

Lance Chester

From: NSCHRISTAIN
Sent: Wednesday, September 18, 1996 1:00 PM
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Subject: Summary of HON Fugitives
Sensitivity: Confidential

The HON Fugitives Emissions MACT (40 CFR 63, Subparts H and I) is a stringent regulation which affects 27 process units in Freeport. The regulation lists standards, monitoring, repair, recordkeeping, and reporting requirements for fugitive components (e.g., valves, flanges, pumps, compressors) in organic hazardous air pollutant service. Generally, monitoring is required and a leak definition is given (e.g., for valves, quarterly monitoring at 10,000 ppm leak definition). The monitoring frequency lengthens and the leak definition decreases as long as the process unit meets certain guidelines (e.g., annual monitoring of valves at 500 ppm leak definition with <0.5% leak rate). Currently, the Vinyl Chloride units and the Chlorinated Ethanes plant perform quarterly monitoring at 500 ppm with a leak rate <0.5% (the most stringent leak rate in the regulation).