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**EPA-453/R-94-003f**

**Hazardous Air Pollutant Emissions  
from Process Units in the  
Synthetic Organic Chemical  
Manufacturing Industry--  
Background Information  
for Final Standards**

**Volume 2F: Comments on  
Identification List**

**Emission Standards Division**

**U.S. Environmental Protection Agency  
Office of Air and Radiation  
Office of Air Quality Planning and Standards  
Research Triangle Park, North Carolina 27711**

**March 1994**

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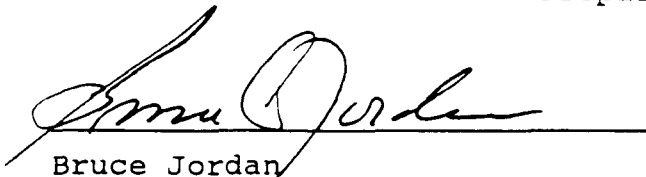
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ENVIRONMENTAL PROTECTION AGENCY

Background Information and Final Environmental  
Impact Statement for Hazardous Air Pollutant  
Emissions from Process Units in the Synthetic  
Organic Chemical Manufacturing Industry  
Volume 2F: Commenter Identification List

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2/8/94  
(Date)

1. The standards regulate emissions of organic hazardous air pollutants (HAP's) emitted from chemical manufacturing process units in the Synthetic Organic Chemical Manufacturing Industry (SOCMI) and from other processes subject to the negotiated regulation for equipment leaks. Only those chemical manufacturing process units that are part of major sources under Section 112(d) of the Clean Air Act (Act) will be regulated. The standards will reduce emissions of 112 of the organic chemicals identified in the Act list of 189 HAP's.
2. Copies of this document have been sent to the following Federal Departments: Labor, Health and Human Services, Defense, Transportation, Agriculture, Commerce, Interior, and Energy; the National Science Foundation; and the Council on Environmental Quality. Copies have also been sent to members of the State and Territorial Air Pollution Program Administrators; the Association of Local Air Pollution Control Officials; EPA Regional Administrators; and other interested parties.
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- Set software to data bits: 8, N; stop bits: 1
- Use access number (919) 541-5742 for 1200, 2400, or 9600 bps modems [access problems should be directed to the system operator at (919) 541-5384].
- Specify TTN Bulletin Board: Clean Air Act Amendments
- Select menu item: Recently Signed Rules

## OVERVIEW

Emission standards under section 112(d) of the Clean Air Act (Act) apply to new and existing sources in each listed category of hazardous air pollutant (HAP) emission sources. This background information document (BID) provides summaries and responses for public comments received regarding the Hazardous Organic National Emission Standard for Hazardous Air Pollutants (NESHAP), commonly referred to as the HON. The HON will primarily affect the Synthetic Organic Chemical Manufacturing Industry (SOCMI). However, the provisions for equipment leaks also apply to certain polymer and resin production processes, certain pesticide production processes, and certain miscellaneous processes that are subject to the negotiated regulation for equipment leaks.

This BID comprises six volumes as follows:

- Volume 2A: Comments on Process Vents, Storage Vessels, Transfer Operations, and Equipment Leaks (EPA-453/R-94-003a);
- Volume 2B: Comments on Wastewater (EPA-453/R-94-003b);
- Volume 2C: Comments on Emissions Averaging (EPA-453/R-94-003c);
- Volume 2D: Comments on Applicability, National Impacts, and Overlap with Other Rules (EPA-453/R-94-003d);
- Volume 2E: Comments on Recordkeeping, Reporting, Compliance, and Test Methods (EPA-453/R-94-003e); and
- Volume 2F: Commenter Identification List (EPA-453/R-94-003f).

Volume 2A is organized by emission point and contains discussions of specific technical issues related to process

vents, storage vessels, transfer operations, and equipment leaks. Volume 2A discusses specific technical issues such as control technology, cost analysis, emission estimates, Group 1/Group 2 determination, compliance options and demonstrations, and monitoring.

Volume 2B addresses issues related to controlling emissions from wastewater. Specific technical issues include control technology, cost analysis, emission estimates, Group 1/Group 2 determination, compliance options and demonstrations, and monitoring.

Volume 2C contains the EPA's decisions regarding emissions averaging. Specific issues include the scope of emissions averaging in the HON, specific provisions related to credits and banking, and enforcement of an emissions averaging system for the HON.

Volume 2D discusses applicability of the HON in terms of selection of source category, selection of source, and selection of pollutants. Volume 2D also addresses the process for determination of the MACT floor and selection of the specific applicability thresholds for process vents, storage vessels, transfer racks, wastewater operations, and equipment leaks.

Volume 2E discusses the provisions for compliance, recordkeeping and reporting. Volume 2E also discusses issues related to the use of EPA test methods.

Volume 2F of each volume contains a list of commenters, their affiliations, and the EPA docket and item number assigned to each comment.

