

Emissions Averaging Provisions

The final rule incorporates the emissions averaging provisions in 40 CFR part 63, subpart G (the HON), with some changes to accommodate batch process vents. For example, the final rule specifies that uncontrolled emissions from batch process vents are to be calculated using the procedures in 40 CFR part 63, subpart GGG, and performance testing must be conducted under worst case conditions, as defined in subpart GGG.

Alternative Standard

The final rule contains an alternative standard for process vents and storage tanks. When emissions are controlled using combustion control devices, the alternative standard requires control to an undiluted TOC concentration of 20 ppmv or less and an undiluted hydrogen halide and halogen HAP concentration of 20 ppmv or less. For noncombustion control devices, the TOC concentration and total hydrogen halide and halogen HAP concentration both must be reduced to 50 ppmv or less. Continuous monitoring of outlet TOC and total hydrogen halide and halogen HAP is required for compliance with this alternative standard.

C. What Are the Testing and Initial Compliance Requirements?

Process Vents

The final rule requires calculation of uncontrolled emissions as a first step in demonstrating compliance with the 98 percent or 95 percent reduction requirement for batch process vents. This initial calculation of uncontrolled emissions is not required if you choose to control process vents using the alternative standard or using specified combustion devices. For continuous process vents, the final rule requires calculation of the TRE index values using the procedures contained in the HON for continuous process vents.

To verify that the required reductions have been achieved, you must either test or use calculation methodologies, depending on the emission stream characteristics, control device, and the type of process vent. For each continuous process vent with a TRE less than or equal to 1.9, compliance with the percent reduction emission limitation must be verified through performance testing. For batch process vents, initial compliance demonstrations must be conducted in accordance with the requirements in the Pharmaceuticals Production NESHAP (40 CFR part 63, subpart GGG). Specifically, performance tests are required for control devices handling

greater than 9.1 Mg/yr (10 tpy) of HAP, while either engineering assessments or performance tests are allowed for control devices with lower loads and for condensers. Performance tests must be conducted under worst-case conditions if the control device is used to control emissions from batch process vents.

Storage Tanks, Transfer Racks, and Wastewater

To demonstrate initial compliance with emission limits and work practice standards for storage tanks, transfer racks, and wastewater systems, the final rule allows you to either conduct performance tests or document compliance using engineering calculations. The initial compliance procedures are specified in 40 CFR part 63, subpart SS (National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process), subpart WW (National Emission Standards for Storage Vessels (Tanks—Control Level 2)), and subpart G (the HON), for control devices used to reduce emissions from storage tanks and transfer racks, storage tanks controlled with floating roofs, and wastewater sources, respectively.

D. What Are the Continuous Compliance Requirements?

The final rule requires monitoring, inspections, and calculations to demonstrate ongoing compliance. Typically, continuous monitoring (*i.e.*, every 15 minutes) of emissions or operating parameters is required when using a control device or wastewater treatment device. If operating parameters are monitored, operating limits must be established during the initial compliance demonstration. Periodic inspections are required for emission suppression equipment on waste management units and floating roofs on storage tanks and wastewater tanks. For processes that have Group 2 batch process vents (*i.e.*, total organic HAP emissions less than 10,000 lb/yr), you must track the number of batches produced to show that emissions remain below the Group 1 threshold.

Continuous monitoring requirements for control devices are specified in 40 CFR part 63, subpart SS, with some exceptions specified in the final rule. For example, the final rule requires that monitoring data during periods of startup, shutdown, and malfunction (SSM) be used in daily averages, whereas subpart SS excludes such data from averages. For batch process vents, you may request approval to set operating limits for individual or groups of emission episodes using the results of

the performance test and applicable supplementary information. To use this approach, you must provide rationale for your selected operating limits in your precompliance report. As an alternative to daily averaging, the final rule also allows averaging over a batch or segment of a batch for control devices used to reduce emissions from batch process vents. For control devices that do not control more than 1 tpy of HAP emissions, only a daily verification that the control device is operating as designed is required.

Inspections for floating roofs must be conducted in accordance with 40 CFR part 63, subpart WW. All monitoring and inspection requirements for wastewater systems must be conducted in accordance with 40 CFR part 63, subpart G.

E. What Are the Notification, Recordkeeping, and Reporting Requirements?

Recordkeeping and reporting requirements are outlined in the General Provisions to part 63 (40 CFR part 63, subpart A), as well as the requirements in referenced subpart G (the HON), subpart SS (National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process), subpart TT (National Emission Standards for Equipment Leaks—Control Level 1), subpart UU (National Emission Standards for Equipment Leaks—Control Level 2 Standards), and subpart WW (National Emission Standards for Storage Vessels—Control Level 2). The sections of subpart A that apply to the final rule are designated in Table 12 to subpart FFFF of 40 CFR part 63. Additional recordkeeping and reporting requirements are specific to the final rule. For example, you are required to submit a precompliance report if you choose to comply using an alternative monitoring approach, use an engineering assessment to demonstrate compliance, or comply using a control device handling less than 1 tpy of HAP emissions. The final rule also references the SSM recordkeeping and reporting requirements contained in 40 CFR part 63, subpart SS. Under these provisions, SSM records are required only for events during which excess emissions occur or events when the startup, shutdown, and malfunction plan (SSMP) was not followed.

Consistent with the General Provisions, you must submit an initial notification, a notification of compliance status (NOCS) report, and compliance reports. The initial notification is required within 120 days of the effective date of 40 CFR part 63,