance date for existing sources to meet the provisions of §63.170 is 4/22/97.

4.0 GENERAL PROVISIONS APPLICABLE TO THE HON

The regulations in 40 CFR 63, Subpart A (*i.e.*, the General Provisions) contain “boilerplate” requirements that apply, in general, to all affected sources subject to applicable requirements in other subparts of Part 63. Rather than repeat common standards or administrative specifications as sections within subsequent NESHAPs, Subpart A provides a common, consolidated repository of these requirements.

Subsequent NESHAPs do, however, may override some parts of the General Provisions as may be warranted by the particular conditions of the affected source and its compliance obligations. Because of the complexity and timing of the HON, it superceded certain portions of the General Provisions. Accordingly, this section of the guide summarizes only those sections of the General Provisions not overridden by the HON. Where the HON did supercede pieces of the General Provisions, the other sections of this guide address such requirements. Table 3 of Subpart F of the rule specifically list the overrides applicability of the General Provisions by the HON.

4.1 APPLICABILITY AND DEFINITIONS

The General Provisions provided in subpart A apply to owners and operators subject to the HON rule except when otherwise specified in the HON rule subpart. Part 63 emission standards or other requirements do not diminish or replace the requirements of a more stringent emission limitation or other applicable requirement established under the Clean Air Act or under state authority. Time periods and deadlines may be changed by agreement between the owner or operator and the administrator. In addition to complying with applicable requirements in the HON rule and the General Provisions, the owner or operator of a subject source may be required to obtain a Title V operating permit. Extension of compliance for some requirements does not delay the owner’s or operator’s obligation for compliance with all other parts.

Some terms used in the HON are defined in the General Provisions.

4.2 PROHIBITED ACTIVITIES AND CIRCUMVENTION

The owner or operator of an affected source shall not operate the source in violation of the requirements except under an extension of compliance granted by the administrator or by a state with an approved permit program or under an exemption granted by the President. After the effective date of an approved permit program in a state, the owner or operator of an affected source that is required to have a Title V operating permit must operate in compliance with the provisions of the State’s permit program. No owner or operator shall fail to keep required records or file reports as required. The owner or operator of an affected source must comply with the requirements by the compliance date(s) regardless of whether a Title V

Section 4. General Provisions Applicable to the HON		
4.1	Applicability and Definitions	I-18
4.2	Prohibited Activities and Circumvention	I-18
4.3	Construction and Reconstruction	I-19
4.4	Compliance with Standards and Maintenance Requirements	I-19
4.5	Performance Testing Requirements	I-20
4.6	Monitoring Requirements	I-20
4.7	Notification Requirements	I-21
4.8	Recordkeeping and Reporting Requirements	I-21
4.9	Control Device Requirements	I-22
4.10	Availability of Information and Confidentiality	I-22

permit has been issued or, if a Title V permit has been issued, whether such permit has been modified to incorporate HON rule requirements.

The owner/operator of an affected source may not conceal an emission that would otherwise constitute noncompliance. Concealment includes:

- Diluting an effluent stream to meet concentration standards, and
- Fragmentation of an operation to avoid a standard.

The provisions of the HON rule and the general provisions are federally enforceable regardless of how they may be incorporated into a Title V permit.

4.3 CONSTRUCTION AND RECONSTRUCTION

A new source that is constructed after the promulgation date of the HON rule is subject to the relevant requirements for new sources, including compliance dates. After the promulgation date of the HON rule no major source can be constructed or reconstructed without written approval. A separate application for approval must be submitted for each construction or reconstruction. The requirements for the application for approval are provided in checklist format (see Table 11-10 of Volume II of this document). The administrator may request additional information after submittal of the application. Approval will be granted if the administrator determines that the source will not cause an emission violation or a violation of the relevant standards or other federally enforceable requirements. In addition, for reconstructions, the administrator will consider:

- Fixed capital costs compared to cost of a new facility,
- Estimated life of the source compared to a new source,
- Extent to which components being replaced contribute to emissions, and
- Economic or technical limitations on compliance with relevant standards that are inherent in proposed replacements.

The applicant will be notified of the completeness status of the application within 30 days of receipt of an application or of additional information for an application. The applicant will be notified of approval or intent to deny approval within 60 days of having a complete application. After notification of intent to deny, applicant has 30 days to provide additional information or arguments. Final determination is made within 60 days of receiving additional information and/or arguments.

4.4 COMPLIANCE WITH STANDARDS AND MAINTENANCE REQUIREMENTS

Section 63.6 applies to an affected source unless it has received an extension of compliance from the Administrator or an exemption from compliance granted by the President. Further, it outlines the process for and content of the extension or denial. This section would also apply to an area source that otherwise would be subject to a relevant standard or other requirement if the area source's potential to emit subsequently increases above major source levels. This section allows sources commencing construction or reconstruction between proposal and promulgation up to three years after the effective date to comply with the promulgated standard if it is more stringent than the proposed standard, provided that the source complies with the proposed standard in the interim.

Section 63.6 requires that malfunctions be corrected as soon as practicable after their occurrence in accordance with the source's Startup, Shutdown and Malfunction Plan. It also requires that the owner or operator operate and maintain emission source and air pollution control equipment in accordance with the procedures in Startup, Shutdown and Malfunction Plan. This section also allows the Administrator to require that the owner or operator make changes to the Plan to address inadequacies. Contents of the Startup, Shutdown and Malfunction Plan are listed on Table 11-7.

Section 63.6 also indicates that demonstrating compliance with nonopacity emission standards may be accomplished by performance tests, conformance with operation and maintenance requirements, monitoring data, records, or inspection of the source.

4.5 PERFORMANCE TESTING REQUIREMENTS

Section 63.7 gives the Administrator the authority to request the owner or operator of an affected source to conduct performance testing any time allowed by Section 114 of the Clean Air Act. If required to do performance testing, the owner or operator of the affected source shall supply the necessary testing facilities, including sampling ports, platforms, utilities, etc. This section stipulates that testing be conducted under representative conditions, which do not include startup, shutdown, or malfunction. The Administrator may request records from the source to determine these representative conditions. This section also requires performance test to be conducted and data to be reduced in accordance with the test methods and procedures set forth in Part 63 or the applicable appendices of Parts 51, 60, 61, and 63 unless the Administrator approves:

- Minor changes in methodology,
- The use of an alternative method,
- Shorter sampling times or smaller sampling volumes unless the Administrator waives the requirement for performance tests.

4.6 MONITORING REQUIREMENTS

Section 63.8 specifies general monitoring requirements such as those governing the conduct of monitoring and those in requests to use alternative monitoring methods. It also specifies detailed requirements that apply to affected sources required to use continuous monitoring systems (CMS) under a relevant standard. This section allows the Administrator to approve minor changes in methodology or use alternative monitoring requirements or procedures.

When more than one CMS is used to measure the emissions from one affected source, the owner or operator shall report the results as required for each CMS. However, if a CMS is installed with the intent of serving as a backup, then its data should only be reported during periods when it is required to gather compliance monitoring data (*i.e.*, is serving in place of the primary CMS). The owner or operator shall: operate and maintain each CMS consistent with good air pollution control practices, ensure the correction of routine or predictable CMS malfunctions, with spare parts readily available. Such repairs shall be reported in the semiannual startup, shutdown, and malfunction report. All CMS must acquire representative data and must be located according to procedures contained in the applicable performance specifications. CMS operational status verification shall include, at a minimum, completion of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system. CMS data shall be verified either prior to or in conjunction with conducting performance tests.

The Administrator may approve a request for alternative monitoring procedures related to the following issues:

- Interferences caused by substances (including water) within effluent gases,
- Infrequent source operation,
- Accommodation of additional measurements to correct for stack gas moisture,
- Alternative locations provided the data will still be representative,
- Alternate methods for converting pollutant concentration measurements,
- Alternate procedures for performing daily checks of zero and high-level drift,
- Alternatives to ASTM or other sampling procedures,
- Alternative CMS that do not meet the design or performance requirements of the General Provisions but that adequately demonstrate a definite and consistent relationship, or
- Alternative monitoring when the effluent from a single affected source or the combined effluent from multiple sources is released through more than one point.

The application for an alternative monitoring method shall contain a description of the proposed alternative monitoring system and information justifying the owner or operator's request for the alternative monitoring method such as technical or economic infeasibility or the impracticality of the affected source using the required method.

4.7 NOTIFICATION REQUIREMENTS

Section 63.9 describes the conditions and timing under which affected sources must provide notification to the EPA or the appropriate delegated authority of becoming subject to applicable requirements. It also addresses overlap of state and federal notifications, allowing that any notification required by a state (*i.e.*, the delegated authority) that contains all the information required in any notification of this section may be submitted to the EPA in lieu of the otherwise required federal notification. The specific information required in the notifications is addressed in Table 11-9 of Volume II of this document. This section also provides for adjustments to time periods or postmark deadlines for submittal and review of required communications upon mutual agreement of the owner or operator with the Administrator.

4.8 RECORDKEEPING AND REPORTING REQUIREMENTS

Section 63.10 describes the conditions and timing under which affected sources must submit reports to the EPA or the appropriate delegated authority to demonstrate compliance with applicable requirements. It also addresses overlap of state and federal reports, allowing that any report required by a state (*i.e.*, the delegated authority) that contains all the information required in a report required by this section may be submitted to the EPA in lieu of the otherwise required federal report. For an owner or operator that supervises more than one stationary source affected by more than one standard in Part 63 or by a standard in Part 63 as well as a standard in Part 60 and/or Part 61, this section allows the Administrator and the owner or operator to agree to a common schedule for which all relevant periodic reports may be submitted.

This section also indicates that, under specific conditions, progress reports pursuant to compliance extensions and startup, shutdown and malfunction reports may need to be submitted to the administrator. The submittal schedules vary according to the content of the reports. Also included in this section is the option for the owner or operator of an affected source to submit a

request for a waiver of recordkeeping or reporting requirements. Contents of the Startup, Shutdown, and Malfunction Report is outlined in Table 11-8 of Volume II of this document.

4.9 CONTROL DEVICE REQUIREMENTS

Section 63.11 contains general requirements for control devices used to comply with applicable requirements in regulations in Part 63. Specifically, it requires owners or operators to monitor flares to assure that they are operated and maintained in conformance with their designs. Detailed requirements for flares are addressed in Table 10-1 in Volume II of this document.

4.10 AVAILABILITY OF INFORMATION AND CONFIDENTIALITY

Section 63.15 specifies that the following materials are deemed a matter of public record with the exception of information protected as confidential:

- Reports,
- Records,
- Information collected by the Administrator,
- Permit applications,
- Compliance plans (including compliance schedules),
- Notifications of compliance status,
- Excess emissions reports,
- Continuous monitoring system performance reports, and
- Title V permits.

5.0 DESCRIPTION OF EMISSION POINT

5.1 PROCESS VENTS

A chemical manufacturing process consists of reactors, recovery units, or a combination of the two. The design of a process will vary at each facility depending on the product, the type of process, and the design capacity. Therefore, each process will have a different number, type, and configuration of process vents.

Manufacture of organic chemicals may involve conversion and separation processes. Reactor and air oxidation processes are conversion processes involving chemical reactions that alter the molecular structure of chemical compounds and form one or more new compounds. An air oxidation process uses air, or a combination of air and oxygen, as an oxygen source in a chemical reaction. Separation processes are used to produce or recover a product from a mixture and are often used following a conversion process. Distillation, stripping, absorption, adsorption, filtration, crystallization, and extraction are all separation processes which divide chemical mixtures into distinct fractions, such as products and by-products. All of these processes have potential emission points. The process vent provisions of the hazardous organics NESHAP (HON) and the SOCOMI distillation, air oxidation, and reactor processes NSPS focus primarily on vents from reactor and air oxidation processes and distillation operations. They cover both vent streams emitted directly from these operations, as well as vent streams that are emitted indirectly (e.g., through a recovery device).

Reactor processes may involve liquid-phase or gas-phase reactions. Gas-phase reactions usually have at least one recovery device used to produce a liquid product. Reactors may have an atmospheric vent, may vent to one or more recovery devices, or both. Also, any vent from a reactor or recovery device may vent to a combustion device.

Figure 5-1 shows four vent types, including:

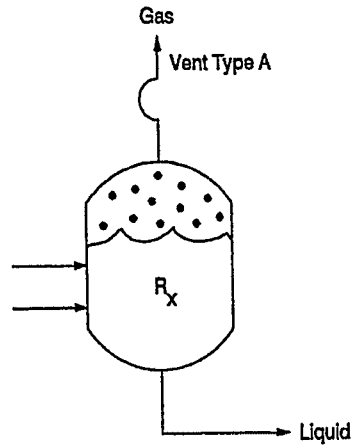
- (A) Direct reactor process vents from liquid-phase reactors;
- (B) Process vents from recovery devices applied to vent streams from liquid phase reactors;
- (C) Process vents from gas-phase reactors after a recovery device;
- (D) Process vents from combustion devices applied to vent types A, B, and C.

These four diagrams represent only a few of the possible vent configurations. For example, a reactor may have both A and B type vents, or multiple type B vents. Air oxidation reactor processes vent large quantities of vapors with low concentrations of volatile organic compounds (VOC's) because large quantities of air or air enriched with oxygen act as the oxidizing agent in

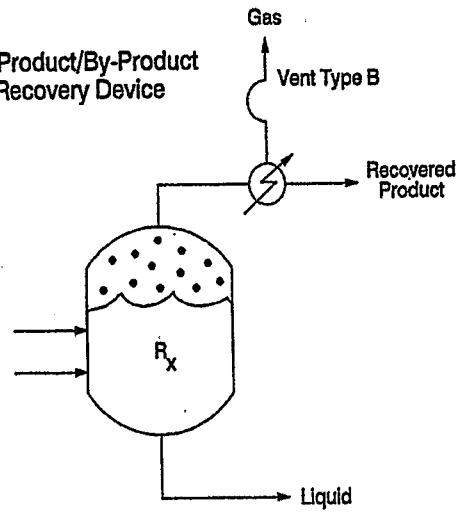
Section 5.0. Description of Emission Point

5.1	Process Vents	I-23
5.2	Transfer Operations	I-24
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	5.3.1 Fixed-Roof Storage Vessel	I-30
	5.3.2 Floating Roof Storage Vessel	I-31
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5.5	References	I-38

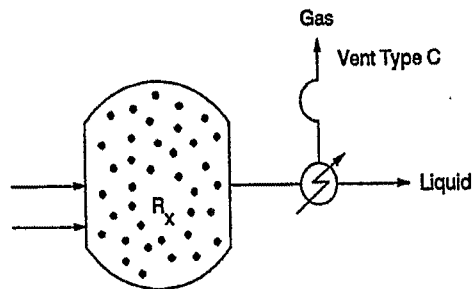
(A) Liquid-Phase Reactor



(B) Product/By-Product Recovery Device



(C) Gas-Phase Reactor



(D) Process Vents Controlled by Combustion

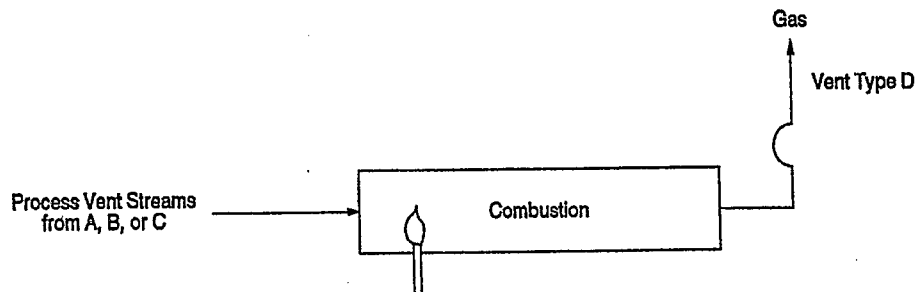


Figure 5-1. Examples of Reactor-related Vents

the process. Because of the increased air flow, these vents are typically larger in size. An air oxidation process typically occurs in a reactor over a catalyst bed, followed by a condensation/extraction process which is usually vented to the atmosphere.

Distillation is the most widely used separation process and has the potential to release larger amounts of VOC's and hazardous air pollutants (HAP's) from multiple emission points than other separation processes. Distillation processes occur at various temperatures and pressures and require varying numbers of distillation stages. Six potential emission points for atmospheric and vacuum distillation columns are shown in Figures 5-2 and 5-3. These emission points can include vents on: (1) condensers, (2) overhead receivers, (3) hot wells, (4) steam jet ejectors, (5) vacuum pumps, and (6) pressure relief valves. Strippers are a type of fractionating distillation column and will have emission points similar to those shown in Figures 5-2 and 5-3. [It should be noted that emissions from hotwells are subject to the wastewater provisions of the HON rather than the process vent provisions because the emissions result from a contaminated stream¹. Also, pressure relief valves are not considered to be process vents in the HON because the gas stream is discharged intermittently, not continuously during operation of the unit.]

5.2 TRANSFER OPERATIONS

The principal method of transferring liquid product to tank trucks and railcars is submerged loading, including submerged fill pipe loading and bottom loading. In submerged fill pipe loading, the fill pipe enters the vessel from the top but extends almost to the bottom of the vessel such that the fill pipe opening is completely submerged in the liquid product. In bottom loading, the fill pipe enters the vessel from the bottom, so that the fill pipe opening is positioned below the liquid level. Figures 5-4 and 5-5 illustrate submerged fill pipe and bottom loading. Both submerged loading techniques significantly reduce liquid turbulence and liquid surface area resulting in low vapor generation.

Top splash loading, rarely used in SOCOMI facilities, is another loading technique in which the fill pipe enters the vessel through the top but does not extend below the surface of the liquid. This type of loading results in high vapor generation.

The loading rack is the equipment used to transfer materials into tank trucks and railcars. The loading rack and the transfer vehicle are emission points during loading operations. A typical loading rack consists of loading arms, pumps, meters, shutoff valves, relief valves, and other associated piping necessary to perform either loading or unloading operations.

Figures 5-6 and 5-7 illustrate tank truck bottom- and top-loading rack arrangements. Sections 4.1 and 4.2 of the Benzene Transfer Operation Inspection Manual² provide additional details, including illustrations of various transfer loading operations. They describe transfer equipment, transfer emission points, and the requirements of the Benzene NESHAP. In some cases, the requirements of the HON will differ from the requirements of the Benzene NESHAP.

5.3 STORAGE VESSELS

Two types of storage vessels are of concern in inspecting a SOCOMI facility: fixed-roof storage vessels (i.e., with no internal floating roof) and floating roof storage vessels. They are exclusively above-ground and cylindrical in shape with the axis perpendicular to the foundation. There are also horizontal tanks, but these are generally smaller and not as widely used.

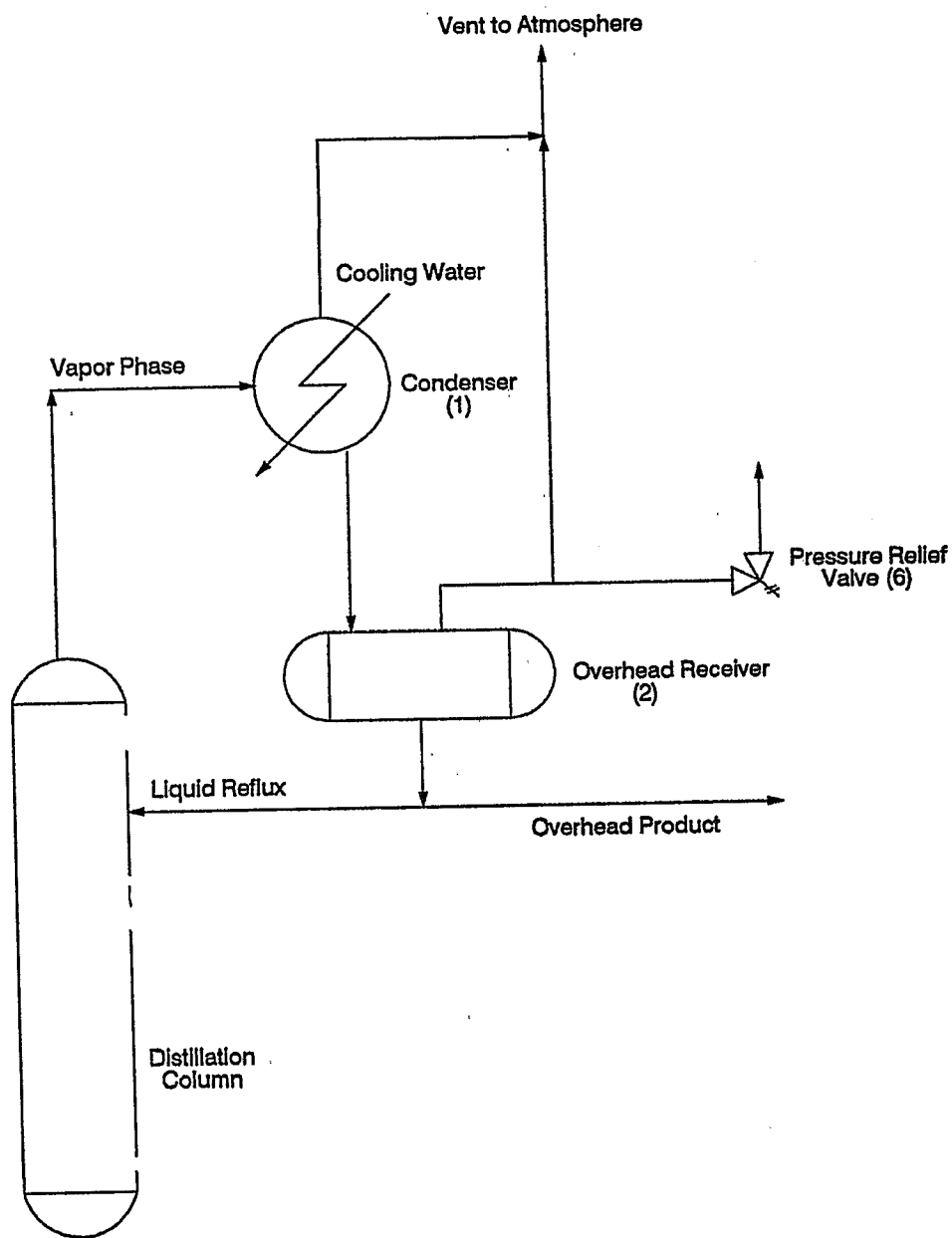


Figure 5-2. Potential VOC and HAP Emission Points for An Atmospheric (Nonvacuum) Distillation Column

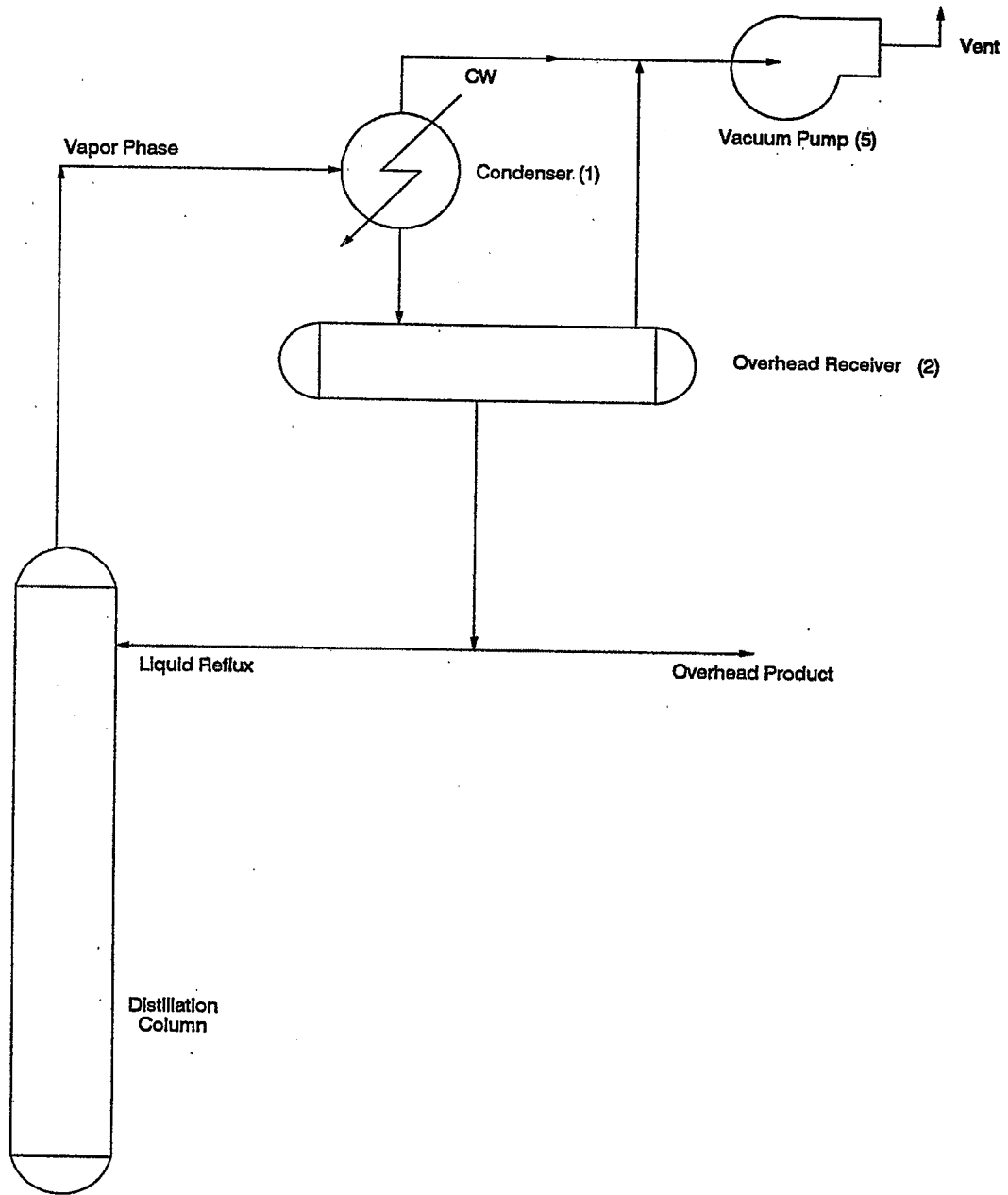


Figure 5-3. Potential VOC and HAP Emission Points for a Vacuum Distillation Column Using a Vacuum Pump

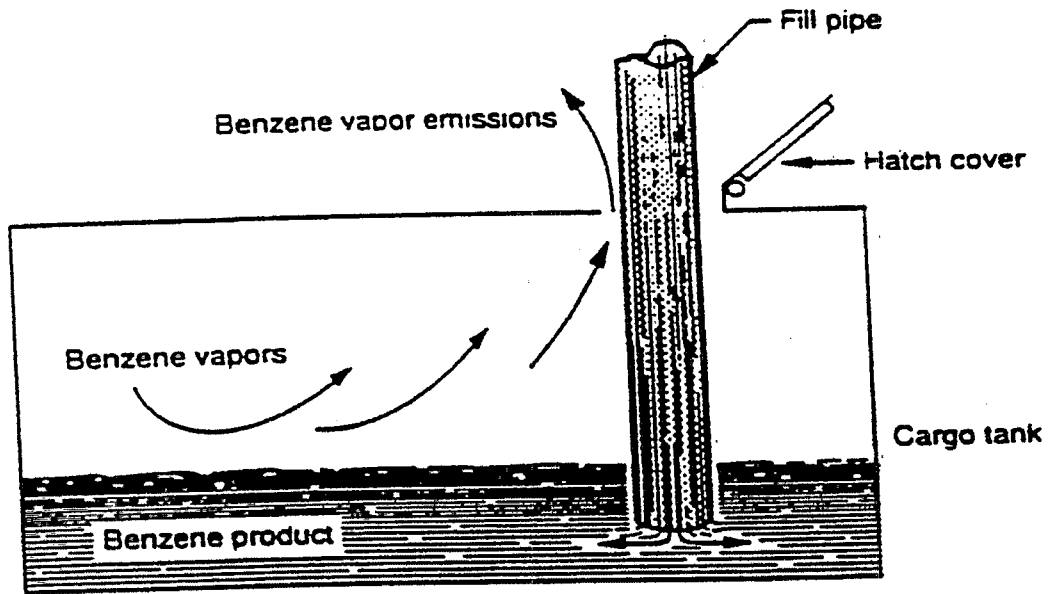


Figure 5-4. Submerged Fill Pipe

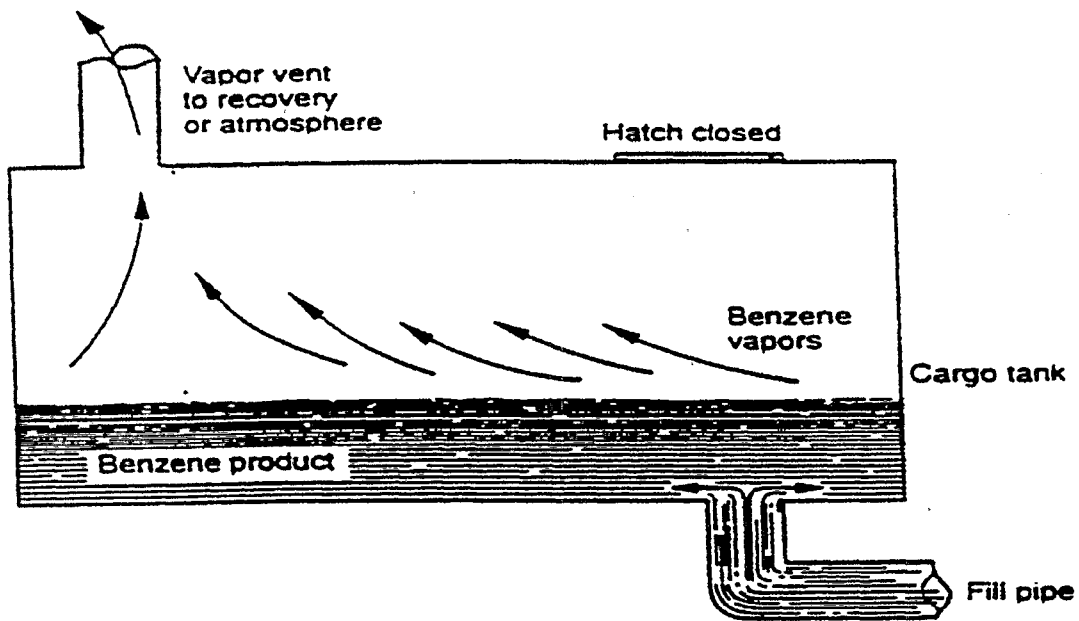


Figure 5-5. Bottom Loading

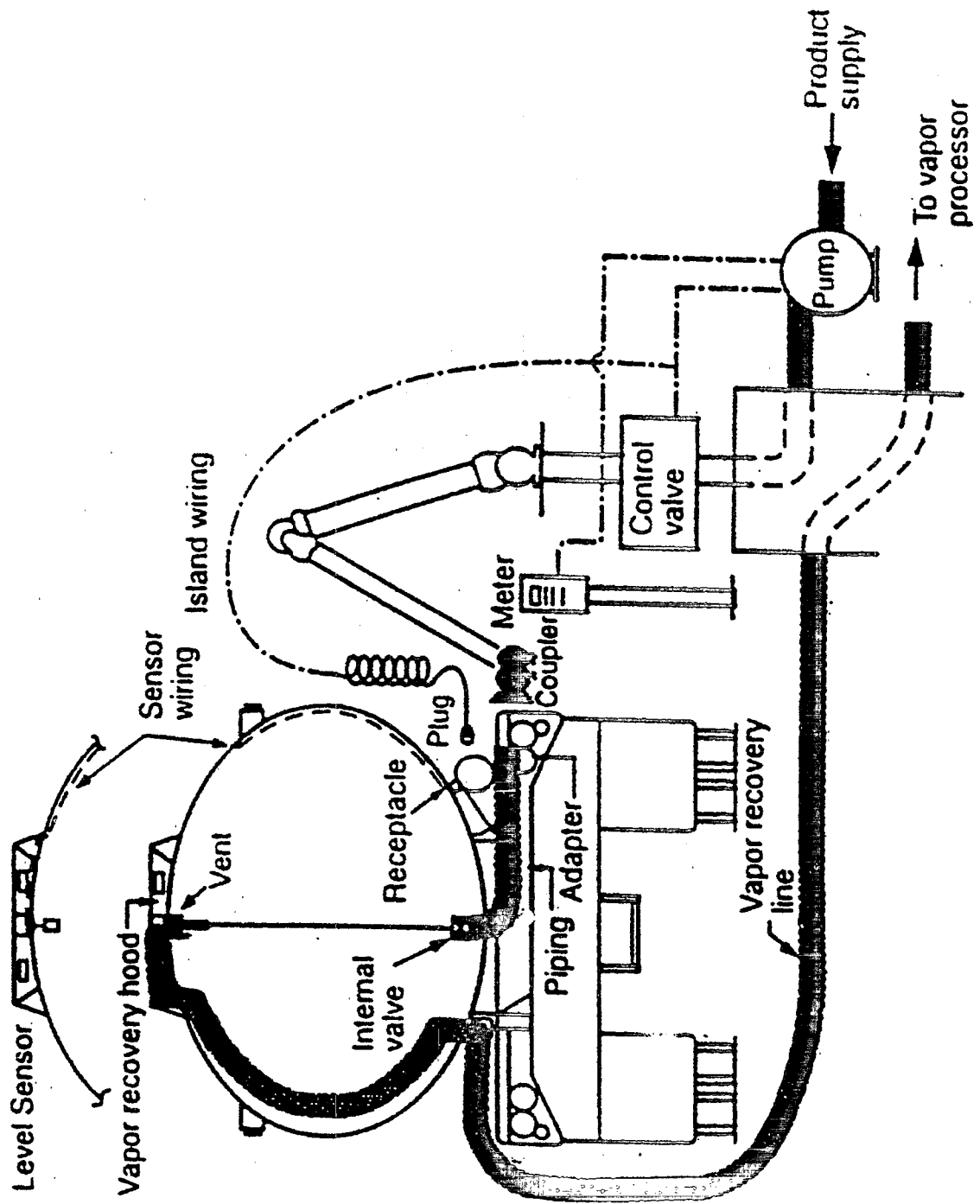


Figure 5-6. Tank Truck Bottom Loading

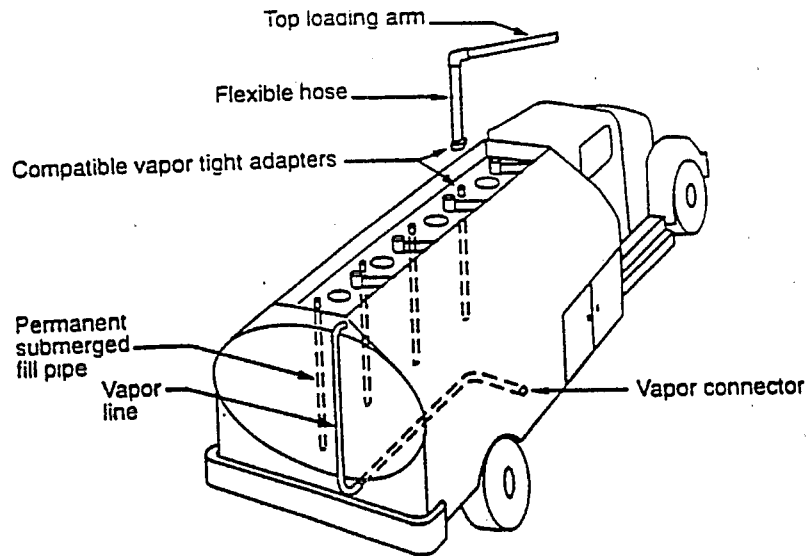


Figure 5-7. Tank Truck Top Loading

5.3.1 Fixed-Roof Storage Vessel

A typical fixed-roof vessel is a cylindrical steel shell with a cone- or dome-shaped roof permanently affixed to it. Refer to Section 4.1.1 of the Benzene Storage Inspection Manual³ for a description of typical fixed-roof vessels and their potential emission points. Figure 5-8 illustrates a fixed-roof vessel with a closed-vent system and control device. As described in the Benzene Storage Inspection Manual³, most emissions from these vessels are released through roof vents. Gauge hatches/sample wells, float gauges, and roof manholes on the fixed roof, which provide access to these tanks, also are potential but less significant sources of emissions.

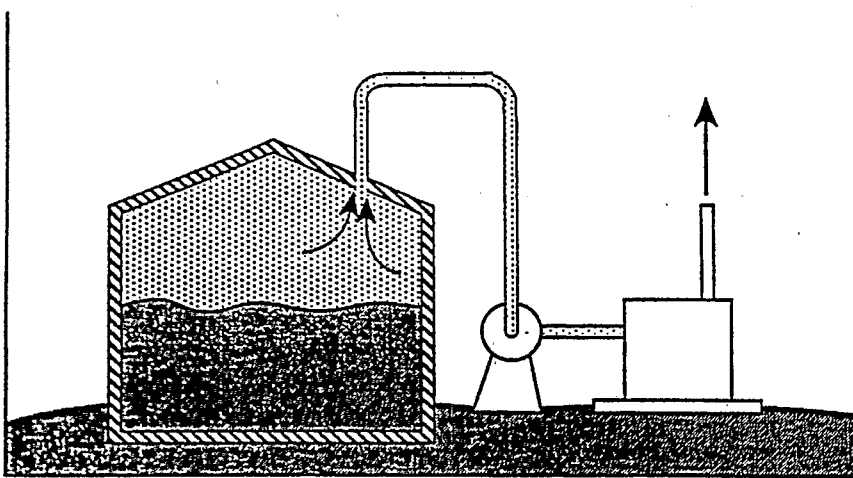


Figure 5-8. Fixed Roof Tank with Closed-Vent System and Control Device

5.3.2 Floating Roof Storage Vessel

A floating roof vessel is a cylindrical steel shell equipped with a disk-shaped deck with a diameter slightly less than the inside tank diameter. The floating deck floats freely on the surface of the stored liquid, rising and falling with the liquid level. The liquid surface is completely covered by the floating deck, except in the small annular space between the deck and the shell. A rim seal attached to the floating deck slides against the vessel wall as the deck is raised or lowered, covering the annular space where the deck is not covering the liquid. Refer to Section 4.1.2 of the Benzene Storage Inspection Manual³ for a general description of a floating roof vessel and a general discussion of emissions from these vessels. Figure 5-9 illustrates a floating roof tank.

For compliance with the storage vessel provisions, the HON allows three specific types of floating roof storage vessels: an external floating roof (EFR) vessel, an internal floating roof (IFR) vessel (i.e., a fixed roof vessel with an IFR), and an EFR vessel converted to an IFR vessel (i.e., a fixed roof installed above an EFR). These floating roof storage vessel types are described below.

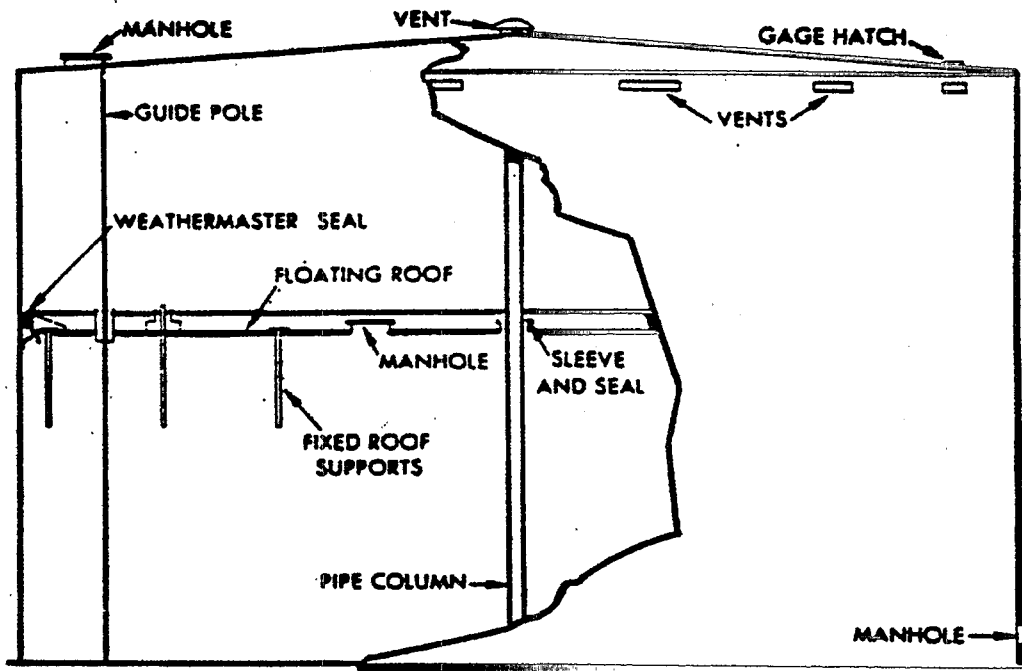


Figure 5-9. Floating Roof Tank

Each discussion refers to specific sections and figures in the Benzene Storage Inspection Manual³ for more detail. The sections referred to in the Benzene Storage Inspection Manual³ include discussions about the requirements of the Benzene Storage NESHAP and descriptions of the vessel types. In some cases, the requirements in the HON will differ from the requirements of the Benzene Storage NESHAP.

5.3.2.1 External Floating Roof Vessel

An EFR vessel does not have a fixed roof; instead, its floating deck is the only barrier between the stored liquid and the atmosphere. An EFR vessel may have several types of rim seals and deck fittings. Figure 5-10 shows an EFR vessel. Refer to Section 4.1.2.1 of the Benzene Storage Inspection Manual³ for a description of a typical EFR vessel and associated emissions. Two types of deck fittings, a gauge hatch and a sampling port, are not shown in Figure 5-10, but are mentioned in Section 4.1.2.1 of the Benzene Storage Inspection Manual,³ Rim seals associated with EFR vessels are described in Section 4.1.2.3 of the Benzene Storage Inspection Manual³ and the associated figures.

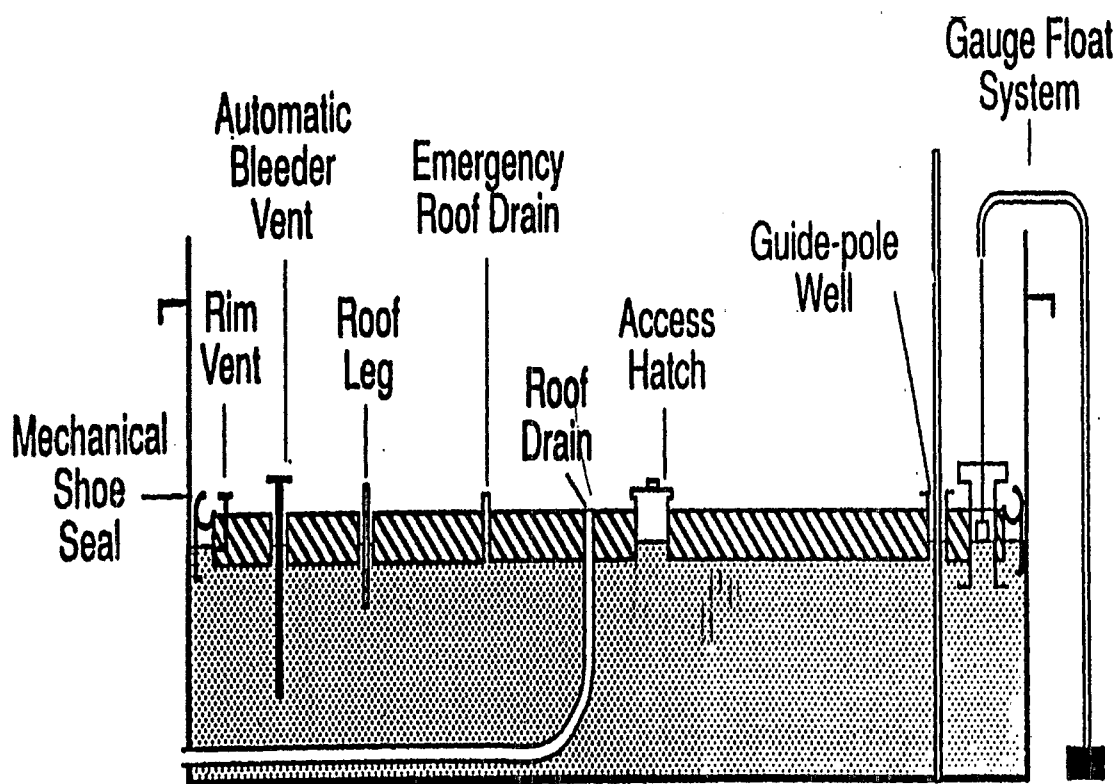


Figure 5-10. External Floating Roof Tank

5.3.2.2 Internal Floating Roof Vessel

An IFR vessel is equipped with a permanently affixed roof above the floating deck. Refer to Section 4.1.2.2 of the Benzene Storage Inspection Manual³ for details. Figure 5-11 illustrates an IFR vessel. In reviewing Figure 5-11, note that the deck fittings and the rim space vent for a mechanical shoe seal are not shown. A rim space vent is illustrated in Figure 5-10 an EFR vessel, and would be the same on an IFR vessel equipped with a mechanical shoe seal. Seals

associated with IFR vessels are described in Section 4.1.2.3 of the Benzene Storage Inspection Manual³ and the associated figures.

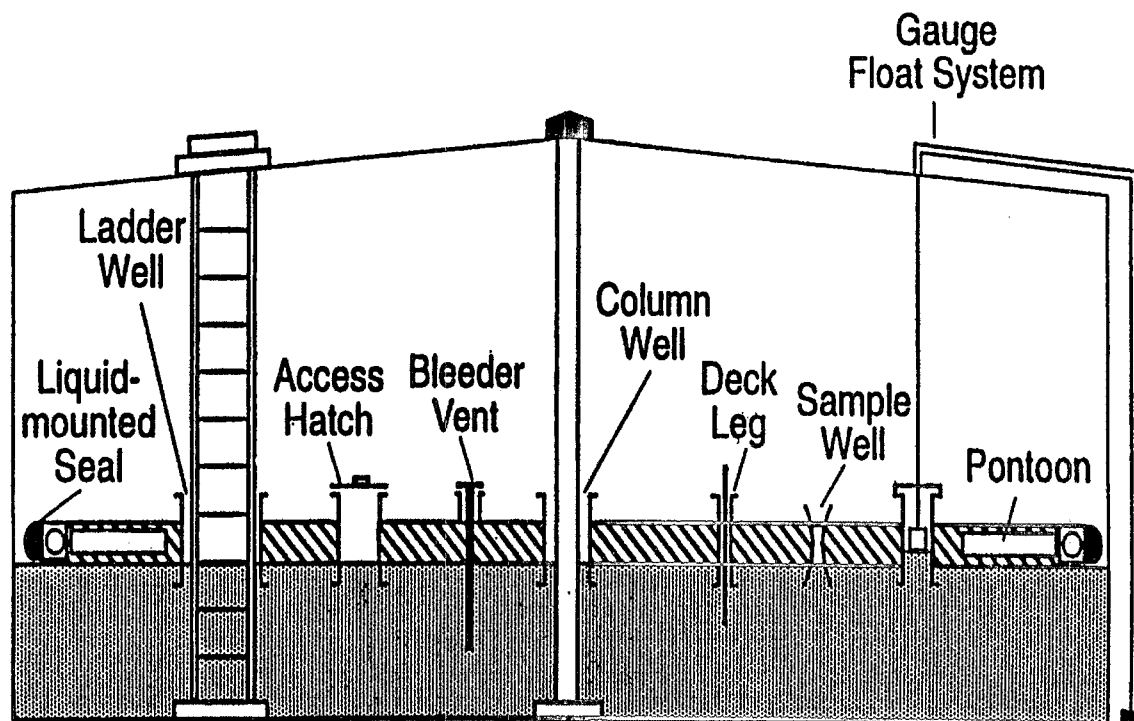


Figure 5-11. Internal Floating Roof Tank

5.3.2.3 External Floating Roof Vessel Converted to an Internal Floating Roof Vessel

The HON specifies that an EFR vessel may be converted to an IFR vessel in order to comply with the storage provisions. This conversion is accomplished by affixing a permanent roof to an EFR vessel, above the floating deck, and equipping the EFR with a seal mechanism equivalent to those required for an IFR. These converted vessels would have the external appearance of an internal floating roof vessel, deck fittings required for an external floating roof vessel, and a rim seal with the characteristics of an IFR vessel. Figure 5-11 shows the characteristics of the permanently affixed roof applicable to a vessel converted from an EFR to an IFR, and Figure 5-10 shows the characteristics of the floating deck applicable to an EFR converted to an IFR. The types of seals applicable to an EFR converted to an IFR would be the same as those for an IFR vessel described in Section 4.1.2.3 of the Benzene Storage Inspection Manual³ and its associated figures.

5.4 WASTEWATER

The HON regulates wastewater streams that are generated when HAP's listed on Table 9 of Subpart G of the HON exit the last recovery device or chemical manufacturing process unit

equipment. Water that contacts HAP's may be categorized as in-process liquid streams, process wastewater, maintenance wastewater, or cooling water. Process wastewater is in-process liquid streams that have been discarded and constitutes the majority of wastewater generated at a SOCOMI facility. There are requirements under the HON applicable to in-process liquid stream. Maintenance wastewater is generated periodically. Cooling water is not categorized as wastewater.

In addition to the process wastewater requirements, the HON regulates the emissions from certain process waters. Specifically, it provides control requirements for equipment coming in contact with certain liquid streams containing hazardous air pollutants in open systems within the manufacturing process.

Examples of process wastewater include, but are not limited to, water used to wash impurities from organic products or reactants, water used to cool or quench organic vapor streams through direct contact, condensed steam from jet ejector systems pulling vacuum on vessels containing organics, product and feed tank drawdown. Maintenance wastewater streams include, but are not limited to, those generated by descaling heat exchanger tubing bundles, cleaning distillation column traps, draining of pumps into an individual drain system, and wastewater generated during equipment washes and spill cleanups. Cooling water is water that has been contaminated with organic HAP's by leaking heat exchange systems.

Process wastewater typically passes through a series of collection units and primary and secondary treatment units. As defined in the HON, the wastewater emission point at a SOCOMI source comprises numerous pieces of equipment such as wastewater tanks, surface impoundments, containers, individual drain systems, oil-water separators, treatment systems, closed-vent systems, and control devices. The wastewater requirements of the HON apply at the point where the wastewater stream exits the last recovery device. Each of the wastewater collection and treatment units must be inspected to ensure compliance with the HON.

Collection and treatment scenarios for process wastewater are facility-specific. The flow rate and organic composition of process wastewater streams at a particular facility are functions of the processes used and influence the sizes and types of collection and treatment units that must be employed. Table 5-1 lists common components of wastewater collection and treatment systems at SOCOMI facilities. The following sections briefly discuss each of these emission components. A detailed discussion of wastewater collection and treatment systems, including diagrams, typical design parameters, emission mechanisms, and factors affecting emissions, is contained in the Control Technology Center (CTC) document.⁴ In addition, emission estimation models and example calculations for VOC emissions are presented in Appendices A and B of the same document.

TABLE 5-1. COMMON COMPONENTS OF WASTEWATER COLLECTION SYSTEMS AND TREATMENT PROCESSES

Waste Management Units and Treatment Processes^a:

Biological treatment basins
Clarifiers
Containers
Drains
Equalization basins or neutralization basins
Junction boxes
Lift stations
Manholes
Oil-water separators
Steam strippers
Sumps
Surface impoundments
Treatment tanks
Trenches
Weirs

^aThis list includes equipment that may be handling in-process streams and not handling wastewater.

5.4.1 Individual Drain Systems

Wastewater streams from various equipment throughout a given process are introduced into the collection system through process drains. Individual drains usually connect directly to the main process sewer line, but may also drain to trenches, sumps, or ditches. Some drains are dedicated to a single piece of equipment, while others, known as area drains, serve several units. In the HON, "individual drain system" is defined as the stationary system used to convey wastewater streams or residuals to a waste management unit or to discharge or disposal. The term includes all hard-piping, process drains and junction boxes, together with their associated sewer lines and other junction boxes, manholes, sumps, and lift stations conveying wastewater streams or residuals. A segregated stormwater sewer system, which is a drain and collection system designed and operated for the sole purpose of collecting rainfall-runoff at the facility, and which is segregated from all other individual drain systems, is excluded from the definition.

5.4.2 Manholes

Manholes are service entrances into process sewer lines that permit inspection and cleaning of the sewer line. They are placed at periodic lengths along the sewer line or where sewers intersect or change significantly in direction, grade, or line diameter. A typical manhole opening is about 2 ft in diameter and is covered with a heavy cast-iron plate that contains two to four holes so that the manhole cover can be more easily grasped for removal.

5.4.3 Trenches

Trenches are used to transport wastewater from the point of process equipment discharge to wastewater collection units. In older plants, trenches may be the primary mode of wastewater transportation in the collection system. Trenches are often interconnected throughout the process area and handle equipment pad water runoff, water from equipment wash down and spill cleanups, and process wastewater discharges. Trench length is determined by the locations of the process equipment and the downstream collection system units, and typically ranges from 50 to 500 ft. Depth and width are dictated by the flow rate of the wastewater discharged from process equipment and must be sufficient to accommodate emergency wastewater flows from the process equipment. Trenches are typically open or covered with grates.

5.4.4 Sumps

Sumps are used to collect and equalize wastewater flow from trenches before treatment. They are usually quiescent and open to the atmosphere. Sumps are sized based on the total flow rate of the incoming wastewater stream.

5.4.5 Junction Boxes

A junction box is defined as a manhole or access point to a wastewater sewer line or lift station. A junction box may combine multiple wastewater streams into one stream which flows downstream. Generally, the flow rate from the junction box is controlled by the liquid level in the junction box. Junction boxes are either square or rectangular and are sized based on the total flow rate of the entering streams. Junction boxes are typically open, but may be closed (for safety) and vented to the atmosphere.

5.4.6 Lift Stations

A lift station is normally the last collection unit before the treatment system and accepts wastewater from one or several sewer lines. The main function of the lift station is to collect wastewater for transport to the treatment system. A pump provides the necessary head pressure for transport and is usually designed to switch on and off based on preset high and low liquid levels. Lift stations are typically rectangular in shape and greater in depth than length or width and are either open or closed and vented to the atmosphere.

5.4.7 Weirs

Weirs act as dams in open channels. The weir face is usually aligned perpendicular to the bed and the walls of the channel. Water from the channel normally overflows the weir but may pass through a notch, or opening, in the weir face. Because of this configuration, weirs provide some control over the level and flow rate through the channel. Weirs may also be used for wastewater flow rate measurement. Water overflowing the weir may proceed down steps, which aerates the wastewater. This increases diffusion of oxygen into the water, which may benefit the biodegradation process (often the next treatment step). However, this increased contact with air also accelerates the volatilization of organic compounds contained in the wastewater.

5.4.8 Oil-Water Separators

Oil-water separation is often the first step in wastewater treatment, but oil-water separators may also be found in the process area. These units separate and remove oils, scum, and solids from the wastewater by gravity. Most of the separation occurs as the wastewater stream passes through a quiescent zone in the unit. Oils and scum with specific gravities less than water float to the top of the aqueous phase, while heavier solids sink to the bottom. Some of the organic compounds contained in the wastewater will partition to the oil phase and then can be removed with the skimmed oil, leaving the separated water.

5.4.9 Equalization Basins

Equalization basins are used to reduce fluctuations in the temperature, flow rate, pH, and organic compound concentrations of the wastewater going to the downstream treatment processes. The equalization of the wastewater flow rate results in more uniform effluent quality from downstream units and can also benefit biological treatment performance by damping any influent concentration and flow rate fluctuations. This damping protects biological processes from upset or failure caused by shock loadings of toxic or treatment-inhibiting compounds. Equalization basins normally use hydraulic retention time to ensure equalization of the wastewater effluent leaving the basin. However, some basins are equipped with mixers or surface aerators to enhance the equalization, accelerate wastewater cooling, or saturate the wastewater with oxygen before secondary treatment.

5.4.10 Treatment Tanks

Several different types of treatment tanks may be used in wastewater treatment systems. Tanks designed for pH adjustment are typically used preceding the biological treatment step. In these tanks, the wastewater pH is adjusted using acidic or alkaline additives to prevent shocking the biological system downstream. Flocculation tanks, on the other hand, are usually used to treat wastewater after biological treatment. Flocculating agents are added to the wastewater to promote the formation or agglomeration of larger particle masses from the fine solids formed during biological treatment. These larger particles precipitate more readily out of the wastewater in the clarifier, which usually follows flocculation in the treatment system.

