



# U.S. Environmental Protection Agency Applicability Determination Index

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**Control Number: PA01**

**Category:** NESHAP  
**EPA Office:** SSCD  
**Date:** 10/31/1991  
**Title:** Equivalence Determination-Subpart FF  
**Recipient:** Spiridakis, Nicholas J.  
**Author:** Rasnic, John B.

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**Subparts:** Part 61, FF, Benzene Waste Operations

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**References:** 61.340

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**Abstract:**

Is a facility which has submitted an equivalent control proposal, which has not yet been approved or denied, subject to NESHAP standards?

The facility remains subject to all standards until the proposal is determined to be acceptable.

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**Letter:**

October 31, 1991

Mr. Nicholas J. Spiridakis  
Benzene NESHAP Coordinator  
Chevron Research and Technology Company  
100 Chevron Way  
Richmond, California 94802-0627

RE: Request for Equivalence Determination for Subpart FF.

Mr. Spiridakis:

This letter regards your July 18, 1991 request for review of a drain configuration to determine whether it is equivalent to the standards in the Benzene Waste Operations NESHAP, 40 CFR Part 61, Subpart FF. We are sending you this letter to inform you that your request was forwarded in late July to the Emissions Standards Division in the Office of Air Quality Planning and Standards for a technical review.

As indicated in your letter, the compliance date for this standard is March 7, 1992. You had requested that review of your request be expedited given the approaching compliance date. The Emission Standards Division is reviewing your request; however, you should be aware that until such time as an equivalent control proposal is determined to be acceptable, Chevron remains subject to the standards as promulgated at Subpart FF.

If you have any questions, please contact Daniel Couturier, of my staff, at (703) 308-8678, or K.C. Hustvedt in the Emission Standards Division at (919) 541-5402.

Sincerely,

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

cc: K.C. Hustvedt (MD-13)  
Gail Lacy (MD-13)