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FROM: J. C. Ledvina
DATE: March 22, 1990

Interoffice
Communication

SUBJ: BENZENE WASTE OPERATIONS REGULATION

VISTA

EPA promulgated a Benzene Waste Operations National Emission Standard for Hazardous Air Pollutants (NESHAP) on March 7, 1990. The standard regulates benzene emissions to the air from wastes and wastewater. Both the LCCC and Baltimore are affected by this rule.

An initial report detailing what benzene waste streams we have at each plant is due to EPA by June 7. Equipment will need to be installed at both locations to reduce benzene emission as specified in the standard. We have until March 7, 1992, two years, to get the controls in place and operational. There is no provision in the Clean Air Act allowing more time.

Houston Environmental, Legal, and the plants have been discussing the rule in detail. We are just starting to get an appreciation of the implications but it is certain that capital projects will be necessary. In some cases, particularly at Baltimore, some of these projects are already identified because of other pressures to reduce benzene emissions. We will keep you informed as the full implications are understood.

EPA also promulgated a Benzene Loading NESHAP on March 7. The standard does not apply to benzene unloading, so for the most part, we are unaffected. The exception is LAC loading at LCCP where we will have a recordkeeping obligation only. No capital will be required.

Jae L.

J. C. Ledvina

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.523

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Interoffice
Communication

To:

J. C. Ledvina - Houston

From:

R. A. Plewa - LCCP

Date:

April 5, 1990

Subject:

LCVCM Filter Press - No Immediate Benzene
NESHAPS Work Required

VISTA

This memo is in response to your March 23, 1990 memo concerning the Benzene Waste Operations NESHAPS Rule and its impact on filter presses (see attached). This rule may impact the LCVCM filter press at a later time.

I recommend the LCVCM rental filter press be installed as designed. No immediate capital modifications are required at this time for the following reasons:

1. We have until 1992 to comply with these regulations.
2. The only potential compliance necessary before 1992 is reporting.
3. We need to gather data on benzene concentration in the materials being handled to determine if the NESHAP rule would apply.

Later, data may show modifications are required in 1992 but there is no reason to take immediate action. I recommend completing the filter press installation without modification.

R. A. Plewa

R. A. Plewa

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