5.4.11 Biological Treatment Basins

Biological waste treatment is normally accomplished using aeration basins. Microorganisms require oxygen to carry out the biodegradation of organic compounds, which results in energy and biomass production. The aerobic environment in the basin is normally achieved with diffused or mechanical aeration. This aeration also maintains the biomass in a well-mixed regime. The performance of aeration basins is particularly affected by (1) mass of organics per unit area of wastewater, (2) temperature and wind patterns, (3) hydraulic retention time, (4) dispersion and mixing characteristics, (5) characteristics of the solids in the influent, and (6) amount of essential microbial nutrients present.

5.4.12 Clarifiers

The primary purpose of a clarifier is to separate solids from wastewater through gravitational settling. Most clarifiers are equipped with surface skimmers to clear the water of floating oil

deposits, grease, and scum. Clarifiers also have sludge-raking arms that remove the accumulation of organic solids that collects at the bottom of the tank. The depth and cross-sectional area of a clarifier are functions of the settling rate of the suspended solids and the thickening characteristics of the sludge. Clarifiers are designed to provide sufficient retention time for the settling and thickening of these solids.

5.4.13 Surface Impoundments

Surface impoundments are used for evaporation, polishing, storage before further treatment or disposal, equalization, leachate collection, and as emergency surge basins. They may be quiescent or mechanically agitated.

5.4.14 Containers

Containers which are compatible with the material(s) held may be used to collect residuals generated by treatment prior to offsite shipment and for other purposes that require mobility. Containers may vary in size and shape ranging from a 55-gallon drum to a tanker truck.

5.5 REFERENCES

1. Memorandum from Paul, D., J.A. Probert, and R. Mead (Radian Corporation), to Dr. Janet S. Meyer (U.S. Environmental Protection Agency, Standards Development Branch). Characterization of Product Accumulator Vessels. January 18, 1994. p. 20.
2. U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Stationary Source Compliance Division. Level II Inspection Manual: Benzene Transfer Operation. Washington, DC. January 1993.
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4. U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Office of Research and Development. Control Technology Center, Industrial Wastewater Volatile Organic Compound Emissions - Background Information for BACT/LAER Determinations. EPA 450/3-90-004. Research Triangle Park, NC. January 1990.

6.0 DESCRIPTION OF EMISSION CONTROL TECHNOLOGIES

Combustion is the most universally applicable technique for control of organic HAP and VOC emissions. Combustion devices can be applied to reactor, air oxidation, and distillation process vents, storage vessels, or emissions from transfer racks and wastewater streams and can achieve efficiencies of 98 percent reduction in organic HAP or VOC emissions, or an outlet HAP or VOC concentration of 20 parts per million by volume (ppmv) dry basis, corrected to 3 percent oxygen. Combustion control devices are described in Section 6.1.

As described in Section 5.1, recovery devices are used in many chemical manufacturing processes. The most common types of recovery devices are described in Section 6.2. Recovery devices are not considered "control devices" for purposes of meeting the 98 percent reduction requirements of the process vents provisions of the HON. However, the HON allows the use of recovery devices to achieve compliance if certain conditions are met. If a recovery device is used to increase the total resource effectiveness (TRE) index value to greater than 1.0, then the process vent is considered to be in compliance. The TRE is an index of the cost effectiveness of control and is calculated from measurements or estimates of vent stream flow and HAP and VOC concentrations after the final recovery device. A recovery device may also be used alone or in combination with one or more control devices to meet the 98 percent reduction if the following three conditions are met: (1) the control system was installed before December 31, 1992; (2) the recovery device used to meet the 98 percent reduction is the last recovery device before release to the atmosphere; and (3) the recovery device alone or in combination with one or more control devices can meet the 98 percent reduction but is not capable of reliably reducing emissions to a concentration of 20 ppmv or less.

A recapture device may also be used to meet the 98 percent reduction or 20 ppmw concentrations. Recapture devices are considered control devices for the purposes of the process vent provisions and are the same types of devices as recovery devices, however the material that is recovered is not normally used, reused, or sold. For example, the materials may be recovered primarily for disposal. The most common recapture devices are also described in Section 6.2.

Section 6.0 Description of Emission Control Technologies

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6.5	Control Techniques Specific to Wastewater	I-52

Information on the specific compliance options for process vents, transfer operations, storage vessels, and wastewater streams are presented in Section 7.

6.1 COMBUSTION CONTROL DEVICES

Combustion control devices include incinerators, flares, boilers, and process heaters. Combustion control devices operate on the principle that any VOC heated to a high enough temperature in the presence of sufficient oxygen will oxidize to carbon dioxide and water. The theoretical combustion temperature varies because VOC's are oxidized at different temperatures,

depending on their properties. A consistent VOC destruction efficiency can usually be achieved in combustion devices, regardless of the amount and type of VOC in the vent stream. Scrubbers can be used downstream of combustion control devices (other than flares) to treat halogenated streams. Scrubbers reduce emissions of halogens and hydrogen halides, such as chlorine and hydrogen chloride, formed during combustion.

6.1.1 Thermal Incinerators

Thermal incinerators are usually refractory-lined chambers containing a burner (or set of burners). An efficient thermal incinerator provides: (1) a chamber temperature high enough to completely oxidize the VOC's; (2) sufficient mixing of combustion products, air, and the process vent streams; and (3) sufficient residence time to allow for complete oxidation of VOC's. Figure 6-1 shows the premixing chamber and combustion chamber of a discrete burner thermal incinerator. As shown in the figure, heat can be recovered to preheat combustion air or the process vent stream, or to generate steam. All thermal incinerators operate using excess air to ensure a sufficient supply of oxygen.

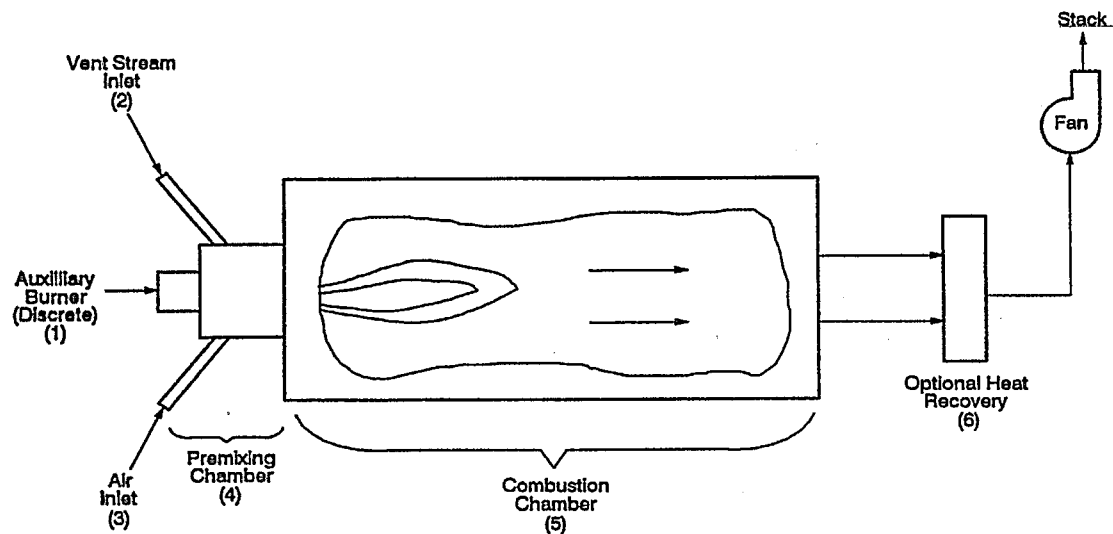


Figure 6-1. Discrete Burner, Thermal Incinerator

Thermal incinerators can achieve at least 98 percent destruction for most VOC's. For vent streams with VOC concentrations below 1,000 ppmv, all new thermal incinerators can achieve outlet concentrations of 20 ppmv or lower. Thermal incinerators are technically feasible control options for most vent streams. Excessive fluctuations in flow rate may prevent the use of a thermal incinerator; in such situations, a flare could be used.

6.1.2 Catalytic Incinerators

Catalytic incinerators operate at lower temperatures than thermal incinerators because some VOC's are oxidized at lower temperatures in the presence of a catalyst. A schematic of a catalytic incinerator is shown in Figure 6-2. The vent stream is preheated in the mixing chamber, and oxidation takes place on the catalyst bed. As with thermal incinerators, heat can be recovered from the exiting gas stream.

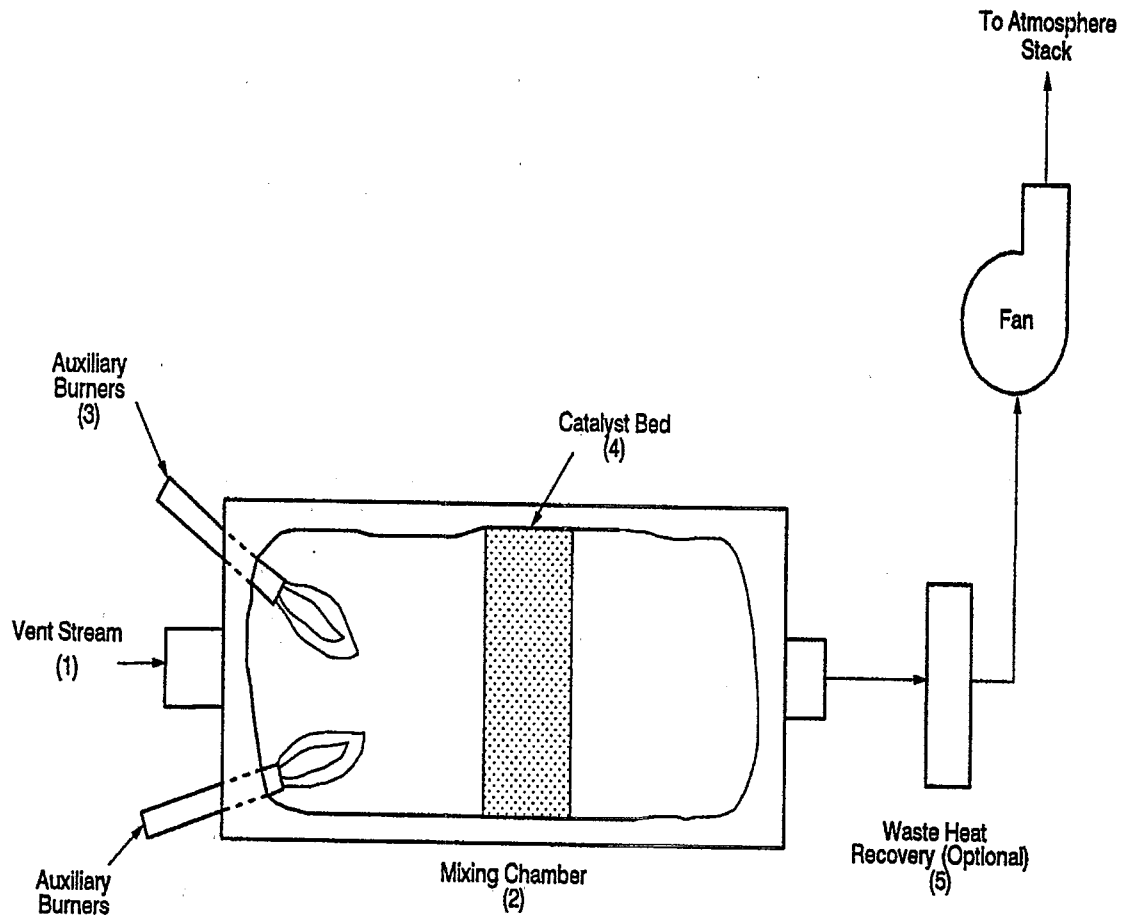


Figure 6-2. Catalytic Incinerator

Catalytic incinerators can achieve overall VOC destruction efficiencies of 95 to over 98 percent. The efficiency depends on temperature, oxygen content, catalyst activity, and the characteristics and concentration of the VOC. Catalytic incinerators are typically used for vent streams with stable flow rates and stable concentrations. They cannot be used on vent streams that poison or block the catalyst reactive sites, or on vent streams with high inlet concentrations or flow rates.

6.1.3 Industrial Boilers and Process Heaters

Industrial boilers and process heaters combust VOC's by incorporating the vent stream into the inlet fuel or by feeding the vent stream into the boiler or heater through a separate burner. Industrial boilers are used to produce steam. When boilers fire natural gas, forced- or natural-draft burners mix the incoming fuel and combustion air. A VOC-containing vent stream can be added to this mixture or it can be fed into the boiler through a separate burner. The majority of industrial boilers used in the chemical industry are of watertube design, where hot combustion gases contact the outside of heat transfer tubes which contain hot water and steam. Process heaters are used to raise the temperature of process streams using a similar tube design, where the process fluids are contained in the tubes. Heat recovery from the exiting gas stream is achievable for both industrial boilers and process heaters.

Boilers and process heaters can achieve efficiencies of at least 98 percent. They can be used to reduce VOC emissions from any vent streams that will not reduce the performance or reliability of the boiler or process heater. For example, the varying flow rate and organic content of some vent streams can lead to explosive mixtures or flame instability. Boilers and process heaters are most applicable where the potential exists for heat recovery from the combustion of the vent stream. Vent streams with a high VOC concentration and high flow rate can provide enough equivalent heat value to act as a substitute for fuel. Because boilers and process heaters cannot tolerate wide fluctuations in the fuel supply, they are not widely used to reduce VOC emissions from batch operations and other noncontinuous vent streams. Vent streams with sulfur or halogenated compounds are not usually combusted in boilers or process heaters because these streams are corrosive.

6.1.4 Flares

Flaring is an open combustion process in which the oxygen necessary for combustion is provided by the air around the flame. High combustion efficiency in a flare is governed by flame temperature, residence time of the organic compound in the combustion zone, turbulent mixing to complete the oxidation reaction, and the amount of available oxygen. Steam-assisted elevated flares are the most common type used in the chemical industry (see Figure 6-3). The high flow rate of the vent stream into the flare requires more combustion air than diffusion of the surrounding air to the flame can supply. Steam injection nozzles are added to increase gas turbulence.

Flares can achieve 98 percent destruction efficiencies. Flares are most applicable to vent streams with wide flammability limits, low auto-ignition temperatures, and high heat contents. Flares can be designed to control both normal process releases and emergency upsets. Flares can be used to control almost any VOC stream and can handle fluctuations in VOC concentration, flow rate, heat content, moisture content, and inerts content. Flaring is appropriate for continuous, batch, and variable flow vent streams. However, halogenated or sulfur-containing vent streams are usually not flared because they can corrode the flare tip or cause the formation of acid gases or sulfur dioxide. The HON provisions do not allow vent streams above a specified halogen content to be routed to a flare.

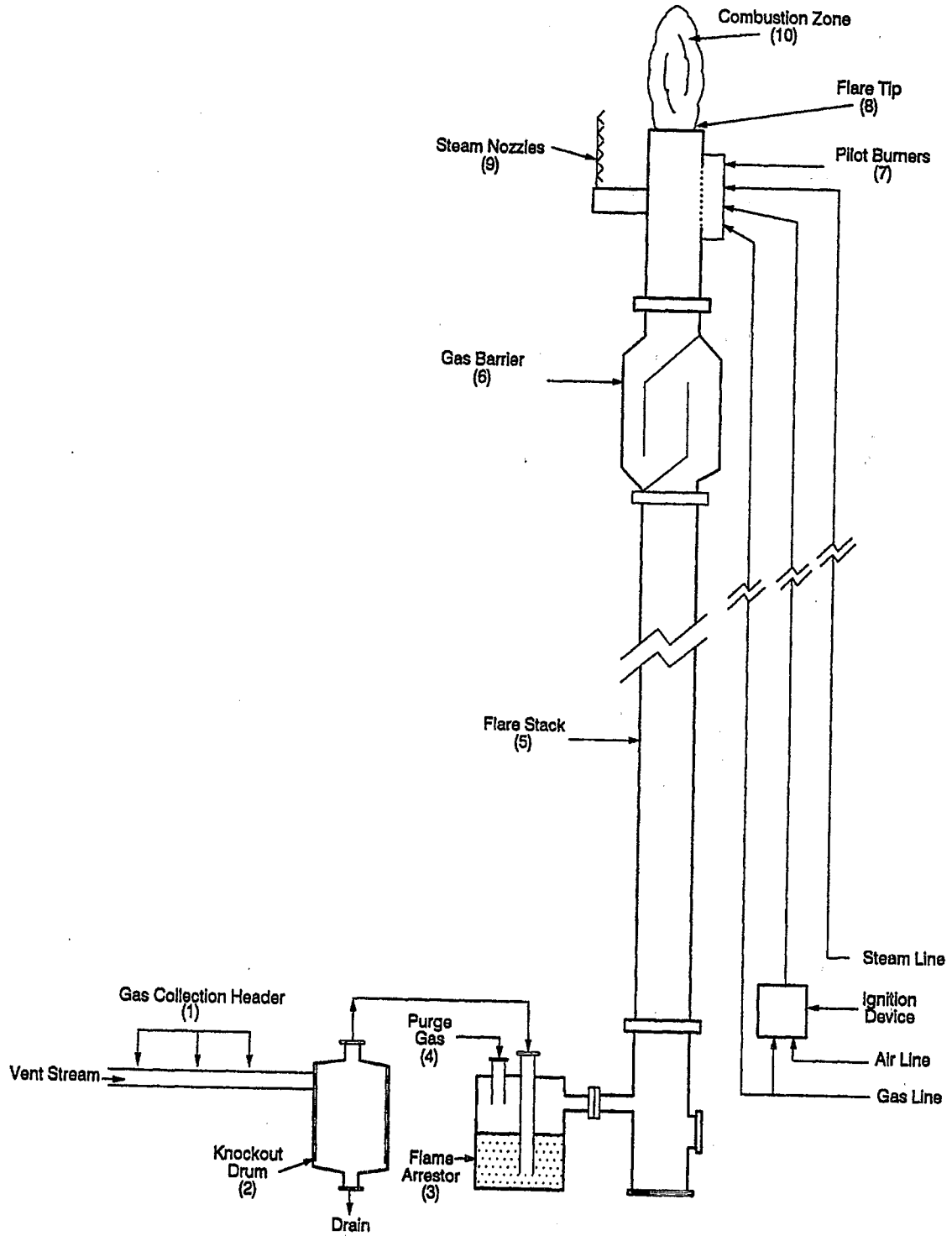


Figure 6-3. Steam-Assisted Elevated Flare System

6.1.5 Halogenated Streams

Combustion equipment used for control of halogenated streams is usually followed by additional control equipment to remove corrosive combustion products (acid gases). The flue gas temperature is lowered, and the flue gas is then routed to a halogen reduction device such as a packed tower or liquid jet scrubber. Absorption equipment (e.g., scrubbers) can also be used as recovery devices and are discussed in Section 6.2 of this manual.

6.2 PRODUCT RECOVERY AND RECAPTURE DEVICES

Product recovery devices and recapture devices include absorbers, carbon adsorbers, and condensers, and the specific device used is determined by the vent stream characteristics. These characteristics affect the performance of recovery or recapture devices, therefore no single technology is applicable to all vent streams.

6.2.1 Condensers

Condensation is a separation technique in which one or more volatile components are separated from a vapor mixture through saturation followed by a phase change. Condensation can be achieved by lowering the temperature at a constant pressure, and refrigeration can be used to obtain the lower temperatures needed for compounds with lower boiling points.

Surface condensers and direct contact condensers are the two most commonly used types. In surface condensers, heat transfer occurs through tubes or plates in the condenser. Thus, the coolant fluid does not contact the vent stream which allows for reuse of the coolant fluid. Furthermore, the VOC's can be directly recovered from the gas stream. A shell-and-tube condenser which circulates the coolant fluid on the tube side is shown in Figure 6-4. Direct contact condensers spray the coolant directly into the vent stream. Therefore, the coolant cannot be reused directly and VOC's cannot be recovered without further processing.

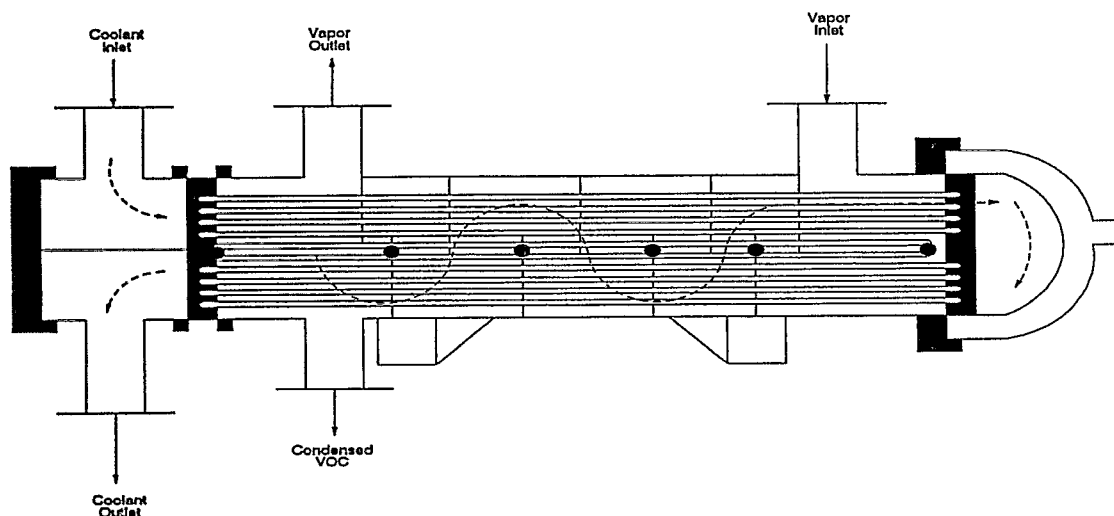


Figure 6-4. Schematic Diagram of a Shell and Tube Surface Condenser

Condensers may be used to recover raw materials and/or products. The removal efficiencies of condensers range from 50 to 95 percent, and the efficiency is dependent upon the vent stream flow rate, concentration, temperature, moisture content, and physical properties. Condensers are more economically feasible for streams with higher condensation temperatures. Vent streams with high concentrations of non-condensables will require a condenser with a larger surface area.

6.2.2 Adsorption

Adsorption is a mass-transfer operation where the gas-phase (adsorbate) is captured on the solid-phase (adsorbent) by physical or chemical means. A physically adsorbed molecule is easily removed from the adsorbent, whereas, the removal of chemisorbed molecules is much more difficult.

The most common industrial adsorption systems use activated carbon as the adsorbent. Activated carbon captures organic vapors by physical adsorption. Since oxygenated adsorbents selectively capture water vapor, they are not suitable for high-moisture process vent streams. Activated carbon beds are regenerated with steam or nitrogen which release the captured vapors. Figure 6-5 shows a typical fixed-bed, regenerative carbon adsorption system. When one bed is saturated, the vent stream is routed to an alternate bed while the saturated carbon bed is regenerated. The steam-laden vapors from regeneration are sent to a condenser and then to a VOC recovery system to separate the VOC's from the condensed steam.

Continuous VOC removal efficiencies of more than 95 percent are achievable using adsorption. The VOC removal efficiency of an adsorption unit depends on the vent stream characteristics, the physical properties of the compounds in the vent stream and of the adsorbent, and the condition of the bed. Carbon adsorption is not recommended for vent streams with high VOC concentrations, high or low molecular weight compounds, mixtures of high and low boiling point VOC's, or vent streams with a high moisture content.

6.2.3 Absorption

Absorption is the selective transfer of one or more components of a gas mixture (solute) into a liquid solvent. Devices based on absorption principles include spray towers, Venturi and wet impingement scrubbers, packed columns, and plate columns. Spray towers have the least effective mass transfer capability and are generally restricted to particulate matter removal and control of high-solubility gases. Venturi scrubbers are also limited to particulate matter and high-solubility gases. Therefore, VOC control by gas absorption is limited to packed or plate columns. A countercurrent packed column is shown in Figure 6-6.

Control efficiencies for absorbers vary from 50 to greater than 95 percent. Efficiency depends on the selected solvent, the contact surface area (absorber size), and the temperature. The applicability of absorption to vent streams is dependent on the availability of a suitable solvent, and the solubility of the VOC in the solvent. If a VOC cannot be easily desorbed from the solvent, then absorption is less viable. Absorption is usually considered for streams with a VOC concentration above 200 to 300 ppmv.

Scrubbers are used downstream of combustion devices to control emissions of halogens and halogen halides formed during combustion. The typical scrubbing solvents used are water or a caustic solution. Either plate or packed bed scrubbers can be used, and these scrubbers can

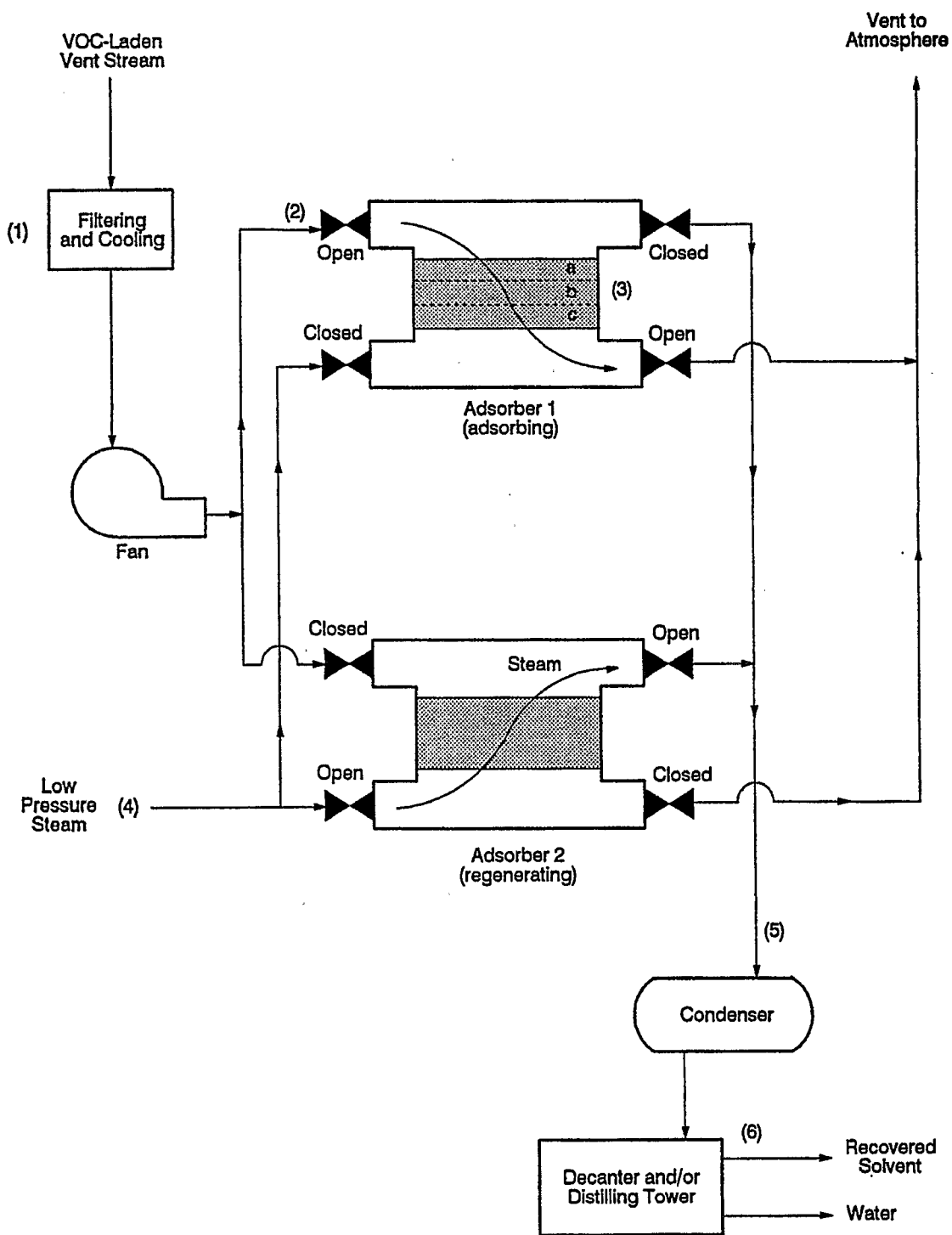


Figure 6-5. Two-Stage Regenerative Adsorption System

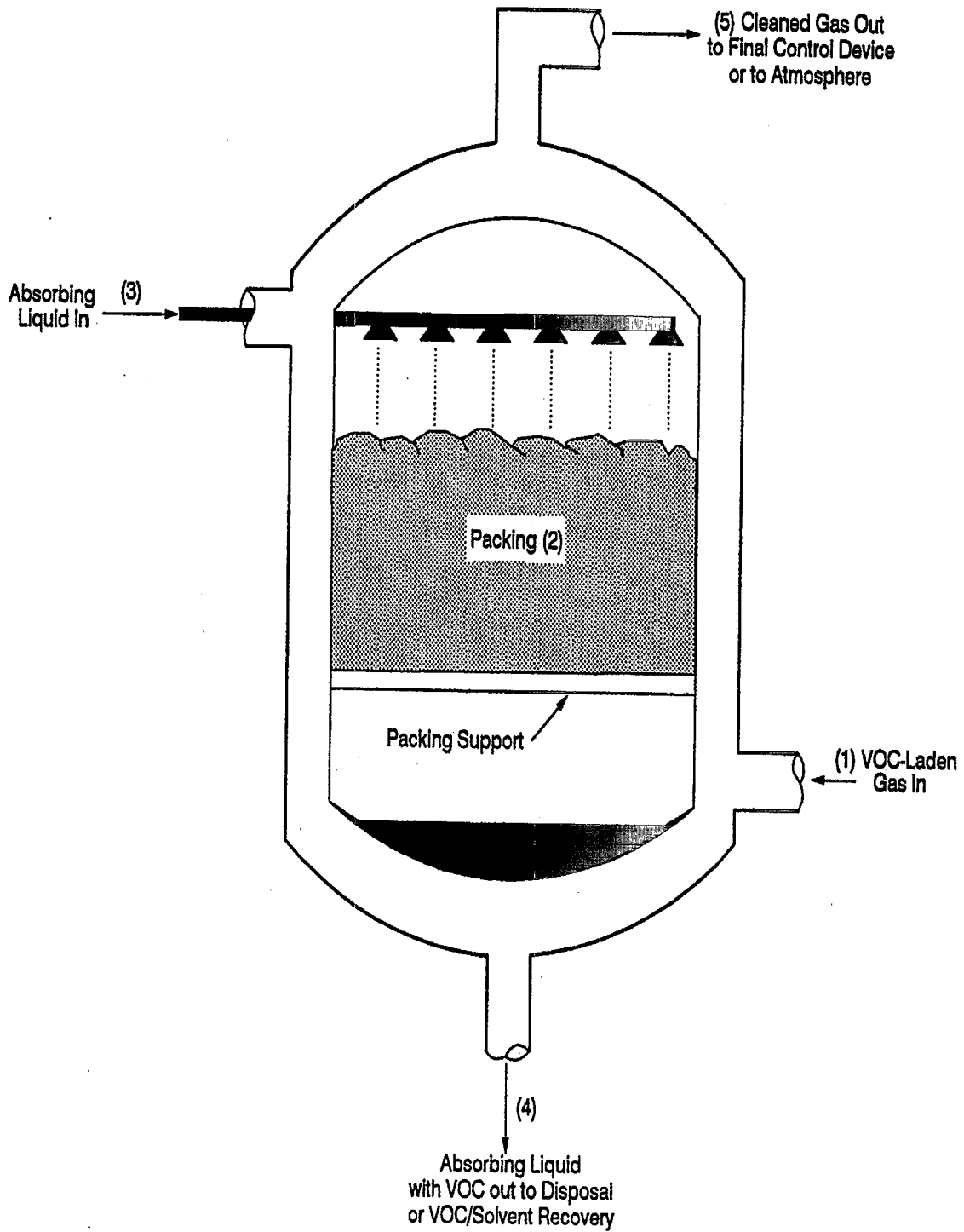


Figure 6-6. Packed Tower Absorption Process

have countercurrent or crosscurrent flow. The type and orientation of the scrubber used depends on liquid and gas flow rates.

Scrubber efficiencies for removal of halogens and halogen halides will vary depending on the type of scrubber and the type of solvent used, and the equilibrium relationship between the gas and liquid. However, most systems can achieve efficiencies from 90 percent to greater than 99 percent.

6.3 CONTROL TECHNIQUES SPECIFIC TO TRANSFER OPERATIONS

Organic HAP and VOC emissions from tank truck and railcar transfer racks can be collected in a vapor collection system and routed to a control device. Unlike process vents, the HON definition of "control device" for transfer racks includes recovery devices as well as combustion devices. Any device that achieves 98 percent reduction of organic HAP or VOC or achieves a 20 ppmv outlet concentration of organic HAP or VOC can be used to comply with the HON transfer provisions. Figure 6-7 shows a tank truck vapor return line routed to a vapor recovery device. Alternatively, transfer rack emissions can be controlled by using a vapor balancing system or routing to a process or fuel gas system.

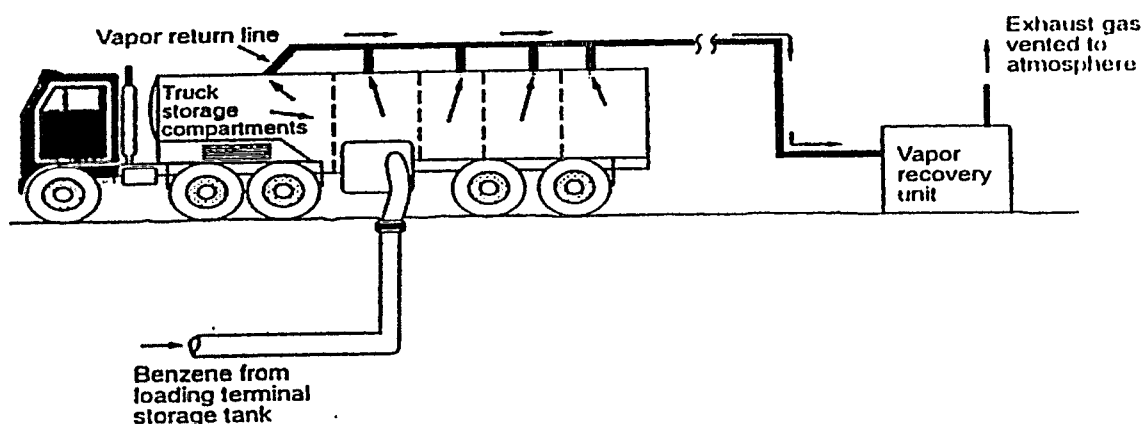


Figure 6-7. Tank Truck Loading with Vapor Recovery

6.3.1 Vapor Collection System

Vapor collection systems consist of piping or ductwork that captures and transports to a control device organic compounds from the vapor space of a transport vessel. Loading rack systems that incorporate the product and vapor lines into a single system are preferred since both connections can be conveniently moved out to the vessel simultaneously. The vapor return line can either be a flexible hose or a metal pipe incorporated into the loading rack arrangement using a dual style orientation. Figure 6-7 shows a tank truck with a vapor collection system (vapor return line), and Figure 6-8 illustrates a dual arm loading rack.

Section 4.2.1 of the Benzene Transfer Operation Inspection Manual¹ provides additional details on transfer vapor collection systems and control techniques, however, this section also discusses the transfer requirements of the Benzene NESHAP. In some cases, these requirements will differ

from the requirements of the HON. For example, the Benzene NESHAP applies to marine vessels, but the HON does not.

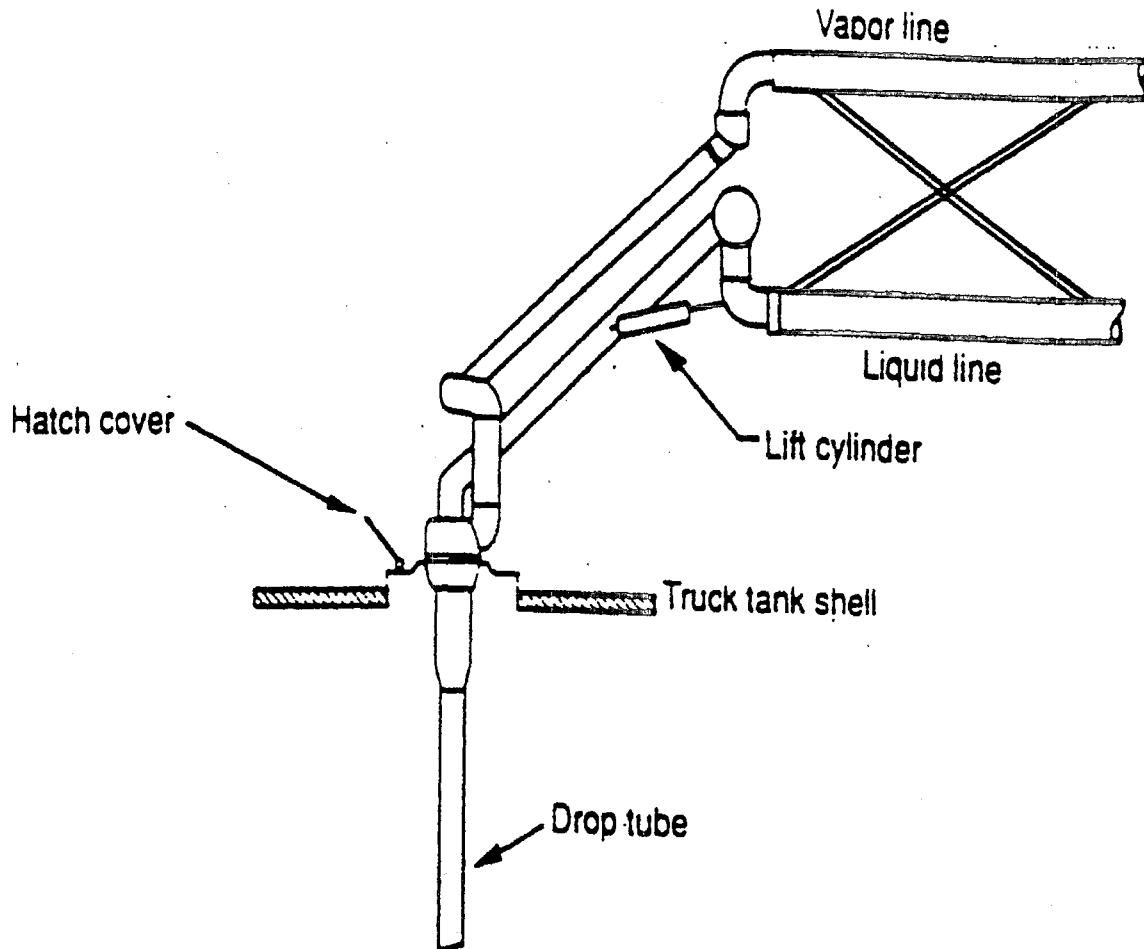


Figure 6-8. Dual Arm Loading Rack

6.3.2 Vapor Balancing

Vapor balancing is another means of collecting vapors and reducing emissions from transfer operations. Vapor balancing is most commonly used where storage facilities are adjacent to the loading facility. As shown in Figure 6-9, an additional line is connected from the transport vessel to the storage tank to return any vapor that is displaced from the transport vessel to the vapor space of the storage vessel from which the transferred liquid was pumped. Because this is a direct volumetric exchange, there should be no losses to the atmosphere.

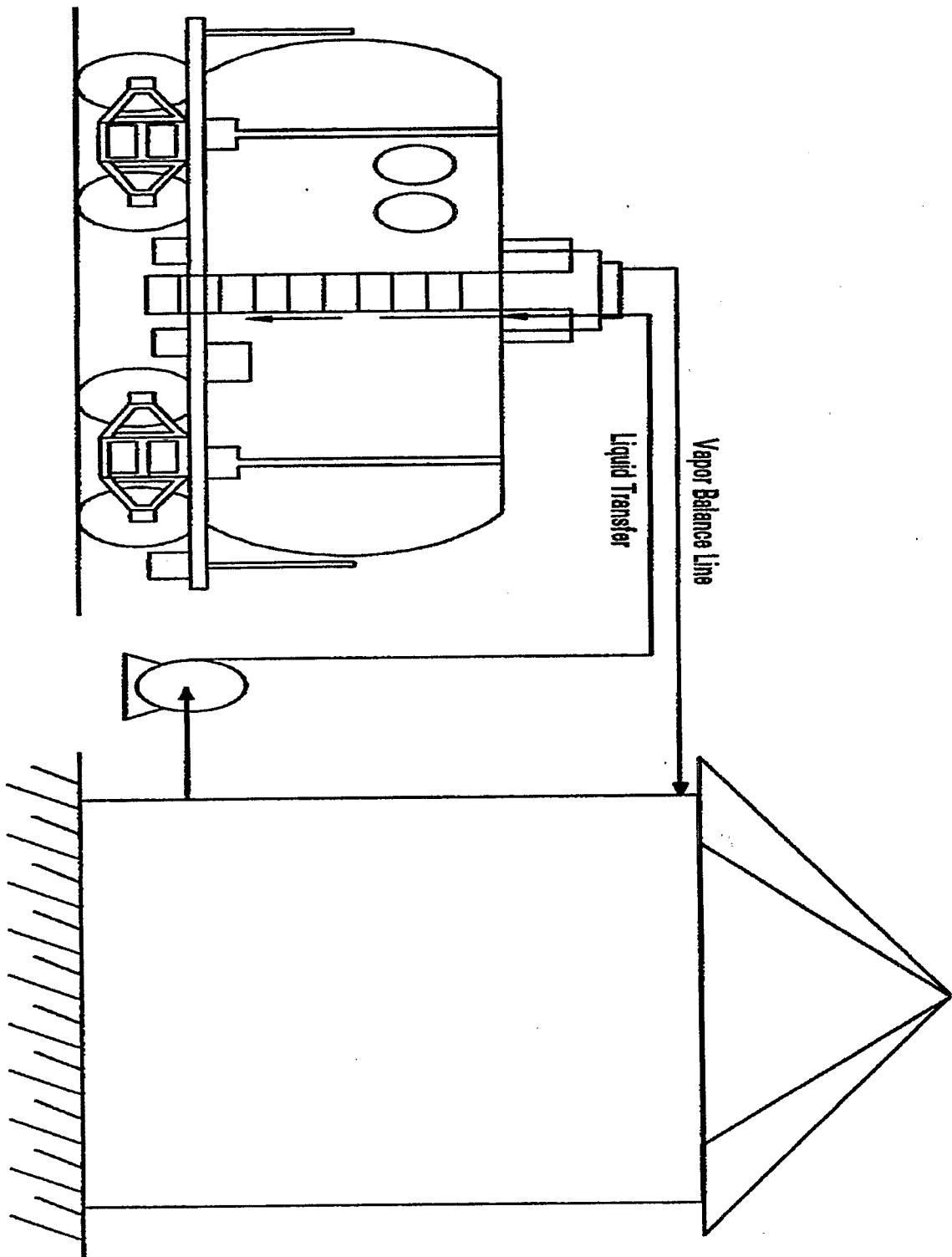


Figure 6-9. Vapor Balancing System

6.3.3 Route to a Process or Fuel Gas System

Emissions from transfer operations may be routed to a process or to a fuel gas system to comply with the transfer control requirements. Fuel gas systems contain large boilers or process heaters that easily combust the HAP and VOC emissions from transfer operations. Section 6.1.3 describes industrial boilers and process heaters. Section 7.2.3 describes the conditions that must be met for emissions routed to a process.

6.4 CONTROL TECHNIQUES SPECIFIC TO STORAGE VESSELS

The control techniques to reduce emissions from storage vessels include equipment designs (e.g., seal design and fittings closure) and work practices.

6.4.1 Fixed-Roof Vessels

Emissions from a fixed-roof vessel may be reduced by equipping it with either a floating roof (i.e., converting it to an IF vessel) or by using a closed vent system routed to a 95-percent efficient control device. Under the HON, if a fixed roof vessel is equipped with an IFR, it is considered an IFR vessel and would be required to be equipped with certain controls and meet certain work practices for an IFR as described in Section 6.4.2.

A closed vent system captures the vapors released by the fixed roof vessel and transfers them to a product recovery or combustion control device. Refer to Section 5.2 of this manual for a description of product recovery and combustion control devices. These same devices would be allowed by the storage provisions.

A closed vent system and control device could also be applied to a horizontal tank. Because of the tank configuration, a floating roof cannot be applied to a horizontal tank.

6.4.2 Floating Roof Vessels

As discussed in Section 5.3.2, the three types of floating roof vessels are IFR vessels, EFR vessels, and EFR vessels converted to IFR vessels.

There are three methods for controlling emissions from floating roof vessels: applying controls to deck fittings, employing certain types of seals, and employing certain work practices. Examples of these three methods are to equip the covers on certain deck fittings with gaskets, to equip an EFR or IF with a liquid-mounted seal instead of a vapor-mounted seal, and to keep all covers associated with deck fittings closed at all times except for access, respectively. Refer to Sections 4.1.2.1 and 4.1.2.2 in the Benzene Storage Inspection Manual² for descriptions of the equipment and work practice controls that may be applied to deck fittings on EFR vessels and IFR vessels, respectively. For information on applying controls to the deck fittings of an EFR converted to an IFR, refer to the discussion about controls applied to fittings of EFR vessels in Section 4.1.2.1 of the Benzene Storage Inspection Manual.² For a description of the types of seals that can be used to control emissions from floating roof vessels, refer to Section 4.1.2.3 of the Benzene Storage Inspection Manual.²

The deck fitting control requirements in the HON are similar but not equivalent to the control requirements of the Benzene NESHAP which are described in the Benzene Storage Inspection

Manual.² The HON specifies a few additional deck fitting controls that are not discussed in the Benzene Storage Inspection Manual.² For example, for EFR vessels the HON specifies the following three additional controls: (1) roof drains must have a slotted membrane fabric cover that covers 90 percent of the area of the opening, (2) openings with covers must be bolted when closed, and (3) guide pole wells must have a sliding cover or flexible fabric sleeve seal and, if the guide pole is slotted, a gasketed float inside the guide pole. For IFR vessels, the HON specifies the following two additional controls: (1) ladder wells must have a gasketed sliding cover, and (2) rim vents must be gasketed and closed except when the IFR is not floating on the stored liquid or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting. Sections 4.1.2.1 and 4.1.2.2 in the Benzene Storage Inspection Manual² should be consulted to gain familiarity with the control options for deck fittings on floating roof vessels.

6.4.3 Route to a Process or a Fuel Gas System

Similar to transfer operations, emissions from storage vessels may be routed to a process or to a fuel gas system to comply with the storage vessel requirements. Fuel gas systems contain large boilers or process heaters that easily combust the HAP and VOC emissions from storage vessels. Section 6.1.3 describes industrial boilers or process heaters. Section 7.3.3 describes the conditions that must be met for emissions routed to a process.

6.5 CONTROL TECHNIQUES SPECIFIC TO WASTEWATER

The technologies used to reduce emissions from SOCM I wastewater systems involve a combination of control equipment and good work practices. This section describes applicable emission control technologies for collection and waste management units, and treatment processes. For each of the control technologies discussed in this section, the design and operation of the control device or system is described including an explanation of the physical and/or chemical processes that destroy the organic HAP's or remove them from the wastewater stream. Additionally, the factors affecting the efficiency of the control device, such as operating parameters, are provided. Several emission control technologies including combustion technologies (e.g., flares, incinerators), fixed and floating roofs, and product recovery devices (e.g., condensers, adsorbers) that can be used to control emissions from wastewater are also applicable to process vents, storage vessels, and/or transfer operations. In such cases, this section discusses the applicability of the control technology to emissions from wastewater and refers to the respective sections in this document for details.

6.5.1 Waste Management Units

As described in Section 5.4, wastewater collection systems and waste management units are the equipment, structure(s) and/or devices used to convey, store, treat, or dispose of wastewater streams or residuals. Examples of waste management units include wastewater tanks, surface impoundments, individual drain systems (which include process drains, junction boxes, manholes, etc.), and biological treatment units. Examples of equipment that may be waste management units include containers, air flotation units, oil-water separators or organic-water separators, or organic removal devices such as decanters, strippers, or thin-film evaporation units. If such equipment is used for recovery, then it is part of a chemical manufacturing process unit and is not a waste management unit. Emissions from wastewater collection system components must be controlled through the use of emission suppression technologies. Suppression technologies reduce volatilization of HAP's and prevent the release of volatile HAP's to the ambient air. This

allows the treatment process(es) following the collection system to achieve greater removal and/or destruction of HAP's. The following sections describe the suppression techniques suitable for the different components in a wastewater collection system.

6.5.1.1 Controls for Process Drains

Water seal controls reduce emissions by limiting the effects of convection and diffusion on VOC's in the wastewater. Water seals can be either P-legs or seal pots. P-leg sealed drains are similar to open drains, which are usually 4 to 6 inches in diameter and extend vertically to a height of 4 to 6 inches above grade, except that a "P" bend in the pipe is found below grade. The P-bend provides a liquid seal for the individual drain, similar to that found in household plumbing. A seal pot drain has a cap covering the drain opening, and the bottom edge of the cap extends below the level of the drain entrance. Liquid from the various drain pipes falls into the drain area outside of the cap and then flows under the edge of the cap into the drain line. The drain cap can easily be removed to clean the drain entrance and drain line. Various drain configurations are illustrated in Figure 6-10.

Water seals will result in emission control only if the liquid levels in the water seals are properly maintained, thereby minimizing mass transfer from the wastewater to the ambient air. Therefore, the control equipment must be coupled with work practices to ensure maximum effectiveness.

A second method for controlling VOC emissions from process drains is to use a closed drain system. In closed drain systems, emission control is achieved by mechanical and/or physical barriers inherent to the drain design and are not dependent on operating procedures (e.g., maintaining an appropriate level of water). Typically, a drain riser extends approximately 12 to 18 inches above grade. The top of the riser is completely sealed with a flange. Drain pipes are welded directly to the riser. This line is normally closed with a valve, but provides access to the closed drain system for intermittent and infrequent needs such as pump drainage. Hoses or flexible lines can be connected to the riser valve from the liquid source. The emission control achieved by a closed system can be as high as 95 percent, depending on the maintenance of the system. A diagram illustrating a closed drain system is in Figure 6-11.

6.5.1.2 Controls for Junction Boxes, Manholes, Trenches, Weirs, Sumps, and Lift Stations

Control of emissions from individual drain system components is based on an equipment standard supported by appropriate work practices. For example, the most feasible method of reducing emissions from a junction box is by installing a tightly fitting solid cover. Figure 6-12 shows a typical junction box. The cover reduces the exposure of the wastewater to the atmosphere, thereby minimizing the effects of diffusion and convection on the HAP's present in the wastewater stream. The cover may be vented to reduce the buildup of pressure and/or explosive concentrations of gases or have openings necessary for operation, inspection or maintenance. In such cases, the vent could be routed to a recovery or combustion control device to prevent the volatilized HAP's from being released to the atmosphere. Emission suppression may also be achieved through the use of other totally enclosed equipment such as hard-piping in place of open trenches.

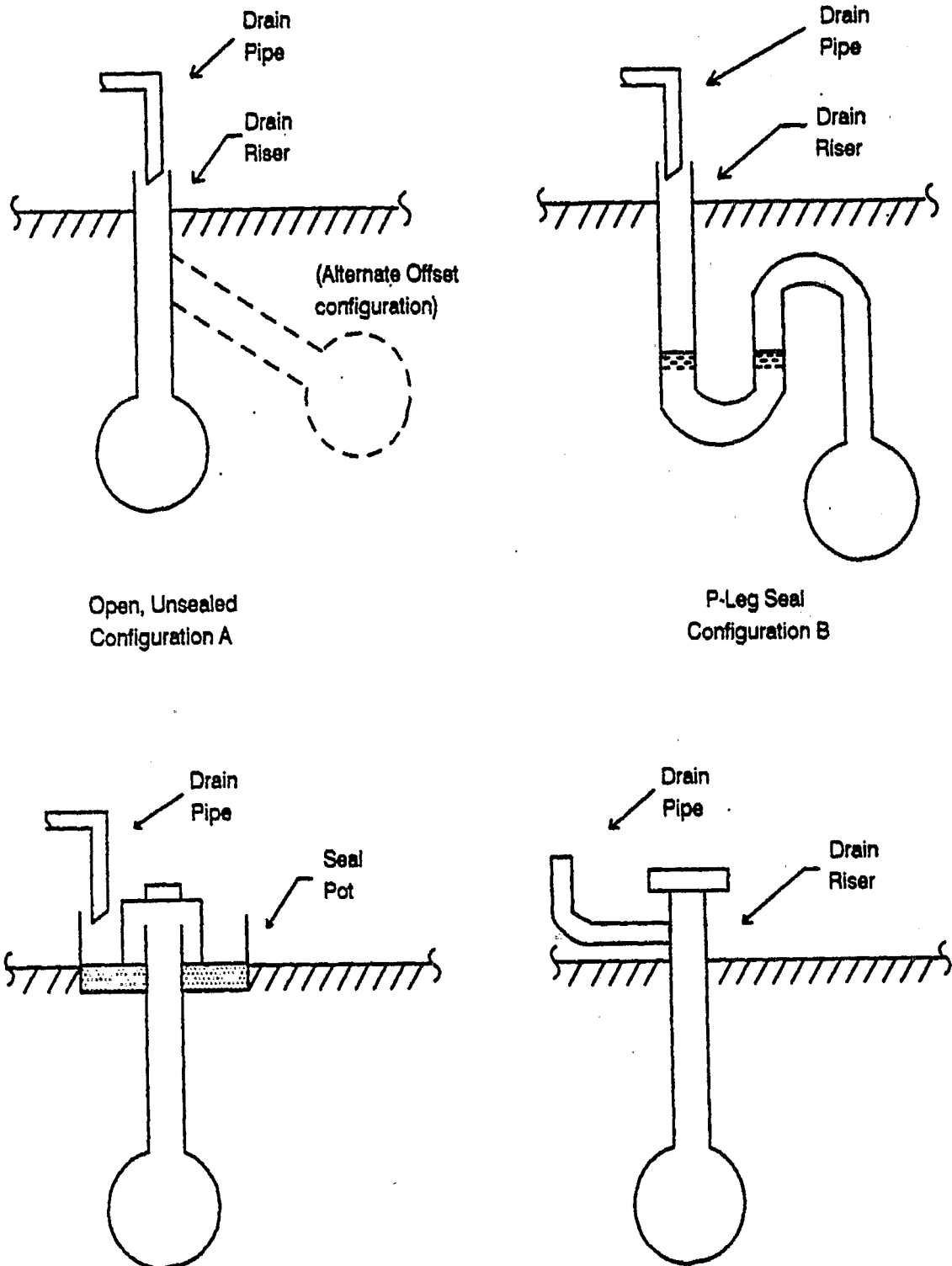


Figure 6-10. Types of Drains

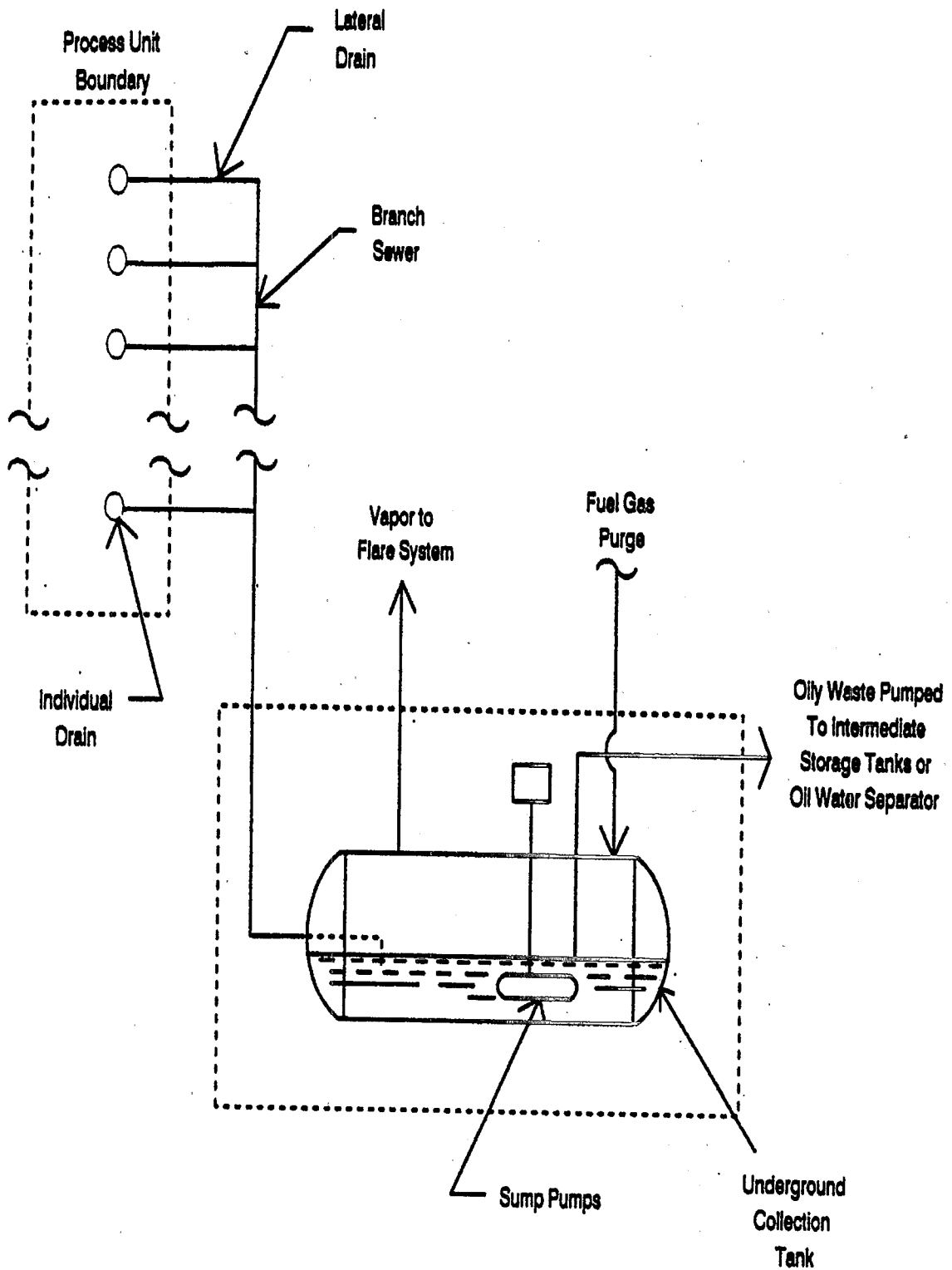


Figure 6-11. Closed Drain System

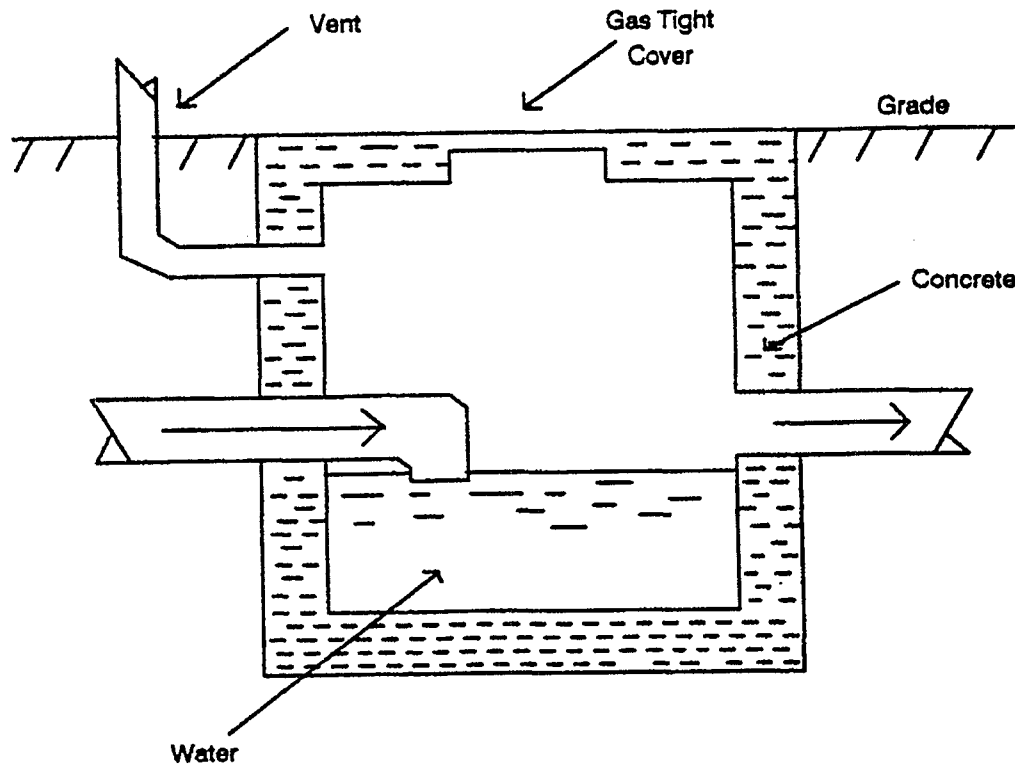


Figure 6-12. Drain System Junction Box

6.5.1.3 Controls for Wastewater Tanks and Oil-Water Separators

Emissions from wastewater tanks and oil-water separators can be reduced by installing either a floating roof over the liquid surface of the separator or tank, or a fixed roof vented to a control device. The roof reduces the effects of evaporation, wind speed, and solar radiation. Fixed roofs can be constructed of various materials and can be mounted on the sides of the tank or separator or supported by horizontal beams set in the sides of the tank or separator. The space between the roof and the edge of the tank or separator, and the spaces around any access doors, can be sealed with gaskets to prevent the release of any HAP's that volatilize from the wastewater. The vent from the tank would be routed to a recovery or combustion control device.

