



Shell Oil Company
Interoffice Memorandum

JANUARY 17, 1985

FROM: J. A. MULLINS
TO: C. H. RIVERS
SUBJECT: PROPOSED CHANGES IN VC REGULATION

On January 9, 1985, the EPA proposed the long-expected changes to the NESHAP standard for VC. A copy of the proposal is attached.

These changes parallel those which we have discussed over the last several months and are summarized below:

- Definitions

- "In VC Service" - specific procedures are proposed to determine if a piece of equipment exceeds the 10% criteria.
 - "EDC and VC purification" - expanded definition to include storage, piping, etc.
 - "Relief Valve" expanded to include other pressure-relieving devices (rupture disks, manual vents, etc.); however, excludes control valves used to control flow to incinerators (i.e., bypass to atmosphere).
 - Definition of "leak", "exhaust gas", "relief valve discharge", and "3-hour period" are added.
- The 10 ppm requirement for exhaust gases from EDC and VC purification is stated as a 3-hour average.
- Relief valve discharges are limited to 4 per year calculated on a rolling 6-month basis. Any over 4 are automatic violations for whatever reason. Although not stated in the proposed regulation, the preamble indicates that multiple relief valve discharges on the same piece of equipment as a result of one incident are counted as a single discharge. For an incident which caused multiple relief valve discharges on different pieces of equipment, each relief valve discharge would count towards the maximum allowable.

07-AIR-NESHAP
01-VC/PVC-GOV

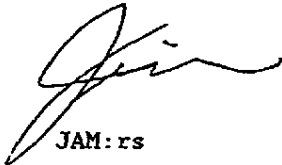
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- Fugitive Emission Controls-

- The fixed point monitors must be retained, along with definition of leak and the program to find and repair leaks detected by the monitors.
 - The requirements of Subpart V (Benzene NESHA) are also added. Since the VC standard will continue to require the use of double seals on rotating equipment and rupture disks under relief valves, the monitoring requirements under Subpart V for this equipment are not applicable if the seal and disk requirements of Subpart V are met. The monthly monitoring for valves can be waived if a demonstration of less than 2% leaking can be made within 90 days and annually thereafter. The record and reporting requirements of Subpart V are also waived if the 2% criteria is met.
- Record retention requirements are raised from 2 to 3 years.
- Reporting requirements are changed to be consistent with the 3-hour emission limit and for relief discharges.

Written comments are due March 25, 1985. A public hearing may be held on February 26, 1985. I would expect that the Vinyl Institute will request a hearing primarily because of concerns for the changes affecting PVC plants. Since the Institute will likely meet in early February to review this proposal, I would appreciate any initial comments (verbal) by the end of January.

Following the Institute meeting, we can discuss the need for Shell to submit written comments.



JAM:rs

Attachment

cc (w/o att.)
B. C. Ebert
R. T. Collins
HS&E-IS (2)