

What are the Initial Compliance Requirements?

- You must complete the following no later than the compliance date:
 - Determine mass threshold for BPV and metal HAP vents, TRE for CPV, MTVP and capacity of storage tanks (or SCV or BR), flow rates for heat exchange systems, and characterize wastewater streams.
 - Install control equipment, as required.
 - Assess your ability to comply with management practices.
- You must comply with all management practices, emissions limits, monitoring (including storage tank inspections) and recordkeeping beginning on the compliance date.
- You must complete your performance test, flare compliance assessment, or design evaluation within 180 days of the compliance date.

What are the On-Going Compliance Requirements?

- You must:
 - Conduct quarterly inspection for leaks.
 - Monitor control device operating parameters and determine daily averages.
 - Inspect closed vent systems (CVS) for leaks
 - Monitor lines that bypass control devices for flow.
 - Inspect storage tanks with floating roof as specified in §63.1063(c) and (d).
 - Continue to comply with all management practices, emissions limits, monitoring, recordkeeping, and reporting.



Key Point: The standards only apply to the affected facility as defined by the rule, not all operations at your plant site.



Key Point: The standard is process based, not equipment based. You may have multiple process trains making the same product which would collectively be the same CMPU. Similarly, an individual piece of equipment may be used in different processes.

What are the Initial Notification Requirements?

- You must submit the information specified in §63.9(b) by **February 26, 2010** (existing sources and new sources with 10/29/09 compliance date) or within 120 of startup (all other new sources).

What are the Notification of Compliance Status (NOCS) Requirements?

- You must submit the NOCS within 60 days of the end of the performance test or design evaluation, but no later than **June 26, 2013**.
- You must:
 - Include the Information specified in §63.9(h).
 - Include a certification signed by the responsible official that the facility complies with each of the applicable management practice requirements and emissions limits.
 - Include appropriate exceptions or alternatives to monitoring or standards (note that some may require prior approval) and information required by the rule for those exceptions or alternatives.

What Are the Semiannual Reporting Requirements?

- You must submit your first Semiannual Report by **January 30, 2013** and every 6 months thereafter.
- You must submit a report only for semiannual reporting periods when the following must be reported:
 - Identification of each deviation from any requirement in the rule.
 - Information required by §63.104(f)(2) of subpart F for each delay of repair of large cooling tower systems.
 - If equipment leak or a leak in process equipment, storage tank, surge control vessel or bottoms receiver, or small cooling tower system is not repaired within specified time periods, include information on the leak detection date, repair date, and reason for delay in repair.
 - Documentation regarding each process change that affects a compliance determination, including a new certification of compliance with the newly applicable requirements.



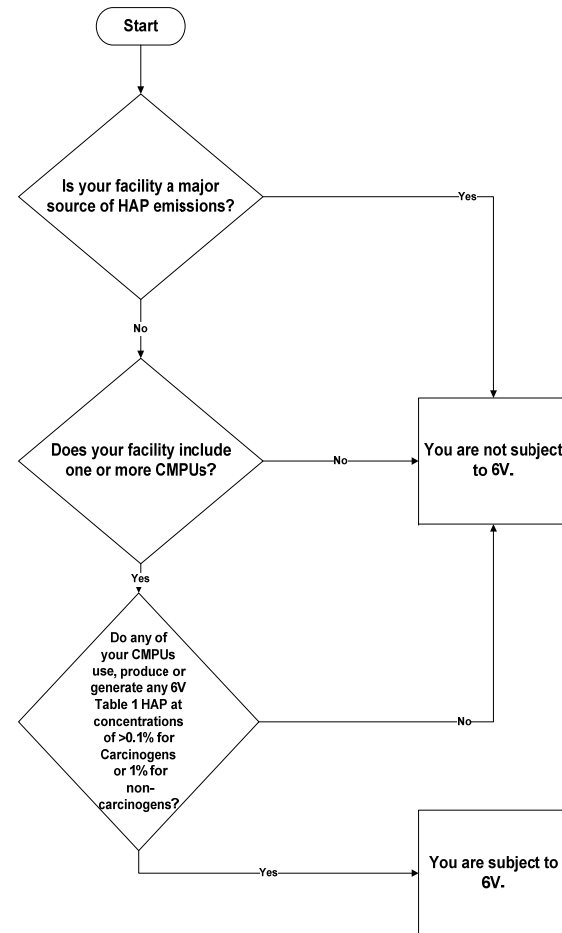
Key Point: This document is to be used in conjunction with the 6V standards at 40 CFR Part 63, not in place of them. The information here is for guidance purposes only and does not include all of the requirements or options under the rule.

Summary of NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) Regulations Controlling Air Emissions from Chemical Manufacturing Areas Sources (CMAS) 40 CFR Part 63 Subpart VVVVVV (6V)

What Is The Compliance Date?

- Existing Sources: **October 29, 2012**
- New Sources: **October 29, 2009** or upon initial startup if startup occurs after October 29, 2009.

Does this Rule Apply to Me?