Floating roofs actually float on the liquid surface, thereby minimizing the vapor space above the wastewater. Floating roofs can be constructed of various materials including plastic, glass foam blocks, aluminum pontoons, or fiberglass. Seals are placed between the roof and the wall of the separator to minimize VOC emissions. A primary seal consists of a foam or liquid-filled seal mounted, in contact with the liquid, between the floating roof and the wall of the separator. Emission reductions from floating roofs can be greater than 95 percent for tanks and oil-water separators holding wastewater. The effectiveness of the roofs in reducing emissions depends on a variety of factors -- the most important being maintenance of the seals around the roofs, doors, and other openings. The HON includes work practices to ensure optimal performance of the control technology. Section 6.4 of this document provides additional details on both fixed and floating roofs.

6.5.1.4 Containers

The technologies used for controlling emissions from containers include the use of covers, submerged-fill pipes, and enclosures. When wastewater or residuals from wastewater treatment are added to a container, use of a submerged-fill pipe minimizes the loss of HAP's during filling. As discussed in Section 5.2 of this manual, in submerged loading the fill pipe is below the liquid level, thus reducing the amount of turbulence and resulting in lower vapor generation. Covers reduce losses due to evaporation and wind. Any container that must be opened can be placed in an enclosure that is vented to a closed-vent system and control device. The conveyance of the gases to a control device reduces the potential for buildup of pressure and/or explosive concentrations of gases in the enclosure. To be subject to the HON, a container must have a capacity greater than or equal to 0.1 m³.

6.5.2 Treatment Processes

For wastewater, the primary treatment processes are steam stripping and biological treatment. This section provides a detailed discussion of each.

6.5.2.1 Steam Stripping

Steam stripping involves the fractional distillation of wastewater to remove HAP's. As the wastewater flows down the column, it contacts the steam flowing countercurrently up the column. Organic compounds are vaporized through heat transfer from the steam. As the organics vaporize in the column, they are transferred from the liquid phase into the gas phase. The vaporized organic constituents flow out the top of the column with any uncondensed steam and undergo a phase change to a liquid in the overhead condenser. From the condenser, the liquid is sent to a decanter where the organic compounds separate from the condensed steam due to differences in density (e.g., the organic layer may float on top of the aqueous phase). The organic layer is usually either recycled and reused in the process or incinerated in an on-site combustion device for heat recovery.³ If the organic layer is reused or recycled then the steam stripper is considered part of a chemical manufacturing process unit, not a waste management unit.

The wastewater effluent leaving the bottom of the steam stripper is usually either routed to an on-site wastewater treatment plant and discharged to a National Pollutant Discharge Elimination System (NPDES)-permitted outfall, or sent to a publicly-owned treatment works (POTW).

Steam stripper systems may be operated in batch or continuous mode. Batch steam strippers are more prevalent when the wastewater feed is generated by batch processes, when the characteristics of the feed are highly variable, or when small volumes of wastewater are generated. Batch strippers may also be used if the wastewater contains relatively high concentrations of solids, resins, or tars.

In contrast to batch strippers, continuous steam strippers are designed to treat wastewater streams with relatively consistent characteristics. A typical continuous steam stripper system is in Figure 6-13. Design of the continuous stripper system is based on the flow rate and composition

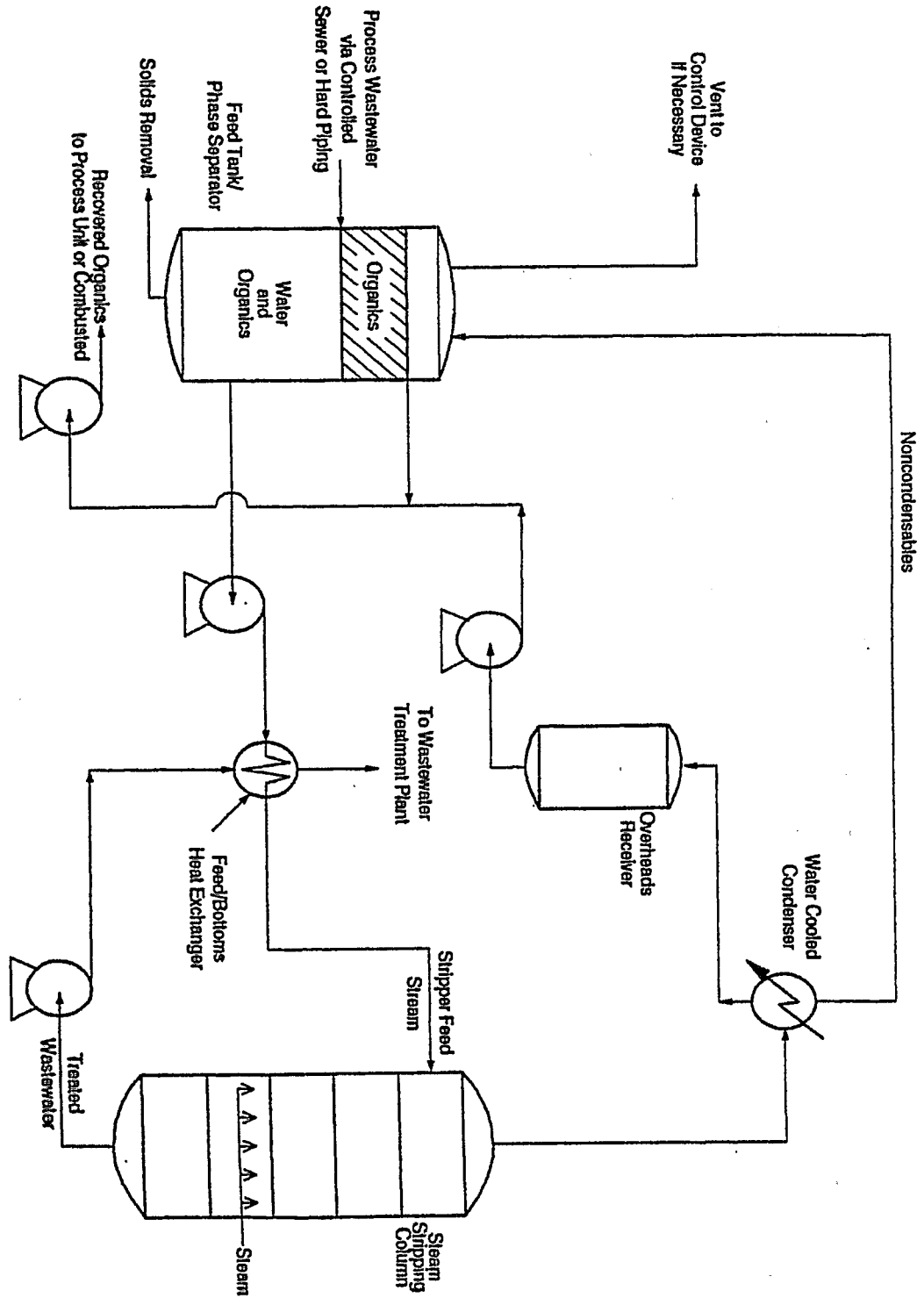


Figure 6-13. Continuous Steam Stripper System.

of a specific wastewater feed stream or combination of streams. Multi-stage, continuous strippers normally achieve greater efficiencies of organic compound removal than batch strippers.

Wastewater streams continuously discharged from process equipment are usually relatively consistent in composition. Such wastewater streams would be efficiently treated with a continuous steam stripper system. However, batch wastewater streams can also be controlled by continuous steam strippers by incorporating a feed tank with adequate residence time to provide a consistent outlet composition. In such cases, the feed tank serves as a buffer between the batch process and the continuous steam stripper. During periods of no wastewater flow from the batch process, wastewater stored in the feed tank is fed to the stripper at a relatively constant rate.

Steam stripping achieves emission reductions of 0 to 99 percent, based on the chemical characteristics (e.g., strippability) of the wastewater stream. However, 95 to 99 percent reduction can be achieved for the majority of organic compounds regulated by the HON. The organic compound removal performance of the steam stripper depends on the degree of contact between the steam and the wastewater. Several factors affecting the degree of contact that occurs in the steam stripper column are: (1) the dimensions of the column (height and diameter); (2) the contacting media in the column (trays or packing); and (3) operating parameters such as the steam-to-feed ratio, column temperatures, and pH of the wastewater.

Steam stripping is most applicable to treating wastewaters with organic compounds that are highly volatile and have a low solubility in water. Oil, grease, and solids content and the pH of a wastewater stream also affect the feasibility of steam stripping. High levels of oil, grease, and solids can cause fouling of the stripper system. High or low pH may prove to be corrosive to equipment. However, these problems can usually be circumvented by design or wastewater preconditioning techniques. Section 2.2.3 of "Hazardous Air Pollutant Emissions from Process Units in the SOCOMI -- Background Information for Proposed Standards, Volume 1B: Control Technologies" provides additional details on steam stripping.⁴

6.5.2.2 Biological Treatment

The use of biological treatment systems as a control technology can be an effective method for the removal of numerous HAP's through microbial degradation. Such systems involve the use of bacteria, algae, fungi, and microorganisms to stabilize, absorb, alter, or destroy organic compounds. The most common form of biological treatment is aerobic (i.e., in the presence of oxygen). In the presence of excess oxygen, organic chemicals are oxidized by bacteria to carbon dioxide and water. Initially, the wastewater stream(s) entering the system must be equalized in order to prevent either the flow rate or concentration from chemically shocking the bacteria. Mixing from aerators combines organic compounds and the activated sludge. The effluent is allowed to settle in a clarifier where a fraction of the sludge is returned to the aeration lagoon to reseed the population of microorganisms. The remaining sludge is usually land disposed.

The design and operating parameters of a biological treatment unit are facility-specific and are dependent on the composition of the wastewater feed stream. The primary factors that affect the removal of HAP's from wastewater in a biological treatment unit include the food-to-microorganism ratio, oxygen availability, mixed liquor suspended solids ratio, pH, temperature, and residence time. Another consideration is the maintenance of a suspended-growth process that generates biomass, uses recycled biomass, and periodically removes biomass from the process.

6.6 REFERENCES

1. U. S. Environmental Protection Agency, Office of Air Quality Planning Standards, Stationary Source Compliance Division. Level II Inspection Manual: Benzene Transfer Operation. Washington, DC. January 1993.
2. U. S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Stationary Source Compliance Division. NESHAP Inspection Manual: Benzene Storage Vessels. EPA-455/R-92-006. Washington, DC. September 1991.
3. LaGrega, Michael and associates. Hazardous Waste Management. McGraw-Hill, Inc. New York, NY. 1994.
4. U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Office of Research and Development. Hazardous Air Pollutant Emissions from Process Units in the SOCM I -- Background Information for Proposed Standards, Volume 1B: Control Technologies. EPA-453/D-92-016b. Research Triangle Park, NC. November 1992.

7.0 THE PROVISIONS

7.1 PROCESS VENT PROVISIONS

This section summarizes the process vent provisions in §63.113 through §63.118 of Subpart G. The checklists in Sections 5, 9 and 10 of Volume II provide additional details of the process vent provisions.

7.1.1 Process Vent Definition

For purposes of the HON, a "process vent" is a gas stream containing greater than 0.005 weight percent total organic HAP that is continuously discharged during operation of the unit from an air oxidation reactor, other reactor or distillation unit within a chemical manufacturing process unit that meets all applicability criteria in §63.100 of Subpart F. Process vents are gas streams discharged to the atmosphere (with or without passing through a control device) either directly or after passing through one or more recovery devices. Relief valve discharges, gaseous streams routed to a fuel gas system(s), and leaks from equipment regulated under Subpart H are not process vents.

7.1.2 Process Vent Group Determination

Group 1 and Group 2 process vents are defined in §63.111 of Subpart G. A Group 1 process vent is a process vent with a flow rate of 0.005 scmm or greater, a total organic HAP concentration of 50 ppmv or greater and a total resource effectiveness (TRE) index value of 1.0 or less. A Group 2 process vent is a process vent that is not a Group 1 process vent. The TRE index value is a measure of the supplemental total resource requirement per unit reduction of organic HAP associated with a process vent stream. The TRE index value is a cost-effectiveness index, associated with an individual process vent stream and is dependent on the process vent flow rate, net heating value, total organic compounds (TOC) emission rate, and HAP emission rate. Equations that must be used to calculate the TRE index value for a process vent stream are provided in Appendix C. The coefficients used in the equation to calculate the TRE index value are different for process vents at new and existing sources.

Table 5-1 of Volume II is a applicability and group determination checklist for process vents. Process vents that are not subject to the process vent provisions may be subject to the equipment leak provisions in Subpart H (NESHAP for SOCM I equipment leaks) or the wastewater provisions in Subpart G, as noted in the checklist. Group 1/Group 2 determinations are required for each process vent stream that is subject to the process vent provisions, unless the process vent is already in compliance with the Group 1 requirements (98 percent reduction, 20 ppmv outlet concentration, or flare control).

Volume I: The Provisions		
7.1	Process Vent Provisions	I-61
7.2	Transfer Operations Provisions	I-76
7.3	Storage Vessel Provisions	I-82
7.4	Wastewater Provisions	I-98

7.1.3 Process Vent Control Requirements

Group 1 process vents must meet the control requirements in §63.113 of Subpart G unless they are included in an emissions average. Compliance options for Group 1 process vent streams include:

- Reducing emissions of organic HAP's using a flare meeting the specification in §63.11(b) of Subpart A (the NESHAP General Provisions);
- Reducing emissions of total organic HAP or TOC by 98 weight percent or to an exit concentration of 20 parts per million by volume, whichever is less stringent (product recovery devices are considered part of the process and cannot be included in determining compliance with this option except for recovery devices meeting certain conditions as described below); or
- Achieving and maintaining a TRE index value greater than 1.0 (e.g., by process modification or a product recovery device).

A recovery device may also be used alone or in combination with one or more control devices to meet the 98 percent reduction if the following three conditions are met: (1) the control system was installed before December 31, 1992; (2) the recovery device used to meet the 98 percent reduction is the last recovery device before release to the atmosphere; and (3) the recovery device alone or in combination with one or more control devices can meet the 98 percent reduction but is not capable of reliably reducing emissions to a concentration of 20 ppmv or less.

A recapture device may also be used to meet the 98 percent reduction. Recapture devices are considered control devices and are the same types of devices as recovery devices, however the material that is recovered is not normally used, reused, or sold. For example, the materials may be recovered primarily for disposal.

If a process vent stream with a mass rate of total hydrogen halides and halogen atoms greater than 0.45 kilograms per hour is combusted, a control device must be installed following the combustion device to reduce emissions of halogens and hydrogen halides. Halogen reduction devices installed after December 31, 1992, must reduce overall emissions of halogens and hydrogen halides by 99 percent or reduce the outlet mass of total hydrogen halides and halogens to less than 0.45 kilograms per hour, whichever is less stringent. Halogen reduction devices installed prior to December 31, 1992 must reduce overall emissions of halogens and hydrogen halides by 95 percent or reduce the outlet mass of total hydrogen halides and halogens to less than 0.45 kilograms per hour, whichever is less stringent.

A halogen reduction device may be used to reduce the vent stream halogen atom mass emission rate to less than 0.45 kilograms per hour prior to any combustion control device, and thus make the vent stream nonhalogenated. Flares cannot be used to control halogenated process vent streams.

If a boiler or process heater is used to comply with the 98 percent reduction or 20 ppmv outlet concentration, then the vent stream must be introduced into the flame zone of the control device.

If an owner or operator elects to achieve and maintain a TRE index value greater than 1.0, the vent would become a Group 2 vent and must comply with the provisions for Group 2 vents. Group 2 vents are not required to apply any additional emission controls, however, they are subject to certain monitoring, reporting, and recordkeeping requirements to ensure that they were correctly determined to be Group 2 and that they remain Group 2.

7.1.4 Process Vent Testing, Monitoring, Recordkeeping, and Reporting

Procedures for determining group status of vents, including test procedures and TRE equations, are contained in §63.115 of Subpart G. Performance test procedures are specified in §63.116. The initial performance testing and initial reporting and recordkeeping requirements for process vents that are controlled with an incinerator, boiler, process heater, or flare are outlined in Table 7-1. Note that compliance can be demonstrated by measuring either HAP or TOC emissions. Initial testing, reporting, and recordkeeping requirements for scrubbers used downstream of a combustion device used to control halogenated streams are also shown in Table 7-1. A performance test is not required for flares. However, a compliance determination by visible emissions observation is required.

Performance tests are not required for boilers and process heaters with a design heat input capacity of 44 Megawatts or greater, or for boilers or process heaters where the vent stream is introduced with or used as the primary fuel. A boiler or process heater burning hazardous waste which is permitted under 40 CFR Part 270 (the RCRA hazardous waste permit program) and is in compliance with 40 CFR Part 266 Subpart H (standard for hazardous waste burned in boilers and industrial furnaces) does not require a performance test under the HON. The compliance demonstrations under these rules replace the performance test under the HON. Performance tests are also not required under the HON for hazardous waste incinerators that are permitted under 40 CFR Part 270 and comply with the requirements of 40 CFR Part 264, Subpart O, or has certified compliance with the interim status requirements of 40 CFR Part 265, Subpart O. The compliance demonstrations under these rules replace the performance test under the HON. In addition, a performance test is not required if (1) a performance test was already conducted to determine compliance with a regulation promulgated by EPA, (2) the test was conducted using the same methods as required by the HON, and (3) either no process changes have been made since the test or it can be demonstrated that the performance test results can reliably demonstrate compliance despite process changes.

Table 7-2 shows the group determination, reporting and recordkeeping requirements for Group 2 process vent streams. As described in Section 7.1.2, a Group 2 vent may be classified Group 2 on the basis of flow, concentration, or TRE index value. If the TRE index value is less than 4.0, the TRE index value calculation must be based on the test measurement parameters summarized in Table 7-2. If the TRE index value is expected to be greater than 4.0, then the parameters (e.g., flow and concentration) used in the TRE index value calculation may be estimated using engineering assessments instead of a test.

Monitoring provisions for process vents are contained in §63.114 of Subpart G. Continuous monitoring, recordkeeping, and reporting requirements for complying with the 98 percent reduction requirement or 20 ppmv outlet concentration are presented in Table 7-3. Continuous monitoring, recordkeeping, and reporting requirements for maintaining a TRE index value greater than 1.0 and less than or equal to 4.0 are presented in Table 7-4. Any boiler or process heater in which all vent streams are introduced with the primary fuel or where the design heat input capacity is greater than or equal to 44 Megawatts is exempt from monitoring requirements. Hazardous

TABLE 7-1. PROCESS VENTS INITIAL PERFORMANCE TEST AND RECORDKEEPING AND REPORTING FOR COMPLIANCE DETERMINATION

Control devices which require a performance test	Test parameters	Test Methods	Recordkeeping/Reporting ^a
Thermal Incinerator;	(1) Percent reduction of organic HAP or TOC if complying with 98 percent reduction in §63.113(a)(2).	(1) Method 18 or any method validated by Method 301	(A) Record and report the percent reduction of organic HAP or TOC or the outlet concentration of HAP or TOC in ppmv
Catalytic Incinerator or Boiler or process heater with design heat input capacity less than 44 megawatts and the vent stream is not mixed with the primary fuel	or The outlet concentration of HAP or TOC ^b in ppmv if complying with 20 ppmv limit in §63.113(a)(2).	(2) Method 1 or 1A	(B) Record and report the value of the appropriate monitored operating parameter(s) shown on Table 7-3, averaged over the time period of the performance test
	(2) Sampling Sites - Location	(3) Method 2, 2A, 2C, 2D	(C) For boilers and process heaters, record and report the location at which the vent stream is introduced
	(3) Volumetric Flow Rate	(4) Method 3B	
	(4) Oxygen Concentration		

(Continued)

TABLE 7-1. PROCESS VENTS INITIAL PERFORMANCE TEST AND RECORDKEEPING AND REPORTING FOR COMPLIANCE DETERMINATION

	Test parameters	Test Methods	Recordkeeping/Reporting ^a
Control devices which require a performance test Scrubber for halogenated vent streams following a combustion device	(1) Percent reduction of total halogens and hydrogen halides if complying with the appropriate reduction requirements in §63.113(c)(1) or Outlet mass of total hydrogen halides and halogens to less than 0.45 kilograms per hour	(1) Method 26 or 26A of 40 CFR Part 60, Appendix A or any method validated by Method 301 of 40 CFR Part 63, Appendix A	(A) Record and report the percent reduction of halogens and hydrogen halides or the concentration of each individual compound at the outlet (B) Record and report the pH of the scrubber effluent and the scrubber liquid to gas ratio
Flare (no performance test is required to determine percent emissions reduction or outlet HAP or TOC concentration)	(1) Visible emissions	(1) Method 22 of 40 CFR Part 60, Appendix A	(A) Record and report all visible emission readings, heat content, flow rate, and exit velocity determinations made during the compliance determination (B) Record and report all periods during the compliance determination when the pilot flame is absent (C) Record and report flare design

(Continued)

TABLE 7-1. PROCESS VENTS INITIAL PERFORMANCE TEST AND RECORDKEEPING AND REPORTING FOR COMPLIANCE DETERMINATION

Control devices which require a performance test	Test parameters	Test Methods	Recordkeeping/Reporting ^a
Scrubber for halogenated vent streams prior to a combustion device (no performance test is required to determine percent emissions reduction or outlet concentration)	(1) Halogen concentration	(1) Method 18 ^b of 40 CFR Part 60, Appendix A	(A) Record and report the halogen concentration in the vent stream

^a Reported information must be included in the Notification of Compliance Status discussed in Section 2.5.3 of this manual and in §63.152 of Subpart G.

^b The owner or operator may also use process knowledge to determine that no halogens or hydrogen halides are present or may use engineering assessment to calculate concentration.

TABLE 7-2. INITIAL GROUP DETERMINATION AND RECORDKEEPING AND REPORTING REQUIREMENTS FOR GROUP 2 PROCESS VENTS^a

Type of vent stream	Test parameters	Test Methods	Recordkeeping/Reporting ^b
Process vent stream with a TRE index value greater than 1.0 but less than 4.0	(1) Sampling sites - location	(1) Method 1 or 1A of 40 CFR Part 60, Appendix A	(A) Record and report the measurements and calculations performed to determine the TRE index value
	(2) Volumetric flow rate	(2) Method 2, 2A, 2C, 2D of 40 CFR Part 60, Appendix A	
	(3) Molar composition of the vent stream	(3) Method 18 of 40 CFR Part 60, Appendix A	(B) If an absorber, condenser, or adsorber is used, record and report the value of the appropriate monitored operating parameter(s) shown on Table 7-4 and averaged over the time period of the flow rate and concentration measurements
	(4) Concentration of carbon monoxide and hydrogen	(4) ASTM Method D1946-77	
	(5) Concentration of water vapor	(5) Method 4 of 40 CFR Part 60, Appendix A	
	(6) Total halogen concentration	(6) Method 18 ^c of 40 CFR Part 60, Appendix A	
Process vent stream with a TRE index value greater than 4.0	None	None	(A) Record and report any measurements, engineering assessments, and calculations performed to determine the TRE index value

(Continued)

TABLE 7-2. INITIAL GROUP DETERMINATION AND RECORDKEEPING AND REPORTING REQUIREMENTS FOR GROUP 2 PROCESS VENTS^a

Type of vent stream	Test parameters	Test Methods	Recordkeeping/Reporting ^b
Process vent stream with a flow rate less than 0.005 standard cubic meter per minute	(1) Sampling sites - location (2) Volumetric flow rate	(1) Method 1 or 1A of 40 CFR Part 60, Appendix A (2) Method 2, 2A, 2C, 2D of 40 CFR Part 60, Appendix A	(A) Record and report the flow rate measurement
Process vent stream with a organic HAP or TOC concentration less than 50 parts per million by volume	(1) Sampling sites - location (2) The outlet concentration of HAP or TOC	(1) Method 1 or 1A of 40 CFR Part 60, Appendix A (2) Method 18 or 25A of 40 CFR Part 60, Appendix A or any method validated by Method 301 ^d of 40 CFR Part 63, Appendix A	(A) Record and report the organic HAP or TOC concentration measurement

^a A Group 2 vent may be determined by demonstrating any of three criteria: TRE >1.0; flow rate < 0.005 scmm; or HAP or TOC concentration < 50 ppmv. For example, if the flow rate is < 0.005 scmm, the TRE index value need not be calculated. Test methods for each criterion are shown in the table.

^b Reported information is included in the Notification of Compliance Status discussed in Section 2.5.3 of this manual and in §63.152 of Subpart G.

^c The owner or operator may also use process knowledge to determine that no halogens or hydrogen halides are present or may use engineering assessment to calculate concentration.

^d If Method 25A is used, the calibration gas must be a single organic HAP compound present at greater than 50 percent by volume. Method 25A must show that the concentration of TOC is below 25 ppmv for the process vent to be Group 2.

TABLE 7-3. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR PROCESS VENTS COMPLYING WITH 98 WEIGHT-PERCENT REDUCTION OF EMISSIONS OR A LIMIT OF 20 PARTS PER MILLION BY VOLUME OR USING A FLARE

Control Device	Parameters to be Monitored ^a	Recordkeeping and Reporting Requirements for Monitored Parameters
Thermal Incinerator	Firebox temperature ^b [63.114(a)(1)(i)]	<ol style="list-style-type: none"> 1. Continuous records^c 2. Record and report the firebox temperature averaged over the full period of the performance test - NCS^d 3. Record the daily average firebox temperature for each operating day^e 4. Report all daily average temperatures that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected^f - PRG
Catalytic Incinerator	Temperature upstream and downstream of the catalyst bed [63.114(a)(1)(ii)]	<ol style="list-style-type: none"> 1. Continuous records 2. Record and report the upstream and downstream temperatures and the temperature difference across the catalyst bed averaged over the full period of the performance test - NCS 3. Record the daily average upstream temperature and temperature difference across catalyst bed for each operating day^e 4. Report all daily average upstream temperatures that are outside the range established in the NCS or operating permit - PR 5. Report all daily average temperature differences across the catalyst bed that are outside the range established in the NCS or operating permit - PR 6. Report all operating days when insufficient monitoring data are collected^f

(Continued)

**TABLE 7-3. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR PROCESS VENTS
COMPLYING WITH 98 WEIGHT-PERCENT REDUCTION OF EMISSIONS OR A
LIMIT OF 20 PARTS PER MILLION BY VOLUME OR USING A FLARE**

Control Device	Parameters to be Monitored ^a	Recordkeeping and Reporting Requirements for Monitored Parameters
Boiler or Process Heater with a design heat input capacity less than 44 megawatts and Vent Stream is not introduced with or as the primary fuel	Firebox temperature ^b [63.114(a)(3)]	<ol style="list-style-type: none"> 1. Continuous records 2. Record and report the firebox temperature averaged over the full period of the performance test - NCS 3. Record the daily average firebox temperature for each operating day^e 4. Report all daily average firebox temperatures that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected^f - PR
Flare	Presence of a flame at the pilot light [63.114(a)(2)]	<ol style="list-style-type: none"> 1. Hourly records of whether the monitor was continuously operating and whether the pilot flame was continuously present during each hour. 2. Record and report the presence of a flame at the pilot light over the full period of the compliance determination - NCS 3. Record the times and durations of all periods when a pilot flame is absent or the monitor is not operating - PR 4. Report the times and durations of all periods when all pilot flames of a flare are absent - PR
Recapture Devices	The appropriate monitoring device identified in Table 7-4 when, in the table, the term "recapture" is substituted for "recovery." [63.114(a)(5)]	<ol style="list-style-type: none"> 1. The recordkeeping and reporting requirements for monitored parameters identified for the appropriate monitoring devices in Table 7-4.

(Continued)

TABLE 7-3. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR PROCESS VENTS COMPLYING WITH 98 WEIGHT-PERCENT REDUCTION OF EMISSIONS OR A LIMIT OF 20 PARTS PER MILLION BY VOLUME OR USING A FLARE

Control Device	Parameters to be Monitored ^a	Recordkeeping and Reporting Requirements for Monitored Parameters
Scrubber for Halogenated Vent Streams (Note: Controlled by a combustion device other than a flare)	pH of scrubber effluent [63.114(a)(4)(I)], and	<ol style="list-style-type: none"> 1. Continuous records of scrubber liquid flow rate 2. Record and report the pH of the scrubber effluent averaged over the full period of the performance test - NCS 3. Record the daily average pH of the scrubber effluent for each operating day^e 4. Report all daily average pH values of the scrubber effluent that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected^f - PR
All Control Devices	Scrubber liquid and gas flow rates [63.114(a)(4)(ii)]	<ol style="list-style-type: none"> 1. Continuous records of scrubber liquid flow rate 2. Record and report the scrubber liquid/gas ratio averaged over the full period of the performance test - NCS 3. Record the daily average scrubber liquid/gas ratio for each operating day^e 4. Report all daily average scrubber liquid/gas ratios that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected^f - PR
All Control Devices	Presence of flow diverted from the control device to the atmosphere [63.114(d)(1)] or	<ol style="list-style-type: none"> 1. Hourly records of whether the flow indicator was operating and whether diversion was detected at any time during each hour 2. Record and report the times and durations of all periods when the vent stream is diverted through a bypass line or the monitor is not operating - PR
	Monthly inspections of sealed valves [63.114(d)(2)]	<ol style="list-style-type: none"> 1. Records that monthly inspections were performed 2. Record and report the duration of all periods when the car-seal or other seal mechanism is broken, the bypass line valve position has changed, or the key for a lock-and-key type lock has been checked out - PR

(Continued)

TABLE 7-3. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR PROCESS VENTS COMPLYING WITH 98 WEIGHT-PERCENT REDUCTION OF EMISSIONS OR A LIMIT OF 20 PARTS PER MILLION BY VOLUME OR USING A FLARE

Control Device	Parameters to be Monitored ^a	Recordkeeping and Reporting Requirements for Monitored Parameters
Other Control Devices not listed above	Owner or operator must submit a plan for monitoring, recordkeeping, and reporting [§63.114(c), §63.151(f), §63.152(e)]	1. As specified in the implementation plan or operating permit

a Regulatory citations are listed in brackets.

b Monitor may be installed in the firebox or in the ductwork immediately downstream of the firebox before any substantial heat exchange is encountered.

c "Continuous records" is defined in §63.111 of Subpart G.

d NCS = Notification of Compliance Status described in §63.152 of Subpart G and discussed in Section 2.5.3 of this manual.

e The daily average is the average of all recorded parameter values for the operating day. If all recorded values during an operating day are within the range established in the NCS or operating permit, a statement to this effect can be recorded instead of the daily average.

f The periodic reports shall include the duration of periods when monitoring data is not collected for each excursion as defined in §63.152(c)(2)(ii)(A) of Subpart G.

g PR = Periodic Reports described in §63.152 of Subpart G and discussed in Section 2.5.4 of this manual.

TABLE 7-4. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR PROCESS VENTS MAINTAINING A TRE INDEX VALUE >1.0 AND ≤4.0

Final Recovery Device	Parameters to be Monitored ^a	Recordkeeping and Reporting Requirements for Monitored Parameters
Absorber ^b	Exit temperature of the absorbing liquid [63.114(b)(1)], and	<ol style="list-style-type: none"> 1. Continuous records^c 2. Record and report the exit temperature of the absorbing liquid averaged over the full period of the TRE determination - NCS^d 3. Record the daily average exit temperature of the absorbing liquid for each operating day^e 4. Report all the daily average exit temperatures of the absorbing liquid that are outside the range established in the NCS or operating permit - PR^f
	Exit specific gravity [63.114(b)(1)]	<ol style="list-style-type: none"> 1. Continuous records 2. Record and report the exit specific gravity averaged over the full period of the TRE determination - NCS 3. Record the daily average exit specific gravity for each operating day^e 4. Report all the daily average exit specific gravity values that are outside the range established in the NCS or operating permit - PR
Condenser ^d	Exit (product side) temperature [63.114(b)(2)]	<ol style="list-style-type: none"> 1. Continuous records 2. Record and report the exit temperature averaged over the full period of the TRE determination - NCS 3. Record the daily average exit temperature for each operating day^e 4. Report all the daily average exit temperatures that are outside the range established in the NCS or operating permit - PR

(Continued)

TABLE 7-4. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR PROCESS VENTS MAINTAINING A TRE INDEX VALUE >1.0 AND ≤4.0

Final Recovery Device	Parameters to be Monitored ^a	Recordkeeping and Reporting Requirements for Monitored Parameters
Carbon Adsorber ^d	Total regeneration stream mass or volumetric flow during carbon bed regeneration cycle(s) [63.114(b)(3)], and	<ol style="list-style-type: none"> 1. Record of total regeneration stream mass flow for each carbon bed regeneration cycle 2. Record and report the total regeneration stream mass flow during each carbon bed regeneration cycle during the period of the TRE determination - NCS 3. Report all carbon bed regeneration cycles when the total regeneration stream mass flow is outside the range established in the NCS or operating permit - PR
	Temperature of the carbon bed after regeneration [and within 15 minutes of completing any cooling cycle(s)] [63.114(b)(3)]	<ol style="list-style-type: none"> 1. Records of the temperature of the carbon bed after each regeneration 2. Record and report the temperature of the carbon bed after each regeneration during the period of the TRE determination - NCS 3. Report all carbon bed regeneration cycles during which temperature of the carbon bed after regeneration is outside the range established in the NCS or operating permit - PR
All Recovery Devices (as an alternative to the above)	Concentration level or reading indicated by an organic monitoring device at the outlet of the recovery device [63.114(b)]	<ol style="list-style-type: none"> 1. Continuous records 2. Record and report the concentration level or reading averaged over the full period of the TRE determination - NCS 3. Record the daily average concentration level or reading for each operating day^e 4. Report all daily average concentration levels or readings that are outside the range established in the NCS or operating permit - PR

(Continued)

TABLE 7-4. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR PROCESS VENTS MAINTAINING A TRE INDEX VALUE >1.0 AND ≤4.0

Final Recovery Device	Parameters to be Monitored ^a	Recordkeeping and Reporting Requirements for Monitored Parameters
Other Recovery Devices not listed above or a Process Vent that maintains a TRE index value >1.0 and ≤4.0 without a Recovery Device	Owner or operator must submit a plan for monitoring, recordkeeping, and reporting [§63.114(c), §63.151(f), §63.152(e)]	1. As specified in the implementation plan or operating permit

a Regulatory citations are listed in brackets. Note that under §63.114(e), an owner or operator may apply to monitor an alternate parameter by submitting a plan and rationale in the Implementation Plan or operating permit application as provided in §63.151(f) or §63.152(e) of Subpart G.

b Alternatively, these devices may comply with the organic monitoring device provisions listed at the end of this table under "All Recovery Devices."

c "Continuous records" is defined in §63.111 of Subpart G.

d NCS = Notification of Compliance Status described in §63.152 of Subpart G and discussed in Section 3.5.3 of this manual.

e The daily average is the average of all values recorded during the operating day. If all recorded values during an operating day are within the range established in the NCS or operating permit, a statement to this effect can be recorded instead of the daily average.

f PR = Periodic Reports described in §63.152 of Subpart G and discussed in Section 3.5.4 of this manual.

waste boilers that are permitted under 40 CFR Part 270 and are in compliance with 40 CFR Part 266 do not have additional continuous monitoring requirements under the HON. The monitoring under these rules replace the monitoring under the HON. Monitoring is also not required for process vents with a TRE index value greater than 4.0, a flow rate less than 0.005 standard cubic meters per minute, or a concentration less than 50 ppmv.

For each parameter monitored according to Tables 7-3 and 7-4, the owner or operator must establish a site-specific range for the parameter that indicates proper operation of the control or recovery device. If an owner or operator uses a control device or recovery device other than those listed in Tables 7-3 and 7-4, or wishes to monitor parameters other than those specified in Tables 7-3 and 7-4, the owner or operator must submit a description of, and rationale for, the planned monitoring, recordkeeping and reporting in the operating permit application or by other appropriate means.

For Group 2 process vents, any process changes which can cause a change in the TRE index value, the flow rate, or the outlet concentration must be reported. Any recalculation or remeasurement of the parameter(s) used to determine Group 2 status, TRE index value, flow rate, or outlet concentration, must also be reported. If the process change causes the flow rate to increase to 0.005 standard cubic meter per minute or the HAP concentration to increase to 50 ppmv, a TRE index value calculation must be performed if either of these parameters are used to determine Group 2 status.

7.2 TRANSFER OPERATION PROVISIONS

This section summarizes the transfer operation provisions in §63.126 through §63.130 of Subpart G. The checklists in Sections 6, 9 and 10 of Volume II provide additional details of the transfer operation provisions.

7.2.1 Transfer Operations Definition

A "transfer operation" is defined as the loading of one or more liquid organic HAP's from a transfer rack assigned to a chemical manufacturing process that is subject to the HON into a tank truck or railcar. A transfer rack is defined as the loading arms, pumps, meters, shutoff valves, relief valves, and other piping and valves necessary to fill tank trucks or railcars. Transfer operations loading at an operating pressure greater than 204.9 kPa are not subject to the HON. Racks that transfer liquids that contain organic HAP's only as impurities are not subject to the HON. Racks that vapor balance during all loading operations are not subject to the transfer provisions in §63.126 through §63.130.

7.2.2 Transfer Operations Group Determination

Group 1 and Group 2 transfer racks are defined in §63.111 of Subpart G. A Group 1 transfer rack is a transfer rack that loads 0.65 million liters per year, or greater, of liquids that contain organic HAP's with a rack weighted average vapor pressure of 10.3 kPa or greater. A Group 2 transfer rack is not a Group 1 transfer rack.

Tables 4-4 and 4-5 of Volume II are applicability and group determination checklists for transfer operations.

7.2.3 Transfer Operation Control Requirements

Group 1 transfer racks must meet the control requirements in §63.126 of Subpart G when the operating pressure of the transfer operation is less than or equal to 204.9 kilopascals, unless the rack is included in an emissions average. Each Group 1 loading rack must be equipped with a vapor collection system and control device. The control device must comply with one of the following criteria:

- Reduce emissions of total organic HAP's by 98 weight-percent or to an exit concentration of 20 parts per million by volume, whichever is less stringent;
- Reduce emissions of organic HAP's using a flare which meets the specifications in §63.11(b) of Subpart A (the NESHAP General Provisions);
- Reduce emissions of organic HAP's using a vapor balancing system; or
- Reduce emissions of organic HAP's by routing emissions to a fuel gas system or to a process.

In contrast to the process vents provisions which do not allow use of product recovery devices to determine compliance with the first option above, for transfer racks, the 98 weight percent reduction or 20 ppmv exit concentration can be achieved using either a combustion device or a product recovery device.

Each vapor collection system used to comply with the transfer provisions must achieve the following:

- Collect the displaced vapors from the transfer operation and route them to a control device; and
- Prevent organic HAP vapors collected in one arm from passing through another loading arm to the atmosphere.

If a vapor balancing system is used to comply with the transfer provisions, the vapor balancing system must achieve the following:

- Collect the displaced vapors from the transfer operation and either:
 - route them to the storage vessel from which the transferred liquid originated; or
 - compress the vapors and commingle the liquid with the raw feed to the chemical manufacturing process unit.

If the emissions are routed to a process, the organic HAP emissions shall meet one or a combination of the following ends:

- Recycled and/or consumed in the same manner as a material that fulfills the same function in that process;

- Transformed by chemical reaction into materials that are not organic hazardous air pollutants;
- Incorporated into a product; and/or
- Recovered.

If a transfer rack vent stream with a mass rate of total hydrogen halides and halogen atoms greater than 0.45 kilograms per hour is combusted, a halogen reduction device must be installed following the combustion device to reduce emissions of halogens and hydrogen halides. Halogen reduction devices installed on or after December 31, 1992 must reduce overall emissions of halogens and hydrogen halides by 99 percent or reduce the outlet mass of total hydrogen halides and halogens to less than 0.45 kilograms per hour, whichever is less stringent. Halogen reduction devices installed prior to December 31, 1992 must reduce overall emissions of halogens and hydrogen halides by 95 percent or reduce the outlet mass of total hydrogen halides and halogens to less than 0.45 kilograms per hour, whichever is less stringent.

A halogen reduction device may be used to reduce the vent stream halogen atom mass emission rate to less than 0.45 kilograms per hour prior to any combustion control device, and thus make the vent stream nonhalogenated. Halogenated streams cannot be routed to a flare.

If a boiler or process heater is used to control the vent stream from a transfer rack, the vent stream must be introduced into the flame zone.

The tank truck or railcar vapor collection equipment must be compatible with and connected to the loading rack's vapor collection system. The owner or operator must ensure that any pressure-relief device will not open during loading and that all vents that could divert the vapor flow to the atmosphere are either secured using a car seal or a lock-and-key type configuration, or equipped with a flow indicator. Also, organic HAP's may only be loaded into a tank truck or railcar which has a current certification for the U.S. Department of Transportation (DOT) pressure test requirements, or which has been demonstrated to be vapor-tight within the preceding 12 months.

Group 2 transfer racks are not required to apply emission controls, but recordkeeping and reporting is required to verify that they are Group 2.

7.2.4 Transfer Operations Testing, Monitoring, Recordkeeping, and Reporting

Initial performance testing, initial reporting, and recordkeeping requirements for Group 1 transfer racks are summarized in Table 7-5. A performance test is not required for flares. However, a compliance determination is required which includes determining visible emissions.

If a control device is shared between a process vent and a transfer rack, the performance test procedures for process vents shall be followed and a separate performance test for the transfer operation's use of the control device does not have to be conducted. Performance tests are not required for vapor balancing systems, or boilers or process heaters with a design heat input capacity of 44 Megawatts or greater or where the vent stream is introduced with the primary fuel. A boiler or process heater burning hazardous waste which is permitted under 40 CFR Part 270 and is in compliance with 40 CFR Part 266 Subpart H also does not require a performance test under the HON. The compliance demonstration under these rules replace the compliance demonstration under the HON. A performance test is not required when emissions are routed to

TABLE 7-5. TRANSFER RACK INITIAL PERFORMANCE TEST AND RECORDKEEPING AND REPORTING FOR COMPLIANCE DETERMINATION^a

Control devices which require a performance test	Test parameters	Test Methods	Recordkeeping/Reporting ^b
Thermal Incinerator; Catalytic Incinerator or Boiler or process heater with design heat input capacity less than 44 megawatts and the vent stream is not mixed with the primary fuel	(1) Percent reduction of organic HAP or TOC ^c if complying with 98 percent reduction in §63.126(b)(1). or The outlet concentration of HAP or TOC ^c in ppmv if complying with 20 ppmv limit in §63.126(b)(1).	(1) Method 18 or 25A of 40 CFR Part 60, Appendix A or any method validated by Method 301 of 40 CFR Part 63, Appendix A	(A) Record and report the percent reduction of organic HAP or TOC ^c or the outlet concentration of HAP or TOC ^c in ppmv (for combustion device the concentration shall be reported on a dry basis corrected to 3-percent oxygen)
or Absorber; Condenser; or Carbon Adsorber	(2) Sampling Sites - Location (3) Volumetric Flow Rate (4) Oxygen Concentration	(2) Method 1 or 1A of 40 CFR Part 60, Appendix A (3) Method 2, 2A, 2C, 2D of 40 CFR Part 60, Appendix A (4) Method 3B of 40 CFR Part 60, Appendix A	(B) Record and report the value of the appropriate monitored operating parameter(s) shown on Table 7-6, averaged over the time period of the performance test (C) For boilers and process heaters, record and report the location at which the vent stream is introduced.

(Continued)

TABLE 7-5. TRANSFER RACK INITIAL PERFORMANCE TEST AND RECORDKEEPING AND REPORTING FOR COMPLIANCE DETERMINATION^a

Control devices which require a performance test	Test parameters	Test Methods	Recordkeeping/Reporting ^b
Scrubber for halogenated vent stream following a combustion device	<p>(1) Percent reduction of total halogens and hydrogen halides if complying with the appropriate reduction requirements in §63.123(d)(1)</p> <p>or</p> <p>Outlet mass of total hydrogen halides and halogens to less than 0.45 kilograms per hour</p>	<p>(1) Method 26 or 26A of 40 CFR Part 60, Appendix A or any method validated by Method 301 of 40 CFR Part 63, Appendix A</p>	<p>(A) Record and report the percent reduction of halogens and hydrogen halides or the concentration of each individual compounds at the outlet</p> <p>(B) Record and report the pH of the scrubber effluent</p> <p>(C) Record and report the scrubber liquid to gas ratio</p>
Flare (no performance test is required to determine percent emissions reduction or outlet HAP or TOC concentration)	<p>(1) Visible emissions</p>	<p>(1) Method 22 of 40 CFR Part 60, Appendix A</p>	<p>(A) Record and report all visible emission readings, heat content, flow rate, and exit velocity</p> <p>(B) Record and report all periods during the compliance determination when the pilot flame is absent</p> <p>(C) Record and report flare design</p>

(Continued)

TABLE 7-5. TRANSFER RACK INITIAL PERFORMANCE TEST AND RECORDKEEPING AND REPORTING FOR COMPLIANCE DETERMINATION^a

Control devices which require a performance test	Test parameters		Test Methods		Recordkeeping/Reporting ^b	
	(1)	Equipment leaks	(1)	Method 21 of 40 CFR Part 60, Appendix A	(A)	Record and report visual inspections and leak readings
Vapor Collection System and Vapor Balancing System	(1)	Equipment leaks	(1)	Method 21 of 40 CFR Part 60, Appendix A	(A)	Record and report visual inspections and leak readings
Scrubber for halogenated vent stream prior to a combustion device	(1)	Halogen concentration	(1)	Method 26 or 26A of 40 CFR Part 60, Appendix A or any method validated by Method 301 of 40 CFR Part 63, Appendix A	(A)	Record and report the halogen concentration in the vent stream
Routing to a fuel gas system or a process	none	none	none	none	(A)	Report that the emission stream is being routed to a fuel gas system or a process

^a For transfer racks that transfer less than 11.8 million liters per year, a design analysis may be conducted instead of a performance test.

^b Reported information must be included in the Notification of Compliance Status discussed in Section 2.5.3 of this manual and in §63.152 of Subpart G.

^c TOC = Total organic compounds.

^d These requirements do not apply to vapor collection systems operated under a vacuum.

a fuel gas system or recycled to a process. Hazardous waste incinerators that are permitted under 40 CFR Part 270 and comply with the requirements of 40 CFR Part 264, Subpart O or have certified compliance with the interim status requirements of 40 CFR Part 265, Subpart O are not required to have performance tests conducted under the HON. The compliance demonstration under these rules replace the compliance demonstration under the HON.

For transfer racks that transfer less than 11.8 million liters per year of liquid containing organic HAP's, the owner or operator may submit a design evaluation for the control device, and monitor the design parameters instead of conducting performance tests.

Continuous monitoring, recordkeeping, and reporting requirements for transfer racks are presented in Table 7-6. Any boiler or process heater in which all vent streams are introduced with the primary fuel or where the design heat input capacity is greater than or equal to 44 Megawatts is exempt from monitoring requirements. Hazardous waste boilers that are permitted under 40 CFR Part 270 and are in compliance with 40 CFR Part 266 do not have continuous monitoring requirements.

The HON also requires periodic inspection of vapor collection and vapor balancing systems to detect leaks. The provisions are specified in §63.148 of Subpart G.

For each parameter monitored in Table 7-6, the owner or operator must establish a site-specific range for the parameters that indicates proper operation of the control device. If an owner or operator uses a control device other than those specified in Table 7-6, or wishes to monitor a parameter other than those specified in Table 7-6, the owner or operator must submit a description of and rationale Group 1 transfer racks may only load tank trucks and railcars that are vapor tight. Vapor tightness must be demonstrated by either: (1) having a current certification in accordance with the U.S. Department of Transportation pressure test requirements of 49 CFR 180 for tank trucks or 49 CFR 173.31 for railcars or (2) having been shown to be vapor tight within the preceding 12 months using Method 27.

Each owner or operator must maintain a record of the transfer rack vent system which lists all valves and vent streams that could divert the vent stream from the control device. The valves which are secured by car-seals or lock-and-key type configurations and the position of these valves must be identified.

The owner or operator of a Group 1 or Group 2 transfer rack must record and update annually an analysis demonstrating the design and actual annual throughput of the transfer rack, the weight-percent organic HAP of the liquid loaded, and the annual rack weighted average HAP vapor pressure. For Group 2 transfer racks that only transfer organic HAP's with vapor pressures less than 10.3 kilopascals, the owner or operator must only document each individual HAP that is transferred. For Group 2 transfer racks that transfer organic HAP's with vapor pressures both above and below 10.3 kilopascals, the owner or operator must calculate and document the rack weighted average vapor pressure.

7.3 STORAGE VESSEL PROVISIONS

This section summarizes the storage vessel provisions in §63.119 through §63.123 of Subpart G. The checklists in Sections 7, 9 and 10 of Volume II provide additional details of the storage vessel provisions.

