

*Xf: Benzene Fug.*

Interoffice Communication

To Distribution
From J. C. Ledvina
Date April 29, 1983
Subject BENZENE FUGITIVE EMISSION NESHAP'S

There were a number of issues that came up during our meeting on 4/27 regarding the Benzene Fugitive NESHAPs. After a discussion with EPA and further thought on these issues I've detailed below positions and interpretations that should be used in planning for implementation of the standard.

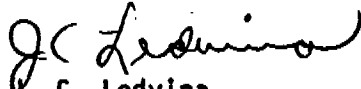
EPA recently proposed a fugitive emission standard for new refineries. They stated that the concepts incorporated in the refinery standard will be included in other fugitive standards including the benzene NESHAPs. The guidance presented here is based on a review of the refinery proposal.

1. Frequency of pump monitoring - Pumps in benzene service at all plants considered existing sources under the regulation are not required to install double or tandem seals. However, pumps that are not so fitted must monitor for seal or packing leaks once a month.

If a benzene concentration of 10,000 ppm or greater is detected near the seal or packing, the pump must be repaired within 15 days. If a pump is a chronic leaker and cannot be repaired, the standard will allow 6 months to install a double or tandem seal. Another option is to encase the seal area and route a vent off the case to a control device.

2. Part-time benzene service - The standard applies to equipment that is intended to be in benzene service. Equipment that is incidentally or accidentally contaminated with benzene is not subject to the standard. If equipment is intended to be in benzene service only part-time and it is not in benzene service at the normal monitoring time, don't monitor. In that case, make a note in ~~your record~~ that the equipment was not in benzene service.
3. Product accumulators with top layers greater than 10% benzene - The standard does not speak to this situation. Fred Dimmick of EPA, who is writing the final standard, agrees with the position we discussed in our 4/27 meeting, i.e., use the total volume of an accumulator when making a determination of whether it is in benzene service.
4. Monitoring Method - Attached is a draft Method 21 which is to be followed in the monitoring program. As you can see, EPA does not specify a particular instrument, but does set performance specifications. Dimmick says that all vapor analyzers on the market that meet the specifications are acceptable to EPA.

5. Monitoring Program - Affected facilities have 90 days from the effective date of the standard to start monitoring. EPA does not expect to grant any time variances for the monitoring program.
6. Promulgation Date - The schedule is slipping. EPA now expects to have a final standard out by mid-October.


V. C. Ledvina

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Attachment

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