

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS - NESHAP

NESHAPs are nationally uniform standards oriented toward particular pollutants at the point of emission. Vinyl chloride is in this category. It applies to new and modified sources that commenced construction after EPA proposed an applicable NESHAP.

As with NSPS applications for approval of construction or modification must be made and accepted prior to the date on which construction or modifications is commenced. The following pages outline the part of the Federal Register that pertains to NESHAPs.

EPA REGULATION

PROPOSED 12/24/75

PROMULGATED 10/20/76

PLANT OPERATED UNDER A WAIVER OF COMPLIANCE UNTIL SYSTEMS COULD BE INSTALLED TO MEET THE STANDARD 9/1/78.

- STRIP SLURRY TO $\angle$ 400 PPM VCM
- REACTOR OPENING LOSS $\angle$ 20 PPM VCM
- NO MANUAL VENTING OF VCM
- NO RELIEF VALVE DISCHARGES OF VCM
- MINIMIZE FUGITIVE VCM EMISSIONS
 - o RAILCAR UNLOADING LINES
 - o DOUBLE MECHANICAL SEAL ON ROTATING PUMPS AND COMPRESSORS AND AGITATORS
 - o REDUCE VCM IN EQUIPMENT BEFORE OPENING TO ATMOSPHERE
 - o SAMPLES
 - o REQUIRED LEAK DETECTION AND ELIMINATION PLAN
- CONTINUOUS MONITORS
- PORTABLE MONITORS
 - o IN-PROCESS WASTEWATER STRIPPED TO LESS THAN 10 PPM VCM
 - o EXHAUST GASES REDUCED TO $\angle$ 10 PPM VCM
- EMISSION TESTS
- EMISSION MONITORING OF INCINERATOR OFFGAS
- REPORTING
- RECORDKEEPING

NATIONAL EMISSION STANDARD FOR HAZARDOUS AIR POLLUTANTS (NESHAPS)

40 CFR PART 61

General Provisions: Sub Part A

Definitions: 61.02

1. Alternative method
2. Capital expenditure
3. Compliance schedule

State Delegation: 61.04(b)

Bureau of Pollution Control
 Department of Natural Resources
 Jackson, MS

Prohibited Activities 61.05

Don't modify without written approval from the Administrator
 (State)

Application for Approval to Construct 61.07

Notification of Start-up 61.09

Initial Report 61.10

Waiver of Compliance 61.11

Up to two years

Compliance with Standards 61.12

Determine by tests specified in rules -
 Alternate methods

Emission tests 61.13

Within 90 days of start up

Notify Agency 30 days before test

Modification 61.15

- 9. Manual Venting
- 10. Opening Equipment
- 11. Samples
- 12. Leak Detection and Elimination - Approval required
 - i. Fixed point monitoring
 - ii. Definition of a leak
 - iii. Subpart V - annual performance test.

Submit results in next quarterly.
- 13. In process wastewater

Emission Tests 61.67

Method 106

Alternate method

Method 107

Emission Monitoring 61.68

Reporting 61.70

Quarterly Reports

Exception reporting

Recordkeeping 61.71

3 years

Leaks

Emission measurements

Daily reactor operating record including T and P

A change, operational or physical, that increases emissions is a modification unless it is not a capital expenditure or is routine maintenance.

Subpart F - VCM

Definitions 61.61

In vinyl chloride service

Relief valve

Leak

Exhaust gas

3 hour period

Emission Standards for PVC Plants 61.64 Reactors

10 ppm exhaust gas limit

ROL

Slurry

PVC and VCM plant emission standards 61.65

(a) RVD's

(b) Fugitives

1. Loading & Unloading
2. Slip gauges
3. Rotating pumps
4. Reciprocating pumps
5. Rotating Compressors
6. Reciprocating Compressors
7. Agitators
8. Leaks from RV's

HISTORY OF VCM NESHAP'S ENFORCEMENT

Oct. 20, 1976	VCM Neshap's Promulgated		
Jan. 19, 1977	VCM Neshap's Becomes Effective		
Feb. 2, 1979	RVD	25,500 lbs.	D-300
Jan. 19, 1980	RVD	24 lbs.	D-400
Apr. 3, 1980	RVD	180 lbs.	D-9
Apr. 7, 1980	RVD	36 lbs.	D-9
Sept. 16, 1981	RVD	20 lbs.	Charge filter
Oct. 16, 1981	RVD	357 lbs.	T-201
Nov. 5, 1981	RVD	89 lbs.	Charge filter
Jan. 11, 1982	RVD	3-7 lbs.	Recovered monomer condenser
June 10, 1982	RVD	57 lbs.	Recovered monomer condenser
Jan. 13, 1983	RVD	222 lbs.	D-745
Dec. 18, 1983	Manual Vent	229 lbs.	?
Feb. 1, 1984	Conoco Sued by DOJ on behalf of EPA		
After July 20, 1984	July voluntarily becomes a party to the suit.		
Aug. 19, 1985	Vista & Conoco agree to settle out of court. \$100,000 penalty Agree to submit a compliance plan.		
Sept. 16, 1985	Compliance plan submitted to EPA. Suggest 3 projects plus administrative; asks for ROL equivalency		
Oct. 25, 1985	EPA asks for more information		
Nov. 14, 1985	Vista sends more information		
Dec. 31, 1985	EPA tentatively approved plan; they do not approve ROL equivalencies.		

Mar. 27, 1986	EPA approves ROL equivalency.
Apr. 1, 1986	AFE for projects submitted. \$107,500 1. Reactor valve limit switches 2. Water Stripper T/P recorder 3. New module BD Tank level indicator Conoco
Apr. 3, 1986	EPA Approves compliance plan.
Dec. 23, 1986	Three projects complete.
July 27, 1986	VCM release
Aug. 8, 1986	VCM release
Mar. 11, 1987	MS Bureau of Pollution Control issues complaint for 2 releases
Apr. 14, 1987	Vista settles with the State for \$2,000.
Aug. 6, 1987	Termination filed on the consent decree.
Nov. 7, 1987	Case closed.