

To: Dave Mahler
From: Joe Ledvina
Date: February 8, 1991
Subject: Part-time Benzene Service

TO: JCL: ERT: MJH: AIO: RF

XF: 294

Dave,

I found no specific exclusion for equipment that contains benzene a small percentage of the time. I vaguely remember talk of a cutoff for equipment that contains benzene less than 10% of the time but have not been able to substantiate that.

We discussed this back when the Benzene Fugitive NESHAP was promulgated. Item 2 of my April 29, 1983 memo (attached) speaks to the issue. This is based on a conversation I had with Fred Dimmick on April 28, 1983. I think this position is still reasonable and recommend we continue to abide by it.

Give me a call if you want to discuss.


Joe Ledvina