



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: Z970009

Category: NESHAP
EPA Office: Region 10
Date: 10/27/1995
Title: New Controls for Proc. Wastewater Treat. Plant
Recipient: Solari, Gery
Author: Thie, Bonnie

Subparts: Part 61, A, General Provisions
Part 61, FF, Benzene Waste Operations

References: 61.15
61.355

Abstract:

Q: A waste water treatment plant is installing vapor tight seals and vent carbon canisters on oily water and phenolic sewer openings as well as all combined process wastewater treatment system openings in the primary treatment section. Does the addition of these control devices constitute a modification?

A: No. The addition of control devices to a stationary source is not a modification (there is no increase in emissions of hazardous air pollutants to which standards apply; see 40 CFR 61.15(a)). EPA would not need to approve this proposed project.

Letter:

Reply To
Attn Of: AT-082

Mr. Gary A. Solari
Tosco Northwest Company
Ferndale Refinery
3901 Unick Road, P.O. Box 8
Ferndale, Washington 98248

Dear Mr. Solari:

We have received your notification dated September 11, 1995, requesting EPA review and concurrence on whether the attached proposed project meets the applicable requirements of 40 CFR Part 61, subpart FF (National Emission Standards for Benzene Waste Operations).

It is our understanding that vapor tight seals and vent point carbon canisters will be installed on subpart FF-covered oily water and phenolic sewer openings, as well as all combined process wastewater treatment system openings in the primary treatment section of the waste water treatment plant.

Since the addition of control devices to a stationary source does not constitute a modification (as there will not be an increase in emissions of a hazardous air pollutant to which a standard applies; see 40 CFR 61.15(a)), EPA would not need to approve this proposed project. However, based upon our review of the project information submitted, we believe this project, if properly equipped and operated, would meet all applicable control technology requirements and emissions standards in subpart FF. Of course, a final determination as to whether the project meets subpart FF requirements cannot be made until our office has had the opportunity to review the results of the performance test required by 61.355(h).

Please call Chris Hall of our office at (206) 553-1949 if you have any questions or comments regarding this matter, or you may contact me at (206) 553-1189.

Sincerely,

Bonnie Thie, Unit Manager
Alaska-Washington Air Unit

cc: Terryl Nyman, NWAPA