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TETRAHYDROBENZALDEHYDE (THBA) PRESUMPTIVE MACT

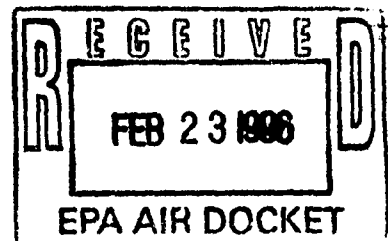
Briefing for Bruce Jordan,
Provided by John Schaefer
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PURPOSE

- To provide background information on the presumptive MACT for THBA.
- To obtain ratification of the draft Presumptive MACT for THBA.
- To review the next steps.



BACKGROUND

- There is only one THBA plant in the Nation operated by Union Carbide in Louisiana. The state of Louisiana has been involved at all steps in the presumptive MACT as a full partner.
- In 1992 Union Carbide proposed to meet the HON for its THBA unit to meet its state MACT requirements by March 20, 1996 (This date may change due to new legislation). The facility already meets most HON requirements.
- The experts meeting was held with Louisiana on March 1, 1995. It was decided that THBA should be added to the list of HON affected chemicals for the draft Presumptive MACT.
- Two round table meetings have been held between EPA, the Louisiana DEQ, and Union Carbide on March 29, 1995 and June 26, 1995 to discuss Union Carbide's comments on the draft P-MACT.
- Two primary issues, which appear to be resolvable, were raised. (These issues are of as much concern to Louisiana in implementing their rule as they are to EPA).

ISSUES

① Equipment Leaks

- Plant prefers to continue its current pressure test/area monitoring program instead of LDAR.
- Pressure test program is an acceptable alternative for meeting the HON for batch processes; THBA is a flexible operation process and meets the HON definition for a batch process.
- Louisiana is still considering whether the area monitoring program is acceptable to meet their requirements. The area monitoring program is not required by the HON.

② Wastewater compliance determination

- Has a control device for acrolein and butadiene in wastewater that meets the HON. (Compliance testing for butadiene may require alternative test procedure.
- Wastewater containing methanol is hard piped to a bio unit that most likely meets the 31% removal requirement in the HON. Union Carbide performed a previous method 304 test on their system with inconclusive results (note: the test was not performed properly). They do not want to repeat method 304 again to try to determine compliance.
- Union Carbide's original MACT compliance plan submitted to Louisiana included a steam stripper to control the methanol. There is still some concern at Carbide that their current bio unit will not meet the 31% removal required by the HON and they might still have to install a steam stripper.

NEXT STEPS

- ① Ratification of Draft Presumptive MACT by ESD.
- ② HON litigation proposal should be proposed around September. This proposal should resolve the method 304 issue.
- ③ Confirm with Louisiana and Union Carbide that no more concerns exist with the Presumptive MACT.
- ④ Propose addition of THBA to HON list of affected chemicals in parallel with HON litigation proposals. This should take place sometime in December according to Jan Meyer.

ALTERNATIVES CONSIDERED

- ① Delist: The butadiene emitted from the process makes this difficult, it is easier to add THBA to the HON.
- ② Separate Standard: Not worth the money or time to develop a separate standard.
- ③ Let the Hammer Fall: A good alternative but adding it to the HON is almost no cost and is clearer.