



CHEMICAL MANUFACTURERS ASSOCIATION

CHEMSTAR FAX

To: Ethylene Dichloride Panel Members

Jim Barter	PPG Industries	412-434-2137
Thomas Grumbles	Vista Chemical	713-588-3456
William Hayes	Dow Chemical	517-636-9899
W.C. Holbrook	BFGoodrich	216-447-6459
Phillip Ostrowski	Occidental	716-278-7297
Thomas Robinson	Vulcan Chemicals	205-877-3102

Date: December 7, 1992

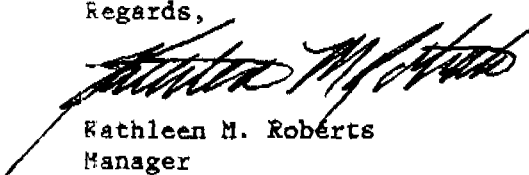
of pages (including cover)-----2

If there are any problems with this transmission, please call
202-887-1146.

Re: Generic CMA Request for Information

Attached is a list of data needs which generic CMA would like to include in its comments on the HON. If you have any questions or can provide any information, please call Richard Sigman at 202-887-1313 or Gary O'Dea at 202-887-1353.

Regards,


Kathleen M. Roberts

Manager

Ethylene Dichloride Panel

SL 063860

Ask Pends to provide, if possible

November 20, 1992

CMA HON DATA NEEDS

Subgroup	Data Need	Status/Response
General	Information from companies that use control technologies other than those specified in the HON which should be included as reference technologies.	
Monitoring and Recordkeeping	Estimate of person-hours needed to comply with the recordkeeping and reporting provisions	
Monitoring and Recordkeeping	Comments or suggestions on the types of monitoring systems discussed in the HON (e.g., charts, data averaging, and data compression) and whether other types of systems exist.	
Monitoring and Recordkeeping	Verification that plant condensers on tanks can achieve a 95% control efficiency	
Applicability	Comments on applicability provisions as they relate to plant operations	
Multi-Media Impacts	Examples ("horror stories") from companies that have tried to get permits for combustion devices but had difficulty due to the production of NOx emissions.	
Multi Media Impacts	Survey of the size of incinerators and NOx emissions planned for HON compliance.	
Emissions Averaging	Plant input on which emissions averaging option they prefer: (1) the quarterly "allowable" limit that is based on an emissions cap or (2) EPA's option that requires that debits not exceed credits by more than 25-35% in any one quarter.	
Phase-In	Plant input on whether they think that construction permits will be required to install HON controls. If so, how many permits will be needed, and how long is it currently taking to get permits.	

SL 063861