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Department for Environmental Protection**

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July 14, 2011

Docket ID # EPA-HQ-OAR-2002-0037  
U.S. Environmental Protection Agency  
Mail Code: 2822T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Sir/Madam:

The Kentucky Division for Air Quality (Division) respectfully submits the following comments on the proposed rule for National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production, as published in the *Federal Register* on May 20, 2011 (76 *Fed Reg* 29528):

1) Referring to equipment leaks, the summary of the proposed rule at 29533 states:

“In 40 CFR 63.11915 of the proposed rule, we are also proposing that, in addition to operating with no detectable emissions, there be no discharge to the atmosphere from any PRD on any equipment in HAP service within the PVCPU. We are proposing that upon a discharge to the atmosphere from the PRD that the monitoring requirements specified in 40 CFR Part 63, Subpart UU for pressure releases from PRD be followed.” [76 *Fed Reg* 29533]

and

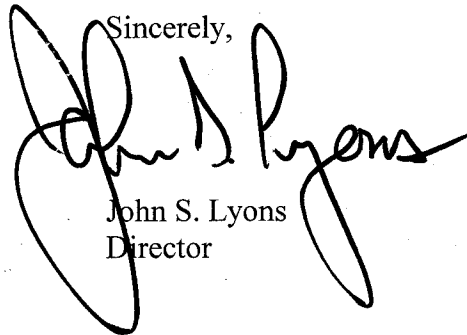
“In 40 CFR 63.11915 of the proposed rule, we are proposing that existing and new affected sources comply with the leak detection and repair (LDAR) program requirements of the National Emission Standards for Equipment Leaks-Control Level 2 Standards, Subpart UU of 40 CFR Part 63, except for agitators, and rotating or reciprocating pumps and compressors. For gas and light liquid valves, Subpart UU specifies a leak definition of 500 parts per million VOC, and a monitoring frequency that is dependent upon the number of leaking valves.” [76 *Fed Reg* 29533]

These are conflicting statements. Although a leak is defined by Subpart UU at 500 parts per million, "no detectable emissions" implies that any detectable emission greater than zero that occurs from a PRD would be a violation. Please clarify these statements.

- 2) Pursuant to the proposed rule at 76 *Fed Reg* 29597 (40 CFR 63.12005), "flow indicator means a device that indicates whether gas flow is, or whether the valve position would allow gas flow to be, present in a line." The term flow indicator is used in various locations in the proposed rule. However, Table 8 of the proposed rule specifies calibration and accuracy requirements for sources monitoring liquid flow rate or gas flow rate parameters. The Division requests that where it is more appropriate, the proposed rule be revised to require flow meters. The proposed rule at 40 CFR 63.11940(a) states, "if flow to a control device could be intermittent, you must install, calibrate, and operate a flow indicator at the inlet or outlet of the control device to identify periods of no flow." The Division requests that the proposed regulation be revised to require flow meters or combinations of flow meters and flow indicators. Continuous records of flow to a control device may be utilized in accessing performance and compliance. This is consistent with other federal requirements. [Please refer to 40 CFR 60.107a(e)]
- 3) The proposed rule requires compliance with 40 CFR 63 Subpart UU. 40 CFR 63.1024(f)(3), requires the source to maintain in the leak repair records the maximum instrument reading measured by Method 21 of 40 CFR Part 60, appendix A at the time the leak is successfully repaired or determined to be nonreparable. The Division suggests that in addition to the recordkeeping requirements in 40 CFR 63 Subpart UU, the proposed rule be revised such that the source shall maintain records of the following:
  - a. The concentration and emission rate at the time that the leak is detected.
  - b. The stream composition of the stream where a leak has been detected.

Thank you for this opportunity to comment on the proposed rule. If you have any questions or concerns regarding the Division's comments, please contact me at (502) 564-3999.

Sincerely,



John S. Lyons  
Director

JSL/II