



EASTERN RESEARCH GROUP, INC.

M E M O R A N D U M

DATE: June 25, 1997
TO: Rick Colyer, EPA/OAQPS
FROM: Greg DeAngelo, Eastern Research Group
SUBJECT: May 29, 1997, Consolidated Federal Air Rule Stakeholder Meeting Notes

1.0 PURPOSE

The purposes of this meeting centered around the new approach to the CAR (collapsing the provisions to a single set of requirements). The CAR team wanted to present to the stakeholders the progress since the last stakeholder meeting (July 17, 1996), including a description of the new CAR approach and the equipment leaks alternative provisions under consideration. In addition, the CAR team requested feedback from the stakeholders on the direction and content of the CAR.

2.0 PLACE AND DATE

Chemical Manufacturers Association
2501 M Street, NW
Washington, DC

May 29, 1997 9:00 a.m. to 12:00 p.m.

3.0 ATTENDEES

The attendees at the May 29, 1997, CAR stakeholders meeting are listed on table 1.

TABLE 1. ATTENDEES LIST
 CONSOLIDATED AIR RULE STAKEHOLDERS MEETING
 May 29, 1997

Name	Organization	Phone Number	Facsimile	E-mail Address
Bill Beck	Mobil, API	(703) 849-6245	(703) 849-6295	bill_r_beck@email.mobil.com
Rick Colyer	EPA/OAQPS	(919) 541-5262	(919) 541-0942	colyer.rick@epamail.epa.gov
Jim Courtovich	Burson-Morsteller	(202) 530-4531	--	james_courtovich@yr.com
Ted Cromwell	CMA	(703) 741-5246	(703) 741-6246	ted_cromwell@mail.cmahq.com
Bob Crowley	DuPont	(302) 774-2386	--	crowleyr@usa.dupont.com
Greg DeAngelo	ERG	(919) 461-1522	(919) 461-1418	gdeangel@erg.com
Norbert Dee	NPRA	(202) 457-0780	--	norbert_dee@npracle.org
Fred Dimmick	EPA/OAQPS	(919) 541-5625	--	dimmick.fred@epamail.epa.gov
Sherry Edwards	SOCMA	(202) 414-4170	(202) 289-8584	edwards@socma.com
Jeff KenKnight	EPA/OECA	(202) 564-7033	(202) 564-0009	kenknight.jeffery@epamail.epa.gov
Tom Kittleman	DuPont	(302) 774-8025	(302) 774-8038	kittleta@engg.dnet.dupont.com
Karl Mangels	EPA/Region II	(212) 637-4078	--	--
Norm Morrow	Exxon Chemical	(713) 870-6112	(713) 588-2522	--
Karen Ritter	API	(202) 682-8472	--	ritterk@api.org
Mae Thomas	ERG	(919) 461-1361	(919) 461-1418	mthomas@erg.com
Don Wang	Union Carbide	(304) 747-4924	(304) 747-3680	adlwenl@peabody.sct.ucarb.com
Joe Woolbert	Eastman	(903) 237-5475	(903) 237-6318	woolbert@eastman.com
Attended via telephone:				
Rob Ferry	TGI Partnerships	(919) 664-8250	(919) 644-8252	--
Jan Meyer	EPA/OAQPS	(919) 541-5254	(919) 541-5689	meyer.jan@epamail.epa.gov

4.0 DISCUSSION

The meeting was opened with introductions and distribution of an agenda. The agenda is included as attachment A.

4.1 Car History Since Last Meeting

The history of the CAR since the last stakeholders meeting was discussed, including an explanation of how major comments on the CAR drafts led to a new approach. The new approach involves collapsing the requirements of the different programs, typically collapsing to the HON or part 63 requirement, in order to achieve a simple rule that is a true consolidation and not just a compilation of the existing rules. This consolidation would eliminate the "options tables", and separate requirements for sources coming from different subparts. Given that stringency would increase for some sources, the group also decided to make the CAR optional; that is, a source could choose to implement the CAR or stay with the underlying subparts. Therefore, the CAR is available for an owner or operator to "opt in".

Some of the major outstanding issues affecting the scope and timing of the CAR were also presented, and feedback from the stakeholders was solicited.

The stakeholders commented that the approach appears to be better than before, and agreed in general with the new, consolidated CAR approach. The stakeholders noted that without additional detail, they could not comment further. They did suggest that some of the concepts that are being considered in the development of 40 CFR Part 60, Subpart Kc, could be useful to the CAR effort.

Some of the stakeholders expressed specific concern about a co-located refinery and chemical plant. The group discussed the scope of the CAR and the provisions for opting non-SOCMI equipment into the CAR if at least some of the SOCMI portions of the site were using the CAR. The stakeholders agreed that the

scope decisions seem to provide a benefit, but again noted that more detail is necessary for further commitment.

The slides from this presentation are included as attachment B.

4.2 Equipment Leaks Alternative

The equipment leaks alternative to valve and connector monitoring was then presented. The presentation included an overview of the concepts, a summary of the available data, the conclusions of the data modeling, and an explanation of how the equipment leaks alternative provisions would work in relation to the CAR.

For valves, the equipment leaks alternative would include extending the monitoring period to once every two years with a 0.25 percent leaker cap and grouping valves by whatever subgroup makes sense to the owner/operator. For connectors, the alternative would include extending the maximum monitoring period from 4 years to 8 years, with a lower leak occurrence cap.

The stakeholders questioned whether the alternative could be extended to other industries beyond SOCFI. The group discussed that the CAR was a pilot project, and if the initiatives in the CAR (such as the equipment leaks alternative) proved successful, then they would be considered to expand beyond the SOCFI.

The stakeholders also questioned how the generic MACT fits into the CAR initiative. The group discussed that the generic MACT is on a parallel development schedule to the CAR, and that in the long run, there is the possibility of joining the two programs.

The slides from this presentation are included as attachment C.

4.3 Closing Remarks

The EPA representatives thanked everyone for attending, and stressed again that for the CAR to succeed, buy-in from the

industries involved will be essential. The meeting adjourned at noon, following the final remarks.