



# U.S. Environmental Protection Agency Applicability Determination Index

Control Number: PA04

**Category:** NESHAP  
**EPA Office:** ESD  
**Date:** 06/26/1992  
**Title:** Equivalence Determination for Process Wastewater Drains  
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**Subparts:** Part 60, QQQ, Petrol. Ref.-Wastewater Systems  
Part 61, FF, Benzene Waste Operations

**References:** 60.690  
60.692  
60.692-2(a)(1)  
61.340  
61.346(b)(1)

**Abstract:**

How should a conflict between NESHAP and NSPS requirements for process drains be resolved?

Process drains in active service must be equipped with water seal controls and be inspected monthly. Drains not in active service can use a tightly sealed cap or plug with semi-annual inspections as an alternative. However due to the intermittent use of the drains at Conoco and the possibility of water seals freezing, it is acceptable to apply caps to all drains at Conoco. Also see PS19 (NSPS).

**Letter:**

June 26, 1992

MEMORANDUM

SUBJECT: Equivalence Determination for Process Wastewater Drains at the Conoco Refinery in Billings, Montana

FROM: Bruce C. Jordan, Director  
Emission Standards Division (MD-13)

TO: Patricia D. Hull, Director  
Air, Radiation and Toxics Division  
Region VIII (8ART-AP)

I am responding to your June 9, 1992, memorandum in which you explained proposed modifications to the Billings, Montana Refinery. This response has been coordinated with the Stationary Source Compliance Division. Concoco's proposal to comply with the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Benzene Waste Operations (Part 61, Subpart FF) includes a request to use the control technique for individual drain systems to simultaneously comply with Subpart QQQ, the New Source Performance Standards (NSPS) for Petroleum Refinery Wastewater Systems (Part 60).

The NESHAP requires that process drains be equipped with water seal controls or a tightly sealed cap or plug (61.346(b)(1)) and inspected quarterly. The NSPS requires that process drains in active service be equipped with water seal controls and inspected monthly (60.692-2(a)(1)). For drains not in active service the NSPS allows, as an alternative to water seal controls, the use of a tightly sealed cap or plug and semiannual inspections.

The difference in the standards for drains in Subpart QQQ (promulgated November 1988) and Subject FF (promulgated March 1990) is a result of the standard development process and based on knowledge gained in the period between promulgation of the two standards. A tightly sealed cap, which is properly installed on the drain, undoubtedly can be as efficient as water seal controls. The intermittent use of the drains at the Conoco refinery and the possibility of the water seals freezing in the drains make a cap more practical.

In light of the extreme weather conditions in Montana (frost penetration reported to be at five feet) and the non-continuous use of the drains, it would be acceptable to apply Subpart FF Controls to all drains at the Conoco Refinery in Billings, Montana in order to comply with NSPS Subpart QQQ.

If you have any further questions, please contact Randy McDonald of my staff at (919) 541-5402.

cc: Dan Couturier, SSCD (EN-341W)  
Robert B. Lucas, ESD/CPB (Md-13)  
John Rasnic, SSCD (EN-341W)  
Cindy Reynolds, Region VIII (8ART-AP)