



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: Z050001

Category: NESHAP
EPA Office: Region 5
Date: 07/14/2004
Title: Junction Box Tight Seal Requirements
Recipient: Andes, Ronald
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Comments: See related determination filed as ADI Control No. 0400031.

Part 61, FF Benzene Waste Operations

References: 61.346(b)(2)(i)

Abstract:

Q: Are covers on junction boxes at Marathon Ashland Petroleum's facilities required to be equipped with a gasket in order to satisfy the "tight seal" requirements for junction box covers under 40 CFR part 61, subpart FF?

A: No. 40 CFR section 61.346(b)(2)(1) requires that junction boxes prevent leaks to the atmosphere in order to satisfy the "tight seal" requirements. However, consistent with a prior determination for similar provisions under 40 CFR part 60, a gasket is not necessarily required to achieve the tight seal.

Letter:

July 14, 2004

Ronald L. Andes
Senior Attorney
Marathon Ashland Petroleum LLC
539 Main Street
Findley, OH 45840-3295

RE: Marathon Ashland Petroleum LLC Request for Applicability Determination 40 C.F.R. Part 61
Subpart FF, Benzene Waste NESHAP

On March 18, 2004, Marathon Ashland Petroleum LLC ("MAP") submitted to the United States Environmental Protection Agency ("EPA"), a letter requesting an applicability determination for 40 C.F.R. Part 61 Subpart FF National Emission Standard for Benzene Waste Operations. The letter requests EPA to determine whether covers on junction boxes are required to be equipped with a gasket or other type of seal in order to satisfy the "tight seal" requirements for junction box covers under Sec. 61.346(b)(2)(i). In summary, we have determined junction boxes must prevent leaks to the atmosphere in order to satisfy the "tight seal" requirements. However, a gasket is not necessarily required.

The control requirements for individual drain systems in Sec. 61.346(b) were designed to mirror the NSPS control requirements for individual drain systems in petroleum waste water systems in Sec. 60.692-2, with the addition of control equipment on the junction box vent stack. This is explained in 55

Fed. Reg. 8346 (March 7, 1990). Correspondingly, the following requirement for junction box covers is found verbatim in both Sec. 61.346(b)(2)(i) and Sec. 60.692-2(b)(2): "Junction box covers shall have a tight seal around the edge . . ."

On May 10, 2004, EPA issued a determination to MAP which stated that the "tight seal" requirement in Sec. 60.692-2 requires that junction box covers prevent detectable leaks around the edges, while not necessarily requiring a gasket. This determination is attached. Since the language is identical in Sec. 61.346(b)(2)(i), it is our finding that junction boxes regulated by Sec. 61.346(b)(2)(i) must likewise prevent detectable leaks to the atmosphere. Semiannual monitoring is not required, however, sources should be able to demonstrate that junction box covers do not leak by monitoring with a hydrocarbon detector upon request. As stated in our NSPS determination, the definition of a leak is an instrument reading of less than 500 ppm above background levels. A physical gasket is not required if another means is available to prevent detectable leaks.

We have coordinated this response with the Office of Enforcement and Compliance Assurance, the Office of Air Quality Planning and Standards, and the National Enforcement Investigation Center. If you have any questions regarding this determination, please call Nathan A. Frank of my staff, at (312) 886-3850.

Sincerely yours,

George T. Czerniak, Chief
Air Enforcement and Compliance Assurance Branch

Attachment

cc: Maria Malave
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