



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: Z930004

Category: NESHAP
EPA Office: SSCD
Date: 06/16/1993
Title: Subpart FF-Vacuum Trucks
Recipient: Turlinski, Bernard
Author: Rasnic, John B.

Subparts: Part 61, FF, Benzene Waste Operations

References: 61.345

Abstract:

Are vacuum trucks used for clean-up and maintenance subject to the control requirements of subpart FF?

Vacuum trucks used for clean-up and maintenance at a facility with an annual average benzene quantity greater than 10 Mg/yr, and therefore subject to all of the control requirements of the subpart, are included in the definition of "containers" and must meet the requirements at section 61.345. Though the trucks used at Chevron are owned by a contractor, they must meet the requirements of the rule when handling controlled waste.

Letter:

Control Number: Z930004

June 16, 1993

MEMORANDUM

SUBJECT: Applicability of NESHAP Subpart FF to Vacuum Trucks

FROM: John B. Rasnic, Director
Stationary Source Compliance Division (EN-341W)
Office of Air Quality Planning And Standards

To: Bernard Turlinski, Chief
Air Enforcement Branch (3AT-23)
Region III

This memorandum is in response to your request of May 27, 1993 for an applicability determination under the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Benzene Emissions from Waste Operations at 40 CFR Part 61, Subpart FF.

Your request concerned vacuum trucks used for clean-up and maintenance at the Chevron Refinery at Philadelphia, Pennsylvania. Your staff stated in a phone conversation that the facility has an annual average benzene quantity greater than 10 Mg/yr, and therefore, they are subject to all of the control requirements of the subpart.

The vacuum trucks are included in the definition of "containers" and must meet the requirements at section 61.345. Each opening shall be maintained in a closed, sealed position at all times except when it is necessary to use the opening for waste loading, removal, inspection or sampling. Covers and openings shall be certified initially and annually to operate with no detectable emissions. Visual inspections are required for each cover and all openings initially and quarterly. Though the trucks used at Chevron are owned by a contractor, they must meet the requirements of the rule when handling controlled waste.

Please contact Daniel Couturier of my staff with any further questions regarding this issue at 703-308-8678. This response has been coordinated with the Emission Standards Division.

cc: Air Compliance Branch Chiefs, Regions I-X
R. Lucas (MD-13)