What is a Chemical Manufacturing Process Unit (CMPU)?

- For the purposes of 6V, a CMAS CMPU includes all process vessels, equipment, storage tanks, transfer racks, surge control vessels, bottoms receivers and activities to make a product (or isolated intermediate) described by North American Industry Classification System (NAICS) code 325.

What is the Affected Source?

- The affected source is the facility-wide collection of CMAS CMPUs and each heat exchange system and wastewater system associated with a CMAS CMPU located at an area source.

What Am I Required To Do?

- If you have at least one CMAS CMPU, you must implement management practices and in some cases, add on control, for your emissions from process vessels, storage tanks, transfer racks, heat exchange systems and wastewater at the affected facility, as summarized on the following pages.
- If you have at least one CMAS CMPU, then all emissions points within your affected source that emit any section 112 HAP (not just Table 1 HAP) are subject to the requirements listed on the following pages. But, if you only use Table 1 organic HAP (OHAP), you are subject only to the OHAP requirements. Likewise, if you only use Table 1 metal HAP, you are subject only to the metal HAP requirements.

How do I know if my affected source is existing or new?

- You are an existing source if you began construction or reconstruction of the affected source before October 6, 2008.
- You are a new source if you began construction or reconstruction of the affected source on or after October 6, 2008.

How is “use, produce, or generate HAP” defined?

- A lower limit for HAP is established at > 0.1% carcinogens; OR >1.0% for noncarcinogens. This lower limit applies to individual HAP in the raw materials, or if you produce or generate a Table 1 HAP, in the process fluid.

What Management Practices and Emissions Standards Must I Implement?

Management Practices

- You must cover process vessels when in use, except to add materials or to sample.
- You must implement a leak detection and repair program, with quarterly inspections, of process vessels, “small” heat exchange systems (cooling water flow rate <8,000 gal/min) and equipment in organic HAP service.
- You must use submerged or bottom loading, OR do one of the following when you transfer liquids containing Table 1 organic HAP to tank trucks or railcars:
 - Vapor balance back to the storage tank from which you are loading;
 - Route emissions to a process or fuel gas system; or
 - Install a closed vent system (CVS) and route emissions to a control device.

Emissions Standards¹

Batch Process Vents (BPV)

- If your *actual uncontrolled* OHAP from the sum of all of the BPVs within the CMPU are $\geq 10,000$ pounds per year, you must reduce total uncontrolled OHAP by $\geq 85\%$ ($\geq 90\%$ for new sources) for the process.
- If your *actual uncontrolled* OHAP from the sum of all of the BPVs within the CMPU are <10,000 pounds per year, you must keep a record of the number of batches of each process operated per month and reevaluate your total emissions from BPVs prior to making any process changes that affect your emission calculations.

Continuous Process Vents (CPV)

- If your CPV has a TRE ≤ 1.0 , you must reduce total uncontrolled organic HAP emissions by $\geq 95\%$ from each CPV ($\geq 85\%$ for periods of startup and shutdown).

Halogenated Streams

- If your halogenated vent stream is controlled in a combustion device, you must use a halogen reduction device to meet any of the emission limits in §63.11496(d),

Metal HAP Process Vents

- If your *actual uncontrolled* metal HAP emissions from the sum of all metal HAP process vents within the CMPU are ≥ 400 lb/yr you must reduce total uncontrolled total metal HAP emissions by $\geq 95\%$ for the process.

What Management Practices and Emissions Standards Must I Implement? (con’t)

Emissions Standards (con’t)

Storage Vessels, Surge Control Vessels (SCV) and Bottoms Receivers (BR)

- If you meet certain criteria for capacity of the storage tank (or SCV or BR) and maximum true vapor pressure (MTVP) of organic HAP in the stored liquid (See Table 5 to subpart 6V), you must implement control measures as specified in 40 CFR part 63, subpart SS and WW (i.e. $\geq 95\%$ control, internal or external floating roof, vapor balance, etc., as applicable).

Wastewater

- If your wastewater streams contains partially soluble HAP at concentrations <10,000 ppmw, you must provide onsite or offsite treatment.
- If your wastewater stream contains partially soluble HAP at concentration $\geq 10,000$ ppmw, you must recycle the separated organic layer(s) to a process, use as fuel, or dispose as hazardous waste.

“Large” Heat Exchange Systems

- If your cooling water flow rate is $\geq 8,000$ gal/min, you must conduct quarterly monitoring for the presence of HAP in the cooling water, following procedures in §63.104(b) or (c) of subpart F and repair the heat exchanger when the inspection indicates the presence of a leak.
- If your equipment meets Current Good Manufacturing Practice (CGMP) requirements in 21 CFR part 211, you may use the physical integrity of the reactor as the surrogate indicator of heat exchange system leaks under §63.104(c).



Key Point: Emissions standards for BPV and Metal HAP vents apply across the process, not on a vent by vent basis. You only need to control a sufficient number of vents within a process to meet the overall reduction requirements.

¹Certain other compliance options are allowed under the rule. See §63.11496