SITE REMEDIATION MACT STANDARD

STAKEHOLDER MEETING

February 15, 2001

OUTLINE

- **Purpose of Meeting**

- **Rule Summary**
  - **Applicability**
  - **Compliance Schedule**
  - **Control Requirements**
    - **Process vents**
    - **Non-vent sources**
    - **Exemptions**

- **Schedule**

- **Questions/Issues**

PURPOSE OF MEETING

- **Provide an overview of the proposed regulation**
- **Provide schedule for proposal**
- **Discuss issues**

APPLICABILITY

Rule applies to sites meeting the following:

1. Major sources of HAP
- emissions of 10 ton/year (tpy) of a single HAP or 25 tpy of a combination of HAP (10/25); and

2. Performing one or more remediation operations. Remediation is a process to cleanup a site with contaminated media.
- remediation operations do not have to exceed 10/25 alone for rule to apply.

Affected sources:

1. The group of process vents associated with remediation.

2. The group of contaminated media management units used in remediation.

3. The group of equipment components that contain or contact contaminated media.

APPLICABILITY (CONTINUED)

Facilitywide Exemptions:

1. **HAP content of media undergoing remediation at the site < 1 MG per year.**

2. **Sites handling mixed/radioactive waste only.**

Other Facilitywide Exemptions Being Considered:

3. **Small HAP potential remediation operations:**

   - Duration example - " remediation lasting __# of days are exempt"
   - Quantity example - "remediation operations handling less than ___ CY/Tons are exempt"

COMPLIANCE SCHEDULE

New sources - affected source groups constructed after proposal: comply with rule upon startup or promulgation date, whichever is later.

Existing sources - affected source groups* constructed before proposal: comply with rule three years after promulgation.

*** If a *unit* is added to an existing affected source group after the proposal date the affected source is still an existing source.**

SUMMARY OF CONTROL REQUIREMENTS - VENTS

Affected Source	Applicability Cutoffs	Draft Rule Requirements
Process Vents	**Vents are exempted from control requirements if:** **1) total of all vent emissions < 3 lb/hr and 3.1 tpy; or** **2) individual vents with flow rates < 0.005 m^3/min; or** **3) individual vents with flow rates < 6.0 m^3/min and HAP concentrations < 20 ppmv.**	**Control HAP emissions from <u>all</u> remediation vents to either:** **1) 3 lb/hr and 3.1 tpy for all affected source vents *combined*; or** **2) Reduce emissions by 95% for all vents *combined*.**

SUMMARY OF CONTROL REQUIREMENTS
NON-VENT AFFECTED SOURCES - GENERAL

Affected Source	Applicability Cutoffs	Draft Rule Requirements
All Contaminated Media Management Units: tanks, surface impoundments, containers, OWS and transfer systems.	**Units *exempted* from control requirements if: 1) Quantity of HAP < 500 ppmw; or 2) One or more units handle < 1 MG of HAP annually**	**Control HAP emissions in accordance with the individual unit requirements below.**
Tank	***Exempted* from control requirements if: used for biological treatment process meeting §63.683**	**See tank summary table**
Surface Impoundments	***Exempted* from control requirements if: used for biological treatment process meeting §63.683**	**Floating membrane cover; or vent to a control device. 40 CFR Subpart QQ**
Containers	**See container summary table**	**See container summary table**
Oil/Water Separators Organic/Water Separators (OWS)		**Install a fixed roof, a floating roof, vent to a control device or operate a pressurized system. 40 CFR Subpart VV**

Transfer Systems	**Drain system**	**Use any combination of covers, hard-piping and venting to control devices. 40 CFR Subpart RR**
	Non-drain system	**Use covers, hard-piping or vent to control device. §63.689(c)**
Equipment Leaks	***Exempted* from control requirements if components handle media containing <10% HAP or operate < 300 hrs/year**	**Leak Detection and Repair program . Meet 40 CFR Subpart TT or UU**

SUMMARY OF CONTROL REQUIREMENTS - TANKS

Tank Size	HAP Vapor Pressure	Draft Rule Requirements
< 10,000 gal	< 11.1 psia	Comply with Control Level 1 or 2: Control level 1 - fixed roof meeting Subpart OO; or Control level 2 - fixed roof with internal floating roof; external floating roof; vent to control device meeting §63.685(d); use a pressure tank; or locate tank in an enclosure vented to a combustion device.
10,000 gal # size < 40,000 gal	< 1.9 psia	Control level 1 or 2
10,000 gal # size < 40,000 gal	$ 1.9 psia	Control level 2
$ 40,000 gal	< 0.1 psia	Control level 1 or 2
$ 40,000 gal	$ 0.1 psia	Control level 2

SUMMARY OF CONTROL REQUIREMENTS - CONTAINERS

Container Design Capacity	Additional Criteria	Draft Rule Requirements
26 gal < capacity # 119 gal	All containers except those used for stabilization processes	Comply with Control Level 1, 2 or 3: Control level 1 - DOT packaging requirements; cover; or install an organic vapor-suppressing barrier; Control level 2 - DOT packaging requirements; operate container with no detectable emissions; or use a vapor-tight container; Control level 3 - Vent container directly to a control device or vent inside an enclosure to a control device. 40 CFR Subpart PP
> 119 gal	not in light material service	Control level 1, 2 or 3
> 119 gal	in light material service	Control level 2 or 3
> 26 gal	used for a stabilization process	Control level 3

Light material service - when the concentration of organics with a VP > 0.04 psi is $20 percent by weight
Stabilization - for example, the addition of binders to reduce mobility of contaminants

SUMMARY OF EXEMPTIONS

! Facilitywide

- Total HAP in extracted media and from remediation process vents < 1 MG annually
- Duration/Quantity?

! Affected Process Vents

<u>All vents combined</u>:
- Emissions < 3 lb/hr and 3.1 tpy

<u>Individual vents</u>:
- Low flow : vent flow rate < 0.005 m^3/min
- Low flow/concentration: vent flow rate < 6.0 m^3/min and total HAP concentration < 20 ppmv

! Contaminated Media Management Units

- Individual units handling media with a HAP concentration < 500 ppmw
- One or more units handling < 1 MG HAP/year
- Biological treatment units (tanks and surface impoundments only)

! Equipment leaks

- Components contacting material with < 10% HAP or < 300 hrs/yr

SCHEDULE

- **Planning Administrator signature of proposal by May 15, 2001.**

- **Proposal signature by May 15, 2001 would put us on schedule meet the May 15, 2002 hammer date.**