TABLE 7-6. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR TRANSFER OPERATIONS COMPLYING WITH 98 WEIGHT-PERCENT REDUCTION OF EMISSIONS OR A LIMIT OF 20 PARTS PER MILLION BY VOLUME OR USING A FLARE

Control Device	Parameters to be Monitored ^a	Recordkeeping and Reporting Requirements for Monitored Parameters
Thermal Incinerator	Firebox temperature ^b [63.127(a)(1)(i)]	1. Continuous records ^c during loading. 2. Record and report the firebox temperature averaged over the full period of the performance test - NCS ^d 3. Record the daily average firebox temperature for each operating day ^e 4. Report daily average temperatures that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected ^f - PR9
Catalytic Incinerator	Temperature upstream and downstream of the catalyst bed [63.127(a)(1)(ii)]	1. Continuous records ^c during loading. 2. Record and report the upstream and downstream temperatures and the temperature difference across the catalyst bed averaged over the full period of the performance test - NCS 3. Record the daily average upstream temperature and temperature difference across catalyst bed for each operating day ^e 4. Report all daily average upstream temperatures that are outside the range established in the NCS or operating permit - PR 5. Report all daily average temperature differences across the catalyst bed that are outside the range established in the NCS or operating permit - PR 6. Report all operating days when insufficient monitoring data are collected ^f

(Continued)

TABLE 7-6. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR TRANSFER OPERATIONS COMPLYING WITH 98 WEIGHT-PERCENT REDUCTION OF EMISSIONS OR A LIMIT OF 20 PARTS PER MILLION BY VOLUME OR USING A FLARE

Control Device	Parameters to be Monitored ^a	Recordkeeping and Reporting Requirements for Monitored Parameters
Boiler or Process Heater with a design heat input capacity less than 44 megawatts and the vent stream is not introduced with or as the primary fuel	Firebox temperature ^b [63.127(a)(3)]	1. Continuous records ^c during loading. 2. Record and report the firebox temperature averaged over the full period of the performance test - NCS 3. Record the daily average firebox temperature for each operating day ^e 4. Report all daily average firebox temperatures that are outside the range established in the NCS or operating permit and all operating days when insufficient data are collected ^f - PR
Flare	Presence of a flame at the pilot light [63.127(a)(2)]	1. Hourly records of whether the monitor was continuously operating and whether the pilot flame was continuously present during each hour. 2. Record and report the presence of a flame at the pilot light over the full period of the compliance determination - NCS 3. Record the times and duration of all periods when all pilot flame(s) are absent or the monitor is not operating - PR 4. Report the duration of all periods when all pilot flames of a flare are absent - PR
Scrubber for Halogenated Vent Streams (Note: Controlled by a combustion device other than a flare)	pH of scrubber effluent [63.127(a)(4)(i)], and	1. Continuous records ^c during loading 2. Record and report the pH of the scrubber effluent averaged over the full period of the performance test - NCS 3. Record the daily average pH of the scrubber effluent for each operating day ^e 4. Report all daily average pH values of the scrubber effluent that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected ^f - PR

(Continued)

TABLE 7-6. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR TRANSFER OPERATIONS COMPLYING WITH 98 WEIGHT-PERCENT REDUCTION OF EMISSIONS OR A LIMIT OF 20 PARTS PER MILLION BY VOLUME OR USING A FLARE

Control Device	Parameters to be Monitored ^a	Recordkeeping and Reporting Requirements for Monitored Parameters
Scrubber for Halogenated Vent Streams (Note: Controlled by a combustion device other than a flare) (continued)	Scrubber liquid and gas flow rates [63.127(a)(4)(ii)]	<ol style="list-style-type: none"> 1. Continuous records^c during loading of scrubber liquid flow rate 2. Record and report the scrubber liquid/gas ratio averaged over the full period of the performance test - NCS 3. Record the daily average scrubber liquid/gas ratio for each operating day^e 4. Report all daily average scrubber liquid/gas ratios that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected^f - PR
Absorber ^h	Exit temperature of the absorbing liquid [63.127(b)(1)], and	<ol style="list-style-type: none"> 1. Continuous records^c during loading 2. Record and report the exit temperature of the absorbing liquid averaged over the full period of the performance test - NCS 3. Record the daily average exit temperature of the absorbing liquid for each operating day^e 4. Report all daily average exit temperatures of the absorbing liquid that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected^f - PR
	Exit specific gravity [63.127(b)(1)]	<ol style="list-style-type: none"> 1. Continuous records^c during loading 2. Record and report the exit specific gravity averaged over the full period of the performance test - NCS 3. Record the daily average exit specific gravity for each operating day^e 4. Report all daily average exit specific gravity values that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected^f - PR

(Continued)

TABLE 7-6. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR TRANSFER OPERATIONS COMPLYING WITH 98 WEIGHT-PERCENT REDUCTION OF EMISSIONS OR A LIMIT OF 20 PARTS PER MILLION BY VOLUME OR USING A FLARE

Control Device	Parameters to be Monitored ^a	Recordkeeping and Reporting Requirements for Monitored Parameters
Condenser ^h	Exit (product side) temperature [63.127(b)(2)]	<ol style="list-style-type: none"> 1. Continuous records^c during loading 2. Record and report the exit temperature averaged over the full period of the performance test - NCS 3. Record the daily average exit temperature for each operating day^e 4. Report all daily average exit temperatures that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected^f - PR
Carbon Adsorber ^h	Total regeneration stream mass or volumetric flow during carbon bed regeneration cycle(s) [63.127(b)(3)], and	<ol style="list-style-type: none"> 1. Records of total regeneration stream mass flow for each carbon bed regeneration cycle 2. Record and report the total regeneration stream mass flow during each carbon bed regeneration cycle during the period of the performance test - NCS 3. Report all carbon bed regeneration cycles when the total regeneration stream mass flow is outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected^f - PR
	Temperature of the carbon bed after regeneration [and within 15 minutes of completing any cooling cycle(s)] [63.127(b)(3)]	<ol style="list-style-type: none"> 1. Records of the temperature of the carbon bed after each regeneration 2. Record and report the temperature of the carbon bed after each regeneration during the period of the performance test - NCS 3. Report all the carbon bed regeneration cycles during which the temperature of the carbon bed after regeneration is outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected^f - PR

(Continued)

TABLE 7-6. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR TRANSFER OPERATIONS COMPLYING WITH 98 WEIGHT-PERCENT REDUCTION OF EMISSIONS OR A LIMIT OF 20 PARTS PER MILLION BY VOLUME OR USING A FLARE

Control Device	Parameters to be Monitored ^a	Recordkeeping and Reporting Requirements for Monitored Parameters
All Recovery Devices (as an alternative to the above)	Concentration level or reading indicated by an organic monitoring device at the outlet of the recovery device [63.127(b)]	<ol style="list-style-type: none"> 1. Continuous records^c during loading 2. Record and report the concentration level or reading averaged over the full period of the performance test - NCS 3. Record the daily average concentration level or reading for each operating day^e 4. Report all daily average concentration levels or readings that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected^f - PR
All Control Devices and Vapor Balancing Systems	Presence of flow diverted to the atmosphere from the control device [63.127(d)(1)] <u>or</u> Monthly inspections of sealed valves [63.127(d)(2)]	<ol style="list-style-type: none"> 1. Hourly records of whether the flow indicator was operating and whether a diversion was detected at any time during each hour 2. Record and report the duration of all periods when the vent stream is diverted through a bypass line or the monitor is not operating - PR 1. Records that monthly inspections were performed 2. Record and report the duration of all periods when the car-seal or other seal mechanism is broken, the bypass line valve position has changed, or the key for the lock-and-key type lock has been checked out - PR 3. Report all times when maintenance is performed on car-sealed valves - PR
Other Control Devices not listed above	Owner or operator must submit a plan for monitoring, recordkeeping, and reporting [63.127(c), 63.151(f), 63.152(e)]	<ol style="list-style-type: none"> 1. As specified in the implementation plan or operating permit

TABLE 7-6. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR TRANSFER OPERATIONS COMPLYING WITH 98 WEIGHT-PERCENT REDUCTION OF EMISSIONS OR A LIMIT OF 20 PARTS PER MILLION BY VOLUME OR USING A FLARE

- a Regulatory citations are listed in brackets.
- b Monitor may be installed in the firebox or in the ductwork immediately downstream of the firebox before any substantial heat exchange is encountered.
- c "Continuous records" is defined in §63.111 of Subpart G.
- d NCS = Notification of Compliance Status described in §63.152 of Subpart G and discussed in Section 2.5.3 of this manual.
- e The daily average is the average of all recorded parameter values for the operating day. If all recorded values during an operating day are within the range established in the NCS or operating permit, a statement to this effect can be recorded instead of the daily average.
- f The periodic reports shall include the duration of periods when monitoring data are not collected for each excursion as defined in §63.152(c)(2)(ii)(A) of Subpart G.
- g PR = Periodic Reports described in §63.152 of Subpart G and discussed in Section 2.5.3 of this manual.
- h Alternatively, these devices may comply with the organic monitoring device provisions listed at the end of this table under "All Recovery Devices."

7.3.1 Storage Vessel Definition

A "storage vessel" is a tank or other vessel that is used to store liquid organic HAP's and is assigned to a chemical manufacturing process subject to the HON. Storage vessels do not include vessels permanently attached to motor vehicles, pressure vessels, vessels with capacities less than 38 m³, or vessels storing liquids that contain organic HAP's only as impurities. Bottoms receiver tanks and surge control vessels are not considered storage vessels because they are covered by the equipment leak provisions, and wastewater storage tanks are not considered storage vessels, since they are covered by the wastewater provisions.

7.3.2 Storage Vessel Group Determination

Group 1 and Group 2 storage vessels are defined in §63.119 of Subpart G. The vessel's design capacity and the vapor pressure of the stored liquid are used to determine whether a storage vessel is Group 1 or Group 2. Group 1 storage vessels at existing sources are storage vessels with capacities of 75 m³ or greater but less than 151 m³ storing liquids with a vapor pressure of total organic HAP of 13.1 kPa or greater. Storage vessels at existing sources with capacities of 151 m³ or greater storing liquids with a vapor pressure of total organic HAP of 5.2 kPa or greater are also Group 1 storage vessels. Group 1 storage vessels at new sources are storage vessels with capacities of 38 m³ or greater but less than 151 m³, storing liquids with a vapor pressure of total organic HAP of 13.1 kPa or greater. Storage vessels at new sources with capacities of 151 m³ or greater storing liquids with a vapor pressure of total organic HAP of 0.7 kPa or greater are also Group 1 storage vessels. Table 7-1 of Volume II is a checklist for applicability and group determination for storage vessels. Group 1/Group 2 determinations are required for each storage vessel that is subject to the storage vessel provisions, unless the storage vessel is already in compliance with the Group 1 requirements.

7.3.3 Storage Vessel Control Requirements

Group 1 storage vessels must meet the control requirements in §63.119 of Subpart G unless they are included in an emissions average. Compliance options for Group 1 storage vessels include:

- Reducing emissions of organic HAP's using a fixed-roof tank equipped with an internal floating roof which is operated according to specified work practices (e.g., keeping access hatches closed and bolted), equipped with specified deck fittings, and equipped with specified seal configurations (i.e., a single liquid-mounted seal, a single metallic shoe seal, or double seals);
- Reducing emissions of organic HAP's using an external floating roof tank operated according to specified work practices, equipped with specified deck fittings, and equipped with specified seal configurations (i.e., double seals, with the primary seal to be either a liquid-mounted or a metallic shoe seal);
- Reducing emissions of organic HAP's using an external floating roof tank converted to a fixed-roof tank equipped with an internal floating roof, which is operated according to specified work practices, equipped with specified deck fittings, and equipped with specified seal configurations (i.e., a single liquid-mounted seal, a single metallic shoe seal, or double seals);

- Reducing emissions of organic HAP's by 95 weight percent using a closed vent system (i.e., vapor collection system) and control device or combination of control devices (or reducing emissions of organic HAP's by 90 weight percent using a closed-vent system and control device if the control device was installed before December 31, 1992); or
- Reducing emissions of organic HAP's by routing the emissions to a process or a fuel gas system, if emissions are routed to a process the emissions must meet one of the same ends listed in Section 7.2.3 for transfer operation emissions routed to a process or fuel gas system.

A detailed list of the work practices and deck fittings specified for internal floating roof vessels, external floating roofs, and external floating roof vessels converted to internal floating roof vessels is provided in Table 7-7, which is discussed in the next section.

Group 2 storage vessels are not required to apply any emission controls, but recordkeeping and reporting is required to verify that they are Group 2.

7.3.4 Storage Vessel Testing, Monitoring, Recordkeeping, and Reporting

Compliance determination for storage vessels using floating roofs is different than for process vents and transfer operations in that performance testing and continuous monitoring are not required. Instead, periodic inspections of the floating roofs and their seals and fittings are required, and any defects must be repaired within specified time periods.

For both Group 1 and Group 2 storage vessels, a record must be kept which provides the dimensions and an analysis showing the capacity of each Group 1 and Group 2 storage vessel. For Group 2 storage vessels, this recordkeeping requirement is the only requirement under the HON, unless the vessel is included in an emission average.

Initial testing for visible emissions (i.e., as specified in §63.11(b) of Subpart A) is required for Group 1 storage vessels controlled with flares. The initial testing is not a performance test, but is a compliance determination. The compliance determination also involves gathering data such as the heat content, the flow rate, and the exit velocity for all periods when the pilot flame is absent. The initial recordkeeping and reporting (i.e., as part of the Notification of Compliance Status) includes records and reports of flare design; visible emission readings and measurements of the heat content, the flow rate, and the exit velocity made during the compliance determination; and, periods when the pilot flame is absent.

Initial performance tests are not required for vapor collection systems or control devices other than flares. Instead, a report is required to be submitted as part of the Notification of Compliance Status which demonstrates that the control device being used achieves the required percent reduction, during reasonably expected maximum loading conditions. This documentation must include a design evaluation of the control device and a description of the gas stream which enters the control device, including flow and organic HAP content under varying liquid level conditions (dynamic and static). This documentation is not required for the following control devices:

- A boiler or process heater with a design heat input capacity of 44 MW or greater;
- A boiler or process heater into which the vent stream is introduced with the primary fuel;

TABLE 7-7. PERIODIC INSPECTION, MEASUREMENT, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR STORAGE VESSELS EQUIPPED WITH AN INTERNAL FLOATING ROOF VESSEL, AN EXTERNAL FLOATING ROOF, OR AN EXTERNAL FLOATING ROOF VESSEL CONVERTED TO AN INTERNAL FLOATING ROOF VESSEL

Control Device	Type and Frequency of Inspection or Measurement ^a	Parameters to be Inspected or Measured	Recordkeeping and Reporting for Inspected or Measured Parameters
IFR or EFR converted to IFR ^b	External Visual Inspection ^{c,d} (performed annually) [For vessels equipped with a single-seal system: 63.120(a)(2)(i)] [For vessels equipped with a double-seal system: 63.120(a)(3)(ii)]	Seal ^e , floating deck	<ol style="list-style-type: none"> 1. Record and report the date of the inspection - PR^f 2. Record and report each storage vessel in which a failure was detected and a description of the failure - PR Seal failures include the following: (1) the seal is detached from the floating deck, (2) holes, tears, or other openings in the seal or seal fabric, and (3) any visible gaps between the seal and the wall of the storage vessel. Floating deck failures include the following: (1) the IFR is not resting on the surface of the liquid storage in the storage vessel and is not resting on the leg supports, and (2) there is liquid on the floating deck. 3. If a failure is detected and repaired within 45 days, record and report the nature of and date the repair was made - PR 4. If a failure is detected and the vessel is not emptied for repair within 45 days, the owner or operator may choose to utilize up to two extensions of 30 days each, in which case the owner or operator must include in the next Periodic Report, documentation that alternate storage capacity was unavailable, a description of the failure, a schedule of actions that ensured that the control equipment was repaired or the storage vessel was emptied as soon as possible, and the nature of and date the repair was made, or the date the storage vessel was emptied - PR

(Continued)

TABLE 7-7. PERIODIC INSPECTION, MEASUREMENT, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR STORAGE VESSELS EQUIPPED WITH AN INTERNAL FLOATING ROOF VESSEL, AN EXTERNAL FLOATING ROOF, OR AN EXTERNAL FLOATING ROOF VESSEL CONVERTED TO AN INTERNAL FLOATING ROOF VESSEL

Control Device	Type and Frequency of Inspection or Measurement ^a	Parameters to be Inspected or Measured	Recordkeeping and Reporting for Inspected or Measured Parameters
IFR or EFR converted to IFR (continued)	<p>Internal Visual Inspection (performed each time a vessel is emptied and degassed, and at least once every 10 years)^c</p> <p>[For vessels equipped with a single-seal system: 63.120(a)(2)(ii)]</p> <p>[For vessels equipped with a double-seal system: 63.120(a)(3)(iii)]</p>	<p>Seal,⁹ floating roof, gaskets, slotted membranes, sleeve seals (if any)</p>	<ol style="list-style-type: none"> 1. Record and report the date of the inspection - PR 2. Record and report each storage vessel in which a failure was detected and a description of the failure - PR <p>Seal failures include any holes, tears, or other openings in the seal or seal fabric.⁹ Floating roof failures include any defect of the floating deck. Gasket failures include any time that a gasket no longer closes off the liquid surface to the atmosphere. Slotted membrane failures includes any time that a slotted membrane has more than 10 percent open area.</p> 3. If a failure is detected and repaired, record and report the nature of the repair and the date the repair was made prior to refilling the storage vessel - PR 4. Prior to each inspection, report the date that the vessel will be refilled after the inspection, in order to afford the Administrator the opportunity to have an observer present; keep a record of this report^h - OR

(Continued)

TABLE 7-7. PERIODIC INSPECTION, MEASUREMENT, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR STORAGE VESSELS EQUIPPED WITH AN INTERNAL FLOATING ROOF VESSEL, AN EXTERNAL FLOATING ROOF, OR AN EXTERNAL FLOATING ROOF VESSEL CONVERTED TO AN INTERNAL FLOATING ROOF VESSEL

Control Device	Type and Frequency of Inspection or Measurement ^a	Parameters to be Inspected or Measured	Recordkeeping and Reporting for Inspected or Measured Parameters
EFR	Seal Gap Measurement ¹ [63.120(b)(1) through (b)(4)], which includes a visual seal inspection [63.120(b)(5) and (b)(6)] (performed at least once every 5 years for the primary seal and annually for the secondary seal)	Primary seal and secondary seal	1. Record and report the date of the measurement - PR 2. Record and report the raw data obtained in the measurement (the width and circumferential length of each gap with a width equal to or greater than 0.32 centimeters), and the calculations of the accumulated area of gaps between the vessel wall and both the primary and secondary seal - PR 3. Record and report each occurrence when the following conditions are identified during the measurement: - PR (a) The accumulated area of gaps or maximum gap width between the vessel wall and either the primary or secondary seal exceeds specified values ¹ (b) If the primary seal is a metallic shoe seal, the upper end of the metallic shoe seal does not extend a minimum vertical distance of 61 centimeters above the stored liquid surface (c) If the primary seal is a metallic shoe seal, the lower end of the metallic shoe seal does not extend into the liquid (d) There are holes, tears, or other openings in the shoe (if a metallic shoe seal is used), seal fabric, or seal envelope of the primary seal (e) There are holes, tears, or other openings in the seal or seal fabric of the secondary seal

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TABLE 7-7. PERIODIC INSPECTION, MEASUREMENT, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR STORAGE VESSELS EQUIPPED WITH AN INTERNAL FLOATING ROOF VESSEL, AN EXTERNAL FLOATING ROOF, OR AN EXTERNAL FLOATING ROOF VESSEL CONVERTED TO AN INTERNAL FLOATING ROOF VESSEL

Control Device	Type and Frequency of Inspection or Measurement ^a	Parameters to be Inspected or Measured	Recordkeeping and Reporting for Inspected or Measured Parameters
EFR (continued)	Seal Gap Measurement ^l [63.120(b)(1) through (b)(4)], which includes a visual seal inspection [63.120(b)(5) and (b)(6)] (performed at least once every 5 years for the primary seal and annually for the secondary seal) (continued)	Primary and Secondary Seal (continued)	<p>4. If any of the conditions described in items 3(a) through 3(e) are identified during a measurement and the repair was completed within 45 days of the measurement, record and report the nature of the repair and the date the repair was made or the date the storage vessel was emptied - PR</p> <p>5. If any of the conditions described in items 3(a) through 3(d) are identified during a measurement and the repair was not completed within 45 days of the measurement, the owner or operator may utilize up to two 30-day extensions, and must record and report in the next PR identification of the vessel, a description of the failure, documentation that alternative storage capacity was not available, a schedule of actions that ensured the control equipment would be repaired or the vessel would be emptied as soon as possible, and the nature of and the date the repair was made, or the date the storage vessel was emptied - PR</p> <p>6. Thirty days prior to the seal gap measurement, report the date that the measurement will be made, in order to afford the Administrator the opportunity to have an observer present. Keep a record of this report - OR</p>
	Internal Visual Inspection (performed each time the vessel is emptied and degassed) ^{k,l} [63.120(b)(10)]	primary seal secondary seal, floating roof, gaskets, slotted membranes ^m	<p>1. Record and report the date of the inspection - PR</p>

(Continued)

TABLE 7-7. PERIODIC INSPECTION, MEASUREMENT, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR STORAGE VESSELS EQUIPPED WITH AN INTERNAL FLOATING ROOF VESSEL, AN EXTERNAL FLOATING ROOF, OR AN EXTERNAL FLOATING ROOF VESSEL CONVERTED TO AN INTERNAL FLOATING ROOF VESSEL

Control Device	Type and Frequency of Inspection or Measurement ^a	Parameters to be Inspected or Measured	Recordkeeping and Reporting for Inspected or Measured Parameters
EFR (continued)	Internal Visual Inspection (performed each time the vessel is emptied and degassed) ^{k,l} [§3.120(b)(10)] (continued)	primary seal secondary seal, floating roof, gaskets, slotted membranes ^m (continued)	<p>2. Record and report each storage vessel in which a failure was detected and a description of the failure - PR</p> <p>Seal failures include any holes, tears, or other openings in the seal of seal fabric. Floating roof failures include any defect of the floating deck. Gasket failures include any time that a gasket no longer closes off the liquid surface to the atmosphere. Slotted membrane failures includes any time that a slotted membrane has more than 10 percent open area.</p> <p>3. If a failure is detected and repaired, record and report the nature of the repair and the date the repair was made prior to refilling the storage vessel - PR</p> <p>4. Prior to each inspection, report the date that the vessel will be refilled after the inspection, in order to afford the Administrator the opportunity to have an observer present.⁹ Keep a record of this report - OR</p>

a Regulatory citations are listed in brackets.

b IFR = internal floating roof.
EFR = external floating roof.

c If a double-seal rather than single-seal system is used on the IFR or EFR converted to IFR, a source has the option to perform the internal visual inspection [§3.120(a)(3)(i)] each time the vessel is emptied and degassed and at least once every 5 years and not perform annual external visual inspections [§3.120(a)(3)(ii)] or internal visual inspections every 10 years [§3.120(a)(3)(iii)]

d External visual inspections are visual inspection of the specified equipment as seen from the fixed roof of a vessel, looking at the specified equipment through the manholes and roof hatches on the fixed roof.

e If a single-seal system is used, inspect the single seal. If a double-seal system is used, inspect the secondary seal.

TABLE 7-7. PERIODIC INSPECTION, MEASUREMENT, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR STORAGE VESSELS EQUIPPED WITH AN INTERNAL FLOATING ROOF VESSEL, AN EXTERNAL FLOATING ROOF, OR AN EXTERNAL FLOATING ROOF VESSEL CONVERTED TO AN INTERNAL FLOATING ROOF VESSEL

- f PR = Periodic reports described in §63.152 of Subpart G, and discussed in Section 2.5.4 of this manual.
- g If a single-seal system is used, inspect the single seal. If a double-seal system used, inspect both the primary and secondary seals.
- h If the inspection is planned, this report is due 30 days prior to the refilling. If the inspection was not planned and the report could not be submitted 30 days prior to the refilling, then the report should include an explanation of why the inspection was unplanned.
- i Seal gap measurements are made according to the method described in section 63.120(b)(2) through (b)(4) of Subpart G.
- j The specified values for the primary seal are:
- Accumulated area of gaps between the vessel wall and the seal: 212 square centimeters per meter of vessel diameter.
Maximum gap width between the vessel wall and the seal: 3.81 centimeters.
- The specified values for the secondary seal are:
- Accumulated area of gaps between the vessel wall and the seal: 21.2 square centimeters per meter of vessel diameter.
Maximum gap width between the vessel wall and the seal: 1.27 centimeters.
- k The storage provisions do not specify a maximum period of time between these inspections.
- l Repair each storage vessel in which a failure was detected; however, no recordkeeping or reporting is specified in the storage provisions.
- m Seal failures include the following: the primary or secondary seal has holes, tears, or other openings in the seal or the seal fabric. Floating roof failures include any defect of the floating deck. Gasket failures include any time that a gasket no longer closes off the liquid surface to the atmosphere. Slotted membrane failures include any time that a slotted membrane has more than 10 percent open area.

- A boiler or process heater burning hazardous waste which has been issued a final permit under 40 CFR Part 270 and complies with the requirements of 40 CFR Part 266, Subpart H, or has certified compliance with the interim status requirements of 40 CFR Part 266, Subpart H; or
- A hazardous waste incinerator which has been issued a final permit under 40 CFR Part 270 and complies with the requirements of 40 CFR Part 264, Subpart O or has certified compliance with the interim status requirements of 40 CFR Part 265, Subpart O.

For enclosed combustion devices with a minimum residence time of 0.5 seconds and a temperature of at least 760°C documentation that these conditions exist is sufficient for the design evaluation. For thermal incinerators, carbon adsorbers, and condensers, the design evaluation must include additional information specified in the storage provisions under §63.120(d)(1). If the control device used to comply with the storage provisions is also used to comply with the process vent, transfer, or wastewater provisions, the performance test required by the process vent, transfer, or wastewater provisions is acceptable to demonstrate compliance with the storage provisions and a design evaluation would not be required.

As part of the Notification of Compliance Status, the owner or operator must also submit a monitoring plan including the following: (1) a description of the parameter(s) to be monitored to ensure that the control device is operated and maintained in conformance with its design, (2) an explanation of the criteria used for selection of the parameter(s), and (3) the frequency with which monitoring will be performed. The owner or operator must also submit in the Notification of Compliance Status the operating range for each monitoring parameter identified. This specified operating range must represent the conditions for which the control device can achieve the 95 percent or greater emission reduction, or a 90 percent or greater emission reduction if installed prior to December 31, 1992.

For storage vessel emissions that are routed to a process, a design evaluation or engineering assessment is required that demonstrates the extent to which one or more of the following ends are being met:

- Recycled and/or consumed in the same manner as a material that fulfills the same function in that process;
- Transformed by chemical reaction into materials that are not organic hazardous air pollutants;
- Incorporated into a product; and/or
- Recovered.

This design evaluation is to be submitted with the Notification of Compliance Status.

Initial performance testing is not required for Group 1 storage vessels equipped with an internal floating roof, an external floating roof, external floating roof converted to an internal floating roof, or a system that routes emissions to a fuel gas system. However, for external floating roof vessels, an initial measurement of seal gap area and maximum seal gap width for both the primary seal and the secondary seal is required to be performed and recorded during the hydrostatic testing of the vessel or by the compliance date, whichever is later, and to be reported

in the first periodic report. For systems that route emissions to a fuel gas system, the owner or operator must include a report as part of the Notification of Compliance Status that the emission stream is connected to the fuel gas system and whether it is subject to §63.148 of Subpart G.

Periodic inspection, measurement, recordkeeping, and reporting requirements for storage vessels equipped with an internal floating roof, an external floating roof, or an external floating roof converted to an internal floating roof are presented in Table 7-7. Continuous and periodic monitoring, recordkeeping, and reporting requirements associated with closed vent systems and control devices for storage vessels are presented in Table 7-8. Included in the tables are both "periodic reports", which are submitted semi-annually, and "other reports", which are submitted as needed, on an irregular basis.

The HON also requires periodic inspection of closed vent systems to detect leaks. The provisions are specified in §63.148 of Subpart G. The provisions of §63.148 also apply to any system other than hard-piping that is operated under positive pressure used to route emissions to a fuel gas system or to a process.

Bypassing the fuel gas system or process is permitted if one of the following conditions are met:

- The level in the storage vessel is not increased;
- The emissions are routed through a closed-vent system to a control device that is complying with the storage vessel provisions for control devices in §63.119(e) of Subpart G; or
- The total aggregate amount of time during the year that the emissions bypass the fuel gas system or process and are not routed to a control device does not exceed 240 hours.

For owners or operators that bypass the fuel gas system or process shall have a record available of the reason it was necessary to bypass the process equipment or fuel gas system, and a record of the duration of the period when the process equipment or fuel gas system was bypassed. Also, the record must include certification of which of the three conditions were met.

7.4 WASTEWATER PROVISIONS

This section summarizes the wastewater provisions of the HON. The discussion focuses on the process wastewater provisions in §63.132 through §63.147 of Subpart G. However, Sections 7.4.6, 7.4.7, and 7.4.8 address process water provisions in §63.149 of Subpart G, the cooling water provisions in §63.104 of Subpart F, and the maintenance wastewater provisions in §63.105 of Subpart F. The checklists in Sections 8, 9 and 10 of Volume II provide additional details of the storage vessel provisions.

7.4.1 Wastewater Definition

For the purpose of the HON, "wastewater" is defined as organic HAP-containing water, raw material, intermediate, product, by-product, co-product, or waste material that exits equipment in a SOCM chemical manufacturing process unit (including the last recovery device) and enters an individual drain system and either: (1) contains an annual average concentration of Table 9 compounds of at least 5 ppmw and has an annual average flow rate of 0.02 l/min or greater; or (2) contains an annual average concentration of Table 9 compounds of at least 10,000 ppmw at

TABLE 7-8. PERIODIC AND CONTINUOUS MONITORING, INSPECTION, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR STORAGE VESSELS EQUIPPED WITH A CLOSED VENT SYSTEM AND CONTROL DEVICE

Control Device	Parameters to be Monitored or Inspected ^a	Recordkeeping and Reporting for Monitored or Inspected Parameters
Flare	Meet the general control device requirements specified in §63.11(b) of Subpart A [63.120(e)(4)]	<ol style="list-style-type: none"> <li data-bbox="375 247 699 1160">1. Record and report each occurrence when the flare does not meet the general control device requirements specified in §63.11(b) of Subpart A - PR^b Each record and report of an occurrence when a flare does not meet the general control device requirements should include the following: (1) identification of the flare that did not meet the requirements, and (2) the reason the flare did not meet the general control device requirements. <li data-bbox="699 247 829 1160">2. Record and report all routine maintenance of the flare that is planned for the next six months and that was performed during the previous six months - PR <li data-bbox="829 247 961 1160">3. Record and report the total number of hours of routine maintenance of the flare during which the flare did not meet the general control device requirements specified in §63.11(b) of subpart A due to the routine maintenance^c - PR

(Continued)

TABLE 7-8. PERIODIC AND CONTINUOUS MONITORING, INSPECTION, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR STORAGE VESSELS EQUIPPED WITH A CLOSED VENT SYSTEM AND CONTROL DEVICE

Control Device	Parameters to be Monitored or Inspected ^a	Recordkeeping and Reporting for Monitored or Inspected Parameters
All Control Devices Other than a Flare	Monitor the parameter or parameters that are specified in the Implementation Plan at the specified frequency ^{d,e} [63.120(d)(5)]	<ol style="list-style-type: none"> 1. Report and record each occurrence when a monitored parameter is outside of its parameter range (which is documented in the Notification of Compliance Status or the operating permit)^f - PR The report and record shall include the following information: (1) identification of the control device for which the measured parameter was outside of its established range, and (2) the cause for the measured parameter to be outside of its established range. 2. Record the measured values of the monitored parameters. 3. Record and report all routine maintenance of the control device that is planned for the next six months and that was performed during the previous six months - PR 4. Record and report the total number of hours of routine maintenance of the control device during which the control device did not reduce inlet emissions by 95 percent (or 90 percent if the control device was installed prior to December 31, 1992)^g - PR

(Continued)

TABLE 7-8. PERIODIC AND CONTINUOUS MONITORING, INSPECTION, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR STORAGE VESSELS EQUIPPED WITH A CLOSED VENT SYSTEM AND CONTROL DEVICE

Control Device	Parameters to be Monitored or Inspected ^a	Recordkeeping and Reporting for Monitored or Inspected Parameters
All Closed Vent Systems and Control Devices ^h	Annual Leak Inspections of Closed Vent Systems ⁱ [63.148]	<ol style="list-style-type: none"> 1. Record all parts of the closed vent system that are designated as difficult or unsafe to inspect, with an explanation of the designations and a plan for inspecting the equipment.^l 2. Record the occurrence of each annual inspection. 3. Record and report^j the results of each annual inspection in which a leak is detected in the closed vent system by an instrument reading of 500 parts per million by volume or greater above background using Method 21 of 40 CFR 60, Appendix A - PR^k 4. If a leak, as described in item 3, is detected and cannot be repaired within 15 days, and if the circumstances of the repair meet certain criteria, then record and report^j that there will be a delay, explaining how the circumstances of the repair meet these certain criteria; the expected date of successful repair; dates of shutdowns that occur while the equipment is unrepaired; and date of successful repair.
	Presence of flow diverted from the control device to the atmosphere [63.148(f)(1)] or Monthly inspections of sealed valves [63.148(f)(2)]	<ol style="list-style-type: none"> 1. Hourly records of whether the flow indicator was operating and whether flow was detected at any time during each hour 2. Record and report the times and durations of all periods when the vent stream is diverted through a bypass line or the monitor is not operating - PR or <ol style="list-style-type: none"> 1. Records that monthly inspections were performed 2. Record and report all monthly inspections that show the valves are not closed or the seal has been changed - PR

(Continued)

TABLE 7-8. PERIODIC AND CONTINUOUS MONITORING, INSPECTION, RECORDKEEPING, AND REPORTING REQUIREMENTS FOR STORAGE VESSELS EQUIPPED WITH A CLOSED VENT SYSTEM AND CONTROL DEVICE

- a Regulatory citations are listed in brackets.
- b PR = Periodic Reports described in §63.152 of Subpart G, and discussed in Section 2.5.4 of this manual.
- c The record should include the following detailed information about each routine maintenance period: (1) the first time of day and date that the flare did not meet the general control device requirements specified in §63.11(b) of Subpart A, and (2) the first time of day and date that the control device did meet the general control device requirements specified in §63.11 (b) of Subpart A at the conclusion of maintenance.
- d The Implementation Plan is described in §63.152 of Subpart G and discussed in Section 2.5.2 of this manual.
- e The owner or operator must specify a proposed monitoring parameter (or parameters) and monitoring frequency in the Implementation Plan for approval.
- f The Notification of Compliance Status is described in §63.152 of Subpart G and discussed in Section 2.5.3 of this manual.
- g The record should include the following detailed information about each routine maintenance period: (1) the first time of day and date that the control device did not achieve the required percent reduction at the beginning of maintenance and (2) the first time of day and date that the control device did achieve the required percent reduction at the conclusion of maintenance. The required percent reduction is 95 percent for control devices installed after December 31, 1992, and 90 percent for control devices installed before December 31, 1992.
- h A closed vent system is equivalent to a vapor collection system.
- i For those parts of closed vent systems designated as difficult-to-inspect, the inspection is required once every 5 years as indicated in a written plan. For those parts of closed vent systems designated as unsafe-to-inspect, the inspection is required as frequently as practicable during safe-to-inspect times, as indicated in a written plan.
- j The reports required for closed-vent systems are to be submitted with the reports required by §63.182(b) of Subpart H (the equipment leak provisions).
- k The record and report should include the following: (1) instrument identification numbers; (2) operator name or initials; (3) identification of leaking equipment; (4) date the leak was detected; (5) date of first attempt at repair; and (6) maximum instrument reading after leak is repaired or determined to be non-repairable.
- l The "certain criteria" include the following: (1) the repair would require a process unit shutdown, or (2) the emissions of purged material resulting from immediate repair would be greater than the fugitive emissions associated with the leak, likely to result from delaying the repair.

any flow rate. Wastewater includes both process wastewater and maintenance wastewater. Table 9 compounds are those compounds listed on Table 9 of subpart G of the HON. Table 8 compounds, which will be referred to later are those compounds listed on Table 8 of subpart G of the HON.

"Process wastewater" means wastewater which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, by-product, or waste product. Examples are product tank drawdown or feed tank drawdown; water formed during a chemical reaction or used as a reactant; water used to wash impurities from organic products or reactants; water used to cool or quench organic vapor streams through direct contact; and condensed steam from jet ejector systems pulling vacuum on vessels containing organics. Process water is considered wastewater when it exits the last recovery device in the chemical manufacturing process.

"Maintenance wastewater" means wastewater generated by the draining of process fluid from components in the chemical manufacturing process unit into an individual drain system prior to or during maintenance activities. Maintenance wastewater can be generated during planned and unplanned shutdowns and during periods not associated with a shutdown. Examples of activities that can generate maintenance wastewaters include descaling of heat exchanger tubing bundles, cleaning of distillation column traps, draining of low legs and high point bleeds, draining of pumps into an individual drain system, and draining of portions of the chemical manufacturing process unit for repair.

Other terms that are critical to understanding the HON wastewater provisions are "residual," "annual average concentration," and "point of determination."

"Residual" means any liquid or solid material containing Table 9 compounds that is removed from a wastewater stream by a waste management unit or treatment process that does not destroy organics (nondestructive units). Examples of residuals from nondestructive wastewater management units are: the organic layer and bottom residue removed by a decanter or organic-waste separator and the overheads from a steam stripper or air stripper. Examples of materials which are not residuals are: silt; mud; leaves; bottoms from a steam stripper or air stripper; and sludges, ash, or other materials removed from wastewater being treated by destructive devices such as biological treatment units and incinerators.

The term "annual average concentration" is defined as the flow-weighted annual average concentration, as determined in §63.144(b).

"Point of determination" means each point where process wastewater exits the chemical manufacturing process unit (after the last recovery device). NOTE: The regulation allows determination of wastewater stream characteristics (1) at the point of determination or (2) downstream of the point of determination if corrections are made for changes in flow rate and annual average concentration. Such changes include losses by air emissions; reduction of annual average concentration or changes in flow rate by mixing with other water or wastewater streams; and reduction in flow rate or annual average concentration by treating or otherwise handling the wastewater stream to remove or destroy HAP's.

Spills, water from safety showers, testing of deluge systems or firefighting systems, wastewaters that are discharged from a CMPU not subject to the HON are all wastewaters not subject to the HON. Stormwater and water from firefighting and deluge systems are also not subject to the HON

if they are in a segregated sewer. HON is not applicable to wastewater with an annual average concentration of Table 9 compounds of less than 10,000 ppmw at a flow rate less than 0.02 μ pm, or to wastewater streams less than 5 ppmw of Table 9 compounds at any flow. Table 4-10 in volume II of this manual is an applicability determination checklist for maintenance wastewater and process wastewater. If a maintenance wastewater stream is subject to the HON, the stream must comply with the requirements described in Section 7.4.8 of this chapter. If a process wastewater stream is subject to the HON, the stream must be categorized as either a Group 1 or Group 2 stream to determine which process wastewater provisions apply.

7.4.2 Sourcewide 1 Mg/yr Exemption

This exemption will be used most often for process wastewater streams which have a high concentration of HAP's but have a low flow rate. It includes two options. The first option is an applicability exemption in §63.138(i)(1), which exempts all Group 1 wastewater streams at a source from process wastewater control requirements if the total source mass flow rate for all Table 8 and/or Table 9 compounds is less than 1 Mg/yr [calculated according to procedures specified in §63.138(i)(1)(i) and (1)(1)(ii)].

The second option is a control option in §63.138(i)(2), which exempts untreated and partially treated Group 1 wastewater streams at a source from compliance with process wastewater control requirements if the source ensures that the total source mass flow rate for untreated and partially-treated Group 1 process wastewater streams is less than 1 Mg/yr [calculated according to procedures specified in §63.138(i)(2)(i) and (1)(2)(ii)]. Therefore, the source may elect to treat or partially treat some wastewater streams so that the total source mass flow rate of the untreated and partially-treated Group 1 process wastewater streams for the source is less than 1 Mg/yr. Also, all waste management units used to receive, manage, or treat Group 1 process wastewater streams must be in compliance with the control requirements described in Section 7.4.4.

7.4.3 Process Wastewater Group Determination

Group 1 and Group 2 wastewater streams are defined in §63.111 of Subpart G based on flow rate, annual average concentration, and whether the stream is part of a new or existing source. It is important to identify whether the source is new or existing because process wastewater streams from new sources are evaluated using more stringent criteria than streams from existing sources. Streams from new sources must be evaluated for concentration and flow rate of HAP's listed on Table 8 of Subpart G of the HON. Table 8 is a list of those HAP's more volatile than benzene. Whether or not a wastewater stream from a new source is a Group 1 stream for HAP's listed on Table 8 of Subpart G of the HON, it must still be evaluated for HAP's listed on Table 9 of Subpart G of the HON. Table 8 is a subset of Table 9. To be considered a Group 1 wastewater stream, the stream must consist of process wastewater as defined in §63.101 of Subpart F. For existing sources, Group 1 wastewater streams have a total annual average concentration of greater than or equal to 10,000 ppmv of Table 9 compounds at any flow, or a concentration of 1,000 ppmw or greater of Table 9 compounds at an annual average flow rate of 10 μ pm or greater. For new sources, Group 1 wastewater streams have an annual average concentration of 10 ppmv or greater of Table 8 compounds and an annual average flow rate of 0.02 μ pm or greater. Wastewater streams at new sources are also considered Group 1 wastewater streams if they meet the criteria for Group 1 status at existing sources -- Group 1 status for Table 9 compounds.

Process wastewater streams from existing sources do not need to be evaluated using the more stringent concentration and flow rate values that apply to Table 8 HAP's. Rather, process

wastewater streams from existing sources must be evaluated using only the concentration and flow rate criteria for Table 9 HAP's.

Both new and existing facilities also may designate either a single process wastewater stream or a combination of process wastewater streams a Group 1 process wastewater stream instead of determining the group status using process knowledge or through sampling and analysis. This option allows sources to declare that at a designated location downstream of the point(s) of determination, all wastewater streams at this location and upstream are Group 1 and will therefore be controlled. The source is required to meet all requirements for Group 1 process wastewater streams (both upstream of the point of determination and downstream) for the designated Group 1 wastewater stream. For example, if a Group 1 and Group 2 stream were mixed, and hard piped together, the combined stream could be designated as a Group 1 process wastewater stream and managed accordingly. Designating process wastewater streams as Group 1 streams will be used most commonly for combinations of streams.

Table 8-1 of Volume II of this manual is a Group determination checklist for process wastewater streams.

7.4.4 Process Wastewater Control Requirements

Group 1 process wastewater streams and equipment managing such streams at both new and existing sources must meet control requirements in §63.132 through §63.139 of Subpart G and the leak detection requirements in §63.148 of Subpart G unless they are included in emissions averaging. Existing sources are not required to meet control requirements if Group 1 process wastewater streams are included in the 1 Mg/yr source-wide exemption discussed in Section 7.4.2 of this section. Group 2 wastewater streams and equipment managing only Group 2 streams are not required to apply additional controls unless the 95-percent biological treatment option, which is discussed in Section 7.4.4.2, is used.

The HON wastewater provisions include control requirements for: (1) waste management units including wastewater tanks, surface impoundments, containers, individual drain systems, and oil-water separators; (2) treatment processes including the design steam stripper, biological treatment units, or other treatment devices; and (3) closed-vent systems and control devices such as flares, catalytic incinerators, etc. This section provides an overview of the control requirements for such equipment when it receives, manages, or treats Group 1 process wastewater streams or residuals removed from process wastewater streams.

7.4.4.1 Waste Management Units

Waste management units are the equipment, structures, or devices used to convey, store, treat, or dispose of wastewater streams or residuals.

Wastewater tanks. The control requirements for tanks holding Group 1 process wastewater are dependent on tank capacity and vapor pressure criteria. Table 7-9 provides the tank capacity and vapor pressure thresholds with a corresponding summary of control requirements. Wastewater tanks holding only Group 1 process wastewater streams must meet the control requirements in §63.133 of Subpart G unless the wastewater is included in an emissions average. Wastewater tanks holding only Group 2 wastewater streams are not required to apply any additional controls. Compliance options for wastewater tanks holding Group 1 process wastewater streams include:

TABLE 7-9. WASTEWATER TANK EMISSION CONTROL REQUIREMENTS

Capacity (m ³)	Vapor Pressure (kPa)	Control Requirements ^a
< 75	N/A	Use of a fixed roof as specified in §63.133(a)(1) of Subpart G
≥ 75 and < 151	< 13.1	
≥ 151	< 5.2	
≥ 75 and < 151	≥ 13.1	Use of a fixed roof and a closed-vent system that routes HAP vapors to a control device; <u>or</u> Use of a fixed roof and an internal floating roof that meets the requirements specified in §63.119(b) of Subpart G; <u>or</u>
≥ 151	≥ 5.2	Use of an external floating roof that meets the requirements specified in §§63.119(c), 63.120(b)(5), and 63.120(b)(6) of Subpart G; <u>or</u> an equivalent means of emission limitation as specified in §63.133(a)(2)(iv).

^a To simplify the table, only an abbreviated description of the control requirement is given. Refer to the text for a more detailed description of the requirements.

- Reducing emissions of organic HAP's using a fixed-roof tank which is operated according to specified work practices (e.g., keeping hatches closed and bolted except during sampling, removal, or for equipment inspection maintenance or repair). If the wastewater tank is used for heating wastewater or treating by means of exothermic reaction, or the contents of the tank are sparged, this option can not be used for this tank;
- Reducing emissions of organic HAP's using a fixed-roof tank and a closed-vent system that routes organic HAP vapors to a control device. The fixed roof must be operated according to specified work practices (e.g., keeping hatches closed and bolted) and equipped with a lid that remains in a closed position (e.g., covered by a lid). The closed-vent system, which is subject to the requirements of §63.148 of Subpart G, and the control device, which is subject to the requirements of §63.139 of Subpart G, are discussed in Section 7.4.4.3 of this inspection tool;
- Reducing emissions of organic HAP's using a fixed-roof tank equipped with an internal floating roof which is operated according to specified work practices, equipped with specified deck fittings, and equipped with specified seal configurations (i.e., a single liquid-mounted seal, a single metallic shoe seal, or double seals);
- Reducing emissions of organic HAP's using an external floating roof tank operated according to specified work practices, equipped with specified deck fittings, and equipped with specified seal configurations (i.e., double seals, with the primary seal to be either a liquid-mounted or a metallic shoe seal); or
- Using another means of emission limitation approved in accordance with §63.102(b) of Subpart F.

A detailed checklist of the work practices and deck fittings specified for fixed-roof tanks, internal floating roof tanks, and external floating roof tanks is provided in Sections 7 and 8, Volume II.

Surface Impoundments. Surface impoundments holding Group 1 process wastewater streams must meet the control requirements in §63.134 of Subpart G unless the wastewater is included in an emissions average. Surface impoundments holding Group 2 wastewater streams are not required to apply any additional controls. The control requirement for surface impoundments holding Group 1 process wastewater streams is:

- Reducing emissions of organic HAP's using a cover (e.g., air-supported structure or rigid cover) and a closed-vent system that routes organic HAP vapors to a control device. The cover must be operated according to specified work practices (e.g., keeping hatches, sampling ports, and gauge wells closed). The closed-vent system, which is subject to the requirements of §63.148 of Subpart G, and the control device, which is subject to the requirements of §63.139 of Subpart G, are discussed in Section 7.4.4.3 of this document; or
- Reducing emissions of organic HAP's using a floating flexible membrane. The floating flexible membrane must float on the surface of the liquid and form a continuous barrier over the entire surface area of the liquid. Requirements are given for the fabrication of the membrane material (HDPE of 2.5 millimeters or any material with equivalent organic permeability properties). The flexible floating membrane must be installed properly, have a closure device, and emergency cover drains (for stormwater removal). The closure device must minimize exposure of HAP's to the atmosphere, and be operated according to specified work practices (e.g., keeping closed except for inspection, maintenance, or repair).

Containers. The control requirements for containers holding Group 1 process wastewater are dependent on container capacity thresholds. Table 7-10 provides the container capacity criteria and corresponding summary of control requirements. Containers holding Group 1 process wastewater streams must meet the control requirements in §63.135 of Subpart G unless the wastewater is included in an emissions average. Containers holding Group 2 wastewater streams are not required to apply any additional controls.

TABLE 7-10. CONTAINER^a EMISSION CONTROL REQUIREMENTS

Capacity (m ³)	Control Requirements
0.1 ≤ capacity < 0.42	Container must meet DOT specifications and testing requirements under 49 CFR Part 178; <u>or</u> The cover and all openings must be maintained without leaks as specified in §63.148 of Subpart G
≥ 0.42	The cover and all openings must be maintained without leaks as specified in §63.148 of Subpart G; <u>and</u> Submerged fill pipes which meet specifications (e.g., fill pipe outlet can extend no more than six inches or within two fill pipe diameters of the bottom of the container) must be used; <u>and</u> Emissions of organic HAP's must be reduced using an enclosure. The enclosure must be operated with a closed-vent system routed to a control device.

^a The term container is defined in the HON (§63.111) to have a capacity greater than or equal to 0.1 m³.

Individual Drain Systems. Individual drain systems holding Group 1 process wastewater streams must meet the control requirements in §63.136 of Subpart G unless the wastewater is included in an emissions average. Individual drain systems holding Group 2 wastewater streams are not required to apply any additional controls. The control requirements for individual drain systems holding Group 1 process wastewater streams include:

- Reducing emissions of organic HAP's using a cover on each opening in the individual drain system and, if vented, a closed vent system that routes organic HAP vapors to a process or control device. The cover must be operated according to specified work practices (e.g., keeping access hatches and sampling ports closed). The closed-vent system, which is subject to the requirements of §63.148 of Subpart G, and the control device, which is subject to the requirements of §63.139 of Subpart G, are discussed in Section 7.4.4.3 of this document; or

- Reducing emissions of organic HAP's using drains equipped with water seal controls (e.g., p-trap) or a tightly fitting cap or plug which are operated according to specified work practices; and junction boxes equipped with a cover and, if vented, a closed vent system that routes organic HAP vapors to a process or a control device. Junction boxes that are fed by gravity or are operated with slight fluctuations in the liquid level are not required to use a closed vent system routing emissions to a process or control device. Instead the vent pipe is to be operated according to specified equipment standards and work practices. The closed-vent system, which is subject to the requirements of §63.148 of Subpart G, and the control device, which is subject to the requirements of §63.139 of Subpart G, are discussed in Section 7.4.4.3 of this document. Each sewer line shall not be open to the atmosphere and shall be covered or enclosed in a manner so as to have no visible gaps or cracks in joints, seals, or other emission interfaces.

Oil-water separators. Oil-water separators holding Group 1 process wastewater streams must meet the control requirements in §63.137 of Subpart G unless the wastewater is included in an emissions average. Oil-water separators holding Group 2 wastewater streams are not required to apply any additional controls. The control requirements for oil-water separators holding Group 1 process wastewater streams include:

- Reducing emissions of organic HAP's using a fixed roof and a closed-vent system that routes organic HAP vapors to a control device. The fixed roof must be operated according to specified work practices (e.g., keeping hatches bolted and closed). The closed-vent system, which is subject to the requirements of §63.148 of Subpart G, and the control device, which is subject to the requirements of §63.139 of Subpart G, are discussed in Section 7.4.4.3 of this document;
- Reducing emissions of organic HAP's using a floating roof operated according to specifications provided in 40 CFR Part 60 Subpart QQQ §§63.693-2(a)(1)(i), (a)(1)(ii), (a)(2), (a)(3), and (a)(4). Where a floating roof is infeasible, such as over a weir mechanism, a fixed roof and closed-vent system routed to a control device may be used; or
- Using another equivalent means of emission limitation approved in accordance with §63.102(b) of Subpart F.

A detailed checklist of work practices and equipment standards is provided in Volume II.

7.4.4.2 Treatment Processes

Treatment processes are techniques that remove or destroy the organics in a wastewater stream or residual. Section 63.138 of the HON wastewater provisions includes several compliance options and specifies how treatment processes may be used to achieve compliance with one or more of the compliance options. The compliance options may be used individually or in combination to achieve the required emission control.

The following is a list of all of the compliance options covered in §63.138. However, it should be noted that not all of the listed options may be used by all sources. For example, some options are

available only for existing sources. Other options may be used to treat only certain types of wastewater streams. All Group 1 wastewater streams not included in an emissions average must be controlled for air emissions prior to treatment and must be treated. Steam stripping and biological treatment are two common methods used for treating wastewater, but other methods not specified in the rule (e.g., thin film evaporation) also may be used. In many plant wastewater systems, Group 1 streams are combined with other Group 1 streams or with Group 2 streams before they are treated. Tables 7-11 and 7-12 provide details on the use of the available compliance options. The following are the compliance options for Group 1 wastewater streams for both Table 8 and Table 9 compounds, unless otherwise indicated:

1. At new or existing sources, reduce, by removal or destruction, the total concentration of Table 9 compounds to a level less than 50 ppmw as specified in §63.145(b). [Note: cannot use biological treatment process or dilution with this option]; or
2. At new sources, reduce, by removal or destruction, individual Table 8 compounds to a level less than 10 ppmw as specified in §63.145(b). [Note: cannot use biological treatment process or dilution with this option]; or
3. Use a design steam stripper which meets the design criteria specified in §63.138(d); or
4. Use a waste management unit or treatment process to reduce by at least 99 percent, by removal or destruction, the total mass flow rate of Table 8 or Table 9 compounds; or
5. Use a waste management unit or treatment process to reduce, by removal or destruction, the mass flow rate of each Table 9 and/or Table 8 compound by at least the fraction removed (Fr) values specified in Table 9 and/or Table 8. [Note the Fr value for all Table 8 compounds is 0.99]; or
6. Use a waste management unit or treatment process to achieve the required mass removal (RMR) of Table 8 compounds at new sources or Table 9 compounds at new or existing sources. To determine compliance for: nonbiological treatment use procedures in §63.145(e); aerobic biological treatment use §63.145(e) or (f); closed biological treatment use §63.145(e); or open biological treatment use §63.145(f); or
7. For new or existing sources, use a biological treatment unit that achieves a RMR of at least 95 percent for all compounds listed on Table 9, or at new sources, use a biological treatment unit that achieves a RMR of 95 percent for all table 8 compounds. [Note: all Group 1 and Group 2 wastewater stream entering the biological treatment unit that are subject to subpart F must be included in the demonstration of 95 percent removal]; or
8. Treat the wastewater or residual in a permitted RCRA hazardous waste incinerator, a RCRA permitted process heater or boiler, or discharge it to a properly permitted underground injection well.

TABLE 7-11. PROCESS WASTEWATER COMPLIANCE OPTIONS FOR NEW SOURCES

Compliance Options ^{a,b}	Group 1 for Table 8 ^c Compounds	Group 1 for Table 9 ^c Compounds	Group 2 Streams Only ^d
1. Use a steam stripper which meets the design criteria specified in §63.138(d) of Subpart G	●	●	N/A
2. Reduce mass flow rate of each Table 8 and/or Table 9 compound by Fr values specified in Table 9 of Subpart G [Fr values for Table 8 compounds are all 0.99]	●	●	N/A
3. Reduce HAP mass flow rate by 99%	●	●	N/A
4. Achieve required mass removal as specified in §63.145(e) and/or §63.145(f) of Subpart G	●	●	N/A
5. Treat in a biological treatment unit that achieves 95% HAP removal ^e	●	●	●
6. Reduce total concentration of Table 9 compounds to less than 50 ppmw ^f	N/A	● ^g	N/A
7. Reduce the concentration of each individually specified Table 8 HAP to less than 10 ppmw	●	N/A	N/A
8. Treat in a RCRA permitted waste incinerator, process heater or boiler, or underground injection well	●	●	N/A
9. Demonstrate that the total source mass flow rate of Table 8 and/or Table 9 compounds is less than 1 Mg/yr using procedures in §63.138(i)(1)(i) and (ii)	●	●	N/A

● means the compliance option can be used for the wastewater stream; and N/A means the compliance option is not applicable.

^a Options correspond to those listed in Section 7.4.4.2. To simplify the table, only an abbreviated description of the option is given. Refer to Section 7.4.4.2 for a more detailed description of the requirements of the option.

^b This table provides a list of compliance options. The stream(s) also need(s) to meet the suppression and control requirements described in Section 7.4.4.1.

^c If a stream is Group 1 for Table 8 and/or Table 9 compounds, it must meet the treatment requirements for Table 8 and/or Table 9 compounds, as applicable.

^d Group 2 streams that are not combined with Group 1 do not require treatment, except for the fifth compliance option - biological treatment unit achieving 95% HAP removal.

^e If the option to achieve a 95-percent HAP destruction using biological treatment is selected, all Group 1 and Group 2 wastewater streams subject to the HON must be routed to the biological treatment unit.

^f When meeting a concentration-based compliance option, the source must ensure that each Group 1 wastewater stream achieves the required average concentration. Dilution is not allowed as a method for reducing concentration.

^g New sources selecting a concentration-based compliance option must ensure that the total concentration of each individual compound listed on Table 8 of Subpart G are reduced to less than 10 ppmw.

TABLE 7-12. PROCESS WASTEWATER COMPLIANCE OPTIONS FOR EXISTING SOURCES

Compliance Options ^{a,b}	Group 1 for Table 9 Compounds ^c	Group 2 Streams Only ^d
1. Use a steam stripper which meets the design criteria specified in §63.138(d) of Subpart G	●	N/A
2. Reduce mass flow rate of <u>each</u> Table 9 organic HAP by the Fr values specified in Table 9 of Subpart G	●	N/A
3. Reduce mass flow rate of Table 9 compounds by 99%	●	N/A
4. Achieve required mass removal as specified in §63.145(e) or (f) of Subpart G	●	N/A
5. Treat in a biological treatment unit that achieves 95% HAP removal ^e	●	●
6. Reduce total concentration of Table 9 compounds to less than 50 ppmw ^f	●	N/A
7. Treat in a RCRA permitted waste incinerator, process heater or boiler, or underground injection well	●	N/A
8. Demonstrate that the total source flow rate of Table 9 compounds is less than 1 Mg/yr using procedures in §63.138(i)(1)(i) and (i)(1)(ii)	●	N/A

● means the compliance option can be used for the wastewater stream; and N/A means the compliance option is not applicable.

^a Options correspond to those listed in Section 7.4.4.2. To simplify the table, only an abbreviated description of the option is given. Refer to Section 7.4.4.2 for a more detailed description of the requirements of the option.

^b This table provides a list of compliance options. The stream(s) also need(s) to meet the suppression and control requirements described in Section 7.4.4.1.

^c Existing sources must comply with requirements only for HAP's listed on Table 9 of Subpart G.

^d Group 2 streams that are not combined with Group 1 do not require treatment, except for the fifth compliance option - biological treatment unit achieving 95% HAP removal.

^e If the option to achieve 95-percent destruction using biological treatment is selected, all Group 1 and Group 2 wastewater streams subject to the HON must be routed to the biological treatment unit.

^f When meeting a concentration-based compliance option, the source must ensure that each Group 1 wastewater stream achieves the required annual average concentration. Dilution is not allowed as a method for reducing concentration.

