



# U.S. Environmental Protection Agency Applicability Determination Index

Control Number: Z970001

**Category:** NESHAP  
**EPA Office:** Region 6  
**Date:** 11/14/1996  
**Title:** Internal Floating Roof for Oil-Water Separator  
**Recipient:** Loganathan, Narayanan  
**Author:** Hepola, John

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

**References:** 60.112b  
60.693-2  
61.347  
61.352

**Abstract:**

Q: Will EPA approve the use of an internal floating roof with liquid-mounted primary seals meeting the requirements of 40 CFR 60, Subpart Kb, 60.112b(a)(1), as an acceptable method of control for an oil-water separator under 40 CFR 61, Subpart FF, 40 CFR 61.347?

A: Yes. An internal floating roof equipped with a primary seal and a secondary seal and meeting the requirements of 60.693-2, can be used to comply with 61.352(a).

**Letter:**

November 14, 1996

Mr. Narayanan Loganathan  
Texas Natural Resource  
Conservation Commission  
P.O. Box 13087  
Austin, TX 78711-3087

Dear Mr. Loganathan:

In a letter dated February 26, 1996, you requested our response to a written request you received from Waid and Associates ("Waid"), Austin, Texas dated February 7, 1996. Waid in its letter to TNRCC requested the use of an internal floating roof with liquid-mounted primary seals meeting the requirements of 40 CFR 60, Subpart Kb, 60.112b(a)(1), as an acceptable method of control for an oil-water separator under 40 CFR 61, Subpart FF, 40 CFR 61.347.

As you are aware, 40 CFR 61, Subpart FF, 40 CFR 61.352(a) (relating to Alternative Standards for Oil-Water Separators under NESHAP Subpart FF) states that an operator or owner may elect to comply with the following, as an alternative to the standards for oil-water separators specified in 61.347 (relating to Standards: Oil-Water Separators): (1) a floating roof meeting the requirements in 40 CFR 60.693-2(a). Furthermore, 40 CFR 60.693-2(a)(1) states that each floating roof shall be equipped with a closure device between the wall of the separator and the roof edge. The closure device is to consist of a primary seal and a secondary seal. As you stated in your letter, the above requirement does not exclude the use of an internal floating roof. Therefore, we concur with your conclusion that an internal floating roof equipped with a primary seal and a secondary seal and meeting the requirements of 60.693-2, can be used to comply with 61.352(a).

We have coordinated your request with the appropriate technical staff at EPA's Office of Air Quality Planning and Standards in Research Triangle Park, North Carolina and the Office of Enforcement and Compliance Assurance in Washington, D.C. Should you need any additional information regarding this matter, please contact me at (214) 665-7220, or Mr. Tony Robledo of my staff at (214) 665-8182.

Sincerely yours,

/s/

John R. Hepola  
Chief  
Air/Toxics and Inspection  
Coordination Branch

cc: Mr. Jeff Grief, TNRCC  
Mr. Troy Dalton, TNRCC  
Ms. Karen Atkinson, TNRCC, Region 12  
Ms. Teresa S. Hurley, Waid and Associates