



U.S. Environmental Protection Agency Applicability Determination Index

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Category: NESHAP
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Title: Control of Waste Management Units
Recipient: Hepola, John R.
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Subparts: Part 61, FF, Benzene Waste Operations

References: 61.340
61.346
61.348(b)(2)(i)
61.348(b)(2)(ii)

Abstract:

How should compliance be determined for commingling streams?

When combining a stream with greater than 10 ppmw benzene concentration with a stream of less than 10 ppmw into a resultant stream of less than 10 ppmw, the facility should apply controls to all waste management units up to the biological treatment unit. Controls should extend to individual drain systems, including junction boxes, but covers and closed-vent system controls are not required.

Letter:

August 17, 1992

MEMORANDUM

SUBJECT: Requirements for Control of Waste Management Units under the Benzene Waste Operations NESHAP, Subpart FF

FROM: John B. Rasnic, Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

TO: John R. Hepola, Chief
Air, Pesticides and Toxics Division
Region VI

This memorandum is in response to your June 16, 1992 request to Susan Wyatt of the Chemicals and Petroleum Branch for an interpretation of the requirements for an enhanced biodegradation unit under the Benzene Waste Operations NESHAP at 40 C.F.R. Part 61, Subpart FF. This response has been coordinated with the Emission Standards Division.

CITGO Petroleum Corporation (CITGO) in Lake Charles, Louisiana, has ontacted both Region VI and Headquarters regarding a unit at their facility. Specifically, CITGO would like an interpretation of Section 61.348(b)(2)(i) covering standards for treatment processes as they may apply to an enhanced biodegradation unit at Lake Charles. CITGO plans to combine streams of greater than 10 ppmw benzene with those less than 10 ppmw to form a combined feed into the enhanced biodegradation unit of less than 10 ppmw for the purpose of facilitating treatment. The total annual quantity of benzene in combined wastewater will be greater than 1 megagram.

When an owner or operator aggregates or mixes individual waste streams in order to facilitate management and treatment, the Section 61.348(b)(2)(i) management and treatment requirements must be met, as discussed in the March 7, 1992 preamble (page 8331, second column). The preamble states that the facility shall "apply controls to all wastewater treatment units up to the point where the benzene concentration is below 10 ppmw and one of the following occurs: (1) the total annual quantity of benzene in the wastewater for the facility is reduced below 1 megagram; or (2) the waste has reached the biological treatment unit. Biological treatment units would need to be controlled only if the benzene concentration of the waste entering the unit is 10 ppmw or greater. These units routinely remove up to 80% of the organics in dilute waste streams and thus would not be required to meet the 1 megagram per year limit if the concentration entering the unit is less than 10 ppmw."

The rule requirements are actually broader in scope than discussed in the preamble and include controls on all the waste management units (rather than the subset, waste treatment units) until the above cited conditions are met. Individual drain systems, which often contain junction boxes, are included in the definition of waste management units. The CITGO schematic (attached) indicates the presence of two and possibly three junction boxes prior to the aeration tanks. All of these junction boxes would need to comply with the individual drain system control standards at Section 61.346. If the feed to the enhanced biodegradation unit is less than 10 ppmw benzene, as stated by CITGO, then covers and closed-vent system controls are not required.

Though the inquiry from CITGO cited Section 61.348(b)(2)(ii), the question was directed at Section 61.348(b)(2)(i). This response has been prepared regarding the latter citation addressing the flow- weighted annual average benzene content being less than 10 ppmw.

Please contact Daniel Couturier of my staff with any questions regarding this issue at (703) 308-8678.

Attachment

cc: Air Compliance Branch Chiefs, Regions I-X
Mark Hansen, (6T-E)
Bob Lucas, (MD-19)
Susan Wyatt, (MD-19)