Sources complying with any of the options, except the design steam stripper or RCRA option, must conduct either a design evaluation or performance test to prove compliance with the chosen option(s). Sources using open biological treatment processes must conduct a performance test (except as noted in Table 36 of Subpart G). The design evaluation must address the operating characteristics of the treatment process based on operation at representative wastewater flow and a concentration under which it would be most difficult to demonstrate compliance. Performance tests must be conducted as specified in §63.145 of Subpart G.

It should be noted that wastewater streams are exempt from the above compliance options if the total source mass flow rate for Table 8 and/or Table 9 compounds is less than 1 megagram per year, based on the mass before the wastewater stream is treated. A detailed checklist of the requirements for each of the treatment compliance options is provided in Section 8 of Volume II.

7.4.4.3 Closed-Vent Systems and Control Devices

Closed-vent systems are used to transport organic HAP vapors from waste management units and treatment processes to control devices. In order to reduce emissions during transport, the duct work or piping in the closed-vent system is subject to periodic leak inspections in §63.148 of Subpart G. There are also provisions in §63.148 to prevent releases through by-pass lines.

Control devices are used to recover or destroy organic HAP vapors. Section 63.139 of the HON wastewater provisions requires that control devices reduce by 95 percent the organic HAP emissions routed to them from waste management units and treatment processes or allow an outlet concentration of 20 ppmv or less. A variety of control devices may be used including flares; enclosed combustion devices such as thermal and catalytic incinerators, boilers, and process heaters; vapor recovery systems such as condensers and carbon adsorbers; scrubbers; and any other devices that can reduce total organic HAP emissions by 95 weight percent or greater, or reduce the outlet concentration to 20 ppmv or less.

7.4.4.4 Residuals Management

Residuals may be generated during the treatment of wastewater. As described in Section 7.4.1, residuals can include, among other things, the organic layer removed by a decanter or the overheads condensate from a steam stripper or air stripper. Residuals generated from the management of a Group 1 process wastewater stream must be managed according to §63.138(k) of Subpart G. Specifically, they must be controlled for air emissions by one of the following compliance options:

- Recycling the residual to a production process;
- Selling the residual for the purpose of recycling or for any other purpose. Residuals being stored prior to sale must be in compliance with waste management unit control requirements. Additionally, once residuals are sold, they must continue to be managed in accordance with the HON;
- Returning the residual to a treatment process (e.g., send to a boiler);
- Treating the residual to destroy the total combined mass flow rate of Table 8 and/or Table 9 compounds by 99 percent or more; or

- Comply with RCRA treatment options given in §63.138(h).

Any residuals generated from Group 2 streams do not require control under the HON; however, other regulations such as RCRA may be applicable.

7.4.5 Process Wastewater Testing, Monitoring, Recordkeeping and Reporting

For both Group 1 and Group 2 process wastewater streams, a record must be kept which provides the annual average flow rate and the annual average concentration for each process wastewater stream. If process knowledge is used to determine that a process wastewater stream is Group 2, a record of how the process knowledge was used to make the decision must be maintained.

As part of the Notification of Compliance Status, sources must submit more specific details on the waste management units, treatment processes, and control devices that are being used, including design analyses, performance test results, and compliance determination results. For HAP's listed on Table 8 and/or Table 9 of Subpart G, each new source must submit the information described in Appendix D, Table D-1.

For each treatment process or waste management unit identified in Tables D-1, the sources also must complete Table D-2 for treatment processes and Table D-3 for waste management units. For each residual removed from a Group 1 process wastewater stream, sources must submit the information described in Table D-4.

If the vapors from a waste management unit or treatment process are routed to a flare, the sources must submit records and reports of flare design, visible emission readings, heat content determinations, flow rate measurements, exit velocity, and periods when the pilot flame is absent. For each control device that is not a flare, the source must submit information justifying site-specific monitoring parameter ranges and either the results of performance tests or a design evaluation for a thermal incinerator, catalytic incinerator, boiler or process heater, condenser, carbon adsorption system, or scrubber. The documentation must include the vent stream composition, constituent concentrations, flow rate, and control device operating parameters. Some control devices are not required to submit design evaluation criteria, including: (1) boilers or process heaters either with a design heat input capacity of 44 MW or greater, or into which the emission stream is introduced with the primary fuel; or (2) boilers or process heaters burning hazardous waste for which the owner or operator has been issued either a final permit or a certification of interim status under RCRA 40 CFR Parts 270 and 266, Subpart H.

For waste management units, treatment processes, and control devices, sources must submit results of inspections and monitoring as part of the Periodic Report, which is submitted semi-annually. A list of inspection and monitoring requirements is provided for waste management units in Table 7-13, for treatment processes in Table 7-14, and for control devices in Table 7-15. Table 7-16 provides a list of reporting and recordkeeping requirements for control devices.

7.4.6 Process Water Control Requirements

The approach used in the HON to regulate wastewater emissions assumed that all process water containing HAP's would be managed in closed systems to minimize the loss of recoverable materials. The provisions on the control of emissions from process water were included to ensure that process fluids containing hazardous air pollutants within the manufacturing process would be

TABLE 7-13. INSPECTION AND MONITORING REQUIREMENTS FOR WASTE MANAGEMENT UNITS

To Comply With	Inspection or Monitoring Requirement	Frequency	Method
WASTEWATER TANKS:			
63.133(b)(1)	Inspect fixed roof and all openings for leaks	Initially Semi-annually	Visual
63.133(c)	Inspect internal floating roof in accordance with §§63.120(a)(2) and (a)(3)	See §63.120(a)(2) and (a)(3)	Visual
63.133(d)	Measure external floating roof seal gaps in accordance with §§63.120(b)(2)(i) through (b)(4) - Primary seal gaps - Secondary seal gaps	Once every 5 years Initially Annually	See §63.120(b)(2)(i) through (b)(4)
63.133(f)	Inspect wastewater tank for control equipment failures and improper work practices	Semi-annually	Visual
63.133(g)			
SURFACE IMPOUNDMENTS:			
63.134(b)(1)	Inspect cover and all openings for leaks ^a	Initially Semi-annually	Visual
63.134(c)	Inspect surface impoundment for control equipment failures and improper work practices	Initially Semi-annually	Visual
CONTAINERS:			
63.135(b)(1)	Inspect cover and all openings for leaks ^a	Initially Semi-annually	Visual
63.135(b)(2)(ii)			
63.135(d)(1)	Inspect enclosure and all openings for leaks ^a	Initially Semi-annually	Visual
63.135(e)	Inspect container for control equipment failures and improper work practices	Initially Semi-annually	Visual

(Continued)

TABLE 7-13. INSPECTION AND MONITORING REQUIREMENTS FOR WASTE MANAGEMENT UNITS

To Comply With	Inspection or Monitoring Requirement	Frequency	Method
INDIVIDUAL DRAIN SYSTEMS: ^a			
63.136(b)(1)	Inspect cover and all openings to ensure there are no gaps, cracks, or holes.	Initially Semi-annually	Visual
63.136(c)	Inspect individual drain system for control equipment failures and improper work practices	Initially Semi-annually	Visual
63.136(e)(1)	Verify that sufficient water is present to properly maintain integrity of water seals	Initially Semi-annually	Visual or smoke test or other means as specified
63.136(f)(1)	Inspect all drains using tightly-sealed caps or plugs to ensure caps and plugs are in place and properly installed	Initially Semi-annually	Visual
63.136(f)(2)	Inspect all junction boxes to ensure covers are in place and have no visible gaps, cracks, or holes	Initially Semi-annually	Visual
63.136(f)(3)	Inspect unburied portion of all sewer lines for cracks and gaps	Initially Semi-annually	Visual
OIL-WATER SEPARATORS:			
63.137(b)(1)	Inspect fixed roof and all openings for leaks ^a	Initially Semi-annually	Visual
63.137(c)	Measure floating roof seal gaps in accordance with 40 CFR 60.696(d)(1) - Primary seal gaps - Secondary seal gaps	Initially ^b Once every 5 years Initially ^b Annually	See 40 CFR 60.696(d)(1)
63.137(d)	Inspect oil-water separator for control equipment failures and improper work practices	Semi-annually	Visual

^a As specified in §63.136(a), the owner or operator shall comply with the requirements of either §63.136(b) and (c), or (e) and (f).

^b Within 60 days of installation as specified in §63.137(c).

TABLE 7-14. MONITORING REQUIREMENTS FOR TREATMENT PROCESSES

To Comply With	Parameters to be Monitored	Frequency	Methods
1. Required mass removal of Table 8 and/or Table 9 compound(s) from wastewater treated in a properly operated biological treatment unit 63.138(f) 63.138(g)	Appropriate parameters as specified in §63.143(c) and approved by permitting authority	Appropriate frequency as specified in §63.143 and approved by permitting authority	Appropriate methods as specified in §63.143 and approved by permitting authority
2. Design steam stripper 63.138(d)	Steam flow rate Wastewater feed mass flow rate Wastewater feed temperature	Continuous Continuous Continuous	Integrating steam flow monitoring device equipped with a continuous recorder Liquid flow meter installed at stripper influent and equipped with a continuous recorder Liquid temperature monitoring device installed at stripper influent and equipped with a continuous recorder
3. Alternative monitoring parameters	Other parameters may be monitored upon approval from the Administrator in accordance with the requirements specified in §63.143(d)		

TABLE 7-15. MONITORING REQUIREMENTS FOR CONTROL DEVICES

Control Device	Monitoring Equipment Required	Parameters to be Monitored	Frequency
All control devices	1. Flow indicator installed at all bypass lines to the atmosphere and equipped with continuous recorder ^a or	1. Presence of flow diverted from the control device to the atmosphere or	Hourly records of whether the flow indicator was operating and whether a dispersion was detected at any time during each hour
	2. Valves sealed closed with car-seal or lock-and-key configuration	2. Monthly inspections of sealed valves	Monthly
Thermal Incinerator	Temperature monitoring device installed in firebox or in ductwork immediately downstream of firebox ^b and equipped with a continuous recorder ^a	Firebox temperature	Continuous
Catalytic Incinerator	Temperature monitoring device installed in gas stream immediately before and after catalyst bed and equipped with a continuous recorder ^a	1. Temperature upstream of catalyst bed or	Continuous
		2. Temperature difference across catalyst bed	
Flare	Heat sensing device installed at the pilot light and equipped with a continuous recorder ^a	Presence of a flame at the pilot light	Hourly records of whether the monitor was continuously operating and whether the pilot flame was continuously present during each hour
Boiler or process heater <44 megawatts and vent stream is not mixed with the primary fuel	Temperature monitoring device installed in firebox ^b and equipped with continuous recorder ^a	Combustion temperature	Continuous
Condenser	Temperature monitoring device installed at condenser exit and equipped with continuous recorder ^a	Condenser exit (product side) temperature	Continuous

(Continued)

TABLE 7-15. MONITORING REQUIREMENTS FOR CONTROL DEVICES

Control Device	Monitoring Equipment Required	Parameters to be Monitored	Frequency
Carbon Adsorber (Regenerative)	Integrating regeneration stream flow monitoring device having an accuracy of ± 10 percent, and	Total regeneration stream mass or volumetric flow during carbon bed regeneration cycle(s)	For each regeneration cycle, record the total regeneration stream mass or volumetric flow
	Carbon bed temperature monitoring device	Temperature of carbon bed after regeneration [and within 15 minutes of completing any cooling cycle(s)]	For each regeneration cycle and within 15 minutes of completing any cooling cycle, record the carbon bed temperature
Carbon Adsorber (Non-regenerative)	Organic compound concentration monitoring device ^c	Organic compound concentration of adsorber exhaust	Daily or at intervals no greater than 20 percent of the design carbon replacement interval, whichever is greater
Alternative monitoring parameters	Other parameters may be monitored upon approval from the Administrator in accordance with the requirements in §63.143(e)(3)		

a "Continuous recorder" is defined in §63.111 of Subpart G.

b Monitor may be installed in the firebox or in the ductwork immediately downstream of the firebox before any substantial heat exchange is encountered.

c As an alternative to conducting this monitoring, an owner or operator may replace the carbon in the carbon adsorption system with fresh carbon at a regular predetermined time interval that is less than the carbon replacement interval that is determined by the maximum design flow rate and organic concentration in the gas stream vented to the carbon adsorption system.

**TABLE 7-16. PERIODIC REPORTING REQUIREMENTS FOR CONTROL DEVICES
USED TO COMPLY WITH §§63.133-63.139**

Control Device	Reporting Requirements
Thermal Incinerator	<ol style="list-style-type: none"> 1. Report all daily average^a temperatures that are outside the range established in the NCS^b or operating permit and all operating days when insufficient monitoring data are collected^c
Catalytic Incinerator	<ol style="list-style-type: none"> 1. Report all daily average^a upstream temperatures that are outside the range established in the NCS^b or operating permit 2. Report all daily average^a temperature differences across the catalyst bed that are outside the range established in the NCS^b or operating permit 3. Report all operating days when insufficient monitoring data are collected^c
Boiler or Process Heater with a design heat input capacity less than 44 megawatts and vent stream is not mixed with the primary fuel	<ol style="list-style-type: none"> 1. Report all daily average^a firebox temperatures that are outside the range established in the NCS^b or operating permit and all operating days when insufficient monitoring data are collected^c
Flare	<ol style="list-style-type: none"> 1. Report the duration of all periods when all pilot flame is absent
Condenser	<ol style="list-style-type: none"> 1. Report all daily average^a exit temperatures that are outside the range established in the NCS^b or operating permit and all operating days when insufficient monitoring data are collected^c
Carbon Adsorber	<ol style="list-style-type: none"> 1. Report all carbon bed regeneration cycles when the total regeneration stream mass or volumetric flow is outside the range established in the NCS^b or operating permit 2. Report all carbon bed regeneration cycles during which the temperature of the carbon bed after regeneration is outside the range established in the NCS^b or operating permit 3. Report all operating days when insufficient monitoring data are collected^c

(Continued)

**TABLE 7-16. PERIODIC REPORTING REQUIREMENTS FOR CONTROL DEVICES
USED TO COMPLY WITH §§63.133-63.139**

Control Device	Reporting Requirements
All Control Devices	<ol style="list-style-type: none"> 1. Report the times and durations of all periods when the vent stream is diverted through a bypass line or the monitor is not operating, or 2. Report all monthly inspections that show the valves are moved to the diverting position or the seal has been changed

a The daily average is the average of all values recorded during the operating day, as specified in §63.147(d) of Subpart G.

b NCS = Notification of Compliance Status described in §63.152 of Subpart G.

c The periodic reports shall include the duration of periods when monitoring data are not collected for each excursion as defined in §63.152(c)(2)(ii)(A) of Subpart G.

handled in a manner consistent with the requirements for wastewater streams subject to control. The process waters regulated by the HON are certain liquid streams in open systems within a chemical manufacturing process unit. The provisions in §63.149 contain control requirements for equipment that comes in contact with such process water streams. Table 7-17 lists the control requirements for equipment coming in contact with such streams.

7.4.7 Heat Exchange Systems and Cooling Water Management Requirements

A heat exchange system, as defined in the HON, includes any recirculating heat exchange system (i.e., cooling tower system) or once-through cooling water system (e.g., river or pond water). A heat exchange system can include more than one heat exchanger and can include an entire recirculating or once-through cooling system. The requirements for managing cooling water are provided in §63.104 of Subpart F.

The HON requires sources using heat exchange systems (either recirculating or once-through heat exchange systems) to monitor cooling water for leaks. The HON requires sources using recirculating heat exchange systems to monitor for leaks of HAP's listed on Table 4 of Subpart F. Sources using once-through heat exchange systems are required to monitor for leaks of all Table 9 compounds.

All heat exchange systems must be monitored for leaks using one of the following parameters: total HAP, total VOC, speciated HAP's, TOC, or other representative substances that would indicate the presence of a leak in the heat exchange system. Monitoring must be performed monthly for the first six months and quarterly thereafter.

Monitoring parameter (e.g., total HAP, total VOC) concentrations in cooling water must be determined using any EPA-approved method listed in 40 CFR Part 136 that is sensitive to concentrations as low as 10 ppm. The same method must be used to measure the inlet and the outlet concentration of the heat exchange system. A leak is detected if a statistically significant difference in concentration of at least 1 ppm at a 95 percent confidence level is observed. Leaks must be repaired no more than 45 days after monitoring tests indicate a leak is present unless the source provides documentation meeting the criteria in §63.104(e) for delay of repair. After a leak is repaired, the source must monitor monthly for six months and quarterly thereafter to ensure that the leak does not recur.

Sources are not required to comply with leak detection monitoring requirements if either: (1) the heat exchange system is operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side; or (2) there is an intervening cooling fluid containing less than 5 percent by weight of the compounds listed in Table 4 of subpart F; or (3) the once-through heat exchange system has an NPDES permit with an allowable discharge limit of less than 1 ppm; or (4) the once-through heat exchange system has an NPDES permit that requires monitoring conditions or parameters to detect a leak of process fluid, specifies the normal range of the parameters or conditions, requires monitoring for the parameters or conditions no less frequently than every month for the first six months and quarterly thereafter, and requires the owner or operator to report and repair leaks when parameter conditions exceed the normal range; or (5) the recirculation heat exchange system is used to cool process fluids that contain less than 5 percent by weight of the compounds listed in Table 4 of subpart F; or (6) the once-through heat exchange system is used to cool process fluids that

TABLE 7-17. CONTROL REQUIREMENTS FOR ITEMS OF EQUIPMENT THAT MEET THE CRITERIA OF §63.149 OF SUBPART G

Item of Equipment	Control Requirements ^a
Drain or drain hub	(a) Tightly fitting solid cover (TFSC); or (b) TFSC with a vent to either a process, to a fuel gas system, or to a control device meeting the requirements of § 63.139 (c); or (c) Water seal with submerged discharge or barrier to protect discharge from wind.
Manhole ^b	(a) TFSC; or (b) TSFC with a vent to either a process, to a fuel gas system, or to a control device meeting the requirements of § 63.139 (c); or (c) If the item is vented to the atmosphere, use a TFSC with a properly operating water seal at the entrance or exit to the item to restrict ventilation in the collection system. The vent pipe shall be at least 90 cm in length and not exceeding 10.2 cm in nominal inside diameter.
Lift station	(a) TFSC; or (b) TFSC with a vent to either a process, to a fuel gas system, or to a control device meeting the requirements of § 63.139 (c); or (c) If the lift station is vented to the atmosphere, use a TFSC with a properly operating water seal at the entrance or exit to the item to restrict ventilation in the collection system. The vent pipe shall be at least 90 cm in length and not exceeding 10.2 cm in nominal inside diameter. The lift station shall be level controlled to minimize changes in the liquid level.
Trench	(a) TFSC; or (b) TSFC with a vent to either a process, to a fuel gas system, or to a control device meeting the requirements of § 63.139 (c); or (c) If the item is vented to the atmosphere, use a TFSC with a properly operating water seal at the entrance or exit to the item to restrict ventilation in the collection system. The vent pipe shall be at least 90 cm in length and not exceeding 10.2 cm in nominal inside diameter.
Pipe	Each pipe shall have no visible gaps in joints, seals, or other emission interfaces.
Oil/Water separator	(a) Equip with a fixed roof and closed vent system that routes vapors to process equipment or to a control device meeting the requirements of § 63.139 (c); or (b) Equip with a floating roof that meets the equipment specifications of § 60.693 (a)(1)(i), (a)(1)(ii), (a)(2), (a)(3), and (a)(4).
Tank ^c	Maintain a fixed roof ^d . If the tank is sparged ^e or used for heating or treating by means of an exothermic reaction, a fixed roof and a closed vent system shall be maintained that routes the organic HAP vapors to other process equipment or to a control device that meets the requirements of 40 CFR § 63.119(e)(1) or (e)(2).

^a Where a tight fitting solid cover is required, it shall be maintained with no visible gaps or openings, except during periods of sampling, inspection, or maintenance.

^b Manhole includes sumps and other points of access to a conveyance system.

^c Applies to tanks with capacities of 38 m³ or greater.

^d A fixed roof may have openings necessary for proper venting of the tank, such as pressure/vacuum vent, j-pipe vent.

^e The liquid in the tank is agitated by injecting compressed air or gas.

contain less than 5 percent by weight of the Table 9 compounds. Table 8-5 of Volume II provides a detailed checklist of requirements for heat exchange systems requiring leak detection monitoring.

7.4.8 Maintenance Wastewater Management Requirements

Maintenance wastewater is defined as wastewater generated by the draining of process fluid from components in the chemical manufacturing process unit into an individual drain system prior to or during maintenance activities. Maintenance wastewater can be generated during planned and unplanned shutdowns and during periods not associated with a shutdown. Examples of activities that can generate maintenance wastewater include descaling of heat exchanger tubing bundles, cleaning of distillation column traps, draining of low legs and high point bleeds, draining of pumps into an individual drain system, and draining of portions of the chemical manufacturing process unit for repair. The requirements for managing maintenance wastewater are provided in §63.105 of Subpart F.

As part of the facility's startup, shutdown, and malfunction plan required by §63.6(e)(3) of 40 CFR Part 63 Subpart A, the HON requires sources to prepare a description of procedures for managing maintenance wastewater. The description must include maintenance procedures for managing wastewater generated from emptying and purging equipment during temporary shutdowns that are necessary for inspections, maintenance, and repair (i.e., maintenance-turnaround) and during periods which are not shutdowns (i.e., routine maintenance). At a minimum, the description must specify: (1) the process equipment and/or maintenance tasks that are expected to create wastewater during maintenance activities; (2) the procedure for properly managing the wastewater and controlling HAP emissions to the atmosphere; and (3) the procedures for clearing materials from process equipment.

The description is to be modified and updated as needed following each maintenance procedure. Records of the maintenance procedures must be kept as part of the startup, shutdown, and malfunction plan. A detailed checklist of the maintenance wastewater requirements are provided in Table 8-6 of Volume II.

September 1997

**Inspection Tool for
the Hazardous Organic NESHAP
(HON)**

Volume II: Inspection Checklists

**U.S. Environmental Protection Agency
Chemical, Commercial Services, and Municipal Division
Washington, D.C. 20460**



1.0 HOW TO USE THE CHECKLISTS

The checklists in this inspection tool are flexible, and suitable for several different approaches to examining a facility. These checklists may be used singularly or in combination at a facility where the user is seeking compliance information on a specific emission point or points, or the user may proceed through the entire group of checklists, section by section, if the approach to examining the facility begins with the initial question of whether there is a chemical manufacturing process unit (CMPU) at the facility that must comply with the HON.

Organization of the Checklists - If the users choose to proceed through the checklists sequentially, they may begin by determining which CMPU's are subject to the HON, which can be done with the checklists in Section 3. Once the applicability is established (either through the checklists in Section 3 or by prior information), the user can move on to the checklists in Section 4 to determine which emission points are subject to the HON. This information allows the user to then move to the sections on emission points that are located at the facility. These sections are for process vents, transfer operations, storage vessels, and wastewater, and the checklists for each are found in Sections 5, 6, 7, and 8, respectively. These sections contain the compliance checklists for the provisions that are unique to the specific emission point. These checklists may also refer to checklists in Sections 9 and 10 which contain provisions that apply to multiple types of emission points (process vents, transfer operations, storage vessels, and wastewater). Section 9 has checklists for control equipment requiring leak detection; it covers the provisions on bypass lines and leak inspection requirements for equipment like closed-vent systems. Section 10 has compliance checklists for each of the control and recovery equipment listed in the rule. Thus, if a transfer rack is controlled using a flare, Section 6 would give the general transfer rack compliance checklists, and refer to Section 9 for the closed-vent system checklist and Section 10 for the checklist on flares.

Flexible Use - However, the checklists may also be used in a flexible manner to examine only certain types of emission points at a facility or specific types of control devices. For example, the user may need to know only about the compliance status of process vents at a facility. In this case the user would be able to visit the facility and conduct an inspection by taking only the checklists in Section 5 for process vents, Checklist 9-1, (the only checklist in Section 9 that applies to process vents), and Section 10 for the control and recovery devices used to control process vents. If the inspector knew the specific control and/or recovery devices being used, the inspector could just take those specific checklists. Also, Section 11 includes a series of checklists for specific types of reports. An inspector may want to inspect the most recent periodic report to make sure all the components are included. Section 11 contains a checklist for periodic report.

Volume II Inspection Checklist

1.0	How to Use the Checklists	II-1
2.0	Preparing for the Inspection	II-3
3.0	Applicability of the HON	II-5
4.0	Emission Point Applicability and Assignment of Emission Points to the Chemical Manufacturing Process Units	II-11
5.0	Process Vents	II-26
6.0	Transfer Operations	II-31
7.0	Storage Vessels	II-37
8.0	Wastewater	II-61
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10.0	Control Device and Recovery Device Checklists	II-91
11.0	Compliance Timeline and Reporting Checklists	II-118

Another instance in which the user benefits from the flexibility of these checklists occurs when a specific control device or recovery device must be examined for compliance. For example, if the user has to examine only one device, such as a carbon adsorber at a Group 1 process vent emission point, it is only necessary to take Checklist 10-6 from Section 10.

The utility of these checklists resides in their capacity to function at a variety of inspection sites and to meet the needs of various approaches to inspecting for compliance at the site. Hence, the inspector may have little or no information about a facility and benefit from using all of the checklists together in order to determine compliance, or specific emission points and control devices may need inspection, so that the user can selectively apply those checklists from the sections as necessary.

These checklists provide the flexibility and ease of use so that the inspector may use them at facilities as efficiently as possible, and refer only to the necessary sections to select the checklists which pertain to that facility's emission point or points for their particular inspection needs.

Meaning of Responses - In general a "yes" response in the checklist indicates compliance and a "no" response indicates noncompliance. Exceptions to this are in the roadmap tables, tables that do not apply to the specific situation, and questions that do not apply to the situation being inspected. The roadmap tables are used to inform the inspector which checklists apply to the situation they are inspecting, therefore a "no" response would indicate that the compliance option does not apply and not that there is a compliance issue. Some tables do not apply to the situation being inspected. For instance, if an inspector is inspecting Group 1 process vents, Table 5-3, Group 2 Process Vents, would not apply and should not be used. There are also specific questions in the checklists that might not apply to the situation being inspected. For example, if an inspector is inspecting Group 2 process vents and is using Table 5-3 to perform the inspection, item 4 may or may not be applicable. Item 4 only applies when a process change is made that changes the group status. If the facility has not made a change that affects the group status of the process vent being inspected, this item would not apply and should not be marked "yes" or "no". In all cases where an item in a checklist may not apply it is obvious in the language that the item is conditional. These items should be skipped when they do not apply.

2.0 PREPARING THE INSPECTION

Compliance with the HON can be determined by review of records and reports, review of performance tests, and visual inspections using the methods and procedures specified in the rule. As required by the rule, testing, monitoring, and inspections are to be carried out by the owner or operator, with records kept for 5 years. Therefore, the local, state, or federal inspector can determine compliance by a review of plant records, along with spot inspections to verify the operation, performance, and condition of the control equipment.

Prior to conducting the inspection, the inspector should become familiar with the regulation, search the EPA, state, or local agency files for information on the facility, and review all relevant information. The HON requires that the operating permit application submitted by each facility that is subject to the

regulation specify which emission points are subject to the HON and what type of control is applied to each emission point. The title V permit application is a good place to start the inspection. Much of the material concerning applicability will be addressed in the application. The Title V permit application can be reviewed along with the applicability requirements of the HON in order to identify any applicability concerns or questions the inspector may have. (The applicability checklists are located in Sections 3 and 4 with group status checklists in the emission point-specific Sections 5, 6 and 7.) In reviewing the determination of group status, it is suggested that the inspector focus on the determination of Group 2 status, because the Group 1 emission points will be controlled (unless the facility is emissions averaging, which is not covered in this document).

The inspector can also use the Title V permit application to develop a list of control devices to inspect. The most recent periodic report should provide information on the facility's compliance status. A review of files will help the inspector become familiar with the operation of the facility and the most recent compliance history. The compliance history and prior inspections will help the inspector prioritize areas of concern for the upcoming inspection. For example, if a leaking tank roof was identified in the last inspection, the inspector would want to check the facility records to verify that the tank roof was repaired in the allotted amount of time. The inspector may also want to visually inspect the tank to verify that it has been repaired.

The inspector may also need to gather safety and emissions detection equipment prior to the inspection. Some facilities will require inspectors to wear hard hats, safety glasses, and steel-toed shoes during their visual inspection. If the inspector will need to do any climbing to inspect equipment such as a tank roof, additional safety equipment may be necessary. If an inspector feels that it is necessary to enter a storage vessel, please be aware of the requirements under EPA Order 1440.2, and the safety information in Guidance on Confined Space Entry in NESHAP Inspections of Benzene Storage Vessels (EPA 455/R-92-003, September 1997). The inspector will also need a portable VOC analyzer to conduct Method 21 tests, and uniform probes for measuring gaps in storage tank roofs.

Examples of when incorrect applicability determinations may be uncovered through review of the Title V permit application

- The source claims that a benzene unit is part of a refinery.
- A process vent from a HON chemical manufacturing unit is routed to a refinery operation and the source claims it is not subject to the HON process vent provisions.

Because the review of records is the primary means of determining compliance, the local, state, or federal inspector should notify the facility management prior to inspection. This gives the facility personnel enough time to gather relevant records and have them organized and available for review. The facility should also provide a map and/or process flow diagrams to the inspector.

The inspection consists of a review of records and reports kept by the plant, and a visual inspection of plant equipment. Volume II provides inspection checklists for process vents, transfer operations, storage vessels, and wastewater. The checklists will enable the inspector to systematically review the plant records and reports. Each checklist provides a series of yes and no statements. A "yes" response to all of the statements indicates compliance with the standard. However, there are a few statements in the checklists that can be checked "no", and the facility would still be in compliance. These exceptions are noted in the checklists. The inspector should copy the applicable checklists in Volume II prior to each inspection.

Inspectors should conduct visual inspections to verify that the records and reports provided by the facility are accurate. Visual inspections will also enable the inspector to assess the condition of the control equipment. When making visual inspections, the checklists, along with plant drawings and specifications, should be used. Notations should be made on the checklists if there are discrepancies between the plant records and reports and the visual inspections. Control equipment should be checked for obvious leaks and lack of maintenance.

3.0 APPLICABILITY OF THE HON

Section 3 takes the inspector through the determination of what chemical manufacturing process units (CMPU's) are subject to the HON. Tables 3-1 and 3-2 establish which CMPU's are subject to the HON. Table 3-1 refers the inspector to Table 3-2 when a facility has a flexible operation unit. Table 3-2 steps through the determination of the primary product and whether the flexible operation unit is subject to HON. Table 3-3 is used to determine the primary product of other CMPU's. The primary product of a CMPU is key in determining whether the CMPU is subject to the HON. Table 3-4 is a checklist to determine if new or existing requirements pertain to the HON source. Table 3-4 is used once it is determined, using Table 3-1 and/or 3-2, that the CMPU is subject to the HON. Table 3-5 provides a place for the inspector to take notes and identify the CMPU's subject to the HON.

Section 3. Applicability of the HON

Table 3-1	Applicability of the HON	II-5
Table 3-2	Determination of Primary Product and Applicability for Flexible Operation Units	II-7
Table 3-3	Determination of the Primary Product	II-8
Table 3-4	Determination of Applicability of Existing and New Source Requirements	II-9
Table 3-5	Identification of CMPU's Subject to the HON	II-10

TABLE 3-1. APPLICABILITY OF THE HON

Complete this form to determine if a CMPU is subject to the HON.

1. Do total potential emissions at the plant site exceed 10 tpy of an individual HAP or 25 tpy of a combination of HAP's?

Y Continue with this checklist.

N The plant site is not subject to the HON.
2. Is the CMPU a petroleum refining process unit; an ethylene process unit; a solvent reclamation, recovery, or recycling operation at a hazardous waste TSDFA facility; an R&DB facility; or a process unit located in a coke by-product recovery plant?

Y The CMPU is not subject to the HON.

N Continue with this checklist.
3. Does the CMPU produce different intended products periodically throughout the year?

Y The CMPU is a flexible operation unit. Skip to Table 3-2 to determine primary product and applicability.

N Continue with this checklist.
4. Is the primary product of the CMPU, as determined in Table 3-3, a SOCM chemical (listed in Table 1 of Subpart F)?

Y Continue with this checklist.

N The CMPU is not subject to the HON.
5. Does the CMPU use as a reactant or manufacture as a product, co-product one of the organic HAP's listed in Table 2 of Subpart F?

Y The CMPU is subject to the HON.C

N The CMPU is not subject to the HON.

a TSDF = Treatment, storage, and disposal facility.

b R&D = Research and development (see §63.101 of Subpart F for definition).

c Determination of applicability must be reported as part of the operating permit application or as otherwise specified by the permitting authority.

TABLE 3-2. DETERMINATION OF PRIMARY PRODUCT AND APPLICABILITY FOR FLEXIBLE OPERATION UNITS^a

Complete this form to determine the primary product of a flexible operation unit and whether it is subject to the HON.

If the CMPU manufactures different products periodically, determine:

- The product manufactured for the greatest annual operating time.

If all products are manufactured for the same amount of operating time, determine:

- The product with the greatest annual production on a mass basis.

1. Is the product determined in either case above listed in Table 1 of Subpart F?

Y The primary product of the CMPU is a SOCM I chemical. Continue with this checklist.

N The primary product of the CMPU is not a SOCM I chemical, and the CMPU is not subject to the HON.

2. Does the flexible operation unit use as a reactant or manufacture as a product, or co-product one or more of the organic HAP's listed in Table 2 of Subpart F?

Y The CMPU is subject to the HON.^b

N The CMPU is not subject to the HON.

^a Determination is based on the expected utilization for the five years following April 22, 1994 for existing sources and the five years after initial start-up for new sources.

^b Determination of applicability must be reported as part of the operating permit application or as otherwise specified by the permitting authority.

TABLE 3-3. DETERMINATION OF THE PRIMARY PRODUCT

Complete this form if referred from Table 3-1. It is used to determine the primary product of CMPU's other than flexible operating units.

List the intended products for the CMPU.

1. Does one of the intended products have the greatest annual design capacity on a mass basis (e.g., makes up >50% on a mass basis if two products are made)?

 Y This is the primary product of the CMPU.

 N Continue with this checklist.

 2. If two or more of the intended products have the same annual design capacity on a mass basis, are any or all of the products listed in Table 1 of Subpart F?

 Y Any of the products that are listed in Table 1 of Subpart F may be designated the primary product of the CMPU. Thus, the primary product is a SOCM chemical. Go to question 5 on Table 3-1.

 N The primary product is not a SOCM chemical, and the CMPU is not subject to the HON.
-
-

**TABLE 3-4. DETERMINATION OF APPLICABILITY OF EXISTING AND
NEW SOURCE REQUIREMENTS**

Complete this form to determine if a chemical manufacturing process unit (CMPU) subject to the HON, as determined in Tables 3-1 or 3-2, is a new or an existing source.

1. Is the CMPU a new construction (on-site fabrication, erection, or installation of an affected source); or is it a reconstruction of an existing CMPU where the fixed capital cost of the new components exceeds 50% of the fixed capital cost that would be required to construct a comparable new CMPU.

Y Continue with this checklist.

N The CMPU is subject to existing source requirements.
 2. Did the reconstruction commence after 12/31/92?

Y The reconstructed CMPU is subject to new source requirements.

N The reconstructed CMPU is subject to existing source requirements.
 3. Did the construction commence after 12/31/92 and the addition has the potential to emit 10 tons per year or more of any HAP or 25 tons per year or more of any combinations of HAPs?

Y The constructed CMPU is subject to new source requirements.

N The constructed CMPU is subject to existing source requirements.
-

TABLE 4-1. APPLICABILITY CHECKLIST FOR PROCESS VENTS

1.	The vent stream is discharged from a chemical manufacturing process subject to the HON. (For process vents from distillation units, Table 4-2 is used to determine whether the distillation unit is part of a CMPU that is subject to the HON.)	Y <input type="checkbox"/>	N <input type="checkbox"/>
2.	The vent is a gas stream containing greater than 0.005 weight percent HAP.	Y <input type="checkbox"/>	N <input type="checkbox"/>
3.	The vent stream is continuously discharged (the vent is not associated with a batch process).	Y <input type="checkbox"/>	N <input type="checkbox"/>
4.	The vent stream is from a reactor or air oxidation reactor or distillation unit, ^a and is either:	Y <input type="checkbox"/>	N <input type="checkbox"/>
	(a) Discharged directly to the atmosphere (with or without passing through a control device); or		
	(b) Discharged after passing through a recovery device.		
5.	The vent is not a pressure relief device. ^b	Y <input type="checkbox"/>	N <input type="checkbox"/>
6.	The vent is not a gaseous stream routed to a fuel gas system.	Y <input type="checkbox"/>	N <input type="checkbox"/>
7.	The vent is not from a recovery device installed to control emissions from wastewater treatment operations. ^c	Y <input type="checkbox"/>	N <input type="checkbox"/>
8.	The vent is not an equipment leak as defined in Subpart H. ^b	Y <input type="checkbox"/>	N <input type="checkbox"/>

Is the vent subject to the HON process vent provisions?

- If all of the statements above are marked "Yes", the vent is subject to the process vent provisions in Subpart G of the HON.
- If any of the statements above are marked "No", the vent is not subject to the process vent provisions in Subpart G of the HON. No other checklists for these process vents apply.

^a The terms reactor, air oxidation reactor, distillation unit, are defined in §63.101 of Subpart F.

^b If false, the emission point is not subject to the process vents provisions of Subpart G, but may be subject to the equipment leak provisions in Subpart H of the HON.

^c If false, the emission point is not subject to the process vents provisions, but may be subject to the wastewater provisions in Subpart G of the HON.

TABLE 4-2. ASSIGNMENT OF DISTILLATION UNITS

Complete this form if referred from Table 4-1. It is used to determine if a distillation unit is assigned to a CMPU subject to the HON, and therefore the process vents from the distillation unit are subject to the HON.

1. Aromex units: Is the distillation unit part of the Aromex unit that produces benzene, toluene, and xylene?
 - Y The vent streams from the distillation unit are part of a CMPU that is subject to the HON.
 - N Go to question 2.
2. Hexane units: Is the distillation unit part of the unit that produces hexane?
 - Y The vent streams from the distillation unit are part of a CMPU that is subject to the HON.
 - N Go to question 3.
3. Cyclohexane units: Is the distillation unit part of the unit that produces cyclohexane?
 - Y The vent streams from the distillation unit are part of a CMPU that is subject to the HON.
 - N Go to question 4.
4. Is the distillation unit used by a single CMPU?
 - Y The distillation unit is assigned to that CMPU. Skip to question 7.
 - N Continue with this checklist.
5. Is there a predominant use of the distillation unit?
 - a. Is the greatest input into the distillation unit from a CMPU located on the same plant site?
 - Y The distillation unit is assigned to that CMPU. Skip to question 7.
 - N Continue with this checklist.
 - b. Does a CMPU at the same plant site receive the greatest output from the distillation unit?
 - Y The distillation unit is assigned to that CMPU. Skip to question 7.
 - N Continue with this checklist.

TABLE 4-2. ASSIGNMENT OF DISTILLATION UNITS

-
-
6. If the distillation unit is shared among CMPU's so that there is no single predominant use, is at least one of the CMPU's subject to the HON?
- Y The distillation unit may be assigned to any one of the CMPU's subject to the HON and therefore the distillation unit is part of a CMPU that is subject to the HON. Go to checklist 4-1, question 2.
- N The distillation unit is not subject to the HON.^b
7. Is the CMPU referred to in questions 4, 5a, or 5b subject to the HON?
- Y The distillation unit is part of a CMPU that is subject to the HON.^b Go to checklist 4-1, question 2.
- Y The distillation unit is not part of a CMPU that is subject to the HON.^b
-
-

^a If the predominant use of the distillation unit varies from year to year, applicability of the HON is to be based on utilization between April 22, 1993 and April 22, 1994. This determination must be reported in the operating permit application or as otherwise specified by the permitting agency.

^b If there is a change in the material stored or a distillation unit that was dedicated to a single CMPU begins to serve another CMPU, applicability of the HON must be reevaluated.

TABLE 4-4. APPLICABILITY CHECKLIST FOR TRANSFER OPERATIONS

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | The transfer rack loads vessels other than marine vessels. | T <input type="checkbox"/> | F <input type="checkbox"/> |
| 2. | The transfer rack operates at pressures less than or equal to 204.9 kilopascals. | T <input type="checkbox"/> | F <input type="checkbox"/> |
| 3. | The transfer rack loads liquids that contain HAP's other than impurities. | T <input type="checkbox"/> | F <input type="checkbox"/> |
| 4. | The transfer rack does not use vapor balancing for all loading of organic HAP-containing liquids. | T <input type="checkbox"/> | F <input type="checkbox"/> |

- If all of the statements above are marked "Yes", see Table 4-5 to determine if the transfer rack is part of a CMPU unit subject to the HON and is therefore subject to the transfer provisions in Subpart G of the HON.
- If any of the statements above are marked "No", the transfer rack is not subject to the transfer rack provisions in Subpart G of the HON. No other checklists for these transfer racks apply.

TABLE 4-5. ASSIGNMENT OF TRANSFER RACKS

Complete this form if referred from Table 4-4. It is used to determine if any part of the transfer rack is assigned to a CMPU subject to the HON, and, therefore, the transfer rack, arm, or hose is subject to the HON.

1. Is the transfer rack used by a single CMPU?
 Y The transfer rack is assigned to that CMPU. Skip to question 5.
 N Continue with this checklist for each individual loading arm or loading hose.
2. Is the loading arm or loading hose dedicated to the transfer of liquid organic HAP from a single unit?
 Y The loading arm or loading hose is assigned to that CMPU. Skip to question 5.
 N Continue with this checklist.
3. Does one CMPU provide the greatest amount of the material that is loaded by a loading arm or loading hose?^a
 Y The loading arm or loading hose is assigned to that CMPU. Skip to question 5.
 N Continue with this checklist.
4. If the transfer rack is shared among CMPU's so that there is no single predominant use, is at least one of the CMPU's providing material to the loading arm or loading hose subject to the HON?
 Y The loading arm or loading hose may be assigned to any of the CMPU's subject to the HON and therefore the loading arm or loading hose is subject to the HON.^b
 N The loading arm or loading hose is not subject to the HON.^b
5. Is the CMPU referred to in questions 1, 2, or 3 subject to the HON?
 Y The transfer rack, loading arm, or loading hose is subject to the HON.^b
 N The transfer rack, loading arm, or loading hose is not subject to the HON.^b

^a If the predominant use of the transfer rack varies from year to year, applicability of the HON is to be based on utilization between April 22, 1993 and April 22, 1994. This determination must be reported in the operating permit application or as otherwise specified by the permitting authority.

^b If there is a change in the material loaded, applicability of the HON must be reevaluated.

**TABLE 4-6. IDENTIFICATION OF TRANSFER RACKS, LOADING ARMS, OR LOADING HOSES
SUBJECT TO THE HON**

Identify the transfer racks, loading arms, or loading hoses subject to the HON:

Use the checklists in Section 6 to determine which of these transfer operations are Group 1 and Group 2 and the requirements of the various control options.

TABLE 4-7. APPLICABILITY CHECKLIST FOR STORAGE VESSELS

1.	The storage vessel stores organic liquid containing organic HAP.	Y <input type="checkbox"/>	N <input type="checkbox"/>
2.	The capacity of the storage vessel is greater than or equal to 38 m ³ .	Y <input type="checkbox"/>	N <input type="checkbox"/>
3.	The storage vessel is not a pressure vessel designed to operate in excess of 204.9 kPa and without emissions to the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>
4.	The organic HAP's stored in the vessel are not considered impurities.	Y <input type="checkbox"/>	N <input type="checkbox"/>
5.	The storage vessel is not a surge control vessel, or bottoms receiver tank. ^a	Y <input type="checkbox"/>	N <input type="checkbox"/>
6.	The storage vessel is not permanently attached to a motor vehicle.	Y <input type="checkbox"/>	N <input type="checkbox"/>
7.	The storage vessel is not a wastewater storage tank. ^b	Y <input type="checkbox"/>	N <input type="checkbox"/>

Yes: If all of the statements above are marked "Yes", see Table 4-8 to determine if the storage vessel is part of a CMPU subject to the HON and is therefore subject to the storage vessel provisions in Subpart G of the HON.

No: If any of the statements above are marked "No", the storage vessel is not subject to the storage vessel provisions in Subpart G of the HON. No other checklists for these storage vessels apply.

^a If false, the emission point may be subject to the equipment leak provisions in Subpart H of the HON.

^b If false, the emission point may be subject to the wastewater provisions in Subpart G of the HON.

TABLE 4-8. ASSIGNMENT OF STORAGE VESSELS

Complete this form if referred from Table 4-7. It is used to determine if any part of a storage vessel is assigned to a CMPU subject to the HON, and, therefore, the storage vessel is subject to the HON.

1. Is the storage vessel located in a tank farm (including a marine tank farm)?
 - Y Continue with this checklist.
 - N Skip to question 3.

2. Is there an intervening storage vessel used by a CMPU before the product or raw material is transferred to the storage vessel in the tank farm?
 - Y The storage vessel in the tank farm is not subject to the HON.
 - N Continue with this checklist.

3. Is the storage vessel used by a single CMPU?
 - Y The storage vessel is assigned to that CMPU. Skip to question 6.
 - N Continue with this checklist.

4. Is there a predominant use of the storage vessel?^a
 - a. Is the greatest input into the storage vessel from a CMPU located on the same plant site?
 - Y The storage vessel is assigned to that CMPU. Skip to question 6.
 - N Continue with this checklist.
 - b. Does a CMPU at the same plant site receive the greatest output from the storage vessel?
 - Y The storage vessel is assigned to that CMPU. Skip to question 6.
 - N Continue with this checklist.

5. If the storage vessel is shared among CMPU's so that there is no single predominant use, is at least one of the CMPU's subject to the HON?
 - Y The storage vessel may be assigned to any one of the CMPU's subject to the HON and therefore the storage vessel is subject to the HON.^b
 - N The storage vessel is not subject to the HON.^b

6. Is the CMPU referred to in questions 3, 4a, or 4b subject to the HON?

TABLE 4-8. ASSIGNMENT OF STORAGE VESSELS

- Y The storage vessel is subject to the HON.^b
- N The storage vessel is not subject to the HON.^b
-
-

^a If the predominant use of the storage vessel varies from year to year, applicability of the HON is to be based on utilization between April 22, 1993 and April 22, 1994. This determination must be reported in the operating permit application or as otherwise specified by the permitting authority.

^b If there is a change in the material stored, applicability of the HON must be reevaluated.

TABLE 4-10. APPLICABILITY CHECKLIST FOR PROCESS AND MAINTENANCE WASTEWATER

1.	The stream is water other than stormwater in a separate sewer.	Y <input type="checkbox"/>	N <input type="checkbox"/>
2.	The stream is water other than a spill or water from a safety shower.	Y <input type="checkbox"/>	N <input type="checkbox"/>
3.	The stream is water other than from fire fighting or deluge systems segregated in a separate sewer.	Y <input type="checkbox"/>	N <input type="checkbox"/>
4.	The stream is water other than from testing or deluge system or testing of firefighting systems.	Y <input type="checkbox"/>	N <input type="checkbox"/>
5.	The stream is discharged from a chemical manufacturing unit subject to the HON.	Y <input type="checkbox"/>	N <input type="checkbox"/>
6.	The annual average concentration of Table 9 compounds of the wastewater ≥ 5 ppmw and the flowrate is ≥ 0.02 lpm, or the concentration of Table 9 compounds of the wastewater is $\geq 10,000$ ppmw at any flow rate. The concentration and flow are to be evaluated at the streams point of determination.	Y <input type="checkbox"/>	N <input type="checkbox"/>

- If all of the statements above are marked "Yes", the wastewater stream is subject to the wastewater provisions.^a
- If any of the statements above are marked "No", the wastewater stream is not subject to the wastewater provisions in Subpart G of the HON. No other checklists for these wastewater streams apply.

^a The wastewater stream subject to the HON is either a process wastewater stream or a maintenance wastewater stream depending on if it was created from a process or a maintenance activity.

**TABLE 4-11. APPLICABILITY CHECKLIST FOR EQUIPMENT HANDLING
IN-PROCESS LIQUID STREAMS**

Complete this checklist to determine what equipment handling in-process liquid streams are subject to the § 63.149 of subpart G.

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | The equipment is a drain, drain hub, manhole, lift station, trench, pipe, oil-water separator and/or tank. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | The equipment handles water other than stormwater. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | The equipment handles water other than spill water and/or water from safety showers. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | The equipment handles water other than firefighting and/or deluge systems. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. | The equipment handles water other than testing firefighting and/or deluge systems. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 6. | The equipment handles water other than a combination of stormwater, spillwater, water from safety showers, water from firefighting, deluge systems, and/or water from the testing of firefighting and/or deluge systems. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 7. | The equipment is part of a chemical manufacturing processing unit (CMPU) subject to the HON. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 8. | The equipment is located at a CMPU subject to new or existing source requirements and contains water with an annual average concentration of Table 9 compounds $\geq 1,000$ ppmw at an average flow rate ≥ 10 lpm; or an annual average concentration of Table 9 compounds, $\geq 10,000$ ppmw at any flow rate; or the equipment is located at a CMPU subject to new source requirements and contains water with an annual average concentration of Table 8 compounds ≥ 10 ppmw at an average flowrate ≥ 10 lpm. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

- If all of the statements above are marked "Yes", the equipment is subject to the provisions of § 63.149 of Subpart G.
- If any of the statements above are marked "No", the equipment is not subject to the provisions of § 63.149 of Subpart G.

**TABLE 4-12. IDENTIFICATION OF PROCESS AND MAINTENANCE WASTEWATER STREAMS
SUBJECT TO THE HON**

Identify the wastewater streams subject to the HON and equipment subject to §63.149 of Subpart G:

Use the checklists in Section 8 to determine which of the process wastewater streams subject to the HON are Group 1 or Group 2 and to check the requirements for the Group 1 process wastewater streams, Group 2 process wastewater streams, maintenance wastewater streams, and equipment subject to §63.149 of Subpart G.

5.0 PROCESS VENTS

This section of the inspection tool is used after determining that a facility has a process vent that is subject to the HON -- after working through the applicability checklists in Sections 3 and 4. It contains a checklist to walk through the process vent group determination (Table 5-1), a list of the control options that the site may have chosen for the Group 1 process vents with pointers to the appropriate checklists for the chosen control techniques (Table 5-2), and a checklist for the requirements for Group 2 process vents (Table 5-3). Once it is determined that a facility has a Group 1 process vent, then Table 5-2 is used to determine the control options. Table 5-2 acts as a roadmap to determine which of the checklists in this document apply to Group 1 process vents. It refers to the checklist for bypass line provisions in Section 9 and the appropriate control or recovery device checklists in Section 10. Table 5-3 is used once it is determined that the facility has a Group 2 process vent.

Section 5. Process Vents		
Table 5-1:	Group Determination Checklist for Process Vents	II-27
Table 5-2:	Roadmap to the Checklists for Group 1 Process Vents	II-28
Table 5-3:	Group 2 Process Vents	II-30

TABLE 5-1. GROUP DETERMINATION CHECKLIST FOR PROCESS VENTS

Complete this form for all process vents subject to the HON as determined in Section 4.

Process Vents Group Determination^{a,b}

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | The flow rate of the vent stream is ≥ 0.005 scmm. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | The HAP concentration of the vent stream is ≥ 50 ppmv. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | The TRE index value of the vent is ≤ 1.0 . ^c | Y <input type="checkbox"/> | N <input type="checkbox"/> |

Is the process vent Group 1?

- The process vent is Group 1 if all of the above statements are marked "Yes".
- The process vent is Group 2 if any of the above statements are marked "No".

^a Group 1 vents must meet the control requirements in §63.113 of Subpart G, unless they are included in an emissions average. Group 2 vents are not required to apply additional controls.

^b If an owner/operator complies with the 98 percent reduction, 20 ppmv, or flare control provisions in §63.113, group determination is not required.

^c The coefficients used in the equation to calculate the TRE index value are different for process vents at new and existing sources. See Appendix C.

TABLE 5-2. ROADMAP TO THE CHECKLISTS FOR GROUP 1 PROCESS VENTS

This table is a roadmap to the checklists used to assess compliance with the Group 1 process vent provisions.

I. HALOGENATED AND NONHALOGENATED PROCESS VENTS.

1. Are emissions routed to a flare to control emissions (halogenated vents may not be flared unless a halogen reduction device is present prior to flaring—Option II.2 below)?

- Y Go to Checklists 9-1 and 10-1
N Continue with this checklist

2. Are emissions routed to a control device that reduces emissions by 98% or to an outlet concentration of 20 ppmv?

- Y Go to checklist 9-1, and select from below the checklist corresponding to the appropriate control device:
- thermal incinerator, checklist 10-2;
 - catalytic incinerator, checklist 10-3;
 - boiler or process heater with a capacity less than 44 MW that does not have the emission stream introduced with the primary fuel, checklist 10-4;
 - boiler or process heater with a capacity greater than 44 MW or that has the vent stream introduced with the primary fuel, checklist 10-5;
 - carbon adsorber used as a recapture device, checklist 10-6;
 - absorber used as a recapture device, checklist 10-7;
 - condenser used as a recapture device, checklist 10-8; or
 - other control device used as a recapture device, checklist 10-9.

- N Continue with this checklist.

3. Does the process vent maintain a TRE index value greater than 1.0 using a recovery device?

- Y Select the checklist corresponding to the appropriate recovery device:
- Carbon adsorber used as a recovery device, checklist 10-6;
 - Absorber used as a recovery device, checklist 10-7;
 - Condenser used as a recovery device, checklist 10-8;
 - Another recovery device not listed above, checklist 10-9.

All compliance options are listed in this checklist. The facility will be using one of the options in this checklist to be in compliance with the HON process vent provisions.

II. HALOGENATED VENTS THAT ARE COMBUSTED

1. Is the vent stream exiting the combustion device routed to a halogen reduction device?

- Y Go to checklist 10-10 when a scrubber is used.
N Continue with this checklist.

TABLE 5-2. ROADMAP TO THE CHECKLISTS FOR GROUP 1 PROCESS VENTS

2. Is the vent stream routed to a halogen reduction device prior to combustion?

Go to checklist 10-10 when a scrubber is used.

The compliance options for halogenated vents are halogen reduction device prior to combustion or after. The facility will be using one of these options to be in compliance with the HON.

TABLE 5-3. GROUP 2 PROCESS VENTS

A "yes" response to all questions in Part I will indicate compliance, and "no" responses will indicate noncompliance. Part II of this checklist is a roadmap to checklists that apply to Group 2 process vents using a recovery device to maintain the TRE index value greater than 1.0 and less than or equal to 4.0.

I. REVIEW OF RECORDS

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | Records of process changes and the recalculation of TRE index values are kept when the TRE index value of the vent stream is greater than 1.0. ^a | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | Records of process changes and the recalculation of flow rate are kept when the flow rate of the vent stream is less than 0.005 standard cubic meter per minute. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | Records of process changes and the recalculation or remeasurement of concentration are kept if the concentration in the vent stream is less than 50 ppmv. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | Whenever process changes are made which cause a change in the status of the process vent stream, records are kept and a report was submitted within 180 days of the process modification or in the next PR describing the process modification and showing the results of the recalculation of flow rate, organic HAP concentration, and/or TRE index value. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

II. ADDITIONALLY, FOR GROUP 2 PROCESS VENTS WITH A TRE INDEX VALUE GREATER THAN 1.0 AND LESS THAN OR EQUAL TO 4.0 USING A RECOVERY DEVICE TO MAINTAIN THE TRE

Is the process vent using:

- Carbon adsorber used as a recovery device, checklist 10-6;
- Absorber used as a recovery device, checklist 10-7;
- Condenser used as a recovery device, checklist 10-8;
- Another recovery device not listed above, checklist 10-9.

^a Examples of process changes include, but are not limited to, changes in production capacity, production rate, feedstock type, or catalyst type, or whenever there is replacement, removal, or addition of recovery equipment. Process changes do not include process upsets; unintentional, temporary process changes; and changes that are within the range on which the original TRE calculation was based.

6.0 TRANSFER OPERATIONS

Once the transfer operations subject to the HON are determined in Section 4, this section can be used to determine which transfer racks require control (i.e., which racks are Group 1 and Group 2). This section also lists the control options for Group 1 transfer racks and the requirements of Group 2

transfer racks. Table 6-1 provides a checklist to determine the group status of the transfer racks. Table 6-2 lists the control options for Group 1 transfer racks. This table acts as a roadmap sending the inspector to the appropriate checklist depending on the method of compliance being used. Table 6-2 refers to the closed-vent system checklists in Section 9 and to the appropriate control device checklists in Section 10. Table 6-3 provides a checklist for a general recordkeeping requirement for both Group 1 and Group 2 transfer racks. Table 6-4 provides a checklist for transfer racks where routing to a fuel gas system or process is used to control emissions.

