Miscellaneous Organic Chemical NESHAP (MON)

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MON Overview

- Background Information
  - Applicability
  - Rule requirements
  - Control requirements
  - Initial Compliance Demonstration
  - Reporting

- Proposed Rule Changes
General Applicability

- Subpart FFFF of 40 CFR part 63 (MON) regulates miscellaneous organic chemical manufacturing.
  - Promulgated on November 10, 2003
  - Amendments published in 2005 and 2006
  - Proposed amendments in August 2008

- Compliance date for existing sources was May 10, 2008.

- MON is the MACT standard for organic chemical processes that have not been regulated under other standards.
General Applicability, contd.

• An organic chemical manufacturing process will most likely be subject to MON if it:
  - uses, generates, or processes HAP,
  - is located at a major source site, and
  - is not part of affected source under another Part 63 NESHAP

• The MON also covers:
  - HON batch process vents,
  - Sources that were excluded from HON that have only HAP solvent emissions
Rule Requirements

- Emission standards potentially apply to:
  - Continuous process vents
  - Batch process vents
  - Hydrogen Halides and Halogen HAPs
  - Process and maintenance wastewater streams
  - Process condensers
  - Storage tanks
  - Equipment leaks
  - Heat exchange systems
  - Transfer racks
Control Requirements

• For most emission point types, there are group determination procedures / cut-offs
  - In general, Group 1 emission points must be controlled.
  - Group 2 emission points are not subject to control but may have monitoring, recordkeeping, reporting requirements.

• Control options and level of control vary based on emission point type
Initial Compliance Demonstration

- Emission Calculations for batch vents using specified calculations or other approved methods
- Either performance testing or design evaluation is required on control devices depending on:
  - Emission point type
  - Size of control device
  - Control device type
- Operating parameters must be established during test or design evaluation.
On-going Compliance Requirements

- Continuous parameter monitoring is required on control / recovery devices
- Fugitive monitoring
- Heat exchange system monitoring
- Startup / Shutdown / Malfunction (SSM) recordkeeping / reporting
- Equipment inspections / Recordkeeping / Reporting, etc.
Semi-Annual Compliance Reports

• REMINDER - First semi-annual compliance reports for Subpart FFFF are due on February 28, 2009.

• NOTE: You can also follow the Title V reporting schedule. Reports would be due at the end of March.
Proposed Rule Changes

- On August 6, 2008, EPA published proposed rule changes to the HON (Subpart G) and MON (Subpart FFFF)
  - Comments were due on September 22, 2008
Proposed Rule Changes ...

• HON Subpart G wastewater tanks (63.133)
  - When using a fixed roof tank with a closed vent system and control device to control Group 1 wastewater stream, the proposed rule would allow use of a fixed roof tank with openings provided it is operated under negative pressure and controlled by a closed vent system and control device.
  - Previously, only allowed for openings to be maintained in controlled position with no detectable emissions, etc.

• Since the MON references this portion of the HON, this change potentially could impact MON units as well.
Proposed Rule Changes ...

• Brief overview of the nine proposed changes to Subpart FFFF

• 63.2450(o) - adds clarification text
  - if Group 1 hydrogen halide or halogen HAP vent stream, then that vent stream cannot be vented to a flare. The new text allows non-Group 1 vent streams that contain hydrogen halide and halogen HAP to be vented to a flare.

• 63.2460(a) - adds clarification text
  - any combination of emission limits (Table 2) for batch process vents (BPV) may be applied to BPV.
  - demonstrate that a process condenser is properly operated applies only in the case where a HAP is heated above its boiling point.
Proposed Rule Changes ...

• 63.2465(b) - amended
  - proposing to define outlet concentration limit to controlled and uncontrolled process vents.

• 63.2470(c) - amended
  - For nonregenerative carbon adsorbers, allows compliance with Pharma MACT provisions instead of Subpart SS

• 63.2485(n)(1) - amended alternative requirements
  - Added neutralization units. Hard-piping may be required.
Proposed Rule Changes ...

- 63.2520(c)(2) - corrected text
  - reference to non-existent 63.2460(c)(5) updated to (k)(6).
- 63.2550(i) - new text and amendments
  - added a definition for the term ‘‘bench-scale process’’ from HON Subpart H
  - Update definition of term ‘‘miscellaneous organic chemical manufacturing process’’ by removing extruder as an endpoint for processes without an extruder (circular reference).

- Table 6 - correcting text
  - Deleting bullet 2 as it was redundant

- Table 7 - amended
  - Proposed certain wastewater requirements as an alternative for liquid streams in open systems.
Questions?