Section 6. Transfer Operations

Table 6-1.	Group Determination Checklist for Transfer Operations	II-32
Table 6-2.	Roadmap to the Checklists for Group 1 Transfer Racks	II-33
Table 6-3.	Group 1 and Group 2 Transfer Racks	II-35
Table 6-4.	Routing the Emissions from a Group 1 Transfer Rack to a Process or Fuel Gas System	II-36

TABLE 6-1. GROUP DETERMINATION CHECKLIST FOR TRANSFER OPERATIONS

Complete this form for all transfer operations subject to the HON as determined in Section 4.

Transfer Rack Group Determination^a

- | | | |
|---|----------------------------|----------------------------|
| 1. The transfer rack loads more than 650,000 liters per year of liquid products containing organic HAP's. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. The transfer rack weighted average partial pressure is greater than or equal to 10.3 kilopascals. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

Is the transfer rack Group 1?

- The transfer rack is Group 1 if all of the above statements are marked "Yes".
- The transfer rack is Group 2 if any of the above statements are marked "No".

^a Group 1 transfer racks must meet the control requirements in Section 63.126 of Subpart G during transfer operations when the operating pressures are less than or equal to 204.9 kilopascals, unless the rack is included in an emissions average. Group 2 transfer racks are not required to apply additional controls.

TABLE 6-2. ROADMAP TO THE CHECKLISTS FOR GROUP 1 TRANSFER RACKS

This table is a roadmap to the checklists used to assess compliance with the Group 1 transfer rack provisions.

I. HALOGENATED AND NONHALOGENATED VENT STREAMS

1. Are emissions routed to a flare to control emissions (halogenated vents may not be flared unless a halogen reduction device is present prior to flaring—Option II.2)?

Y Go to Checklists 9-1, 9-2, and 10-1.

N Continue with this checklist.

2. Are the emissions routed to a control device that reduces emissions by 98% or to an outlet concentration of 20 ppmv?

Y Go to checklists 9-1 and 9-2, and select from below the checklist corresponding to the appropriate control device:

- thermal incinerator, checklist 10-2;
- catalytic incinerator, checklist 10-3;
- boiler or process heater with a capacity less than 44 MW that does not have the emission stream introduced with the primary fuel, checklist 10-4;
- boiler or process heater with a capacity greater than 44 MW or that has the vent stream introduced with the primary fuel, checklist 10-5;
- carbon adsorber, checklist 10-6;
- adsorber, checklist 10-7;
- condenser, checklist 10-8; or
- other control device, checklist 10-9.

N Continue with this checklist.

3. Is vapor balancing used to control emissions?

Y Go to Checklists 9-1 and 9-2.

N Continue with this checklist.

4. Are emissions routed to a fuel gas system or to a process?

Go to Checklist 6-4.

All compliance options are listed in this checklist. The facility will be using one of the options in this checklist to be in compliance with the HON transfer provisions.

TABLE 6-2. ROADMAP TO THE CHECKLISTS FOR GROUP 1 TRANSFER RACKS

II. HALOGENATED VENTS THAT ARE COMBUSTED

1. Is the vent stream exiting the combustion device routed to a halogen reduction device?

Y Go to checklist 10-10 when a scrubber is used.
N Continue with this checklist.

2. Is the vent stream routed to a halogen reduction device prior to combustion?

Go to checklist 10-10 when a scrubber is used.

The compliance options for halogenated vent streams are halogen reduction prior to combustion or after. The facility will be using one of these options to be in compliance with the HON.

**TABLE 6-4. ROUTING THE EMISSIONS FROM A GROUP 1 TRANSFER RACK TO
A PROCESS OR FUEL GAS SYSTEM**

Complete this form when the emissions from a Group 1 transfer rack is routed to a process or fuel gas system. A "yes" response to the question will indicate compliance, and a "no" response will indicate noncompliance.

REVIEW OF RECORDS

1. The report was submitted that the emission stream is being routed to a fuel gas system or to a process was submitted in the NCS. Y N
-
-

NCS = Notification of Compliance Status.

7.0 STORAGE VESSELS

After Section 3 and 4 are used to determine which storage vessels are subject to the HON, Section 7 is used to determine the group status of each storage vessel subject to the HON, the compliance options for Group 1 storage vessels, the requirements for Group 2 storage vessels, and the inspection checklists for floating roofs and control devices used to control emissions from storage vessels. Table 7-1 is used to check the group status of each storage vessel. Table 7-2 lists the control options for

Group 1 storage vessels. The table is a roadmap directing the inspector to the applicable checklists depending on the compliance option that the owner or operator has chosen. Table 7-3 is a checklist for general recordkeeping and reporting requirements for Group 1 and Group 2 storage vessels. Table 7-4 provides a checklist for external floating roofs, Table 7-5 covers internal floating roofs, and Table 7-6 lists the requirements for an external floating roof converted to an internal floating roof. Table 7-7 is a checklist for nonflare control devices used to control storage vessel emissions. Table 7-8 is a checklist for storage vessel emissions routed to a process or fuel gas system.

Section 7. Storage Vessels	
Table 7-1.	Group Determination Checklist for Storage Vessels . . . II-38
Table 7-2.	Roadmap to the Checklists for Group 1 Storage Vessels . . . II-40
Table 7-3.	Group 1 and Group 2 Storage Vessels . . . II-41
Table 7-4.	Compliance Checklist for Group 1 Storage Vessels with External Floating Roofs . . . II-42
Table 7-5.	Compliance Checklist for Group 1 Storage Vessels with Internal Floating Roofs . . . II-48
Table 7-6.	Compliance Checklist for Group 1 Storage Vessels with an External Floating Roof Converted To an Internal Floating Roof . . . II-53
Table 7-7.	Compliance Checklist for Group 1 Storage Vessels Equipped with a Closed-vent System and Control Device . . . II-58
Table 7-8.	Compliance Checklist for Group 1 Storage Vessel Emissions Routed to a Process or Fuel Gas System . . . II-60

TABLE 7-1. GROUP DETERMINATION CHECKLIST FOR STORAGE VESSELS

Complete this form for all storage vessels subject to the HON as determined in Section 4.

Storage Vessel Identification: _____

I. Group Determination For Storage Vessels at New Sources^{a,b}

- a. The storage vessel capacity is greater than or equal to 151 m³, and the vapor pressure of the stored organic HAP is greater than or equal to 0.7 kPa.^c Y N
- b. The storage vessel capacity is greater than or equal to 38 m³ and less than 151 m³, and the vapor pressure of the stored organic HAP is greater than or equal to 13.1 kPa.^c Y N

Is the storage vessel Group 1?

- The storage vessel is Group 1 if either of the above statements is marked "Yes".
- The storage vessel is Group 2 if both of the above statements are marked "No".

II. Group Determination For Storage Vessels at Existing Sources^{a,d}

- a. The storage vessel capacity is greater than or equal to 151 m³ and the vapor pressure of the stored organic HAP is greater than or equal to 5.2 kPa.^c Y N
- b. The storage vessel capacity is greater than or equal to 75 m³ and less than 151m³, and the vapor pressure of the stored organic HAP is greater than or equal to 13.1 kPa.^c Y N

Is the storage vessel Group 1?

- The storage vessel is Group 1 if either of the above statements is marked "Yes".
- The storage vessel is Group 2 if both of the above statements are marked "No".

TABLE 7-1. GROUP DETERMINATION CHECKLIST FOR STORAGE VESSELS

- a Group 1 storage vessels must meet the control requirements in § 63.119 of Subpart G of the HON, unless they are included in an emissions average. Group 2 storage vessels are not required to apply additional controls.
- b A "new" source refers to a source (not a storage vessel) that commenced construction or reconstruction after December 31, 1992.
- c "Vapor pressure" refers to the maximum true vapor pressure of total organic HAP at storage temperature.
- d An "existing" source refers to a source (not a storage vessel) that commenced construction or reconstruction before December 31, 1992.

TABLE 7-2. ROADMAP TO THE CHECKLISTS FOR GROUP 1 STORAGE VESSELS

This table is a roadmap to the checklists used to assess compliance with the Group 1 storage vessel provisions.

Storage Vessel Identification: _____

1. Is an external floating roof used to control emissions?
Y Go to checklist 7-4.
N Continue with this checklist.
2. Is an internal floating roof used to control emissions?
Y Go to checklist 7-5.
N Continue with this checklist.
3. Is an external floating roof converted to an internal floating roof used to control emissions?
Y Go to checklist 7-6.
N Continue with this checklist.
4. Is a flare used to control emissions?
Y Go to checklists 9-1, 9-2, and 10-1.
N Continue with this checklist.
5. Is a closed-vent system and a non-flare control device used to control emissions?
Y Go to checklists 7-7, 9-1, and 9-2.
N Continue with this checklist.
6. Are the emissions routed to a fuel gas system or to a process?
Y Go to checklist 7-8.
N If the facility is using another means to comply with the HON for Group 1 storage vessels, review records for compliance with the approved alternative means of emission limitation.

**TABLE 7-4. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH EXTERNAL FLOATING ROOFS**

A "yes" response to all questions will indicate compliance, and a "no" response will indicate noncompliance with the standard.

Storage Vessel Identification: _____

REVIEW OF RECORDS

1. Review records of Seal Gap Measurements.
 - (a) Records indicate that seal gap measurements were made annually for the secondary seal and every five years for the primary seal.^a Y N
 - (b) When a failure is detected, the date and results of seal gap measurements are submitted in PR, annually for the secondary seal and every five years for the primary seal. Y N
 - (c) When a failure is detected in the seal(s), the date and results of the visual inspection of the seals (which is performed together with the seal gap measurement) are included in the PR. Y N
 - (d) The date of the seal gap measurement, the raw data obtained during the measurement, and the calculations made are recorded. Y N
 - (e) The raw data and calculations recorded for seal gap measurements is consistent with the information reported in the PR. Y N
 - (f) For each seal gap measurement in a PR, there is a report notifying the Administrator of the measurement in advance. If the measurement had been planned, then the report was submitted 30 days in advance of the measurement. If the measurement was not planned, then the report was submitted at least 7 days in advance of the measurement and included an explanation of why the measurement was unplanned. Y N
 - (g) If a failure was detected during a seal gap measurement and visual seal inspection, the PR indicated the date and the nature of the repair or the date the vessel was emptied. Y N

**TABLE 7-4. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH EXTERNAL FLOATING ROOFS**

- | | | | |
|------|--|----------------------------|----------------------------|
| (h) | If the report described in (g) documents that the repair was made more than 45 days after the failure was detected, then the next PR includes documentation of the use of up to two 30-day extensions for completing the repair, including identification of the storage vessel, a description of the failure, documentation that alternate storage capacity was unavailable, a schedule of actions to be taken to repair the control equipment or empty the vessel as soon as possible, and the date the storage vessel was emptied and the nature of and date the repair was made. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|
 | | | |
| 2. | Review records of internal visual inspections. | | |
| (a) | The occurrence of each internal visual inspection is recorded. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) | For each internal visual inspection in which a failure was detected, the following information is submitted in the PR: (1) the date of the inspection, (2) identification of all storage vessels for which failures were detected, (3) a description of those failures, and (4) either the date and nature of the repair or the date the vessel was emptied. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | Any repairs performed as described in (b) were completed before the repaired storage vessel was refilled. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (d) | For each internal visual inspection documented in a PR, there is a report notifying the Administrator in advance of the date the inspected vessel would be refilled after the inspection. If the inspection had been planned, the report was submitted 30 days in advance of refilling the vessel. If the inspection was not planned, then the report was submitted at least 7 days in advance of refilling the vessel and included an explanation of why the inspection was unplanned. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

**TABLE 7-4. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH EXTERNAL FLOATING ROOFS**

VISUAL INSPECTION

Note: The inspector should not perform the inspection while on the EFR if the roof is below four feet of the top of the tank and if the inspector is not equipped with the proper respiratory protection. Based on the inspector's assessment of the availability of records documenting the design of the control equipment, an adequate inspection without respiratory protection may be performed with a combination of a record inspection and a visual inspection conducted from the platform with the aid of vision-enhancing devices (binoculars). If the inspector feels that it is necessary to be on the EFR when the roof is below four feet of the top of the tank, please be aware of the requirements under EPA Order 1440.2 and the safety information in Guidance on Confined Space Entry in NESHAP Inspections of Benzene Storage Vessels (EPA 455/R-92-003-September 1992).

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | The EFR is resting on the liquid surface of the stored material, unless the EFR is resting on the roof leg supports because the vessel has just been emptied and degassed or the vessel is partially or completely emptied before being subsequently refilled or degassed. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | The external floating roof is in good condition (i.e., free of defects such as corrosion and pools of standing liquid). | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | There is a secondary seal installed above the primary seal. ^b | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | Inspect the secondary seal. ^b | | |
| | (a) The secondary seal is continuous and completely covers the annular space between the EFR and the vessel wall. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (b) There are no holes, tears, or other openings in the seal or seal fabric. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (c) There are no visible gaps between the seal and the wall of the storage vessel, except as specified in (e)(1) and (e)(2). | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (d) The seal is not detached from the floating deck. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (e) Perform seal gap measurement of the secondary seal as specified in §63.120(b)(1) through (b)(4) of the HON storage provisions. | | |
| | (1) The accumulated area of gaps between the vessel wall and the secondary seal does not exceed 21.2 cm ² per meter of vessel diameter. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (2) The maximum gap width between the vessel wall and the seal does not exceed 1.27 cm. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

**TABLE 7-4. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH EXTERNAL FLOATING ROOFS**

5.	Inspect the primary seal. ^b		
(a)	The primary seal is either a metallic shoe seal or a liquid-mounted seal. ^b	Y <input type="checkbox"/>	N <input type="checkbox"/>
(b)	The primary seal forms a continuous closure that completely covers the annular space between the wall of the storage vessel and the edge of the EFR, except as described in (f)(1) and (f)(2).	Y <input type="checkbox"/>	N <input type="checkbox"/>
(c)	There are no holes, tears, or other openings in the seal fabric, seal envelope, or shoe (if a metallic shoe seal is used).	Y <input type="checkbox"/>	N <input type="checkbox"/>
(d)	If the primary seal is a metallic shoe seal:		
(1)	The lower end of the metallic shoe seal extends into the stored liquid (no specific distance);	Y <input type="checkbox"/>	N <input type="checkbox"/>
(2)	The upper end of the metallic shoe seal extends a minimum vertical distance of 61 cm above the stored liquid surface; and	Y <input type="checkbox"/>	N <input type="checkbox"/>
(3)	There is a flexible coated fabric that spans the space between the metal shoe and the vessel wall.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(e)	If the primary seal is a liquid-mounted seal, the seal is in contact with the liquid between the wall of the storage vessel and the EFR.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(f)	Perform seal gap measurements of the primary seal as specified in §63.120(b)(1) through (b)(4) of the HON storage provisions.		
(1)	The accumulated area of gaps between the vessel wall and the primary seal does not exceed 212 cm ² per meter of vessel diameter.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(2)	The maximum gap width between the vessel wall and the seal does not exceed 3.81 cm.	Y <input type="checkbox"/>	N <input type="checkbox"/>
6.	Inspect deck openings.		
(a)	If the EFR is non-contact, then each opening in the floating roof, except automatic bleeder vents and rim space vents, provides a projection below the stored liquid's surface. ^c	Y <input type="checkbox"/>	N <input type="checkbox"/>
(b)	Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof is equipped with a gasketed cover, seal, or lid which forms a vapor-tight seal.	Y <input type="checkbox"/>	N <input type="checkbox"/>

**TABLE 7-4. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH EXTERNAL FLOATING ROOFS**

(c)	Each gasketed cover, seal, or lid on any opening in the EFR is closed, unless the cover or lid must be open for access.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(d)	Covers on each access hatch and gauge float well are bolted or fastened so as to be air-tight when closed.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(e)	The gasket on each cover, seal, or lid described in (b) closes off the liquid surface from the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>
7.	Inspect automatic bleeder vents.		
(a)	Automatic bleeder vents are closed, unless the roof is being floated off or is being landed on the roof leg supports.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(b)	Automatic bleeder vents are gasketed.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(c)	The gasket on the automatic bleeder vents close off the liquid surface from the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>
8.	Inspect rim space vents.		
(a)	Rim space vents are closed, except when the roof is being floated off the roof leg supports or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(b)	Rim space vents are gasketed.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(c)	The gaskets on the rim space vents close off the liquid surface from the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>
9.	Each roof drain is covered with a slotted membrane fabric that covers at least 90 percent of the area of the opening.	Y <input type="checkbox"/>	N <input type="checkbox"/>
10.	Each unslotted guide pole well has either a gasketed sliding cover or a flexible fabric sleeve seal.	Y <input type="checkbox"/>	N <input type="checkbox"/>
11.	Each unslotted guide pole shall have on the end of the pole a gasketed cap which is closed at all times except when gauging the liquid level or taking liquid samples.	Y <input type="checkbox"/>	N <input type="checkbox"/>
12.	Each slotted guide pole well is equipped with the following equipment: (1) a gasketed sliding cover or a flexible fabric sleeve seal, and (2) a gasketed float inside the guide pole or other control device which closes off the liquid surface from the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>
13.	Each gauge hatch/sample well has a gasketed cover which is closed (except when the hatch or well must be open for access).	Y <input type="checkbox"/>	N <input type="checkbox"/>
14.	All of the gaskets described in 10 through 13 close off the liquid surface from the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>

**TABLE 7-4. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH EXTERNAL FLOATING ROOFS**

PR = Periodic Report. EFR = External Floating Roof.

- a If an external floating roof has a liquid-mounted or metallic shoe primary seal as of December 31, 1992, a secondary seal is not required until the next emptying and degassing or April 22, 2004, whichever is later. For such storage vessels, measurement of gaps in the primary seal must be conducted once per year until a secondary seal is installed.

- b If the external floating roof is equipped, as of December 31, 1992, with either: (1) a liquid-mounted primary seal and no secondary seal, (2) a metallic shoe primary seal and no secondary seal, or (3) a vapor mounted primary seal and a secondary seal, then the seal requirement of a liquid-mounted or metallic shoe primary seal and secondary seal does not apply until the earlier of the following dates: (1) the next time the storage vessel is emptied and degassed, or (2) April 22, 2004.

- c If these openings (excluding automatic bleeder vents and rim space vents) did not provide projections below the liquid service as of December 31, 1992, this requirement does not apply until the earlier of the following dates: (1) the next time the storage vessel is emptied and degassed, or (2) no later than April 22, 2004.

**TABLE 7-5. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH INTERNAL FLOATING ROOFS**

A "yes" response to all questions will indicate compliance, and a "no" response will indicate noncompliance with the standard.

Storage Vessel Identification: _____

REVIEW OF RECORDS

1. Review records of external visual inspections
 - (a) The occurrence of each annual external visual inspection is recorded. If the floating roof is equipped with double seals, the source will not have performed this inspection if it chose to perform internal visual inspections once every 5 years instead of performing both annual external visual inspections and internal visual inspections at least once every 10 years. See Item 2 below. Y N
 - (b) For each annual external visual inspection in which a failure was detected, the following information is submitted in the PR: (1) the date of the inspection, (2) identification of all storage vessels for which failures were detected, (3) a description of those failures, and (4) either the date and the nature of the repair or the date the vessel was emptied. Y N
 - (c) If the report described in (a) and (b) documents that the repair was made more than 45 days after the failure was detected, then the next PR includes documentation of the use of up to two 30-day extensions for completing the repair and the following information: identification of the storage vessel, a description of the failure, documentation that alternate storage capacity was unavailable, a schedule of actions to be taken to repair the control equipment or empty the vessel as soon as possible, and the date the storage vessel was emptied and the nature of and date the repair was made. Y N
2. Review records of internal visual inspections.
 - (a) The occurrence of each internal visual inspection is recorded. If the floating roof is equipped with double seals and the source chose not to perform annual external inspections [described in item 1(b)], this inspection will be performed, recorded, and reported at least every 5 years. Y N

**TABLE 7-5. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH INTERNAL FLOATING ROOFS**

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|-----|---|----------------------------|----------------------------|
| (b) | For each internal visual inspection in which a failure was detected, the following information is submitted in the PR: (1) the date of the inspection, (2) identification of all storage vessels for which failures were detected, (3) a description of those failures, and (4) the date and nature of the repair. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | Any repairs performed as described in (b) were completed before the repaired storage vessel was refilled. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (d) | For each internal visual inspection documented in a PR, there is a report notifying the Administrator in advance of the date the inspected vessel would be refilled after the inspection. If the inspection had been planned, the report was submitted 30 days in advance of refilling the vessel. If the inspection was not planned, then the report was submitted at least 7 days in advance of refilling the vessel and included an explanation of why the inspection was unplanned. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

VISUAL INSPECTIONS

Note: The inspector should be advised of the hazards of inspecting an internal floating roof vessel that contains a liquid hazardous air pollutant (HAP). An inspector may perform an external visual inspection of a storage vessel at any time (i.e., the vessel does not need to be taken out of service). However, the inspector will need to have proper respiratory protection before opening the roof hatch to visually inspect, from the fixed roof, the floating deck and seal. An inspector may perform the more thorough internal inspection only when the vessel has been taken out of service (i.e., emptied, degassed and cleaned). Unless a vessel is taken out of service more frequently than is required by the HON, this internal inspection can only take place once every ten years, during those 30 days after which the State Agency has received notice that the vessel has been emptied and degassed and will subsequently be refilled. The inspector should never enter a storage vessel to inspect the IFR without first consulting documents that address the safety issues to consider while entering a confined space and while inspecting an IFR that contains HAP -- EPA Order 1440.2 and the EPA document Guidance on Confined Space Entry in NESHAP Inspections of Benzene Storage Vessels (EPA-455/R-92-003, September 1992).

1. External Visual Inspection

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|-----|---|----------------------------|----------------------------|
| (a) | The IFR is resting on the liquid surface of the stored material, unless the IFR is resting on the leg supports because the vessel has just been emptied and degassed or the vessel is partially or completely emptied before being subsequently refilled or degassed. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) | The IFR is in good condition (i.e., free of defects such as corrosion and pools of standing liquid). | Y <input type="checkbox"/> | N <input type="checkbox"/> |

**TABLE 7-5. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH INTERNAL FLOATING ROOFS**

(c)	Inspect the seal (i.e., if a single-seal system is used, inspect the single seal, and if a double-seal system is used, inspect both the primary and secondary seals).		
(1)	The seal is not detached from the IFR.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(2)	There are no holes, tears, or other openings in the seal or seal fabric.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(3)	There are no visible gaps between the seal and the wall of the storage vessel.	Y <input type="checkbox"/>	N <input type="checkbox"/>
2.	Internal Visual Inspection		
(a)	The IFR is resting on the liquid surface of the stored material, unless the IFR is resting on the leg supports because the vessel has just been emptied and degassed or the vessel is partially or completely emptied before being subsequently refilled or degassed.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(b)	The IFR is in good condition (i.e., free of defects such as corrosion and pools of standing liquid).	Y <input type="checkbox"/>	N <input type="checkbox"/>
(c)	The IFR is equipped with one of the following closure devices, between the wall of the storage vessel and the edge of the IFR: (1) a liquid-mounted seal, (2) a metallic shoe seal, or (3) two seals (i.e., a primary and secondary seal), each of which forms a continuous closure that completely covers the annular space between the wall of the storage vessel and the edge of the IFR. ^a	Y <input type="checkbox"/>	N <input type="checkbox"/>
(d)	Inspect the seal (i.e., if a single-seal system is used, inspect the single seal, and if a double-seal system is used, inspect both the primary and secondary seals).		
(1)	The seal is not detached from the IFR.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(2)	There are no holes, tears, or other openings in the seal or seal fabric.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(3)	There are no visible gaps between the seal and the wall of the storage vessel.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(e)	Inspect deck openings.		
(1)	If the IFR is non-contact, then each opening in the floating roof, except for automatic bleeder vents and rim space vents, provides a projection below the stored liquid's surface. ^b	Y <input type="checkbox"/>	N <input type="checkbox"/>

**TABLE 7-5. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH INTERNAL FLOATING ROOFS**

(2)	Except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains, each opening in the IFR is equipped with a gasketed cover or lid. ^C	Y <input type="checkbox"/>	N <input type="checkbox"/>
(3)	Each cover or lid on any opening in the IFR is closed, unless the cover or lid is open for access.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(4)	Covers on each access hatch and automatic gauge float well are bolted or fastened so as to be air-tight when closed.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(5)	The gasket on each cover or lid described in (3) closes off the liquid surface from the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(f)	Inspect automatic bleeder vents.		
(1)	Automatic bleeder vents are closed, unless the roof is being floated off or is being landed on the roof leg supports.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(2)	Each automatic bleeder vent is gasketed. ^C	Y <input type="checkbox"/>	N <input type="checkbox"/>
(3)	The gasket on each automatic bleeder vent closes off the liquid surface from the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(g)	Inspect rim space vents.		
(1)	Rim space vents are closed, except when the roof is being floated off the roof leg supports or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(2)	Rim space vents are gasketed. ^C	Y <input type="checkbox"/>	N <input type="checkbox"/>
(3)	The gaskets on the rim space vents close off the liquid surface from the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(h)	Each, sample well (i.e., each penetration of the IFR for the purpose of sampling), has a slit fabric cover that covers at least 90 percent of the opening. ^C	Y <input type="checkbox"/>	N <input type="checkbox"/>
(i)	Each penetration of the IFR that allows for passage of a ladder has a gasketed sliding cover. ^C	Y <input type="checkbox"/>	N <input type="checkbox"/>
(j)	Each penetration of the IFR that allows for passage of a column supporting the fixed roof has either a flexible fabric sleeve seal or a gasketed sliding cover. ^C	Y <input type="checkbox"/>	N <input type="checkbox"/>
(k)	The gaskets described in (i) and (j) close off the liquid surface to the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>

**TABLE 7-5. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH INTERNAL FLOATING ROOFS**

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|-----|---|----------------------------|----------------------------|
| (l) | If a flexible fabric sleeve seal is used as described in (j), the fabric sleeve is free of defects (i.e., free of holes, tears, or gaps). | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|-----|---|----------------------------|----------------------------|
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PR = Periodic Report. IFR = Internal Floating Roof.

- a If the internal floating roof is equipped, as of December 31, 1992, with a single vapor-mounted seal, then the requirement for a liquid-mounted seal or metallic shoe seal or two seals does not apply until the earlier of the following dates: (1) the next time the storage vessel is emptied and degassed, or (2) April 22, 2004.
- b If these openings (excluding automatic bleeder vents and rim space vents) did not provide projections below the liquid service as of December 31, 1992, this requirement does not apply until the earlier of the following dates: (1) the next time the storage vessel is emptied and degassed, or (2) no later than April 22, 2004.
- c If the internal floating roof did not meet these specifications as of December 15, 1992, the requirement to meet these specifications does not apply until the earlier of the following dates: (1) the next time the storage vessel is emptied and degassed, or (2) no later than April 22, 2004.

**TABLE 7-6. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH AN EXTERNAL FLOATING ROOF CONVERTED TO
AN INTERNAL FLOATING ROOF**

A "yes" response to all questions will indicate compliance, and a "no" response will indicate noncompliance with the standard.

Storage Vessel Identification: _____

REVIEW OF RECORDS

1. Review records of external visual inspections
 - (a) The occurrence of each annual external visual inspection is recorded. If the floating roof is equipped with double seals, the source will not have performed this inspection if it chose to perform internal visual inspections once every 5 years instead of performing both annual external visual inspections and internal visual inspections at least once every 10 years. See Item 2 below. Y N
 - (b) For each annual external visual inspection in which a failure was detected, the following information is submitted in the PR: (1) the date of the inspection, (2) identification of all storage vessels for which failures were detected, (3) a description of those failures, and (4) either the date and the nature of the repair or the date the vessel was emptied. Y N
 - (c) If the report described in (a) and (b) documents that the repair was made more than 45 days after the failure was detected, then the next PR includes documentation of the use of up to two 30-day extensions for completing the repair and the following information: identification of the storage vessel, a description of the failure, documentation that alternate storage capacity was unavailable, a schedule of actions to be taken to repair the control equipment or empty the vessel as soon as possible, and the date the storage vessel was emptied and the nature of and date the repair was made. Y N
2. Review records of internal visual inspections.
 - (a) The occurrence of each internal visual inspection is recorded. If the floating roof is equipped with double seals and the source chose not to perform annual external inspections [described in item 1(b)], this inspection will be performed, recorded, and reported at least every 5 years. Y N

**TABLE 7-6. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH AN EXTERNAL FLOATING ROOF CONVERTED TO
AN INTERNAL FLOATING ROOF**

- | | | | |
|-----|---|----------------------------|----------------------------|
| (b) | For each internal visual inspection in which a failure was detected, the following information is submitted in the PR:
(1) the date of the inspection, (2) identification of all storage vessels for which failures were detected, (3) a description of those failures, and (4) the date and nature of the repair. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | Any repairs performed as described in (b) were completed before the repaired storage vessel was refilled. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (d) | For each internal visual inspection documented in a PR, there is a report notifying the Administrator in advance of the date the inspected vessel would be refilled after the inspection. If the inspection had been planned, the report was submitted 30 days in advance of refilling the vessel. If the inspection was not planned, then the report was submitted at least 7 days in advance of refilling the vessel and included an explanation of why the inspection was unplanned. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

VISUAL INSPECTIONS

Note: The inspector should be advised of the hazards of inspecting an external floating roof vessel converted to an internal floating roof vessel that contains a liquid hazardous air pollutant (HAP). An inspector may perform an external visual inspection of a storage vessel at any time (i.e., the vessel does not need to be taken out of service). However, the inspector will need to have proper respiratory protection before opening the roof hatch to visually inspect, from the fixed roof, the floating deck and seal. An inspector may perform the more thorough internal inspection only when the vessel has been taken out of service (i.e., emptied, degassed and cleaned). Unless a vessel is taken out of service more frequently than is required by the HON, this internal inspection can only take place once every ten years, during those 30 days after which the State Agency has received notice that the vessel has been emptied and degassed and will subsequently be refilled. The inspector should never enter a storage vessel to inspect the floating roof without first consulting documents that address the safety issues to consider while entering a confined space and while inspecting an external floating roof vessel converted to an internal floating roof vessel that contains HAP-- EPA Order 1440.2 and the EPA document Guidance on Confined Space Entry in NESHAP Inspections of Benzene Storage Vessels (EPA-450/R-92-003, September 1992).

1. External Visual Inspection

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|-----|---|----------------------------|----------------------------|
| (a) | The floating roof is resting on the liquid surface of the stored material, unless the floating roof is resting on the leg supports because the vessel has just been emptied and degassed or the vessel is partially or completely | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|-----|---|----------------------------|----------------------------|

**TABLE 7-6. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH AN EXTERNAL FLOATING ROOF CONVERTED TO
AN INTERNAL FLOATING ROOF**

(b)	The floating roof is in good condition (i.e., free of defects such as corrosion and pools of standing liquid).	Y <input type="checkbox"/>	N <input type="checkbox"/>
(c)	Inspect the seal (i.e., if a single-seal system is used, inspect the single seal, and if a double-seal system is used, inspect both the primary and secondary seals).		
(1)	The seal is not detached from the floating roof.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(2)	There are no holes, tears, or other openings in the seal or seal fabric.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(3)	There are no visible gaps between the seal and the wall of the storage vessel.	Y <input type="checkbox"/>	N <input type="checkbox"/>
2.	Internal Visual Inspection		
(a)	The floating deck is resting on the liquid surface of the stored material, unless the floating deck is resting on the leg supports because the vessel has just been emptied and degassed or the vessel is partially or completely emptied before being subsequently refilled or degassed.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(b)	The floating deck is in good condition (i.e., free of defects such as corrosion and pools of standing liquid).	Y <input type="checkbox"/>	N <input type="checkbox"/>
(c)	The floating deck is equipped with one of the following closure devices, between the wall of the storage vessel and the edge of the floating deck: (1) a liquid-mounted seal, (2) a metallic shoe seal, or (3) two seals (i.e., a primary and secondary seal), each of which forms a continuous closure that completely covers the annular space between the wall of the storage vessel and the edge of the floating deck. ^a	Y <input type="checkbox"/>	N <input type="checkbox"/>
(d)	Inspect the seal (i.e., if a single-seal system is used, inspect the single seal, and if a double-seal system is used, inspect both the primary and secondary seals).		
(1)	The seal is not detached from the floating deck.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(2)	There are no holes, tears, or other openings in the seal or seal fabric.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(3)	There are no visible gaps between the seal and the wall of the storage vessel.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(e)	Inspect deck openings		

**TABLE 7-6. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH AN EXTERNAL FLOATING ROOF CONVERTED TO
AN INTERNAL FLOATING ROOF**

(1)	If the floating deck is non-contact, then each opening in the floating roof, except automatic bleeder vents and rim space vents, provides a projection below the stored liquid's surface. ^b	Y <input type="checkbox"/>	N <input type="checkbox"/>
(2)	Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof is equipped with a gasketed cover, seal, or lid which forms a vapor-tight seal.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(3)	Each gasketed cover, seal, or lid on any opening in the floating deck is closed, unless the cover or lid must be open for access.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(4)	Covers on each access hatch and gauge float well are bolted or fastened so as to be air-tight when closed.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(5)	The gasket on each cover, seal, or lid described in (2) closes off the liquid surface from the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(f)	Inspect automatic bleeder vents		
(1)	Automatic bleeder vents are closed, unless the roof is being floated off or is being landed on the roof leg supports.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(2)	Automatic bleeder vents are gasketed.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(3)	The gaskets on the automatic bleeder vents close off the liquid surface from the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(g)	Inspect rim space vents		
(1)	Rim space vents are closed, except when the roof is being floated off the roof leg supports or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(2)	Rim space vents are gasketed.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(3)	The gaskets on the rim space vents close off the liquid surface from the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(h)	Each roof drain is covered with a slotted membrane fabric that covers at least 90 percent of the area of the opening.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(i)	Each unslotted guide pole well has either a gasketed sliding cover or a flexible fabric sleeve seal.	Y <input type="checkbox"/>	N <input type="checkbox"/>

**TABLE 7-6. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
WITH AN EXTERNAL FLOATING ROOF CONVERTED TO
AN INTERNAL FLOATING ROOF**

(j)	Each unslotted guide pole shall have on the end of the pole a gasketed cap which is closed at all times except when gauging the liquid level or taking liquid samples.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(k)	Each slotted guide pole well is equipped with the following equipment: (1) a gasketed sliding cover or a flexible fabric sleeve seal, and (2) a gasketed float inside the guide pole or other control device which closes off the liquid surface from the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(l)	Each gauge hatch/sample well has a gasketed cover which is closed (except when the hatch or well must be open for access).	Y <input type="checkbox"/>	N <input type="checkbox"/>
(m)	All of the gaskets described in (i), (j), (k), and (l) close off the liquid surface from the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>

a If the internal floating roof is equipped, as of December 31, 1992, with a single vapor-mounted seal, then the requirement for a liquid-mounted seal or metallic shoe seal or two seals does not apply until the earlier of the following dates: (1) the next time the storage vessel is emptied and degassed, or (2) April 22, 2004.

b If these openings (excluding automatic bleeder vents and rim space vents) did not provide projections below the liquid service as of December 31, 1992, this requirement does not apply until the earlier of the following dates: (1) the next time the storage vessel is emptied and degassed, or (2) no later than April 22, 2004.

**TABLE 7-7. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
EQUIPPED WITH A CONTROL DEVICE**

Complete this form for Group 1 storage vessels equipped with a closed-vent system and control device. If the control device is shared with a Group 1 process vent or Group 1 transfer rack, the provisions for control devices used for process vents and transfer racks can be followed instead of the provisions for storage vessels -- see process vent or transfer rack checklists. A "yes" response to all questions will indicate compliance and a "no" response will indicate noncompliance with this standard.

Storage Vessel Identification: _____

REVIEW OF RECORDS

1. A design evaluation of the control device and a description of the gas stream entering the control device are recorded and reported in the NCS.^{a,b,c}

	Y <input type="checkbox"/>	N <input type="checkbox"/>
--	----------------------------	----------------------------

 - (a) If the control device is a thermal incinerator, the design evaluation includes the autoignition temperature of the organic HAP emission stream, the combustion temperature, and the residence time at the combustion temperature.^{a,b}

	Y <input type="checkbox"/>	N <input type="checkbox"/>
--	----------------------------	----------------------------
 - (b) If the control device is a carbon adsorber, the design evaluation includes the affinity of the organic HAP vapors for carbon, the amount of carbon in each bed, the number of beds, the humidity of the feed gases, the temperature of the feed gases, the flow rate of the organic HAP emission stream, the desorption schedule, the regeneration stream pressure or temperature, and the flow rate of the regeneration stream. For vacuum desorption, pressure drop is included.

	Y <input type="checkbox"/>	N <input type="checkbox"/>
--	----------------------------	----------------------------
 - (c) If the control device is a condenser, the design evaluation includes the final temperature of the organic HAP vapors, the type of condenser, and the design flow rate of the organic HAP emission stream.

	Y <input type="checkbox"/>	N <input type="checkbox"/>
--	----------------------------	----------------------------
2. The documentation described in (a) demonstrates that the control device achieves 95-percent control efficiency during reasonably expected maximum loading conditions (or 90-percent efficiency if the control device was installed prior to December 31, 1992).

	Y <input type="checkbox"/>	N <input type="checkbox"/>
--	----------------------------	----------------------------
3. Recorded and reported in the NCS are: (1) a description of the parameter (or parameters) to be monitored to ensure that the control device is operated and maintained in conformance with its design, (2) an explanation of the criteria used for selection of the parameter (or parameters), and (3) the frequency with which monitoring will be performed.

	Y <input type="checkbox"/>	N <input type="checkbox"/>
--	----------------------------	----------------------------
4. For each monitoring parameter identified in the NCS, the operating range is recorded and reported in the NCS.

	Y <input type="checkbox"/>	N <input type="checkbox"/>
--	----------------------------	----------------------------

**TABLE 7-7. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSELS
EQUIPPED WITH A CONTROL DEVICE**

5.	Records of the monitored parameter (or parameters), as described in (c) and (d), are kept at the required frequency.	Y <input type="checkbox"/>	N <input type="checkbox"/>
6.	Each occurrence when the monitored parameter (or parameters) was outside its parameter range (documented in the NCS) is recorded and reported in the PR.	Y <input type="checkbox"/>	N <input type="checkbox"/>
7.	Each record and report described in (6) includes an explanation of why the measured parameter (or parameters) was outside of its established range.	Y <input type="checkbox"/>	N <input type="checkbox"/>
8.	The total number of hours of routine maintenance of the control device during which the control device does not achieve a 95-percent control efficiency (or 90-percent control efficiency if the control device was installed prior to December 31, 1992) is recorded and reported in the PR.	Y <input type="checkbox"/>	N <input type="checkbox"/>

VISUAL INSPECTION

1.	There are no visible gaps, holes, or corrosion spots seen in the ductwork of the vapor collection system.	Y <input type="checkbox"/>	N <input type="checkbox"/>
2.	A device to monitor the parameter (or parameters) specified in the NCS is present.	Y <input type="checkbox"/>	N <input type="checkbox"/>

NCS = Notification of Compliance Status

^a A design evaluation is not required for a boiler or process heater with a capacity of 44 MW or greater; a boiler or process heater burning hazardous waste with a final permit under 40 CFR Part 270 meeting the requirements of 40 CFR Part 266 Subpart H, or has certified compliance that it meets the requirements of 40 CFR Part 266 Subpart H; a hazardous waste incinerator with a final permit under 40 CFR Part 270 meeting the requirements of 40 CFR Part 264 Subpart O, or has certified compliance that it meets the requirements of 40 CFR Part 265 Subpart O; or a boiler or process heater into which the vent stream is introduced with the primary fuel.

^b If an enclosed combustion device is documented to have a minimum residence time of 0.5 seconds and a minimum temperature of 760°C, then additional documentation is not required.

^c If the control device used to comply with the storage vessel provisions is also used to comply with the process vent, transfer, or wastewater provisions, the performance test required by those provisions is an acceptable substitute for the design evaluation for determining compliance.

**TABLE 7-8. COMPLIANCE CHECKLIST FOR GROUP 1 STORAGE VESSEL
EMISSIONS ROUTED TO A PROCESS OR FUEL GAS SYSTEM**

Complete this form when the emissions from a Group 1 storage vessel is routed to a process or fuel gas system. A "yes" response to all questions will indicate compliance and a "no" response will indicate noncompliance with the standard.

Storage Vessel Identification: _____

REVIEW OF RECORDS

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | For emissions routed to a process, a design evaluation or engineering assessment demonstrating the extent to which the emissions are recycled, consumed, transformed by chemical reaction into materials that are not HAP's, incorporated into a product and/or recovered were submitted in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | Records are kept for any by-pass of the fuel gas system or process. The records include the reason for the by-pass, duration of the by-pass, and documentation that the owner or operator either did not increase the liquid level in the storage vessel during the by-pass, routed the emissions through a closed-vent system to a control device during the by-pass, or the total aggregate time of by-pass without routing to a control device during the year has not exceeded 240 hours. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | If emissions are routed to a fuel gas system, the report was submitted as part of the NCS that the emission stream is routed to a fuel gas system. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

8.0 WASTEWATER

Once it is determined that a wastewater stream is subject to the HON or there are items of equipment that meet the criteria of §63.149 of Subpart G, Section 8 can be used to carry out the inspection. Table 8-1 is used to determine the group status of process wastewater streams. Table 8-2 outlines the provisions for waste management units that receive, manage or treat Group 1 process wastewater

streams. It refers to other checklists in Sections 7, 9, and 10 where the requirements are common to provisions for other emission points. Table 8-3 is a compliance checklist for waste management units. Table 8-4 is a compliance checklist for wastewater treatment. Table 8-5 is a checklist for heat exchange systems requiring leak detection. Table 8-6 is a roadmap for items of equipment handling in-process liquid streams and meeting the criteria of §63.149 of Subpart G (Table 4-11 steps through the determination of whether equipment meets the criteria of §63.149 of Subpart G). The table refers to checklists with requirements that are common to other types of emission points, Sections 9 and 10. Table 8-6 is a compliance checklist for items of equipment handling in-process liquid streams.

Section 8. Wastewater

Table 8-1. Group Determination Check for Process Wastewater Streams	II-62
Table 8-2. Roadmap for the Checklists for Waste Management Units	II-63
Table 8-3. Compliance Checklist for Waste Management Units	II-67
Table 8-4. Compliance Checklist for Treatment Processes	II-74
Table 8-5. Compliance Checklist for Heat Exchange Systems Requiring Leak Detection	II-78
Table 8-6. Roadmap to the Checklist for Items of Equipment Handling In-Process Liquid Streams	II-81
Table 8-7. Compliance Checklist for Items of Equipment Handling In-Process Liquid Streams	II-85

TABLE 8-1. GROUP DETERMINATION CHECK FOR PROCESS WASTEWATER STREAMS

Complete this form for all wastewater streams subject to the HON as determined in Section 4.

I. New Sources -- Group 1/Group 2 Determination for Streams Containing HAP's Listed on Table 8 of Subpart G of the HON

1. Is the flow rate ≥ 0.02 lpm and the concentration of Table 8 compounds ≥ 10 ppmw?
- Y The wastewater stream is Group 1 for HAP's listed on Table 8 of Subpart G of the HON.
- N The wastewater stream is Group 2 for HAP's listed on Table 8 of Subpart G of the HON. Continue to Section II of this table to determine if the wastewater stream is Group 1 for HAP's listed on Table 9 of Subpart G of the HON.

II. New and Existing Sources -- Group 1/Group 2 Determination for Streams Containing HAP's Listed on Table 9 of Subpart G of the HON

1. Is the total concentration of Table 9 compounds $\geq 10,000$ ppmw at any flow rate or is the total concentration of Table 9 compounds $\geq 1,000$ ppmw and the flow rate ≥ 10 lpm?
- Y The wastewater stream is Group 1 for HAP's listed on Table 9 of Subpart G of the HON.
- N The wastewater stream is Group 2 for HAP's listed on Table 9 of Subpart G of the HON.
-
-

TABLE 8-2. ROADMAP FOR THE CHECKLISTS FOR WASTE MANAGEMENT UNITS

Complete this form for waste management units receiving, managing, or treating Group 1 wastewater streams or a residual removed from a Group 1 wastewater stream. There is a specific Section of this form for each type of waste management unit. This table is a roadmap to the checklists used to assess compliance with the provisions for waste management.

Note: In addition to the checklists referred to below, complete checklist 8-3 for all waste management units receiving, managing, or treating Group 1 wastewater streams or a residual removed from a Group 1 wastewater stream.

I. WASTEWATER TANKS

1. Are wastewater tanks controlled using a fixed roof^a?

Y Go to checklist 9-2.

N Continue with this checklist.

2. Are wastewater tanks being controlled using a fixed roof and a closed-vent system routed to a control device?

Y Go to checklists 9-1 and 9-2, and select from below the checklist corresponding to the appropriate control device:

- flare, checklist 10-1;
- thermal incinerator, checklist 10-2;
- catalytic incinerator, checklist 10-3;
- boiler or process heater with a capacity less than 44 MW that does not have the emission stream introduced with the primary fuel, checklist 10-4;
- boiler or process heater with a capacity greater than 44 MW or that has the vent stream introduced with the primary fuel, checklist 10-5;
- carbon adsorber, checklist 10-6;
- condenser, checklist 10-8; or
- other control device, checklist 10-9.

N Continue with this checklist.

3. Are wastewater tanks controlled using an external floating roof?

Y Go to checklist 7-4.

N Continue with this checklist.

TABLE 8-2. ROADMAP FOR THE CHECKLISTS FOR WASTE MANAGEMENT UNITS

4. Are wastewater tanks controlled using a fixed roof with an internal floating roof?

Y Go to checklist 7-5.

N Continue with this checklist.

5. Are wastewater tanks controlled using an equivalent means of emission limitation?

If an owner or operator is using another method for achieving compliance other than one listed in 1 through 4, above, review the FEDERAL REGISTER notice permitting the use of the alternative and any monitoring records required.

II. SURFACE IMPOUNDMENTS

1. Are surface impoundments controlled using a cover with a closed-vent system that routes to a control device?

Y Go to checklists 9-1 and 9-2, and select from below the checklist corresponding to the appropriate control device:

- flare, checklist 10-1;
- thermal incinerator, checklist 10-2;
- catalytic incinerator, checklist 10-3;
- boiler or process heater with a capacity less than 44 MW that does not have the emission stream introduced with the primary fuel, checklist 10-4;
- boiler or process heater with a capacity greater than 44 MW or that has the vent stream introduced with the primary fuel, checklist 10-5;
- carbon adsorber, checklist 10-6;
- condenser, checklist 10-8; or
- other control device, checklist 10-9.

N Continue with this checklist.

2. Are surface impoundments controlled using a floating flexible membrane cover?

Only checklist 8-3 applies to surface impoundments with floating flexible membrane covers.

Surface impoundments must have either a cover with closed-vent system routed to a control device or a floating flexible membrane cover; no other options apply.

TABLE 8-2. ROADMAP FOR THE CHECKLISTS FOR WASTE MANAGEMENT UNITS

III. CONTAINERS

Containers must have a cover.

Go to checklist 9-2 for containers $> 0.42\text{m}^3$ and for containers $\leq 0.42\text{m}^3$ that do not meet the existing DOT specifications and testing requirements.

IV. INDIVIDUAL DRAINS

1. Are individual drains controlled using a cover and, if vented, routed to a process or through a closed-vent system to a control device?

Y Go to checklist 8-3 and 9-2 for the covers; go to checklists 9-1 and 9-2 if a closed-vent systems is being used; and select from below the checklist corresponding to the appropriate control device:

- flare, checklist 10-1;
- thermal incinerator, checklist 10-2;
- catalytic incinerator, checklist 10-3;
- boiler or process heater with a capacity less than 44 MW that does not have the emission stream introduced with the primary fuel, checklist 10-4;
- boiler or process heater with a capacity greater than 44 MW or that has the vent stream introduced with the primary fuel, checklist 10-5;
- carbon adsorber, checklist 10-6;
- condenser, checklist 10-8; or
- other control device, checklist 10-9.

N Continue with this checklist.

2. Are individual drains controlled using water seal controls or a tightly fitting cap or plug for drains, tightly fitting solid covers for junction boxes, and covers or enclosures for sewer lines?

Only checklist 8-3 applies to drains, junction boxes and sewer lines controlled in this way.

Individual drains must have either a cover and a closed-vent system routed to a control device or drains, junction boxes and sewer lines covered; no other options apply.

V. OIL-WATER SEPARATORS

1. Are oil-water separators controlled using a fixed roof and a closed-vent system routed to a control device?

Y Go to checklists 9-1 and 9-2, and select from below the checklist corresponding to the appropriate control device:

- flare, checklist 10-1;
- thermal incinerator, checklist 10-2;
- catalytic incinerator, checklist 10-3;
- boiler or process heater with a capacity less than 44 MW that does not have the emission stream introduced with the primary fuel, checklist 10-4;

TABLE 8-2. ROADMAP FOR THE CHECKLISTS FOR WASTE MANAGEMENT UNITS

- boiler or process heater with a capacity greater than 44 MW or that has the vent stream introduced with the primary fuel, checklist 10-5;
 - carbon adsorber, checklist 10-6;
 - condenser, checklist 10-8; or
 - other control device, checklist 10-9.
- N Continue with this checklist.
2. Are oil-water separators controlled using a floating roof?
- Y Only checklist 8-3 applies to floating roofs used on oil-water separators.
- N Continue with this checklist.
3. Are oil-water separators controlled using an equivalent means of emissions limitation?
- If an owner or operator is using another method for achieving compliance other than one listed in 1 through 2, above, review the FEDERAL REGISTER notice permitting the use of the alternative and any monitoring records required.
-

^a A fixed roof only cannot be used on wastewater tanks if the tank is used for heating wastewater, or treating by means of an exothermic reaction or the contents of the tank are sparged. Also, this option cannot be used on tanks having a capacity greater than 75 m³ and less than 151 m³ storing liquid with a vapor pressure greater than or equal to 13.1 kPa, or for tanks with a capacity of 151 m³ or greater storing liquids with a vapor pressure greater than or equal to 5.2 kPa. For these tanks, one of the compliance options listed in 1b, 1c, 1d, or 1e must be used.

TABLE 8-3. COMPLIANCE CHECKLIST FOR WASTE MANAGEMENT UNITS

Complete this form for waste management units. See also table 8-2 to determine if other checklists apply to waste management units. A "yes" response to all questions will indicate compliance and "no" responses will indicate noncompliance except where noted.

I. REVIEW OF RECORDS**A. FOR WASTEWATER TANKS, SURFACE IMPOUNDMENTS, CONTAINERS, INDIVIDUAL DRAIN SYSTEMS, AND OIL-WATER SEPARATORS**

- | | | | |
|-----|---|----------------------------|----------------------------|
| 1. | The occurrence of each semiannual visual inspection for improper work practices is recorded. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | The occurrence of each semiannual visual inspection for control equipment failures is recorded. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | For each inspection during which a control equipment failure was identified, the following were recorded and reported in the next PR ^a | | |
| (a) | Date of the inspection. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) | Identification of the wastewater tank, surface impoundment, container, individual drain system, or oil-water separator having the failure. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | Description of the failure. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (d) | Description of the nature of the repair. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (e) | Date the repair was made. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

B. ADDITIONALLY FOR CONTAINERS

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | A record of the capacity of each container at the facility is maintained. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|----|---|----------------------------|----------------------------|

C. FOR DRAIN, JUNCTION BOXES, AND SEWER LINES, AS AN ALTERNATIVE TO A.

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | A record documents the occurrence of each semiannual inspection of drains to ensure that caps or plugs are in place and properly installed [or 2] | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|----|---|----------------------------|----------------------------|

TABLE 8-3. COMPLIANCE CHECKLIST FOR WASTE MANAGEMENT UNITS

- | | | | |
|--|---|----------------------------|----------------------------|
| 2. | A record documents the occurrence of each semiannual verification of water supply to the drain. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | A record documents the occurrence of each semiannual inspection of junction boxes to ensure that there are no gaps, cracks, or other holes in the cover. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | A record documents the occurrence of each semiannual inspection of the unburied portion of each sewer line to ensure that there are no cracks or gaps that could result in air emissions. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| D. ADDITIONALLY FOR OIL-WATER SEPARATORS WITH A FLOATING ROOF | | | |
| 1. | Records indicate that seal gap measurements were performed annually for the secondary seal and every five years for the primary seal. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | When a failure is detected, the date and results of seal gap measurements are submitted in periodic reports, annually for the secondary seal and every five years for the primary seal. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | When a control equipment failure is detected in the seal(s), the date and results of the visual inspection of the seals (which is performed together with the seal gap measurement) are included in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | The date of the seal gap measurement, the raw data obtained during the measurement, and the calculations made are recorded. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. | The raw data and calculations recorded for seal gap measurements is consistent with the information provided in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 6. | If a failure was detected during a seal gap measurement and visual seal inspection, the PR indicated the date and the nature of the repair or the date the wastewater tank was emptied. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 8-3. COMPLIANCE CHECKLIST FOR WASTE MANAGEMENT UNITS

II. VISUAL INSPECTION**A. WASTEWATER TANKS, IF THE CONTROL EQUIPMENT IS A FIXED ROOF OR A FIXED ROOF WITH A CLOSED-VENT SYSTEM ROUTED TO A CONTROL DEVICE**

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | All openings (e.g., access hatches, sampling ports, and gauge wells) are maintained in a closed position (e.g., covered by a lid) when not in use (e.g., during sampling, equipment maintenance, inspection, or repair). | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|----|--|----------------------------|----------------------------|

B. SURFACE IMPOUNDMENTS

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | Access hatches and all other openings are closed when not in use. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | All control equipment is functioning properly (e.g., seals, joints, lids, covers, and doors are not cracked, gapped, or broken). | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | For surface impoundments with floating flexible membrane covers, the floating flexible membrane cover is made of high density polyethylene with a thickness of no less than 2.5 millimeters, or a material that has an equivalent organic permeability and integrity for the intended service life of the floating cover. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | For surface impoundments with floating flexible membrane covers, all openings are equipped with closure devices such that there are no visible cracks, holes, gaps, or other open spaces between the perimeter of the cover opening and the closure device when it is closed. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

C. CONTAINERS

- | | | | |
|-----|--|----------------------------|----------------------------|
| 1. | For containers with $0.1 \leq \text{capacity} \leq 0.42 \text{ m}^3$. | | |
| (a) | The container meets existing DOT specifications and testing requirements or the requirements of § 63.148 of subpart G which are contained in the checklists 9-1 and 9-2. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) | The cover and all openings are maintained in a closed position (e.g., covered by a lid) when not in use (e.g., during filling). | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | For containers with capacity $>0.42 \text{ m}^3$. | | |
| (a) | The container is equipped with a submerged fill pipe that does not extend more than 6 inches or within two fill pipe diameters of the bottom of the container while the container is being filled. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 8-3. COMPLIANCE CHECKLIST FOR WASTE MANAGEMENT UNITS

(b)	The cover and all openings, except those required for the submerged fill pipe and for venting to prevent damage or deformation of the container or cover, are closed.	Y <input type="checkbox"/>	N <input type="checkbox"/>
3.	Whenever a container with capacity $\geq 0.1 \text{ m}^3$ is open, during treatment in the container of a Group 1 wastewater stream or residual, it is located within an enclosure that is routed by a closed-vent system to a control device. The closed-vent system meets the requirements in checklists 9-1 and 9-2 and the control device meets the requirements in the appropriate checklist in Section 10.	Y <input type="checkbox"/>	N <input type="checkbox"/>
4.	All control equipment is functioning properly (e.g. covers and doors are not cracked, gapped, or broken).	Y <input type="checkbox"/>	N <input type="checkbox"/>
D. INDIVIDUAL DRAIN SYSTEMS			
1.	If the control equipment is a cover with or without a closed-vent system routed to a control device or to a process.		
(a)	The individual drain system is designed and operated to segregate the vapors within the system from other drain systems and the atmosphere.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(b)	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) are maintained in a closed position when not in use (e.g., during sampling, equipment maintenance, inspection, or repair).	Y <input type="checkbox"/>	N <input type="checkbox"/>
(c)	The cover and all openings are maintained in good condition.		
2.	For drains, junction boxes, and sewer lines, as an alternative to Item 1:		
(a)	Each drain is equipped with either water seal controls (e.g., p-trap, s-trap) or a tightly-fitting cap or plug.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(b)	For each drain equipped with a water seal, there is water in the water seal.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(c)	If a water seal is used on a drain receiving a Group 1 process wastewater stream, then one of the requirements in (i) or (ii) below, must be met.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(i)	The drain pipe discharging the wastewater extends below the liquid surface in the water seal [or (ii)].	Y <input type="checkbox"/>	N <input type="checkbox"/>

TABLE 8-3. COMPLIANCE CHECKLIST FOR WASTE MANAGEMENT UNITS

(ii)	A flexible shield (or other enclosure which restricts wind motion) is installed that encloses the space between the pipe discharging the wastewater and the drain receiving the wastewater.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(d)	Each junction box is equipped with a tightly fitting solid cover, and, if vented, is equipped with a vent pipe meeting the requirements in (i) or (ii) below.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(i)	The vent pipe is connected to a closed vent system that meets the requirements in Table 9-2 and is routed to a process or to a control device that meets the requirements in Table 10-1 through 10-9 for the applicable control device.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(ii)	If the junction box is filled and emptied by gravity flow or is operated with no more than slight fluctuations in the liquid level, the junction box may be vented to the atmosphere provided the vent pipe is at least 90 centimeters in length and shall not exceed 10.2 centimeters in diameter; and a water seal is installed at the entrance or exit of the junction box that restricts ventilation in the individual drain system and between components in the individual drain system.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(e)	Each sewer line is not open to the atmosphere and is covered or enclosed so that no visible gaps or cracks in joints, seals, or other emission interfaces exist.	Y <input type="checkbox"/>	N <input type="checkbox"/>

E. OIL-WATER SEPARATORS**IF THE CONTROL EQUIPMENT IS A FLOATING ROOF**

Note: The inspector should not perform the inspection while on the floating roof if the roof is below four feet of the top of the separator and if the inspector is not equipped with the proper respiratory protection. Based on the inspector's assessment of the availability of records documenting the design of the control equipment, an adequate inspection without respiratory protection may be performed with a combination of a record inspection and a visual inspection conducted from the platform with the aid of vision-enhancing devices (binoculars). If the inspector feels that it is necessary to be on the EFR when the roof is below four feet of the top of the tank, please be aware of the requirements under EPA Order 1440.2 and the safety information in Guidance on Confined Space Entry in NESHAP Inspections of Benzene Storage Vessels (EPA 455/R-92-003, September 1992).

TABLE 8-3. COMPLIANCE CHECKLIST FOR WASTE MANAGEMENT UNITS

1.	The floating roof is resting on the liquid surface of the stored material, unless the floating roof is resting on the roof leg supports because the oil-water separator has just been emptied and degassed or the tank is partially or completely emptied before being subsequently refilled or degassed.	Y <input type="checkbox"/>	N <input type="checkbox"/>
2.	The floating roof is in good condition (i.e., free of defects such as corrosion and pools of standing liquid).	Y <input type="checkbox"/>	N <input type="checkbox"/>
3.	There is a secondary seal installed above the primary seal.	Y <input type="checkbox"/>	N <input type="checkbox"/>
4.	Inspect the secondary seal.		
(a)	The secondary seal is continuous and completely covers the annular space between the floating roof and the separator wall.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(b)	There are no holes, tears, or other openings in the seal or seal fabric.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(c)	There are no visible gaps between the seal and the wall of the oil-water separator, except as specified in (e)(1) and (e)(2) below.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(d)	The seal is not detached from the floating deck.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(e)	Perform seal gap measurement of the secondary seal as specified in §60.696(d)(1) of the standards of performance for VOC emissions.		
(1)	The total gap area between the separator wall and the secondary seal does not exceed 6.7 cm ² per meter (0.32 in ² /ft) of the separator wall perimeter.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(2)	The maximum gap width between the separator wall and the seal does not exceed 1.3 cm (0.5 in) at any point.	Y <input type="checkbox"/>	N <input type="checkbox"/>
5.	Inspect the primary seal.		
(a)	The primary seal is a liquid-mounted seal.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(b)	The primary seal forms a continuous closure that completely covers the annular space between the wall of the oil-water separator and the edge of the floating roof, except as described in (f)(1) and (f)(2) below.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(c)	There are no holes, tears, or other openings in the seal fabric, seal envelope, or shoe (if a metallic shoe seal is used).	Y <input type="checkbox"/>	N <input type="checkbox"/>

TABLE 8-3. COMPLIANCE CHECKLIST FOR WASTE MANAGEMENT UNITS

(d) If the primary seal is a liquid-mounted seal (e.g., foam or liquid-filled seal), the seal is in contact with the liquid between the wall of the oil-water separator and the floating roof.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(e) The seal is not detached from the floating roof.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(f) Perform seal gap measurements of the primary seal as specified in §60.696(d)(1) of the standards of performance for VOC emissions.		
(1) The total gap area between the separator wall and the primary seal does not exceed 67 cm ² per meter (3.2 in ² /ft) of separator wall perimeter.	Y <input type="checkbox"/>	N <input type="checkbox"/>
(2) The maximum gap width between the separator wall and the seal does not exceed 3.8 cm (1.5 in) at any point.	Y <input type="checkbox"/>	N <input type="checkbox"/>
6. If the floating roof is equipped with one or more emergency roof drains for removal of stormwater, each emergency roof drain is fitted with a slotted membrane fabric cover that covers at least 90 percent of the drain opening area or a flexible fabric sleeve seal.	Y <input type="checkbox"/>	N <input type="checkbox"/>
7. All openings in the floating roof are equipped with a gasketed cover, seal, or lid, which is maintained in a closed position at all times, except during inspection and maintenance.	Y <input type="checkbox"/>	N <input type="checkbox"/>
8. No gaskets, joints, lids, covers, or doors are cracked, gapped, or broken.	Y <input type="checkbox"/>	N <input type="checkbox"/>

PR = Periodic Report

NOTE ALL DEFICIENCIES.

TABLE 8-4. COMPLIANCE CHECKLIST FOR TREATMENT PROCESSES

A "yes" response to all questions will indicate full compliance, and a "no" responses will indicate noncompliance except where noted.

Note: The HON does not specify a particular treatment process that must be used to achieve compliance. The source may use any waste management unit or treatment process to achieve compliance with one of the compliance options (or a combination of compliance options). The compliance options are listed in Tables 7-11 and 7-12 of Volume I. If the source elects to use a design steam stripper, the HON does specify operating parameters in §63.138(d) of Subpart G. These operating parameters are included in this checklist. Sources meeting the requirements of the 1mg/yr exemption, described in 7.4.2 of Volume I wastewater streams.

TREATMENT PROCESS _____

I. REVIEW OF RECORDS

FOR ALL TREATMENT PROCESSES

- | | | | |
|-----|---|----------------------------|----------------------------|
| 1a. | Identification and description of the treatment process, identification of the wastewater streams treated by the process, and identification of monitoring parameters were included in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 1b. | If a treatment process other than the design steam stripper is used, the request to monitor site-specific parameters was included in the operating permit application or Implementation Plan. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | Documentation to establish a site-specific range was submitted in the NCS or operating permit application. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | Results of the initial measurement of the parameters approved by the Administrator were submitted in the NCS or operating permit application. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | Records of a design evaluation and supporting documentation that includes operating characteristics were included in the NCS [or #5]. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. | Records of performance tests conducted using test methods and procedures specified in §63.145 of Subpart G were included in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 8-4. COMPLIANCE CHECKLIST FOR TREATMENT PROCESSES

[Note: The records described in #4 and #5 above are not required if the wastewater stream or residual is discharged to: (1) a hazardous waste incinerator permitted under 40 CFR Part 270 and complying with 40 CFR Part 264 Subpart O; (2) an industrial furnace or boiler burning hazardous waste that is permitted under 40 CFR Part 270 and complying with 40 CFR Part 266, Subpart H; (3) an industrial furnace or boiler burning hazardous waste for which the owner or operator has certified compliance with the interim status requirements of 40 CFR Part 266 Subpart H; or (4) an underground injection well permitted under 40 CFR Part 270 or 40 CFR Part 144 and complying with 40 CFR Part 122.]

- | | | | |
|-----|---|----------------------------|----------------------------|
| 6. | Records described in #4 and #5 demonstrate that the level of treatment required by §63.138(b) and/or (c) is achieved. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 7. | Results of visual inspections, in which a control equipment failure was identified, were reported in the PR, including: | | |
| | (a) Identification of the treatment process, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (b) Description of the failure, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (c) Description of the nature of the repair, and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (d) Date the repair was made. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 8. | For each parameter approved by the permitting authority that is required to be monitored continuously: | | |
| | (a) Records of the daily average value of the parameter are kept. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (b) Each operating day, when the daily average value of the parameter was outside the site-specific range established in the NCS (i.e., a monitoring parameter excursion is detected), or when insufficient monitoring data are collected, they are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 9. | For each treatment process that receives a residual removed from a Group 1 wastewater stream, the following were submitted in the NCS: | | |
| | (a) Identification of treatment process; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (b) Identification and description of the residual; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (c) Identification of wastewater stream from which residual was removed; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (d) Fate of residual; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (e) Identification and description of control device (if any) used to destroy the HAP mass in the residual by 99 percent; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (f) Documentation of the 99 percent control efficiency of the device in (e). | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 10. | Records show that residuals are in compliance with control options in §63.138(k) of Subpart G. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 8-4. COMPLIANCE CHECKLIST FOR TREATMENT PROCESSES

FOR DESIGN STEAM STRIPPERS

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | Records are kept of the steam flow rate, wastewater feed mass flow rate, and wastewater feed temperature. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | If the parameters in #1 are not monitored, the facility has documentation that they applied for and received approval to monitor alternative parameter(s) and are performing the required recordkeeping and reporting. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If #2 is checked "Yes", the facility is in compliance even if number 1 is checked "No".]

FOR BIOLOGICAL TREATMENT UNITS

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | Records are kept of appropriate monitoring parameters that were approved by the permitting authority. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | Records are kept of the F_{bio} determination made according to the procedures in Appendix C to 40 CFR Part 63 ^a | Y <input type="checkbox"/> | N <input type="checkbox"/> |

II. VISUAL INSPECTION**FOR ALL TREATMENT PROCESSES**

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | Each opening in the treatment process (except biological treatment systems) is covered and vented to a closed-vent system that is routed to a control device. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | Any associated closed-vent system is in compliance with the HON according to the checklists in Tables 9-1 and 9-2. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | Any associated control device is in compliance with the HON according to the appropriate checklist:
<input type="checkbox"/> flare, checklist 10-1
<input type="checkbox"/> thermal incinerator, checklist 10-2
<input type="checkbox"/> catalytic incinerator, checklist 10-3
<input type="checkbox"/> boiler or process heater with a capacity less than 44 MW that does not have the emission stream introduced with the primary fuel, checklist 10-4
<input type="checkbox"/> boiler or process heater with a capacity greater than 44 MW or that has the vent stream introduced with the primary fuel, checklist 10-5
<input type="checkbox"/> carbon adsorber, checklist 10-6
<input type="checkbox"/> condenser, checklist 10-8
<input type="checkbox"/> other control device, checklist 10-9 | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | Each cover is kept closed and is in compliance with the HON according to the checklist in Table 9-2. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

**TABLE 8-5. COMPLIANCE CHECKLIST FOR HEAT EXCHANGE SYSTEMS
REQUIRING LEAK DETECTION**

A "yes" response to all questions will indicate full compliance, and "no" responses will indicate noncompliance except where noted.

HEAT EXCHANGE SYSTEM _____

Note: Sources are not required to comply with leak detection monitoring requirements if one or more of the following conditions are met: (1) the heat exchange system is operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side; (2) the once-through heat exchange system has an NPDES permit with an allowable discharge limit of less than or equal to 1 ppm above influent concentration or 10% or less above influent concentration, whichever is greater; (3) there is an interviewing cooling fluid, containing less than 5% of total HAP listed in Table 4 of subpart F, between the process and cooling water; (4) the once-through heat exchange system is subject to an NPDES permit that requires monitoring of a parameter of condition, that specifies that normal range of the parameter or condition, and that requires monitoring of the parameters no less frequently than monthly for the first 6 months and quarterly thereafter; (5) the recirculating heat exchange system is used to cool process fluids that contain less than 5% of total HAPs listed in Table 4 of Subpart F; or (6) the once-through heat exchange system is used to cool process fluids that contain less than 5% of total HAP listed in Table 9 of subpart G. See paragraph 63.104(a) of Subpart F for additional details.

I. REVIEW OF RECORDS

- | | | | |
|-----|--|----------------------------|----------------------------|
| 1a. | For once-through heat exchange systems, records indicate that systems are monitored for leaks of HAPs listed on Table 9 of Subpart G. [or 2] | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 1b. | For recirculating heat exchange systems, records indicate that systems are monitored for leaks of HAPs listed on Table 4 of Subpart F. [or 2] | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | When monitoring of a surrogate indicator of heat exchange system leaks is used, a monitoring plan contains the following: | | |
| (a) | The procedures that will be used to detect leaks of process fluids into cooling water; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) | A description of the parameter or condition to be monitored and an explanation of how the selected parameter or condition will reliably indicate the presence of a leak; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | The parameter level or condition that shall constitute a leak, documented by data or calculations; | Y <input type="checkbox"/> | N <input type="checkbox"/> |

**TABLE 8-5. COMPLIANCE CHECKLIST FOR HEAT EXCHANGE SYSTEMS
REQUIRING LEAK DETECTION**

- | | | |
|--|----------------------------|----------------------------|
| (d) The monitoring frequency which shall be no less frequently than monthly for the first 6 months and quarterly thereafter; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (e) The records that will be maintained. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If #2(a), 2(b), 2(c), 2(d), and 2(e) are all checked "Yes", the facility is in compliance even if numbers 1a and/or 1b are checked "No".]

- | | | |
|--|----------------------------|----------------------------|
| 3. Records indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. If a leak is detected, the dates of efforts to repair the leak. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. If a leak is detected, the method or procedure used to confirm repair of a leak and the date repair was confirmed. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 6. Documentation for the basis for the determination that a shutdown for repair would cause greater emissions than the emissions likely to result from delaying the repair; or documentation that the necessary parts or personnel were not available to make the repair. ^a | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 7. If there is a delay of repair of a leak, the following information was reported in the PR and maintained as a record. | | |
| (a) Identification of the leak and date the leak was detected. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) Whether or not the leak has been repaired. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) Reason for delay of repair. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (d) The expected date of repair if the leak remains unrepaired. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (e) The date of repair, if the leak is repaired. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

PR = Periodic Reports.

^a Documentation for a delay of repair is not necessary if the equipment is isolated from the process, or if a shutdown is expected within the next 2 months after it is determined that a delay of repair is necessary.

TABLE 8-6. ROADMAP TO THE CHECKLISTS FOR ITEMS OF EQUIPMENT HANDLING IN-PROCESS LIQUID STREAMS

Complete this form for items of equipment that meet criteria of § 63.149 of Subpart G. Checklist 4-11 can be used to determine if the items of equipment meet the criteria in §63.149.

I. FOR MANHOLES, LIFT STATIONS, AND TRENCHES:

1. Is a tightly fitting solid cover with no vent being used?

Y Go to checklist 8-7

N Continue with this section of the checklist

2. Is a tightly fitting solid cover being used with a vent to either a process, to a fuel gas system, or to a control device?

Y Go to checklist 8-7, and, if emissions are routed to a control device, select from below the checklist corresponding to the appropriate control device:

- flare, checklist 10-1;
- thermal incinerator, checklist 10-2;
- catalytic incinerator, checklist 10-3;
- boiler or process heater with a capacity less than 44 MW that does not have the emission stream introduced with the primary fuel, checklist 10-4;
- boiler or process heater with a capacity greater than 44 MW or that has the vent stream introduced with the primary fuel, checklist 10-5;
- carbon adsorber, checklist 10-6;
- condenser, checklist 10-8; or
- other control device, checklist 10-9.

N Continue with this checklist

3. If the item is vented to the atmosphere, is a tightly fitting solid cover being used with a properly operating water seal at the entrance or exit to the item to restrict ventilation in the collection system?

Y Go to checklist 8-7.

Manhole, lift stations and trenches must use one of the compliance options in I.1 through I.3.

TABLE 8-6. ROADMAP TO THE CHECKLISTS FOR ITEMS OF EQUIPMENT HANDLING IN-PROCESS LIQUID STREAMS

II. DRAIN OR DRAIN HUB

1. Is a tightly fitting solid cover with no vent being used?

Y Go to checklist 8-7

N Continue with this section of the checklist

2. Is a tightly fitting solid cover being used with a vent to either a process, to a fuel gas system, or to a control device?

Y Go to checklist 8-7; and, if emissions are routed to a control device, select from below the checklist corresponding to the appropriate control device:

- flare, checklist 10-1;
- thermal incinerator, checklist 10-2;
- catalytic incinerator, checklist 10-3;
- boiler or process heater with a capacity less than 44 MW that does not have the emission stream introduced with the primary fuel, checklist 10-4;
- boiler or process heater with a capacity greater than 44 MW or that has the vent stream introduced with the primary fuel, checklist 10-5;
- carbon adsorber, checklist 10-6;
- condenser, checklist 10-8; or
- other control device, checklist 10-9.

N Continue with this section of the checklist

3. Is a water seal with submerged discharge or barrier to protect the discharge from wind being used?

Y Continue with this checklist.

Drains or drain hubs must use one of the compliance options in II.1 through II.3.

TABLE 8-6. ROADMAP TO THE CHECKLISTS FOR ITEMS OF EQUIPMENT HANDLING IN-PROCESS LIQUID STREAMS

III. OIL-WATER SEPARATOR

1. Is the oil-water separator equipped with a fixed roof and closed vent system routed to a process or control device?

Y Select from below the checklist corresponding to the appropriate control device:

- flare, checklist 10-1;
- thermal incinerator, checklist 10-2;
- catalytic incinerator, checklist 10-3;
- boiler or process heater with a capacity less than 44 MW that does not have the emission stream introduced with the primary fuel, checklist 10-4;
- boiler or process heater with a capacity greater than 44 MW or that has the vent stream introduced with the primary fuel, checklist 10-5;
- carbon adsorber, checklist 10-6;
- condenser, checklist 10-8; or
- other control device, checklist 10-9.

N Continue with this checklist.

2. If the oil-water separator equipped with a floating roof?

Checklist 8-3 applies to floating roofs used on oil-water separators.

Oil-water separators must have either a fixed roof and a closed-vent system routed to a control device, or use a floating roof; no other options apply.

IV. TANKS^a

1. Does the tank have a fixed roof^b only?

Y The tank is in compliance

N Continue with this checklist

2. Is the tank equipped with a fixed roof, closed vent system and are emissions routed to a fuel gas system, process or control device?

Y For emissions routed to a control device, go to checklist 7-7

Must use one of the compliance options in IV.1 or IV.2.

**TABLE 8-7. COMPLIANCE CHECKLIST FOR EQUIPMENT HANDLING
IN-PROCESS LIQUID STREAMS**

Complete this form for manholes, lift stations, trenches, drains and drain hubs that handle in-process liquid streams and that meet the criteria of section 63.149 of Subpart G. Drain or drain hubs with a water seal with submerged discharge or barrier to protect the discharge from the wind are not subject to the provisions in this checklist. A "yes" response to all questions will indicate compliance and "no" response will indicate noncompliance.

VISUAL INSPECTION

- 1. Tight fitting solid covers are maintained with no visible gaps or openings, except during periods of sampling, inspection, or maintenance. Y N

- 2. For tight fitting solid covers with water seals, the vent pipe is at least 90 cm in length and does not exceed 10.2 cm in nominal inside diameter. This item does not apply to drains or drain hubs. Y N

- 3. For lift stations with tight fitting solid covers with water seals, the lift station is level controlled to minimize changes in liquid level. Y N

9.0 CLOSED-VENT SYSTEMS AND CONTROL EQUIPMENT REQUIRING LEAK DETECTION

This section contains checklists for equipment that require leak detection. These equipment include vent, closed-vent, vapor collection, and vapor balancing systems, and the covers, enclosures, and fixed roofs associated with wastewater streams and in-process liquid streams handled by equipment subject to §63.149 of Subpart G.

Table 9-1 contains a checklist for the bypass line provisions and Table 9-2 contains the checklist for the leak detection of closed-vent systems and control equipment. The checklists in Sections 5, 6, 7, and 8 refer to these checklists when the provisions regarding bypass lines and leak detection of closed-vent systems and control equipment apply.

<u>Section 9. Closed-Vent Systems and Control Equipment Requiring Leak Detection</u>	
Table 9-1. Compliance Checklist for Bypass Provisions for Vent, Closed-Vent, Vapor Collection, and Vapor Balancing Systems	II-87
Table 9-2. Compliance Checklist for Closed-Vent, Vapor Collection, And Vapor Balancing Systems, and Covers, Enclosures, And Fixed Roofs	II-89

TABLE 9-1. COMPLIANCE CHECKLIST FOR BYPASS LINE PROVISIONS FOR VENT, CLOSED-VENT, VAPOR COLLECTION, AND VAPOR BALANCING SYSTEMS^a

Complete this form for vent, closed-vent, vapor collection, and vapor balancing systems used on process vents, storage vessels, transfer operations, and waste management and treatment units for wastewater streams. This checklist does not apply to vent systems routing vapors to recovery devices that are part of a process. A "yes" response to all questions will indicate compliance and a "no" response will indicate noncompliance with the standard except where noted.

System Identification: _____

REVIEW OF RECORDS

[Note: Items #1 through #4 do not apply to low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes.]

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | Hourly records are kept of whether the flow indicator in the bypass line was operating and whether a diversion was detected at any time during the hour, when seal mechanisms are not used <u>and</u> | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | The time of all periods when flow is diverted or the flow indicator is not operating are reported in the PR when seal mechanisms are not used [or #3 and #4]. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | Records of monthly visual inspections are kept when seal mechanisms are used <u>and</u> | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | All periods when the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line valve was checked out are recorded and reported in the PR when seal mechanisms are used. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: In order to be in compliance with provisions for bypass lines either: #1 and #2 must both be checked "yes" or both #3 and #4 must both be checked "yes".]

VISUAL INSPECTION

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | A flow indicator is present at the entrance to any bypass line that could divert the vent stream flow away from the control device to the atmosphere <u>or</u> all bypass line valves are sealed in a closed position (e.g., with a car seal or lock-and-key configuration). | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|----|--|----------------------------|----------------------------|

PR = Periodic Reports.

^a This checklist is not applicable to closed-vent systems that are subject to §63.172 in the negotiated rule for equipment leaks (40 CFR Part 63 Subpart H) because such closed-vent systems are exempt from the requirements in §63.148 of Subpart G of the HON.

**TABLE 9-1. COMPLIANCE CHECKLIST FOR BYPASS LINE PROVISIONS FOR VENT,
CLOSED-VENT, VAPOR COLLECTION, AND VAPOR BALANCING SYSTEMS^a**

NOTE ALL DEFICIENCIES

**TABLE 9-2. COMPLIANCE CHECKLIST FOR CLOSED-VENT,
VAPOR COLLECTION, AND VAPOR BALANCING SYSTEMS,
AND COVERS, ENCLOSURES, AND FIXED ROOFS^a**

Complete this form for closed-vent, vapor collection, and vapor balancing systems. This form is also for covers, enclosures and fixed roofs associated with wastewater streams or equipment subject to §63.149. A "yes" response to all questions will indicate compliance, and a "no" response will indicate noncompliance with the standard.

Equipment Identification: _____

[Note: This checklist does not apply to vapor collection systems that are operated under negative pressure.]

- | | | | |
|-----|---|----------------------------|----------------------------|
| 1. | Records are kept of all parts of any closed-vent, vapor-collection, or vapor balancing system, fixed roof, cover, or enclosure that are designated as either unsafe-to-inspect or difficult-to-inspect. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | For equipment that is designated as difficult to inspect, a written plan is kept that requires inspection of equipment at least once every five years. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | For equipment that is designated as unsafe to inspect, a written plan is kept that requires inspection of equipment as frequently as practicable. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | For each annual inspection during which a leak was detected, the following information is recorded and reported. ^b | | |
| (a) | Instrument identification numbers, operator name or initials, and equipment identification information; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) | The date the leak was detected and the date of the first attempt to repair it; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | Maximum instrument reading after the leak is repaired or determined to be non-repairable; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (d) | Explanation of delay in repair, if the leak was not repaired within 15 days after it was discovered or by the next transfer loading operation, for transfer racks; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (e) | Name or initials of person who decides repairs cannot be made without a shutdown; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (f) | Expected date of successful repair if not repaired within 15 days; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (g) | Dates of shutdowns that occur while the equipment is unrepaired; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (h) | Date of successful repair of the leak. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

10.0 CONTROL DEVICE AND RECOVERY DEVICE CHECKLISTS

This section contains checklist specific to the control or recovery device being used. The checklists in sections 5, 6, 7, and 8 refer to these checklists when they are applicable.

Section 10. Control Device and Recovery Device Checklists

Table 10-1. Compliance Checklist for Flares	II-92
Table 10-2. Compliance Checklist for Thermal Incinerators	II-93
Table 10-3. Compliance Checklist for Catalytic Incinerators	II-96
Table 10-4. Compliance Checklist for a Boiler or Process Heater With a Design Heat Input Capacity less than 44 Megawatts and the Vent Stream is Not Introduced with the Primary Fuel	II-99
Table 10-5. Compliance Checklist for a Boiler or Process Heater with a Design Heat Input Capacity Greater than 44 Megawatts	II-102
Table 10-6. Compliance Checklist for a Carbon Adsorber Used as a Control or Recovery Device	II-103
Table 10-7. Compliance Checklist for an Absorber Used as a Control or Recovery Device	II-106
Table 10-8. Compliance Checklist for a Condenser Used as a Control or Recovery Device	II-109
Table 10-9. Compliance Checklist for a Control or Recovery Device Not Specifically Listed	II-112
Table 10-10. Compliance Checklist for Combusted Halogenated Vent Streams Using a Scrubber	II-115

TABLE 10-1. COMPLIANCE CHECKLIST FOR FLARES

Complete this form when emissions are routed to a flare from a process vent, storage vessel, transfer rack, waste management or wastewater treatment unit, or equipment that handle in-process liquid streams and that meet the criteria of § 63.149 of Subpart G. A "yes" response to all questions will indicate compliance and "no" response will indicate noncompliance with the standard.

Flare Identification: _____

REVIEW OF RECORDS

- 1. Results of the initial test were submitted in the NCS. Y N
- 2. The presence of a continuous flare pilot flame is monitored using a device designed to detect the presence of a flame. Y N
- 3. All periods when all pilot flames to a flare were absent or the monitor was not operating have been recorded and reported in the PR. Y N
- 4. For a storage vessel flare, the total number of hours of routine maintenance of the flare during which the flare is bypassed is recorded and reported in the PR. Y N

VISUAL INSPECTION

- 1. A device for detecting the flame is present. Y N

NCS = Notification of Compliance Status. PR = Periodic Reports.

NOTE ALL DEFICIENCIES

TABLE 10-2. COMPLIANCE CHECKLIST FOR THERMAL INCINERATORS

Complete this form when emissions are routed to a thermal incinerator from a process vent, transfer rack, waste management or wastewater treatment unit, or equipment that handle in-process liquid streams and that meet the criteria of § 63.149 of Subpart G. A "yes" response to all questions will indicate compliance and "no" response will indicate noncompliance with the standard except where noted.

Control Device: _____

REVIEW OF RECORDS

- | | | | |
|-----|---|----------------------------|----------------------------|
| 1. | Results of the initial performance test or design evaluation ^a were submitted in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | Test documentation demonstrates 98 percent HAP or TOC control efficiency for process vents and transfer racks, 95 percent HAP or TOC control efficiency for wastewater, or an outlet concentration of 20 ppmv or less HAP or TOC. ^a | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | A temperature monitoring device equipped with a continuous recorder is used to measure the temperature of the gas stream in the firebox (or in the ductwork immediately downstream of the firebox before any substantial heat exchange occurs). | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | Documentation to establish a site-specific range for firebox temperature was submitted in the NCS or operating permit application. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. | Continuous records ^b of firebox temperature are kept. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 6. | Records of daily average firebox temperature are kept. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 7. | All daily average firebox temperatures that are outside the site-specific established range and all operating days when insufficient monitoring data are collected are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 8. | The number of excursions does not exceed the number of excused excursions in the semi-annual reporting period. ^c | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 9. | If the firebox temperature is not monitored, the facility has documentation that they applied for and received approval to monitor an alternative parameter, and are performing the required recordkeeping and reporting. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 10. | For thermal incinerators used for emissions from waste management units and wastewater treatment units, if the firebox temperature is not monitored and if #9 is checked "No": | | |

TABLE 10-2. COMPLIANCE CHECKLIST FOR THERMAL INCINERATORS

- | | | |
|--|----------------------------|----------------------------|
| (a) Continuous records are kept of the concentration level or reading indicated by an organic monitoring device at the outlet of the control device. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) Records are kept of the daily average concentration level or reading for each operating day. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) All daily average concentration levels or readings that are outside the site-specific range are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If #9 is checked "Yes", or 10(a), 10(b) and 10(c) are checked "Yes", the facility is in compliance even if numbers 3 through 8 are checked "No".]

VISUAL INSPECTION

- | | | |
|---|----------------------------|----------------------------|
| 1. A temperature monitoring device is present, or approved alternative monitor is present. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. For waste management and wastewater treatment units, if the monitoring devices listed in item 1 is not present, an organic compounds monitor is present. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If item #2 is checked "Yes", the facility is in compliance even if #1 is checked "No".]

NCS = Notification of Compliance Status. PR = Periodic Reports.

- ^a Owners or operators are not required to conduct performance tests on control devices used to control emissions from waste management units, wastewater treatment units, or from transfer racks that transfer less than 11.8 million liters per year. For these emission points, a design evaluation documenting that the control device being used achieves the required control efficiency as specified in §63.139(d)(2) for wastewater or §63.128(h) for transfer racks is required to be submitted as part of the NCS. Owners and operators of process vents routed to a control device do not have the option of submitting a design evaluation and must perform a performance test.
- ^b Continuous records, as defined in §63.111, means documentation, either in computer readable form or hard copy, or data values measured at least once every 15 minutes and recorded at the frequency specified in §63.152(f). Section 63.152(f) allows the owner to record either values measured every 15 minutes or 15-minute (or shorter period) block average values calculated from all measured values during each period. If the daily average value of a monitored value for a given parameter is within the range established in the NCS, the owner or operator may retain block hourly averages instead of the 15-minute values. An owner or operator may request approval to use alternatives to continuous monitoring under §63.151(g) of Subpart G.

TABLE 10-3. COMPLIANCE CHECKLIST FOR CATALYTIC INCINERATORS

Complete this form when emissions are routed to a catalytic incinerator from a process vent, transfer rack, waste management or wastewater treatment unit, or equipment that handle in-process liquid streams and that meet the criteria of § 63.149 of Subpart G. A "yes" response to all questions will indicate compliance and "no" response will indicate noncompliance with the standard except where noted.

Control Device: _____

REVIEW OF RECORDS

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | Results of the initial performance test or design evaluation ^a were submitted in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | Test documentation demonstrates 98 percent HAP or TOC control efficiency for process vents and transfer racks, 95 percent HAP or TOC control efficiency for wastewater, or an outlet concentration of 20 ppmv or less HAP or TOC. ^a | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | Temperature monitoring devices equipped with continuous recorders are used to measure the temperature in the gas stream immediately before and after the catalyst bed. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | Documentation to establish a site-specific range for the gas stream temperature upstream of the catalyst bed and the temperature difference across the bed was submitted in the NCS or operating permit application. ^b | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. | Continuous records ^c are kept of the temperature of the gas stream upstream of the catalyst bed and the temperature difference across the catalyst bed. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 6. | Records of the daily average temperature upstream of the catalyst bed and the temperature difference across the catalyst bed are kept. ^b | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 7. | All daily average upstream temperatures that are outside the site-specific range and all operating days when insufficient monitoring data are collected are reported in the PR. ^b | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 8. | All daily average temperature differences across the catalyst bed that are outside the site-specific range and all operating days when insufficient monitoring data are collected are reported in the PR. ^b | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 9. | The number of excursions does not exceed the number of excused excursions in the semi-annual reporting period. ^d | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 10-3. COMPLIANCE CHECKLIST FOR CATALYTIC INCINERATORS

- | | | | |
|-----|--|----------------------------|----------------------------|
| 10. | If the temperature upstream of the catalyst bed and/or the temperature differential across the catalyst bed are not monitored, the facility has documentation that they applied for and received approval to monitor an alternative parameter, and are performing the required recordkeeping and reporting. ^b | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 11. | For catalytic incinerators used for emissions from waste management units and wastewater treatment units, if the firebox temperature is not monitored and if #10 is checked "No": | | |
| (a) | Continuous records are kept of the concentration level or reading indicated by an organic monitoring device at the outlet of the control device. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) | Records are kept of the daily average concentration level or reading for each operating day. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | All daily average concentration levels or readings that are outside the site-specific range are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If #10 is checked "Yes", or 11(a), 11(b) and 11(c) are checked "Yes", the facility is in compliance even if numbers 3 through 9 are checked "No".]

VISUAL INSPECTION

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | A temperature monitoring device is present, or approved alternative monitor is present. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | For waste management and wastewater treatment units, if the monitoring devices listed in item 1 is not present, an organic compounds monitor is present. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If item #2 is checked "Yes", the facility is in compliance even if number 1 is checked "No".]

NCS = Notification of Compliance Status. PR = Periodic Reports.

- ^a Owners or operators are not required to conduct performance tests on control devices used to control emissions from waste management units, wastewater treatment units, or from transfer racks that transfer less than 11.8 million liters per year. For these emission points, a design evaluation documenting that the control device being used achieves the required control efficiency as specified in §63.139(d)(2) for wastewater or §63.128(h) for transfer racks is required to be submitted as part of the NCS. Owners and operators of process vents routed to a control device do not have the option of submitting a design evaluation and must perform a performance test.

TABLE 10-3. COMPLIANCE CHECKLIST FOR CATALYTIC INCINERATORS

b For catalytic incinerators used for wastewater emission, either the gas stream temperature upstream of the catalyst bed or the temperature difference across the bed can be monitored.^c Continuous records, as defined in §63.111, means documentation, either in computer readable form or hard copy, or data values measured at least once every 15 minutes and recorded at the frequency specified in §63.152(f). Section 63.152(f) allows the owner to record either values measured every 15 minutes or 15-minute (or shorter period) block average values calculated from all measured values during each period. If the daily average value of a monitored value for a given parameter is within the range established in the NCS, the owner or operator may retain block hourly averages instead of the 15-minute values. An owner or operator may request approval to use alternatives to continuous monitoring under §63.151(g) of Subpart G.

c The number of excused excursions is as follows:

- For the first semi-annual period after the NCS is due - 6 excursions;
- For the second semi-annual period - 5 excursions;
- For the third semi-annual period - 4 excursions;
- For the fourth semi-annual period - 3 excursions;
- For the fifth semi-annual period - 2 excursions;
- For the sixth and all subsequent semi-annual periods - 1 excursion.

An excursion occurs when: (1) the daily average value of the monitored parameter is outside the range established in the NCS or operating permit; or (2) if monitoring data are insufficient. In order to have sufficient data, a source must have measured values for each 15-minute period within each hour for at least 75 percent of the hours the control device is operating in a day. For example, if a control device operates 24 hours per day, data must be available for all 15-minute periods in at least 18 hours; but up to 6 hours may have incomplete data. If more than 6 hours have incomplete data, an excursion has occurred. For control devices that operate less than 4 hours a day, one hour of incomplete data is allowed.

NOTE ALL DEFICIENCIES

TABLE 10-4. COMPLIANCE CHECKLIST FOR A BOILER OR PROCESS HEATER WITH A DESIGN HEAT INPUT CAPACITY LESS THAN 44 MEGAWATTS AND THE VENT STREAM IS NOT INTRODUCED WITH THE PRIMARY FUEL

Complete this form when emissions are routed to a boiler or process heater with a design heat input capacity less than 44 megawatts and the vent stream is not introduced with the primary fuel from a process vent, transfer rack, waste management or waste treatment unit, or equipment that handle in-process liquid streams and that meet the criteria of § 63.149 of Subpart G. A "yes" response to all questions will indicate compliance and "no" response will indicate noncompliance with the standard except where noted.

Control Device: _____

REVIEW OF RECORDS

- | | | | |
|-----|---|----------------------------|----------------------------|
| 1. | Results of the initial performance test or design evaluation ^a were submitted in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | A description of the location at which the vent stream is introduced into the boiler or process heater was submitted in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | The vent stream is introduced into the flame zone of the boiler or process heater. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | Test documentation demonstrates 98 percent HAP or TOC control efficiency for process vents and transfer racks, 95 percent HAP or TOC control efficiency for wastewater, or an outlet concentration of 20 ppmv or less HAP or TOC. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. | A temperature monitoring device equipped with a continuous monitor is used to measure the temperature of the gas stream in the firebox. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 6. | Documentation to establish a site-specific range for firebox temperature was submitted in the NCS or operating permit application. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 7. | Continuous records ^b are kept of the firebox temperature. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 8. | Records of the daily average firebox temperature are kept. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 9. | All daily average firebox temperatures that are outside the site-specific range and all operating days when insufficient monitoring data are collected are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 10. | The number of excursions does not exceed the number of excused excursions in the semi-annual reporting period. ^c | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 10-4. COMPLIANCE CHECKLIST FOR A BOILER OR PROCESS HEATER WITH A DESIGN HEAT INPUT CAPACITY LESS THAN 44 MEGAWATTS AND THE VENT STREAM IS NOT INTRODUCED WITH THE PRIMARY FUEL

- | | | | |
|-----|---|----------------------------|----------------------------|
| 11. | If the firebox temperature is not monitored, the facility has documentation that they applied for and received approval to monitor an alternative parameter, and are performing the required recordkeeping and reporting. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 12. | For boilers or process heaters used for emissions from waste management units and wastewater treatment units, if the firebox temperature is not monitored and if #11 is checked "No": | | |
| (a) | Continuous records are kept of the concentration level or reading indicated by an organic monitoring device at the outlet of the control device. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) | Records are kept of the daily average concentration level or reading for each operating day. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | All daily average concentration levels or readings that are outside the site-specific range are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If #11 is checked "Yes" or 12(a), 12(b), and 12(c) are checked "Yes", the facility is in compliance even if numbers 5 through 10 are checked "No"]

VISUAL INSPECTION

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | A temperature monitoring device is present, or approved alternative monitor is present. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | For waste management and wastewater treatment units, if the monitoring devices listed in item 1 is not present, an organic compounds monitor is present. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If item #2 is checked "Yes", the facility is in compliance even if number 1 is checked "No".]

NCS = Notification of Compliance Status. PR = Periodic Reports.

- ^a Owners or operators are not required to conduct performance tests on control devices used to control emissions from waste management units, wastewater treatment units, or from transfer racks that transfer less than 11.8 million liters per year. For these emission points, a design evaluation documenting that the control device being used achieves the required control efficiency as specified in §63.139(d)(2) for wastewater or §63.128(h) for transfer racks is required to be submitted as part of the NCS. Owners and operators of process vents routed to a control device do not have the option of submitting a design evaluation and must perform a performance test.

**TABLE 10-4. COMPLIANCE CHECKLIST FOR A BOILER OR PROCESS HEATER WITH A
DESIGN HEAT INPUT CAPACITY LESS THAN 44 MEGAWATTS AND
THE VENT STREAM IS NOT INTRODUCED WITH THE PRIMARY FUEL**

b Continuous records, as defined in §63.111, means documentation, either in computer readable form or hard copy, or data values measured at least once every 15 minutes and recorded at the frequency specified in §63.152(f). Section 63.152(f) allows the owner to record either values measured every 15 minutes or 15-minute (or shorter period) block average values calculated from all measured values during each period. If the daily average value of a monitored value for a given parameter is within the range established in the NCS, the owner or operator may retain block hourly averages instead of the 15-minute values. An owner or operator may request approval to use alternatives to continuous monitoring under §63.151(g) of Subpart G.

c The number of excused excursions is as follows:

- For the first semi-annual period after the NCS is due - 6 excursions;
- For the second semi-annual period - 5 excursions;
- For the third semi-annual period - 4 excursions;
- For the fourth semi-annual period - 3 excursions;
- For the fifth semi-annual period - 2 excursions;
- For the sixth and all subsequent semi-annual periods - 1 excursion.

An excursion occurs when: (1) the daily average value of the monitored parameter is outside the range established in the NCS or operating permit; or (2) if monitoring data are insufficient. In order to have sufficient data, a source must have measured values for each 15-minute period within each hour for at least 75 percent of the hours the control device is operating in a day. For example, if a control device operates 24 hours per day, data must be available for all 15-minute periods in at least 18 hours; but up to 6 hours may have incomplete data. If more than 6 hours have incomplete data, an excursion has occurred. For control devices that operate less than 4 hours a day, one hour of incomplete data is allowed.

NOTE ALL DEFICIENCIES

TABLE 10-5. COMPLIANCE CHECKLIST FOR A BOILER OR PROCESS HEATER WITH A DESIGN HEAT INPUT CAPACITY GREATER THAN 44 MEGAWATTS

Complete this form when emissions are routed to a boiler or process heater with a design heat input capacity greater than 44 megawatts from a process vent, transfer rack, waste management or wastewater treatment unit, or equipment that handles in-process liquid streams and that meet the criteria of § 63.149 of Subpart G. A "yes" response to all questions will indicate compliance and "no" response will indicate noncompliance with the standard.

Control Device: _____

REVIEW OF RECORDS

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | A description of the location at which the vent stream is introduced into the boiler or process heater was submitted in the NCS. ^a | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | The vent stream is introduced into the flame zone of the boiler or process heater. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | For wastewater, if any changes in the location of where the vent stream is introduced, records of these changes are kept. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

NCS = Notification of Compliance Status.

^a This provision doesn't apply for boilers or process heaters used to control emissions from waste management and wastewater treatment units.

NOTE ALL DEFICIENCIES

TABLE 10-6. COMPLIANCE CHECKLIST FOR A CARBON ADSORBER USED AS A CONTROL OR RECOVERY DEVICE

Complete this form when emissions are routed to a carbon adsorber from a process vent, transfer rack, waste management or wastewater treatment unit, or equipment that handle in-process liquid streams and that meet the criteria of § 63.149 of Subpart G. A "yes" response to all questions will indicate compliance and "no" response will indicate noncompliance with the standard except where noted.

Control Device: _____

REVIEW OF RECORDS

FOR CARBON ADSORBERS USED AS A RECOVERY DEVICE ON A PROCESS VENT TO MAINTAIN THE TRE INDEX VALUE GREATER THAN 1.0

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | Documentation of the initial TRE calculation including test results was submitted in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|----|---|----------------------------|----------------------------|

FOR CARBON ADSORBERS USED AS A CONTROL DEVICE

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | Results of the initial performance test or design evaluation ^a were submitted in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | Test documentation demonstrates 98 percent HAP or TOC control efficiency for process vents and transfer racks, 95 percent HAP or TOC control efficiency for wastewater, or an outlet concentration of 20 ppmv or less HAP or TOC. ^{a,b} | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | The number of excursions does not exceed the number of excused excursions in the semi-annual reporting period. ^c | Y <input type="checkbox"/> | N <input type="checkbox"/> |

FOR ALL CARBON ADSORBERS

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | An integrating regeneration stream (e.g., steam) flow monitoring device having an accuracy of ± 10 percent and capable of recording total regeneration stream mass or volumetric flow for each regeneration cycle is used to measure regeneration stream flow. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | A carbon bed temperature monitoring device capable of recording the carbon bed temperature after each regeneration and within 15 minutes of completing any cooling cycle is used to measure carbon bed regeneration temperature. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | Documentation to establish a site-specific range for the regeneration stream flow and carbon bed regeneration temperature was submitted in the NCS or operating permit. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 10-6. COMPLIANCE CHECKLIST FOR A CARBON ADSORBER USED AS A CONTROL OR RECOVERY DEVICE

- | | | | |
|----|--|----------------------------|----------------------------|
| 4. | Records are kept of the total regeneration stream mass or volumetric flow for each carbon bed regeneration cycle. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. | Records are kept of the temperature of the carbon bed after each carbon bed regeneration. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 6. | All regeneration cycles when the total regeneration stream mass or volumetric flow is outside the site-specific range are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 7. | All regeneration cycles during which the temperature of the carbon bed after regeneration is outside the site-specific range are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 8. | If the regeneration stream flow and/or the carbon bed regeneration temperature are not monitored, either: | | |
| | (a) The facility has documentation that they applied for and received approval to monitor an alternative parameter, and are performing the required recordkeeping and reporting <u>or</u> continue with items [(b) <u>and</u> (c) <u>and</u> (d)]. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (b) Continuous records are kept of the concentration level or reading indicated by an organic monitoring device at the outlet of the control device. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (c) Records are kept of the daily average concentration level or reading for each operating day. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (d) All daily average concentration levels or readings that are outside the site-specific range are reported in the PR. ^b | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If #8(a) is checked "Yes", or if 8(b) and 8(c) and 8(d) are checked "Yes", the facility is in compliance even if numbers 1 through 7 are checked "No".]

VISUAL INSPECTION

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | A device for measuring carbon bed temperature and a device for measuring regeneration stream flow are present [or #2]. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | If the monitoring devices listed in item 1 is not present, an organic compounds monitor is present. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If item #2 is checked "Yes", the facility is in compliance even if number 1 is checked "No".]

NCS = Notification of Compliance Status. PR = Periodic Reports.

TABLE 10-6. COMPLIANCE CHECKLIST FOR A CARBON ADSORBER USED AS A CONTROL OR RECOVERY DEVICE

^a Owners or operators are not required to conduct performance tests on control devices used to control emissions from waste management units, wastewater treatment units, or from transfer racks that transfer less than 11.8 million liters per year. For these emission points, a design evaluation documenting that the control device being used achieves the required control efficiency as specified in §63.139(d)(2) for wastewater or §63.128(h) for transfer racks is required to be submitted as part of the NCS. Owners and operators of process vents routed to a control device do not have the option of submitting a design evaluation and must perform a performance test.

^b The 20 ppmv compliance option is not available for owners or operators using carbon adsorbers on emissions from surface impoundments or containers.

^c The number of excused excursions is as follows:

- For the first semi-annual period after the NCS is due - 6 excursions;
- For the second semi-annual period - 5 excursions;
- For the third semi-annual period - 4 excursions;
- For the fourth semi-annual period - 3 excursions;
- For the fifth semi-annual period - 2 excursions;
- For the sixth and all subsequent semi-annual periods - 1 excursion.

An excursion occurs when: (1) the daily average value of the monitored parameter is outside the range established in the NCS or operating permit; or (2) if monitoring data are insufficient. In order to have sufficient data, a source must have measured values for each 15-minute period within each hour for at least 75 percent of the hours the control device is operating in a day. For example, if a control device operates 24 hours per day, data must be available for all 15-minute periods in at least 18 hours; but up to 6 hours may have incomplete data. If more than 6 hours have incomplete data, an excursion has occurred. For control devices that operate less than 4 hours a day, one hour of incomplete data is allowed.

NOTE ALL DEFICIENCIES

**TABLE 10-7. COMPLIANCE CHECKLIST FOR AN ABSORBER USED AS
A CONTROL OR RECOVERY DEVICE**

Complete this form when emissions are routed to an absorber from a process vent or transfer rack. A "yes" response to all questions will indicate compliance and "no" response will indicate noncompliance with the standard except where noted.

Control or Recovery Device: _____

REVIEW OF RECORDS

**FOR ABSORBERS USED AS A RECOVERY DEVICE ON A
PROCESS VENT TO MAINTAIN THE TRE INDEX VALUE
GREATER THAN 1.0**

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | Documentation of the initial TRE calculation including test results was submitted in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|----|---|----------------------------|----------------------------|

FOR ABSORBERS USED AS A CONTROL DEVICE

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | Results of the initial performance test or design evaluation ^a were submitted in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | Test documentation demonstrates 98 percent HAP or TOC control efficiency for process vents and transfer racks, 95 percent HAP or TOC control efficiency for wastewater, or an outlet concentration of 20 ppmv or less HAP or TOC. ^a | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | The number of excursions does not exceed the number of excused excursions in the semi-annual reporting period. ^b | Y <input type="checkbox"/> | N <input type="checkbox"/> |

FOR ALL ABSORBERS

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | A temperature monitoring device and a specific gravity monitoring device equipped with a continuous monitor are used to measure the exit temperature of the scrubbing liquid and the exit specific gravity. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | Documentation to establish a site-specific range for the exit temperature of the scrubbing liquid and exit specific gravity was submitted in the NCS or operating permit. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | Records of the daily average exit temperature of the scrubbing liquid and exit specific gravity are kept. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | Continuous records ^c of the exit temperature of the absorbing liquid are kept. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. | Continuous records ^c of the exit specific gravity are kept. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

**TABLE 10-7. COMPLIANCE CHECKLIST FOR AN ABSORBER USED AS
A CONTROL OR RECOVERY DEVICE**

- | | | | |
|-----|--|----------------------------|----------------------------|
| 6. | All daily average exit temperatures of the absorbing liquid that are outside the site-specific range are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 7. | All daily average specific gravity values that are outside the site-specific range are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 8. | If the exit temperature and/or the exit specific gravity are not monitored, either: | | |
| (a) | The facility has documentation that they applied for and received approval to monitor an alternative parameter, and are performing the required recordkeeping and reporting <u>or</u> continue with items [(b) <u>and</u> (c) <u>and</u> (d)]. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) | Continuous records are kept of the concentration level or reading indicated by an organic monitoring device at the outlet of the control device. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | Records are kept of the daily average concentration level or reading for each operating day. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (d) | All daily average concentration levels or readings that are outside the site-specific range are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If #8(a) is checked "Yes", or if 8(b) and 8(c) and 8(d) are checked "Yes", the facility is in compliance even if numbers 1 through 7 are checked "No".]

VISUAL INSPECTION

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | A device for measuring exit liquid temperature and a device for measuring exit specific gravity are present [or #2]. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | If the monitoring devices listed in item 1 is not present, an organic compounds monitor is present. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If item #2 is checked "Yes", the facility is in compliance even if number 1 is checked "No".]

NCS = Notification of Compliance Status. PR = Periodic Reports.

^a Owners or operators are not required to conduct performance tests on control devices used to control emissions from waste management units, wastewater treatment units, or from transfer racks that transfer less than 11.8 million liters per year. For these emission points, a design evaluation documenting that the control device being used achieves the required control efficiency as specified in §63.139(d)(2) for wastewater or §63.128(h) for transfer racks is required to be submitted as part of the NCS. Owners and operators of process vents routed to a control device do not have the option of submitting a design evaluation and must perform a performance test.

**TABLE 10-7. COMPLIANCE CHECKLIST FOR AN ABSORBER USED AS
A CONTROL OR RECOVERY DEVICE**

b The number of excused excursions is as follows:

- For the first semi-annual period after the NCS is due - 6 excursions;
- For the second semi-annual period - 5 excursions;
- For the third semi-annual period - 4 excursions;
- For the fourth semi-annual period - 3 excursions;
- For the fifth semi-annual period - 2 excursions;
- For the sixth and all subsequent semi-annual periods - 1 excursion.

An excursion occurs when: (1) the daily average value of the monitored parameter is outside the range established in the NCS or operating permit; or (2) if monitoring data are insufficient. In order to have sufficient data, a source must have measured values for each 15-minute period within each hour for at least 75 percent of the hours the control device is operating in a day. For example, if a control device operates 24 hours per day, data must be available for all 15-minute periods in at least 18 hours; but up to 6 hours may have incomplete data. If more than 6 hours have incomplete data, an excursion has occurred. For control devices that operate less than 4 hours a day, one hour of incomplete data is allowed.

c Continuous records, as defined in §63.111, means documentation, either in computer readable form or hard copy, or data values measured at least once every 15 minutes and recorded at the frequency specified in §63.152(f). Section 63.152(f) allows the owner to record either values measured every 15 minutes or 15-minute (or shorter period) block average values calculated from all measured values during each period. If the daily average value of a monitored value for a given parameter is within the range established in the NCS, the owner or operator may retain block hourly averages instead of the 15-minute values. An owner or operator may request approval to use alternatives to continuous monitoring under §63.151(g) of Subpart G.

NOTE ALL DEFICIENCIES

TABLE 10-8. COMPLIANCE CHECKLIST FOR A CONDENSER USED AS A CONTROL OR RECOVERY OR DEVICE

Complete this form when emissions are routed to a condenser from a process vent, transfer rack, waste management unit, or wastewater treatment unit, or equipment that handles in-process liquid streams and that meet the criteria of § 63.149 of Subpart G. A "yes" response to all questions will indicate compliance and "no" response will indicate noncompliance with the standard except where noted.

Control or Recovery Device: _____

REVIEW OF RECORDS

FOR CONDENSERS USED AS A RECOVERY DEVICE ON A PROCESS VENT TO MAINTAIN THE TRE INDEX VALUE GREATER THAN 1.0

- | | | |
|--|----------------------------|----------------------------|
| 1. Documentation of the initial TRE calculation including test results was submitted in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|--|----------------------------|----------------------------|

FOR CONDENSERS USED AS A CONTROL DEVICE

- | | | |
|---|----------------------------|----------------------------|
| 1. Results of the initial performance test or design evaluation ^a were submitted in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. Test documentation demonstrates 98 percent HAP or TOC control efficiency for process vents and transfer racks, 95 percent HAP or TOC control efficiency for wastewater, or an outlet concentration of 20 ppmv or less HAP or TOC. ^{a,b} | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. The number of excursions does not exceed the number of excused excursions in the semi-annual reporting period. ^c | Y <input type="checkbox"/> | N <input type="checkbox"/> |

FOR ALL CONDENSERS

- | | | |
|--|----------------------------|----------------------------|
| 1. A temperature monitoring device equipped with a continuous recorder is used to measure the product side exit temperature. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. Documentation to establish a site-specific range for the exit temperature was submitted in the NCS or operating permit. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. Records of the daily average exit temperature are kept. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. Continuous records ^d of the exit temperature are kept. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. All product side daily average exit temperatures that are outside the site-specific range are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 10-8. COMPLIANCE CHECKLIST FOR A CONDENSER USED AS A CONTROL OR RECOVERY OR DEVICE

6. If the exit temperature is not monitored, either:
- | | | | |
|-----|--|----------------------------|----------------------------|
| (a) | The facility has documentation that they applied for and received approval to monitor an alternative parameter, and are performing the required recordkeeping and reporting <u>or</u> continue with items [(b) <u>and</u> (c) <u>and</u> (d)]. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) | Continuous records are kept of the concentration level or reading indicated by an organic monitoring device at the outlet of the control device. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | Records are kept of the daily average concentration level or reading for each operating day. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (d) | All daily average concentration levels or readings that are outside the site-specific range are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If #6(a) is checked "Yes", or if 6(b) and 6(c) and 6(d) are checked "Yes", the facility is in compliance even if numbers 1 through 5 are checked "No".]

VISUAL INSPECTION

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | A temperature monitoring device is present [or #2]. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | If the monitoring devices listed in item 1 is not present, an organic compounds monitor is present. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: If item #2 is checked "Yes", the facility is in compliance even if number 1 is checked "No".]

NCS = Notification of Compliance Status. PR = Periodic Reports.

- ^a Owners or operators are not required to conduct performance tests on control devices used to control emissions from waste management units, wastewater treatment units, or from transfer racks that transfer less than 11.8 million liters per year. For these emission points, a design evaluation documenting that the control device being used achieves the required control efficiency as specified in §63.139(d)(2) for wastewater or §63.128(h) for transfer racks is required to be submitted as part of the NCS. Owners and operators of process vents routed to a control device do not have the option of submitting a design evaluation and must perform a performance test.
- ^b The 20 ppmv compliance option is not available for owners or operators using condensers on emissions from surface impoundments or containers.

TABLE 10-8. COMPLIANCE CHECKLIST FOR A CONDENSER USED AS A CONTROL OR RECOVERY OR DEVICE

c The number of excused excursions is as follows:

- For the first semi-annual period after the NCS is due - 6 excursions;
- For the second semi-annual period - 5 excursions;
- For the third semi-annual period - 4 excursions;
- For the fourth semi-annual period - 3 excursions;
- For the fifth semi-annual period - 2 excursions;
- For the sixth and all subsequent semi-annual periods - 1 excursion.

An excursion occurs when: (1) the daily average value of the monitored parameter is outside the range established in the NCS or operating permit; or (2) if monitoring data are insufficient. In order to have sufficient data, a source must have measured values for each 15-minute period within each hour for at least 75 percent of the hours the control device is operating in a day. For example, if a control device operates 24 hours per day, data must be available for all 15-minute periods in at least 18 hours; but up to 6 hours may have incomplete data. If more than 6 hours have incomplete data, an excursion has occurred. For control devices that operate less than 4 hours a day, one hour of incomplete data is allowed.

d Continuous records, as defined in §63.111, means documentation, either in computer readable form or hard copy, or data values measured at least once every 15 minutes and recorded at the frequency specified in §63.152(f). Section 63.152(f) allows the owner to record either values measured every 15 minutes or 15-minute (or shorter period) block average values calculated from all measured values during each period. If the daily average value of a monitored value for a given parameter is within the range established in the NCS, the owner or operator may retain block hourly averages instead of the 15-minute values. An owner or operator may request approval to use alternatives to continuous monitoring under §63.151(g) of Subpart G.

NOTE ALL DEFICIENCIES

TABLE 10-9. COMPLIANCE CHECKLIST FOR A CONTROL OR RECOVERY DEVICE NOT SPECIFICALLY LISTED

Complete this form when emissions are routed from a process vent, transfer rack, waste management unit or wastewater treatment unit, or equipment that handle in-process liquid streams and that meet the criteria of § 63.149 of Subpart G to a control or recovery device not specifically listed in the HON. A "yes" response to all questions will indicate compliance and "no" response will indicate noncompliance with the standard except where noted.

Control or Recovery Device: _____

REVIEW OF RECORDS

FOR OTHER DEVICES USED AS A RECOVERY DEVICE ON A PROCESS VENT TO MAINTAIN THE TRE INDEX VALUE GREATER THAN 1.0

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | Documentation of the initial TRE calculation including test results was submitted in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|----|---|----------------------------|----------------------------|

FOR OTHER DEVICES USED AS A CONTROL DEVICE

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | Results of the initial performance test or design evaluation ^a were submitted in the NCS. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | Test documentation demonstrates 98 percent HAP or TOC control efficiency for process vents and transfer racks, and 95 percent HAP or TOC control efficiency for wastewater, or an outlet concentration of 20 ppmv or less HAP or TOC. ^a | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | The number of excursions does not exceed the number of excused excursions in the semi-annual reporting period. ^b | Y <input type="checkbox"/> | N <input type="checkbox"/> |

FOR OTHER DEVICES USED AS EITHER A RECOVERY OR CONTROL DEVICE

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | The facility has documentation that they applied for and received approval to monitor an alternative parameter and are performing the required recordkeeping and reporting. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | Documentation to establish a site-specific range for the monitored parameter was submitted in the NCS or operating permit. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | Records of the daily average monitored parameter are kept. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | Continuous records ^c of the monitored parameter are kept. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 10-9. COMPLIANCE CHECKLIST FOR A CONTROL OR RECOVERY DEVICE NOT SPECIFICALLY LISTED

- | | | |
|--|----------------------------|----------------------------|
| 5. Monitored parameters that are outside the site-specific range are reported in the PR. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|--|----------------------------|----------------------------|

VISUAL INSPECTION

- | | | |
|---|----------------------------|----------------------------|
| 1. The monitoring device to monitor the approved monitoring parameter is present. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|---|----------------------------|----------------------------|

NCS = Notification of Compliance Status. PR = Periodic Reports.

^a Owners or operators are not required to conduct performance tests on control devices used to control emissions from waste management units, wastewater treatment units, or from transfer racks that transfer less than 11.8 million liters per year. For these emission points, a design evaluation documenting that the control device being used achieves the required control efficiency as specified in §63.139(d)(2) for wastewater or §63.128(h) for transfer racks is required to be submitted as part of the NCS. Owners and operators of process vents routed to a control device do not have the option of submitting a design evaluation and must perform a performance test.

^b The number of excused excursions is as follows:

- For the first semi-annual period after the NCS is due - 6 excursions;
- For the second semi-annual period - 5 excursions;
- For the third semi-annual period - 4 excursions;
- For the fourth semi-annual period - 3 excursions;
- For the fifth semi-annual period - 2 excursions;
- For the sixth and all subsequent semi-annual periods - 1 excursion.

An excursion occurs when: (1) the daily average value of the monitored parameter is outside the range established in the NCS or operating permit; or (2) if monitoring data are insufficient. In order to have sufficient data, a source must have measured values for each 15-minute period within each hour for at least 75 percent of the hours the control device is operating in a day. For example, if a control device operates 24 hours per day, data must be available for all 15-minute periods in at least 18 hours; but up to 6 hours may have incomplete data. If more than 6 hours have incomplete data, an excursion has occurred. For control devices that operate less than 4 hours a day, one hour of incomplete data is allowed.

^c Continuous records, as defined in §63.111, means documentation, either in computer readable form or hard copy, or data values measured at least once every 15 minutes and recorded at the frequency specified in §63.152(f). Section 63.152(f) allows the owner to record either values measured every 15 minutes or 15-minute (or shorter period) block average values calculated from all measured values during each period. If the daily average value of a monitored value for a given parameter is within the range established in the NCS, the owner or operator may retain block hourly averages instead of the 15-minute values. An owner or operator may request approval to use alternatives to continuous monitoring under §63.151(g) of Subpart G.

11.0 COMPLIANCE TIMELINE AND REPORTING CHECKLIST

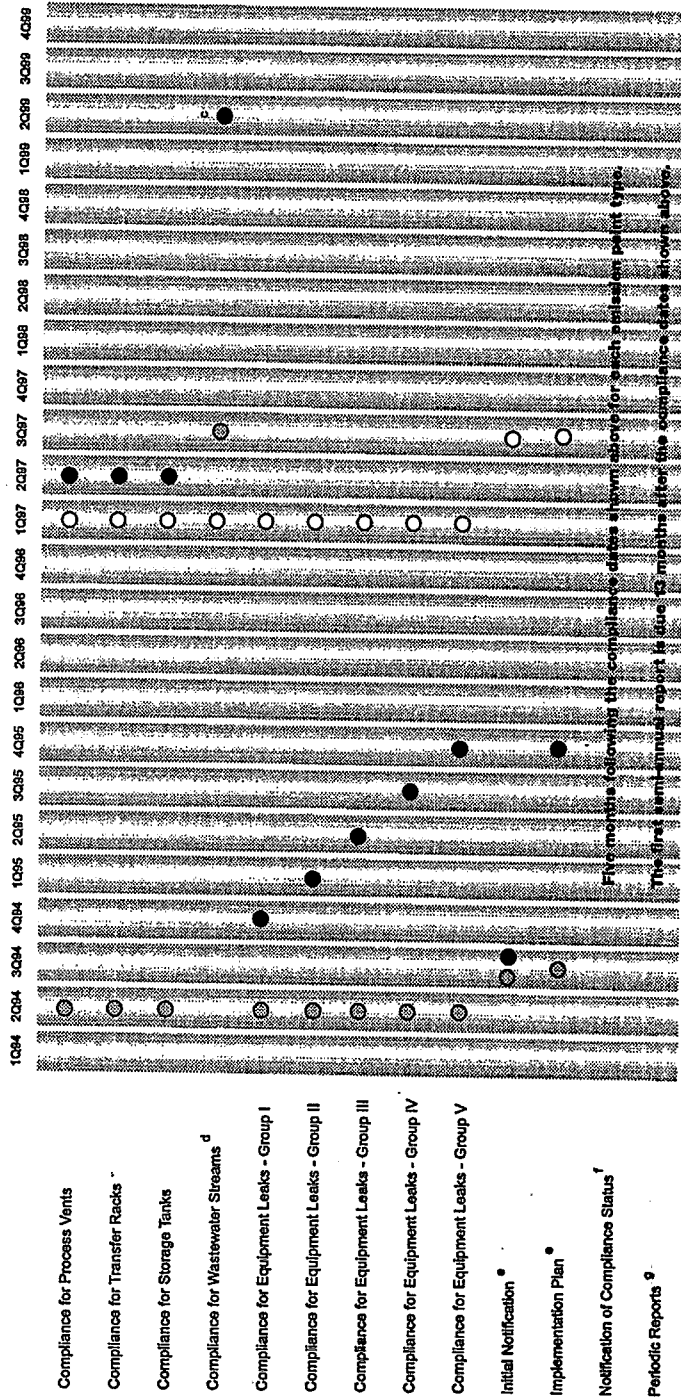
Once it is known that a source has emission points that are subject to the HON, the inspector may use the checklists contained in this portion of the guide to evaluate the content of the reports submitted as part of the source's compliance procedures. Figure 11-1 is a compliance timeline for the HON; it shows the compliance dates as well as the dates when reports must be submitted. Table 11-1 is a checklist for the Initial Notification.

The checklist contained in Table 11-2 pertains to the implementation data to be present in operating permit applications or in the implementation plan. Table 11-3 covers the Notification of Compliance Status. Tables 11-4 deals with periodic reports. Table 11-5 provides a checklist for assessing requests for an extension of compliance. Table 11-6 is a checklist for evaluating requests for use of alternative monitoring or recordkeeping procedures. A checklist for the Start-Up, Shutdown and Malfunction Plan is given in Table 11-7. Table 11-8 is a checklist for evaluating Start-up, Shutdown and Malfunction reports. Table 11-9 is a checklist for initial notifications for new or reconstructed major affected sources. Table 11-10 is a checklist for source construction and reconstruction permit application. The tables in this section include general provisions applicable to the HON that pertain to reporting.

Section 11.0. Compliance Timeline and Reporting Checklists

Figure 11-1.	HON Compliance Timeline	II-119
Table 11-1.	Checklist for the Initial Notification	II-120
Table 11-2.	Checklist for Implementation Data	II-121
Table 11-3.	Checklist for the Notification of Compliance Status	II-123
Table 11-4.	Checklist for Periodic Reports	II-128
Table 11-5.	Checklist for a Request of Compliance Extension	II-131
Table 11-6.	Checklist for Request to Use Alternative Monitoring or Recordkeeping Procedures	II-132
Table 11-7.	Checklist for Start-up, Shutdown and Malfunction Plan	II-134
Table 11-8.	Checklist for Start-up, Shutdown and Malfunction Reports	II-135
Table 11-9.	Checklist for Initial Notifications by New or Reconstructed Major Affected Sources	II-136
Table 11-10.	Checklist for Source Construction and Reconstruction Permit Applications	II-137

Figure 11-1. HON Compliance Timeline ^{a,b}



Legend

- Compliance dates for existing sources
- ◐ Compliance dates for new sources commencing construction after December 31, 1992 and before August 27, 1996.
- Compliance dates for new sources commencing construction after August 26, 1996.

a Compliance with the revisions to the HON proposed on August 26, 1996 and promulgated on December 5, 1996 and January 17, 1997 must be achieved by January 17, 1997.
 b Changes or additions to existing sources not subject to new source requirements must be in compliance upon initial startup or by April 22, 1997, whichever is later. However, compliance dates may be extended for up to three years for certain changes; see Sections 63.100(f)(4)(ii)(B) and 63.100(m). Compliance for new sources constructed after December 31, 1992 is required by the date shown in the timeline or by initial start-up, whichever is later.
 c If nitrobenzene contributes to the Group 1 status, the wastewater stream shall be in compliance no later than January 18, 2000. If a process wastewater stream is used to generate credits in an emissions average, the process wastewater stream shall be in compliance no later than April 22, 1997.
 d These compliance dates pertain to heat exchange systems, maintenance wastewater, process wastewater, and equipment meeting the criteria in Section 63.149.
 e New sources commencing construction after August 26, 1996 should submit a permit application as soon as practicable before construction. An implementation plan is only required for existing sources using emissions averaging or for new sources, but only if the required information has not been submitted in an operating permit application.
 f This report includes performance test results along with other compliance information.
 g In addition to semi-annual reports, periodic reports also include quarterly reports of emissions averaging results and reports of compliance data if the affected source has exceeded the number of excused excursions.

TABLE 11-1. CHECKLIST FOR THE INITIAL NOTIFICATION

Complete this form for any source with emission points subject to the HON. A "yes" response to all questions will indicate compliance, and a "no" will indicate noncompliance.

- | | | |
|--|----------------------------|----------------------------|
| 1. The report contains the name and address of the owner or operator. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. The report provides the physical location (address) of the affected sources. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. The report identifies the kinds of emission points within the chemical manufacturing process units that are subject to Subpart G. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. The report identifies the chemical manufacturing processes subject to Subpart G. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. The report provides a statement of whether the source can achieve compliance by the relevant compliance dates specified in Subpart F. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 11-2. CHECKLIST FOR IMPLEMENTATION DATA

Complete this form for existing sources and for new sources. For existing sources, this information must be submitted in an operating permit application or as otherwise specified by the permitting authority. For new sources, this information must be submitted in the implementation plan, unless already submitted in the operating permit application, or as otherwise specified by the permitting authority. A "yes" response to all questions will indicate compliance, and a "no" will indicate noncompliance except where noted.

- | | | |
|---|----------------------------|----------------------------|
| 1. The report contains a list designating each emission point complying with §§63.113 through 63.149 and whether each emission point is Group 1 or Group 2. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. The report specifies the control technology or method of compliance that will be applied to each Group 1 emission point. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. The report includes a statement that the compliance demonstration, monitoring, inspection, recordkeeping, and reporting provisions in §§63.113 through 63.149 that are applicable to each emission point will be implemented beginning on the date of compliance. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. The report includes the operating plan required by §63.122(a)(2) and (b) for each storage vessel controlled with a closed vent system with a control device other than a flare. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. If the owner or operator of the source seeks to comply through use of a control technique other than those for which monitoring parameters are specified in §63.114 for process vents, §63.127 for transfer racks, and §63.143 for process wastewater, the report includes: | | |
| (a) A description of the parameter(s) to be monitored and an explanation of the criteria used to select the parameter(s); | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) A description of the methods and procedures that will be used to demonstrate that the parameter indicates proper operation of the control device, the schedule for this demonstration, and a statement that the owner or operator will establish a range for the monitored parameter as part of the Notification of Compliance Status report; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) The frequency and content of and rationale for monitoring and recording, if monitoring and recording is not continuous; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 11-2. CHECKLIST FOR IMPLEMENTATION DATA

- | | | |
|---|----------------------------|----------------------------|
| (d) The frequency and content of and rationale for reporting, if reporting of daily average monitoring parameter values being outside the acceptable range will not take place in the Periodic Reports required under §63.152(c). | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 6. If alternative monitoring or recordkeeping is being requested, the information in checklist 11-6. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
-
-

TABLE 11-3. CHECKLIST FOR THE NOTIFICATION OF COMPLIANCE STATUS

Complete this form for any source with emission points subject to the HON. A "yes" response to all questions will indicate compliance, and a "no" will indicate noncompliance except where noted. Any of the information required in the checklist that has already been submitted in the operating permit application does not need to be resubmitted in the NCS.

I. GENERAL CONTENTS

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | The report contains results of emission point group determinations and performance tests including, as necessary: ^{a,b} | | |
| | (a) At least one complete test report for each test method used for a particular kind of emission point where the complete test report includes: | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (1) A brief process description, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (2) A sampling site description, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (3) A description of sampling and analysis procedures and any modifications to standard procedures, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (4) Quality assurance procedures, | | |
| | (5) Records of operating conditions during the test, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (6) Records of preparation of standards, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (7) Records of calibrations, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (8) Raw data sheets for field sampling, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (9) Raw data sheets for field and laboratory analyses, and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (10) Documentation of calculations; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (b) The results – but not necessarily the complete test report – for additional tests of other emission points tested by the same method. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | The report contains the operating range of monitored parameters established during performance tests. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | Where a parameter range and operating day is required to be established, the report includes: | | |
| | (a) The specific range of the monitored parameter(s) for each emission point; | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 11-3. CHECKLIST FOR THE NOTIFICATION OF COMPLIANCE STATUS

- | | | | |
|-----|---|----------------------------|----------------------------|
| (b) | The rationale for the specific range for each parameter for each emission point, including any data and calculations used to develop the range and a description of why the range indicates proper operation of the control device; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | A definition of the source's operating day for purposes of determining daily average values of monitored parameters, specifying the times at which an operating day begins and ends. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. | If the provisions of § 63.110 allows the owner to choose which testing, monitoring, reporting and recordkeeping provisions will be followed, the report indicates which of the rule's requirements will be followed. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. | For any Group 1 wastewater stream or any residual removed from a Group 1 wastewater stream transferred for treatment by another party pursuant to §63.132(g), the report includes the name and location of the transferee and a description of the Group 1 wastewater stream or residual. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 6. | When a flare is used as a control device, the report contain the results of the flare compliance determination including: | | |
| (a) | The flare design (i.e., steam-assisted, air-assisted, or non-assisted); | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) | All visible emission readings, heat content determinations, flow rate measurements, and exit velocity determinations made during the compliance determinations; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | All periods during the compliance determination when the pilot flame is absent. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 11-3. CHECKLIST FOR THE NOTIFICATION OF COMPLIANCE STATUS

II. FOR STORAGE VESSELS EQUIPPED WITH A CLOSED-VENT SYSTEM AND CONTROL DEVICE AND FOR TRANSFER RACKS WHERE A DESIGN EVALUATION IS CONDUCTED

- | | | | |
|-----|--|----------------------------|----------------------------|
| 1. | The report contains a design evaluation of the control device and a description of the gas stream entering the control device. ^{c,d,e} | | |
| (a) | If the control device is a thermal incinerator, the design evaluation includes the autoignition temperature of the organic HAP emission stream, the combustion temperature, and the residence time at the combustion temperature. ^{c,d} | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) | If the control device is a carbon adsorber, the design evaluation includes the affinity of the organic HAP vapors for carbon, the amount of carbon in each bed, the number of beds, the humidity of the feed gases, the temperature of the feed gases, the flow rate of the organic HAP emission stream, the desorption schedule, the regeneration stream pressure or temperature, and the flow rate of the regeneration stream. For vacuum desorption, pressure drop is included. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | If the control device is a condenser, the design evaluation includes the final temperature of the organic HAP vapors, the type of condenser, and the design flow rate of the organic HAP emission stream. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | For storage vessels, the documentation described in (1) demonstrates that the control device achieves 95-percent control efficiency during reasonably expected maximum loading conditions (or 90-percent efficiency if the control device was installed prior to December 31, 1992). For transfer racks, the documentation described in (1) demonstrates that the control device achieves 98-percent control efficiency during reasonably expected maximum loading conditions. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

III. FOR STORAGE VESSELS AND TRANSFER RACKS WITH EMISSIONS ROUTED TO A FUEL GAS SYSTEM OR PROCESS

- | | | | |
|----|---|----------------------------|----------------------------|
| 1. | For storage vessels with emissions routed to a process, the report contains a design evaluation or engineering assessment demonstrating the extent to which the emissions are recycled, consumed, transformed by chemical reaction into materials that are not HAP's, incorporated into a product and/or recovered. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | The report contains information that indicates the emission stream is routed to a fuel gas system or a process. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 11-3. CHECKLIST FOR THE NOTIFICATION OF COMPLIANCE STATUS

IV. FOR WASTEWATER STREAMS TREATMENT PROCESSES

- | | | |
|---|----------------------------|----------------------------|
| 1. The report contains identification and description of the treatment process, identification of the wastewater streams treated by the process, and identification of monitoring parameters. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. The report contains records of a design evaluation and supporting documentation that includes operating characteristics or records of performance tests conducted using test methods and procedures specified in § 63.145 of subpart G. ^c | Y <input type="checkbox"/> | N <input type="checkbox"/> |

[Note: The information described in #2 above is not required if the wastewater stream or residual is discharged to an underground injection well permitted under 40 CFR Part 270 or 40 CFR Part 144 and complying with 40 CFR Part 122.]

- | | | |
|---|----------------------------|----------------------------|
| 3. For each treatment process that receives a residual removed from a Group 1 wastewater stream, the report includes: | | |
| (a) Identification of treatment process; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) Identification and description of the residual; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) Identification of wastewater stream from which residual was removed; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (d) Fate of residual; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (e) Identification and description of control device (if any) used to destroy the HAP mass in the residual by 99 percent; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (f) Documentation of the 99 percent control efficiency of the device in (e). | Y <input type="checkbox"/> | N <input type="checkbox"/> |

V. FOR A BOILER OR PROCESS HEATER WITH A DESIGN HEAT INPUT CAPACITY GREATER THAN 44 MEGAWATTS, OR WITH A DESIGN HEAT INPUT CAPACITY LESS THAN 44 MEGAWATTS WHERE THE VENT STREAM IS NOT INTRODUCED WITH THE PRIMARY FUEL.

- | | | |
|---|----------------------------|----------------------------|
| 1. The report contains a description of the location at which the vent stream is introduced into the boiler or process heater. ^c | Y <input type="checkbox"/> | N <input type="checkbox"/> |
|---|----------------------------|----------------------------|
-

TABLE 11-3. CHECKLIST FOR THE NOTIFICATION OF COMPLIANCE STATUS

- a Information may be included in the operating permit application.
- b Owners or operators are not required to conduct performance tests on control devices used to control emissions from waste management units, wastewater treatment units, from transfer racks that transfer less than 11.8 million liters per year, or from storage vessels. For these emission points, a design evaluation documenting that the control device being used achieves the required control efficiency as specified in §63.139(d)(2) for wastewater, §63.128(h) for transfer racks, or § 63.120(d) for storage vessels is required to be submitted as part of the NCS. Owners and operators of process vents routed to a control device do not have the option of submitting a design evaluation and must perform a performance test.
- c A design evaluation is not required for a boiler or process heater with a capacity of 44 MW or greater; a boiler or process heater burning hazardous waste with a final permit under 40 CFR Part 270 meeting the requirements of 40 CFR Part 266 Subpart H, or has certified compliance that it meets the requirements of 40 CFR Part 266 Subpart H; a hazardous waste incinerator with a final permit under 40 CFR Part 270 meeting the requirements of 40 CFR Part 264 Subpart O, or has certified compliance that it meets the requirements of 40 CFR Part 265 Subpart O; or a boiler or process heater into which the vent stream is introduced with the primary fuel.
- d If an enclosed combustion device is documented to have a minimum residence time of 0.5 seconds and a minimum temperature of 760°C, then additional documentation is not required.
- e If the control device used to comply with the storage vessel provisions is also used to comply with the process vent, transfer, or wastewater provisions, the performance test required by those provisions is an acceptable substitute for the design evaluation for determining compliance.

TABLE 11-4. CHECKLIST FOR PERIODIC REPORTS

Complete this form for any source with emission points subject to the HON. A "yes" response to all questions will indicate compliance, and a "no" will indicate noncompliance except where noted.

- | | | |
|---|----------------------------|----------------------------|
| 1. The report indicates periods when any monitored parameters were outside their established ranges. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. The report contains the daily average values of monitored parameters for both excused and unexcused excursions, and for excursions caused by a lack of monitoring data, the duration of periods when monitoring data were not collected. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| [Note: Questions No. 1 and No. 2 do not apply to any storage vessel for which the owner or operator is not required by the applicable monitoring plan to keep continuous records.] | | |
| 3. If any performance tests or group determination are included in the report, the following information is provided: | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (a) At least one complete test report for each test method used for a particular kind of emission point where the complete test report includes: | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 1. A brief process description, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. A sampling site description, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. A description of sampling and analysis procedures and any modifications to standard procedures, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. Quality assurance procedures, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. Records of operating conditions during the test, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 6. Records of preparation of standards, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 7. Records of calibrations, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 8. Raw data sheets for field sampling, | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 9. Raw data sheets for field and laboratory analyses, and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 10. Documentation of calculations; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) The results – but not necessarily the complete test report – for additional tests of other emission points tested by the same method. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 11-4. CHECKLIST FOR PERIODIC REPORTS

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|---|----------------------------|----------------------------|
| 4. For process vents, the report contains a description of process changes, results of the recalculation of group determination, and a statement that the owner or operator will comply with the rule, if the group status has changed and control is now required. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. The report contains any needed supplements to the data provided in the Implementation Plan or in operating permit applications, as required by §63.151(l) and(j). | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 6. The report contains notification of any Group 2 emission point that has become a Group 1 emission point, including a compliance schedule. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 7. For process wastewater streams transferred for treatment by another party in accordance with §63.132(g), the report includes changes in the identity of the treatment facility or the transferee, if applicable. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 8. The report contains information on the occurrence of any control equipment, seal gap, or seal failure, including: | | |
| (a) Date of inspections; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) Identification of equipment (i.e., storage vessel, wastewater tank, surface impoundment, seal, etc.) having the failure; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) Description of the failure; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (d) Description of the nature of the repair; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (e) Date repair was made. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 9. The report contains times and durations of all periods recorded when the vent stream is diverted from the control device through a bypass line. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 10. The report contains all periods recorded in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line was checked out. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 11. The report contains the times and durations of all periods recorded in which all pilot flames of a flare were absent. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 12. If an extension to repairing or emptying a tank is utilized in accordance with § 63.120(b)(7)(ii), (b)(8), § 63.133(e)(2), or (h) of subpart G, the report shall include the following: | | |
| (a) Identify the storage vessel or wastewater tank; | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 11-4. CHECKLIST FOR PERIODIC REPORTS

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|-----|--|----------------------------|----------------------------|
| (b) | An explanation of why it was unsafe to perform the inspection or seal or gap measurement or a description of the failure that cannot be repaired in 45 days; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) | Documentation that alternate storage capacity is unavailable; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (d) | A schedule of actions that will ensure the storage vessel or wastewater tank will be emptied as soon as practical. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 11-5. CHECKLIST FOR A REQUEST OF COMPLIANCE EXTENSION

Complete this form for any source, subject to the HON, that has requested an extension of compliance. A "yes" response to all questions will indicate compliance, and a "no" will indicate noncompliance.

Note: Requests for extensions must be submitted no later than 120 days prior to the compliance dates specified in § 63.100(k)(2), §63.100(l)(4), and §63.100(m) of Subpart F, except as provided for in §63.151(a)(6)(iv).^a

- | | | |
|---|----------------------------|----------------------------|
| 1. The request contains a description of the controls to be installed to comply with the standards. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. The request contains a compliance schedule specifying dates by which: | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (a) Contracts for emission control systems or process changes for emission control will be awarded; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) On-site construction, installation of emission control equipment, or a process change is to be initiated; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) On-site construction, installation of emission control equipment, or a process change is to be completed; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (d) Final compliance will be achieved. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. The request states whether the owner or operator is also requesting an extension of other applicable requirements (e.g., performance testing). | Y <input type="checkbox"/> | N <input type="checkbox"/> |

^a Requests must be submitted with the operating permit application, as part of the Initial Notification, or as a separate submittal.

**TABLE 11-6. CHECKLIST FOR REQUEST TO USE ALTERNATIVE
MONITORING OR RECORDKEEPING PROCEDURES^a**

Complete this form for any source requesting to use alternative monitoring or recordkeeping procedures. A "yes" response to all questions will indicate compliance, and a "no" will indicate noncompliance.

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | If the source does not have an automated monitoring and recording system capable of measuring parameter values at least once every 15 minutes and generating continuous records, the request for a less frequent, non-automated monitoring system includes: | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (a) Manual reading and recording of the value of the relevant operating parameter no less frequently than once per hour and calculation and recording of the daily average value from these measurements; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (b) A description of the planned monitoring and recordkeeping system; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (c) Documentation that the source does not have an automated monitoring and recording system; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (d) A justification for requesting an alternative monitoring and recordkeeping system; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (e) A demonstration to the Administrator's satisfaction that the proposed monitoring frequency is sufficient to represent the control device operating conditions considering typical variability of the specific process and control device operating parameter being monitored. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | If the source wishes to use an automated data compression recording system that does not record monitored operating parameter values at a set frequency, but instead records all values that meet set criteria for variation from previously recorded values, the request must address the systems ability to: | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (a) Measure the operating parameter once every 15 minutes; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (b) Record at least 4 values each hour during periods of operation; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (c) Record the date and time when monitors are turned on or off; | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| | (d) Recognize unchanging data that may indicate the monitor is not functioning properly, alert the operator, and record the incident; | Y <input type="checkbox"/> | N <input type="checkbox"/> |

**TABLE 11-6. CHECKLIST FOR REQUEST TO USE ALTERNATIVE
MONITORING OR RECORDKEEPING PROCEDURES^a**

- | | | | |
|-----|--|----------------------------|----------------------------|
| (e) | Compute daily average values of the monitored operating parameter based on recorded data; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (f) | Retain all recorded data for that operating day if the daily average operating parameter value is an excursion. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | In addition, the request for a system described in question 2 above includes a description of the monitoring system and the data compression recording system, including the criteria used to determine which monitored values are recorded and retained, the method for calculating daily averages, and a demonstration that the system meets all the requirements outlined in questions 2(a) through 2(f) above. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
-

^a The information shall be submitted with the operating permit application or as otherwise specified by the permitting authority.

TABLE 11-7. CHECKLIST FOR START-UP, SHUTDOWN AND MALFUNCTION PLAN^a

Complete this form for any source with emission points subject to the HON. A "yes" response to all questions will indicate compliance, and a "no" will indicate noncompliance.

- | | | |
|---|----------------------------|----------------------------|
| 1. The Plan describes in detail the procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. The Plan defines a program of corrective action for malfunctioning process and air pollution control equipment used for compliance. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. The Plan identifies all routine or otherwise predictable continuous monitoring system malfunctions. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. The plan includes procedures for managing maintenance wastewater and specifies the following items: | | |
| (a) The process equipment and/or maintenance tasks that are expected to create wastewater during maintenance activities. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) The procedure for properly managing the wastewater and controlling HAP emissions to the atmosphere. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (c) The procedures for clearing materials from process equipment. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
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^a The plan must be submitted by the compliance date.

TABLE 11-8. CHECKLIST FOR START-UP, SHUTDOWN AND MALFUNCTION REPORTS^a

Complete this form for any source with emission points subject to the HON. A "yes" response to all questions will indicate compliance, and a "no" will indicate noncompliance.

- | | | | |
|-----|--|----------------------------|----------------------------|
| 1. | A record of the occurrence and duration of each start-up, shutdown and malfunction of operation of air pollution control equipment or continuous monitoring systems used to comply with Subparts F, G or H during which excess emissions occur. (This record is not required to be submitted in the Start-up, Shutdown and Malfunction Report. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. | For each start-up, shutdown or malfunction during which excess emissions occur, the report indicates: | | |
| (a) | That the procedures specified in the source's start-up, shutdown and malfunction plan were followed; and | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| (b) | Any actions taken that are not consistent with the plan. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. | The report includes a letter stating the name, title, and signature of the responsible official certifying the report's accuracy. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

^a Reports of Start-up, shutdown and malfunction must be submitted semi-annually and may be included with the semiannual report.

TABLE 11-9. CHECKLIST FOR INITIAL NOTIFICATIONS BY NEW OR RECONSTRUCTED MAJOR AFFECTED SOURCES

Complete this form to address the construction or reconstruction of major affected sources subject to the HON. A "yes" response to all questions will indicate compliance, and a "no" will indicate noncompliance.

- | | | |
|--|----------------------------|----------------------------|
| 1. A notification contains a statement of intention to construct a new major affected source, reconstruct a major affected source, or reconstruct a major source such that it becomes a major affected source. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. A notification indicates the date when construction or reconstruction was commenced, submitted simultaneously with the permit application if it was commenced before the effective date of the relevant standard. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 3. A notification indicates the date when construction or reconstruction was commenced, postmarked no later than 30 days after such date if it was commenced after the effective date of the relevant standard. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. A notification indicates the actual date of startup postmarked within 15 days after that date. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

TABLE 11-10. CHECKLIST FOR SOURCE CONSTRUCTION AND RECONSTRUCTION PERMIT APPLICATIONS

Complete this form to address the construction or reconstruction of sources subject to the HON. A "yes" response to all questions will indicate compliance, and a "no" will indicate noncompliance except where noted.

- | | | |
|---|----------------------------|----------------------------|
| 1. The application contains the applicant's name and address. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 2. The application contains a notification of intention to construct a new major affected source or make any physical or operational change to a major affected source. | | |
| 3. The application notes the (proposed) physical location/address of the source. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 4. The application identifies the relevant standard that is the basis of the application. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 5. The application indicates the expected commencement date of the construction or reconstruction. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 6. The application identifies the expected date of initial startup. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 7. The application addresses the type and quantity of HAPs emitted by the source, reported in units and averaging times and in accordance with the test methods specified in the relevant standard, as well as operating parameters to the extent that they are used to demonstrate compliance. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 8. For reconstructions only, the application contains a brief description of the affected source and the components to be replaced. | | |
| 9. For reconstructions only, the application contains a description of present and proposed emission control system, including control efficiencies for each HAP. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 10. For reconstructions only, the application contains an estimate of the fixed capital cost of replacements and of constructing a comparable entirely new source unless the owner or operator declares that there are no economic or technical limitations to prevent compliance. | Y <input type="checkbox"/> | N <input type="checkbox"/> |
| 11. For reconstructions only, the application contains the estimated life of the affected source after the replacements unless the owner or operator declares that there are no economic or technical limitations to prevent compliance. | Y <input type="checkbox"/> | N <input type="checkbox"/> |

**TABLE 11-10. CHECKLIST FOR SOURCE CONSTRUCTION AND
RECONSTRUCTION PERMIT APPLICATIONS**

12. For reconstructions only, the application contains a discussion of any technical or economic limitations the source may have in complying with the applicable requirements unless the owner or operator declares that there are no economic or technical limitations to prevent compliance.
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APPENDICES

- Appendix A: Code of Federal Regulations Citations**
- Appendix B: Comparison of HON Process Vent Provisions with Distillation, Air Oxidation, and Reactors NSPS**
- Appendix C: Example Calculation of TRE Index Value**
- Appendix D: Information on Wastewater to be Submitted with Notification of Compliance Status**
- Appendix E: Conversion Factors**



**APPENDIX A
CODE OF FEDERAL REGULATIONS CITATIONS**

- I. Hazardous Organic NESHAP
 - 40 CFR 63 Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry.
 - 40 CFR 63 Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater.
 - 40 CFR 63 Subpart H - National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.
- II. NESHAP General Provisions
 - 40 CFR 63 Subpart A - General Provisions.
- III. NSPS for SOCOMI Process Vents
 - 40 CFR 60 Subpart III - Standards of Performance for Volatile Organic Compound Emissions (VOC) from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes.
 - 40 CFR 60 Subpart NNN - Standards of Performance for Volatile Organic Compounds Emissions (VOC) from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations.
 - 40 CFR 60 Subpart RRR - Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.
- IV. Test Methods
 - 40 CFR 60 Appendix A, Method 1 - Sample and velocity traverses for stationary sources.
 - 40 CFR 60 Appendix A, Method 1A - Sample and velocity traverses for stationary sources with small stacks or ducts.
 - 40 CFR 60 Appendix A, Method 2 - Determination of stack gas velocity and volumetric flow rate (Type S pilot tube).
 - 40 CFR 60 Appendix A, Method 2A - Direct measurement of gas volume through pipes and small ducts.
 - 40 CFR 60 Appendix A, Method 2C - Determination of stack gas velocity and volumetric flow rate in small stacks or ducts (standard pilot tube).

- 40 CFR 60 Appendix A, Method 2D - Measurement of gas volumetric flow rates in small pipes and ducts.
- 40 CFR 60 Appendix A, Method 3B - Gas analysis for the determination of emission rate correction factor or excess air.
- 40 CFR 60 Appendix A, Method 4 - Determination of moisture content in stack gases.
- 40 CFR 60 Appendix A, Method 18 - Measurement of gaseous organic compound emissions by gas chromatography.
- 40 CFR 60 Appendix A, Method 21 - Determination of volatile organic compounds leaks.
- 40 CFR 60 Appendix A, Method 25A - Determination of total gaseous organic concentration using a flame ionization analyzer.
- 40 CFR 60 Appendix A, Method 25D - Determination of the volatile organic concentration of waste samples.
- 40 CFR 60 Appendix A, Method 26 - Determination of hydrogen chloride emissions from stationary sources.
- 40 CFR 60 Appendix A, Method 26A - Determination of hydrogen halide and halogen emissions from stationary sources - isokinetic method.
- 40 CFR 63 Appendix A, Method 301 - Field validation of emission concentrations from stationary sources.
- 40 CFR 63 Appendix A, Method 304A - Determination of biodegradation rates of organic compounds (vent option).
- 40 CFR 63 Appendix A, Method 304B - Determination of biodegradation rates of organic compounds (scrubber option).
- 40 CFR 63 Appendix A, Method 305 - Measurement of emission potential of individual volatile organic compounds in waste.

V. Procedures

- 40 CFR 63 Appendix C - Determination of the fraction biodegraded (F_{DIO}) in a biological treatment unit.

**APPENDIX B
COMPARISON OF HON PROCESS VENT
PROVISIONS WITH DISTILLATION, AIR
OXIDATIONS, AND REACTOR NSPS**

This Appendix summarizes the major differences between the HON process vent provisions and the SOCOMI distillation, air oxidation, and reactors NSPS (40 CFR 60, Subparts NNN, III, and RRR, respectively). The comparison is organized into the following sections: applicability; control techniques; performance testing; monitoring; and recordkeeping and reporting.

Applicability

- The three NSPS apply only to new sources. A new distillation facility is defined as a facility for which construction, modification, or reconstruction commenced after December 30, 1983. A new air oxidation facility is defined as a facility for which construction, modification, or reconstruction commenced after October 21, 1983. The date for reactors is June 29, 1990.
- The NSPS apply to VOC's, while the HON applies to HAP's.
- The SOCOMI chemical lists for the HON and the distillation, air oxidation, and reactor NSPS are different. The SOCOMI list for the distillation, air oxidation, and NSPS can be found in 40 CFR §60.667, §60.617, and §60.707, respectively.
- The definition of a halogenated vent stream in the HON is any vent stream from a process vent or transfer operation determined to have a mass emission rate of halogen atoms contained in organic compounds of 0.45 kilograms per hour or greater. The NSPS define a halogenated vent stream as one containing a total concentration of halogen compounds of 20 ppmv or greater.
- The TRE equations and coefficients are different for the HON and the NSPS. The coefficients in the NSPS are selected based on the flow rate, heat content, and halogen status of the vent stream. The coefficients in the HON are based on the halogen status of the vent stream and whether the facility is new or existing. The NSPS have separate equations for incinerators and flares. The TRE equations and coefficients for the air oxidation NSPS are located in 40 CFR §60.614(e), and the TRE equations and coefficients for the distillation and reactors NSPS are located in 40 CFR §60.664(e), and §60.704, respectively.
- The NSPS do not use the terms Group 1 and Group 2. However, the NSPS have similar applicability criteria to HON, because they only require control of streams with TRE index values less than or equal to 1.0. The distillation NSPS has a low flow cutoff. The reactors NSPS includes low flow and low concentration cutoffs.

Control Techniques

- In the NSPS, a scrubber is not required downstream of an incinerator that is used to combust halogenated vent streams (the NSPS only apply to VOC).
- The NSPS do not prohibit the use of flares for control of halogenated vent streams.
- There are no emissions averaging provisions in the NSPS.

Performance Testing

- The HON allows methods other than Method 18 to determine the concentration in the vent stream when complying with the 98 percent reduction or 20 ppmv outlet concentration requirements, or for purposes of calculating the TRE index value as long as the method has been validated by Method 301. The NSPS only specify Method 18.
- The distillation and air oxidation NSPS require Method 3 for measurement of percent oxygen when determining compliance with the 20 ppmv concentration limit. The reactors NSPS and the HON specify Method 3B.
- The HON and the reactors NSPS do not require an initial performance test for boilers or process heaters when the vent stream is introduced with the primary fuel or for permitted hazardous waste boilers. The distillation and air oxidation NSPS do not contain these exclusions.
- The NSPS do not allow the determination of TRE index value parameters by engineering assessment. The HON provisions allow the determination of TRE index value parameters by engineering assessment if the TRE index value is greater than 4.0.
- There are no initial tests required for scrubbers in the NSPS, because there are no scrubber provisions in the NSPS.
- The distillation and reactors NSPS require a performance test for all process vents with a TRE index value less than or equal to 8.0. The air oxidation NSPS and the HON require a test for all process vents with a TRE index value less than or equal to 4.0.

Monitoring

- The distillation and air oxidation NSPS do not exempt boilers or process heaters where the vent stream is introduced with the primary fuel from the monitoring requirements. The HON and the reactors NSPS contain these exemptions. The HON also exempts permitted hazardous waste boilers from monitoring, unlike the NSPS.
- The distillation and air oxidation NSPS require monitoring of operation for boilers or process heaters with design heat input capacities of 44 megawatts or greater. The HON and the reactors NSPS do not require any monitoring of such boilers.

- The distillation and reactors NSPS require monitoring for all process vent streams with a TRE index value less than or equal to 8.0. The air oxidation NSPS, like the HON, requires monitoring for all process vent streams with a TRE index value less than or equal to 4.0.

Recordkeeping and Reporting of Monitored Parameters

- The NSPS require semiannual reporting of monitored parameters that are outside the established range, but the out-of-range periods described in these reports are not considered violations. The facility may be required to repeat the performance test, and if the test shows that the facility is no longer in compliance, enforcement action could be taken. However, violations and penalties cannot be invoked based solely on monitored parameters being out of the established range. In contrast, the HON provisions specify that if parameters are out of range for a longer period of time than the excused excursion period, this is a direct violation of the permit operating requirements and enforcement actions can be taken.
- The NSPS require three hour averaging periods for records and reports of monitored data. The HON requires daily averaging periods (24 hour).
- The NSPS require performance tests to establish ranges of monitored parameters. The NSPS specifically define exceedances of monitored parameters which include limits above and/or below the performance test value of the parameter. For example, an exceedance for incinerators includes all 3 hour periods of operation during which the average combustion temperature was more than 28 °C below the value measured during the performance test. In contrast, the HON does not contain specific definitions of acceptable ranges or exceedances. The HON requires sources to establish site specific ranges based on testing supplemented by engineering analyses.
- The distillation and air oxidation NSPS require records of operation for boilers or process heaters with design heat input capacities of 44 megawatts or greater to be kept. These records may include steam use, fuel use, or data monitored to comply with another regulation. For the distillation and air oxidation NSPS, all periods when a boiler or process heater is not in operation must be reported in the semiannual report.
- The initial semiannual report is due within 6 months of the initial start-up date in order to comply with the NSPS. The HON requires the first semiannual report to be submitted no later than 8 months after the compliance date.
- The NSPS require that all records of monitored data be kept for 2 years. The HON requires that records be kept for 5 years.

Recordkeeping and Reporting - Initial Reports and Notifications

- The HON requires the compliance option that will be used, be reported in the operating permit or as specified by the permitting authority and a Notification of Compliance Status to report the results of the initial performance test. The NSPS require a notification of initial start-up and an initial performance test report.

- The NSPS require the results of the performance test to be submitted within 60 days of achieving the maximum production rate, but no later than 180 days after start-up. The HON requires the Notification of Compliance Status, which includes the results of the performance test, to be submitted 150 days after the source's compliance date.
- The NSPS require notification of the Administrator no later than 30 days after an affected facility is constructed or reconstructed. The Administrator must also be notified no later than 30 days prior to the initial start-up and no later than 15 days after the actual start-up of an affected facility. The HON (§63.151 of Subpart G) requires an initial notification which is due 120 days after the date of promulgation for existing sources. For new sources, the initial notification is due as soon as practicable before commencement of construction or reconstruction, or 90 days after promulgation, whichever is later. Additional notification requirements for new sources subject to the HON (such as applications for approval of construction or reconstruction and notifications of start-up) are contained in the NESHAP General Provisions (40 CFR 63, Subpart A).
- The distillation NSPS requires an initial report of the design production capacity of the process unit. The reactors NSPS requires a design capacity report for process units that are exempt from control requirements because they are below the 1 Gg/year capacity cutoff.
- When making a process change, the NSPS require a report of the compliance option to be used 90 days before the change is made if the compliance option will change.
- When making a process change, the NSPS require a performance test to be done within 180 days of the change.

APPENDIX C EXAMPLE CALCULATION OF TRE INDEX VALUE

This Appendix summarizes the steps for calculating the TRE index value for a process vent stream and presents an example TRE index value calculation. Detailed requirements for calculating the TRE index value for a process vent stream are presented in §63.115(d) in Subpart G of the proposed HON rule.

The equation for calculating the TRE index value for a vent stream controlled by a flare or incinerator is as follows:

$$TRE = \frac{1}{E_{HAP}} [a + b (Q_s) + c (H_T) + d (E_{TOC})] \quad (1)$$

where:

- | | | |
|-----------|---|--|
| TRE | = | TRE index value. |
| E_{HAP} | = | Hourly emission rate of total organic HAP (kilogram per hour). |
| Q_s | = | Vent stream flow rate (standard cubic meters per minute) at a standard temperature of 20 °C. |
| H_T | = | Vent stream net heating value (megaJoules per standard cubic meter). |
| E_{TOC} | = | Hourly emission rate of TOC (kilograms per hour minus methane and ethane). |
| a,b,c,d | = | Coefficients for existing and new source process vents presented in Tables 1 and 2. |

Engineering assessment may be used to determine the total organic HAP emission rate, the volumetric flow rate, the net heating value, and the TOC emission rate for the representative operating condition expected to yield the lowest TRE index value. Engineering assessment includes, but is not limited to:

- Previous test results;
- Bench-scale or pilot-scale test data;
- Permit values; and
- Design analysis.

If the calculated TRE index value is greater than 4.0, the owner or operator is not required to perform any measurements. If the calculated TRE index value is less than or equal to 4.0, measurements and/or further calculations of the volumetric flow rate, the net heating value, and the TOC and total organic HAP emission rates must be performed. The volumetric flow rate shall be determined using Method 2, 2A, 2C, or 2D. The molar composition, which is used to calculate net heating value, shall be determined using the following methods:

- Method 18 to measure the concentration of each organic compound;
- ASTM Method D1946-77 to measure the carbon monoxide and hydrogen concentration; and
- Method 4 to determine the water vapor content.

The net heating value shall be calculated using the following equation:

$$H_T = K_1 \left(\sum_{j=1}^n C_j H_j \right) (1 - B_{ws}) \quad (2)$$

where:

- H_T = Net heating value of the sample (megaJoule per standard cubic meter).
 K_1 = Constant, 1.740×10^{-7} (parts per million)⁻¹ (gram-mole per standard cubic meter) (megaJoule per kilocalorie).
 B_{ws} = Water vapor content of the vent stream, proportion by volume.
 C_j = Concentration on a dry basis of all organic compounds j (parts per million).
 H_j = Net heat of combustion of compound j (kilocalorie per gram-mole).

The emission rate of TOC and the emission rate of total organic HAP shall both be calculated using the following equation:

$$E = K_2 \left(\sum_{j=1}^n C_j M_j \right) Q_s \quad (3)$$

where:

- E = Emission rate of TOC or total organic HAP in the sample (kilograms per hour).
 K_2 = Constant, 2.494×10^{-6} (parts per million)⁻¹ (gram-mole per standard cubic meter) (kilogram/gram) (minutes/hour).
 C_j = Concentration on a dry basis of organic compound j (parts per million).
 M_j = Molecular weight of organic compound j (gram/gram-mole).
 Q_s = Vent stream flow rate (dry standard cubic meter per minute) at a temperature of 20 °C.

TABLE 1. COEFFICIENTS FOR TOTAL RESOURCE EFFECTIVENESS FOR EXISTING SOURCE
NONHALOGENATED AND HALOGENATED VENT STREAMS

Type of Stream	Control Device Basis	Values of Coefficients			
		a	b	c	d
Nonhalogenated	Flare	1.935	3.660×10	-7.687×10^{-3}	-7.333×10^{-4}
	Thermal Incinerator 0 Percent Heat Recovery	1.492	6.267×10	3.177×10^{-2}	-1.159×10^{-3}
	Thermal Incinerator 70 Percent Heat Recovery	2.519	1.183×10	1.300×10^{-2}	4.790×10^{-2}
Halogenated	Thermal Incinerator and Scrubber	3.995	5.200×10	-1.769×10^{-3}	9.700×10^{-4}

TABLE 2. COEFFICIENTS FOR TOTAL RESOURCE EFFECTIVENESS FOR NEW SOURCE
NONHALOGENATED AND HALOGENATED VENT STREAMS

Type of Stream	Control Device Basis	Values of Coefficients			
		a	b	c	d
Nonhalogenated	Flare	0.5276	0.0998	-2.096×10	-2.000×10^{-4}
	Thermal Incinerator 0 Percent Heat Recovery	0.4068	0.0171	8.664×10	-3.162×10^{-4}
	Thermal Incinerator 70 Percent Heat Recovery	0.6868	3.209×10	3.546×10^{-3}	1.306×10^{-2}
Halogenated	Thermal Incinerator and Scrubber	1.0895	1.417×10	-4.822×10^{-4}	2.645×10^{-4}



**APPENDIX D
INFORMATION ON WASTEWATER TO BE
SUBMITTED WITH NOTIFICATION
OF COMPLIANCE STATUS**

This appendix contains copies of 4 tables (Tables 15, 17, 18, and 19) from Subpart G of the HON. The tables specify the information that must be submitted with the Notification of Compliance Status.

Table Number	Table Name	Page Number
D-1	Information on Table 8 and/or Table 9 to be Submitted with Notification of Compliance Status for Process Units at New and/or Existing Sources	D-2
D-2	Information for Treatment Processes to be Submitted with Notification of Compliance Status	D-3
D-3	Information for Waste Management Units to be Submitted with Notification of Compliance Status	D-4
D-4	Information on Residuals to be Submitted with Notification of Compliance Status	D-5

TABLE D-1. INFORMATION ON TABLE 8 AND/OR TABLE 9 COMPOUNDS TO BE SUBMITTED WITH NOTIFICATION OF COMPLIANCE STATUS FOR PROCESS UNITS AT NEW AND/OR EXISTING SOURCES^{a,b}

Process Unit Identification Code ^c	Stream Identification Code	VOHAP Concentration (ppmw) ^{d,e}	Flow Rate (lpm) ^{e,f}	Group 1 or Group 29	Compliance Approach ^h	Treatment Process(es) Identification	Waste Management Unit(s) Identification ^j	Intended Control Device
Average								

a The information specified in this table must be submitted; however, it may be submitted in any format. This table presents an example format.

b Other requirements for the Notification of Compliance Status are specified in §63.152(b) of Subpart G.

c Also include a description of the process unit (e.g., benzene process unit).

d Except when §63.132(e) is used, annual average concentration, as specified in 63.132(c) or (d) and §63.144.

e When §63.132(e) is used, indicate the wastewater stream is a designated Group 1 wastewater stream.

f Except when §63.132(e) is used, annual average flow rate as specified in 63.132(c) or (d) and in §63.144.

g Indicate whether stream is Group 1 or Group 2. If group 1, indicate whether it is Group 1 for Table 8 or Table 9 Compounds or for both Table 8 and Table 9 compounds.

h Cite §63.138 compliance option used.

TABLE D-2. INFORMATION FOR TREATMENT PROCESSES TO BE SUBMITTED WITH NOTIFICATION OF COMPLIANCE STATUS^{a,b}

Treatment Process Identification ^c	Description ^d	Wastewater Stream(s) Treated ^e	Monitoring Parameters ^f
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^a The information specified in this table must be submitted; however, it may be submitted in any format. This table presents an example format.

^b Other requirements for the Notification of Compliance Status are specified in §63.152(b) of Subpart G.

^c Identification codes should correspond to those listed in Table 15.

^d Description of treatment process.

^e Stream identification code for each wastewater stream treated by each treatment unit. Identification codes should correspond to entries listed in Table 15.

^f Parameter(s) to be monitored or measured in accordance with Table 12 and §63.143 of this Subpart.

TABLE D-3. INFORMATION FOR WASTE MANAGEMENT UNITS TO BE SUBMITTED WITH NOTIFICATION OF COMPLIANCE STATUS^{a,b}

Waste Management Unit Identification ^c	Description ^d	Wastewater Stream(s) Received or Managed ^e
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a The information specified in this table must be submitted; however, it may be submitted in any format. This table presents an example format.

b Other requirements for the Notification of Compliance Status are specified in §63.152(b) of Subpart G.

c Identification codes should correspond to those listed in Table 15.

d Description of waste management unit.

e Stream identification code for each wastewater stream received or managed by each waste management unit. Identification codes should correspond to entries listed in Table 15.

TABLE D-4. INFORMATION ON RESIDUALS TO BE SUBMITTED WITH NOTIFICATION OF COMPLIANCE STATUS^{a,b}

Residual Identification ^c	Residual Description ^d	Wastewater Stream Identification ^e	Treatment Process ^f	Fate ^g	Control Device Identification Code	Control Device Description ^h	Control Device Efficiency ⁱ
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^a The information specified in this table must be submitted; however, it may be submitted in any format. This table presents an example format.

^b Other requirements for the Notification of Compliance Status are specified in §63.152(b) of Subpart G.

^c Name or identification code of residual removed from Group 1 wastewater stream.

^d Description of residual (e.g., steam stripper A-13 overhead condensates).

^e Identification of stream from which residual is removed.

^f Treatment process from which residual originates.

^g Indicate whether residual is sold, returned to production process, or returned to waste management unit or treatment process; or whether HAP mass of residual is destroyed by 99 percent.

^h If the fate of the residual is such that the HAP mass is destroyed by 99 percent, give description of device used for HAP destruction.

ⁱ If the fate of the residual is such that the HAP mass is destroyed by 99 percent, provide an estimate of control device efficiency and attach substantiation in accordance with §63.146(b)(9) of Subpart G.



APPENDIX E CONVERSION FACTORS

HON INSPECTION TOOL CONVERSION TABLE

	Metric Units given in the Rule	English Units
Numbers used in Process Vent Provisions	0.005 standard cubic meter per minute (scmm)	0.18 standard cubic foot per minute (scfm)
	0.45 kilogram per hour (kg/hr)	0.99 pound per hour (lb/hr)
	44 megawatts (MW)	59,000 horsepower (hp) 150 million Btu per hour (MMBtu/hr)
Numbers used in Transfer Provisions	650,000 liters per year (l/yr)	170,000 gallons per year (gal/yr)
	10.3 kilopascals (kPa)	1.49 pounds per square inch (psi)
	11.8 million liters/year (l/yr)	3.12 million gallons per year (gal/yr)
	0.45 kilogram per hour (kg/hr)	0.99 pound per hour (lb/hr)
	44 megawatts (MW)	59,000 horsepower (hp) 150 million Btu per hour (MMBtu/hr)

HON INSPECTION TOOL CONVERSION TABLE

	Metric Units given in the Rule	English Units
Numbers used in Storage Vessel Provisions	151 cubic meters (m ³)	39,900 gallons (gal)
	0.7 kilopascal (kPa)	0.1 pound per square inch (psi)
	38 cubic meters (m ³)	10,000 gallons (gal)
	13.1 kilopascals (kPa)	1.90 pounds per square inch (psi)
	5.2 kilopascals (kPa)	0.75 pound per square inch (psi)
	75 cubic meters (m ³)	20,000 gallons (gal)
	21.2 square centimeters (cm ²) per meter of vessel diameter	1.00 square inches (in ²) per foot of vessel diameter
	1.27 centimeters (cm)	0.500 inch (in)
	61 centimeters (cm)	24.0 inches (in)
	212 square centimeters (cm ²)	32.9 square inches (in ²)
	3.81 centimeters (cm)	1.50 inches (in)
44 megawatts (MW)	59,000 horsepower (hp) 150 million Btu per hour (MMBtu/hr)	

HON INSPECTION TOOL CONVERSION TABLE

	Metric Units given in the Rule	English Units
Numbers used in Wastewater Provisions	5 meters (m)	16 feet (ft)
	0.04 kilogram (kg) steam per liter (l) of wastewater	0.3 pound (lb) steam per gallon (gal) of wastewater
	44 megawatts (MW)	59,000 horsepower (hp) 150 million Btu per hour (MMBtu/hr)
	95 degrees Celsius (°C)	200 degrees Fahrenheit (°F)
	67,100 liters/hour/m ²	1650 gallons/hour/ft ²
	0.1 cubic meter (m ³)	26 gallons (gal)
	0.42 cubic meter (m ³)	110 gallons (gal)
	6.7 square centimeters per meter (cm ² /m) of separator wall perimeter	0.32 square inch per foot (in ² /ft) of separator wall perimeter
	1.3 centimeters (cm)	0.51 inch (in)
	67 square centimeters per meter (cm ² /m)	3.2 square inches per foot (in ² /ft)
3.8 centimeters (cm)	1.5 inches (in)	

SI/English Conversion Factors:

1 meter (m) = 3.2808 feet (ft)

2.54 centimeters (cm) = 1 inch (in)

1 liter (l) = 0.2642 gallon (gal)

1 cubic meter (m³) = 264.2 gallons (gal)

1 kilopascal (kPa) = 0.1450 pound per square inch (psi)

1 kilograms (kg) = 2.2046 pounds (lb)

1 megawatt (MW) = 1341 horsepower (hp) = 3.4122 million Btu/hr (MMBtu/hr)