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## ACRONYM AND ABBREVIATION LIST

<u>ACRONYM</u>	<u>TERM</u>
Act	Clean Air Act
ALAPCO	Association of Local Air Pollution Control Officers
ASPEN	advanced system for process engineering
BACT	best available control technology
BAT	best available technology
BD	butadiene
BID	background information document
BIF	boilers and industrial furnaces
CEM	continuous emissions monitoring
CFR	Code of Federal Regulations
CMA	Chemical Manufacturers Association
CMPU	chemical manufacturing process unit
CO	carbon monoxide
CTG	control techniques guideline
CWA	Clean Water Act
DMS	dual mechanical seal
DOT	Department of Transportation
DRE	destruction and removal efficiency
EB/S	ethylbenzene/styrene
EDC	ethylene dichloride
EFR	external floating roof
EO	ethylene oxide
E.O.	Executive Order
EPA	Environmental Protection Agency
Fe	fraction emitted
Fm	fraction measured
FR	FEDERAL REGISTER
Fr	fraction removed
FTIR	Fourier transform infrared
HAP	hazardous air pollutant



# ACRONYM AND ABBREVIATION LIST, CONTINUED

<u>ACRONYM</u>	<u>TERM</u>
HON	hazardous organic national emission standards for hazardous air pollutants
IFR	internal floating roof
LDAR	leak detection and repair
LAER	lowest achievable emission rate
MACT	maximum achievable control technology
MIBK	methyl isobutyl ketone
MR	mass removal (actual)
NCS	Notification of Compliance Status
NESHAP	national emission standards for hazardous air pollutants
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRDC	Natural Resources Defense Council
NSPS	new source performance standards
NSR	new source review
OCCM	Office of Air Quality Planning and Standards Control Cost Manual
OCPSF	organic chemicals, plastics, and synthetic fibers
OMB	Office of Management and Budget
OSHA	Occupational Safety and Health Administration
P.L.	Public Law
PAV	product accumulator vessel
POM	polycyclic organic matter
POTW	publicly owned treatment works
PRA	Paperwork Reduction Act
PRV	pressure relief valve
PSD	prevention of significant deterioration
QIP	quality improvement program

# ACRONYM AND ABBREVIATION LIST, CONTINUED

<u>ACRONYM</u>	<u>TERM</u>
R & D	research and development
RCRA	Resource Conservation and Recovery Act
RCT	reference control technology
RIA	Regulatory Impact Analysis
RMR	required mass removal
SARA	Superfund Amendment and Reauthorization Act
SIP	State Implementation Plan
SMS	single mechanical seal
SOCMI	synthetic organic chemical manufacturing industry
STAPPA	State and Territorial Air Pollution Program Administrators
TAC	total annual cost
TACB	Texas Air Control Board
TCI	total capital investment
THC	total hydrocarbon
TIC	total industry control
TOC	total organic compound
TRE	total resource effectiveness
TRI	toxics release inventory
TSDF	treatment, storage, and disposal facility
VHAP	volatile hazardous air pollutant
VO	volatile organics measurable by Method 25D
VOC	volatile organic compound
VOHAP	volatile organic hazardous air pollutant

<u>ABBREVIATION</u>	<u>UNIT OF MEASURE</u>
bbl	barrel
BOE	barrels of oil equivalent

# ACRONYM AND ABBREVIATION LIST, CONTINUED

<u>ABBREVIATION</u>	<u>UNIT OF MEASURE</u>
Btu	British thermal unit
Btu/kW-hr	British thermal unit per kilowatt-hour
°C	degrees Celsius
°F	degrees Fahrenheit
gal	gallon
gpm	gallons per minute
hr	hour
kg/hr	kilograms per hour
kPa	kilopascals
kW-hr/yr	kilowatt-hour per year
ℓ/hour•m <sup>2</sup>	liters per hour per square meter
ℓpm	liters per minute
gal	gallons
m <sup>3</sup>	cubic meters
Mg	megagrams
mg	milligrams
mg/dscm	milligram per dry standard cubic meter
MW	megawatts
ppb	parts per billion
ppm	parts per million
ppmv	parts per million by volume
ppmw	parts per million by weight
psia	pounds per square inch absolute
scm/min	standard cubic meter per minute
TJ	terajoules
yr	year

## LIST OF FREQUENTLY USED TERMS

Act means the Clean Air Act as amended in 1990.

Administrator means the Administrator of the U. S. Environmental Protection Agency or his or her authorized representative (e.g., a State that has been delegated the authority to implement the provisions of part 63).

Enhanced monitoring rule means the rule to be located in sections 64.1 through 64.9 of part 64 of title 40 of the Code of Federal Regulations. This rule implements section 702(b) of title VII of the 1990 Clean Air Act Amendments. This rule establishes the criteria and procedures that owners or operators must satisfy in evaluating, selecting and demonstrating enhanced monitoring, and includes appendices containing enhanced monitoring performance and quality assurance requirements. The enhanced monitoring rule does not apply to sources subject to 40 CFR part 63, and therefore does not apply to sources subject to the HON. The proposed rule was published in the Federal Register on October 22, 1993 (58 FR 54648).

General Provisions means the general provisions located in subpart A of part 63 of title 40 of the Code of Federal Regulations. These General Provisions codify national emission standards for hazardous air pollutants (NESHAP) for source categories covered under section 112 of the Act as amended November 15, 1990.

Implementing agency means the Administrator of the U. S. Environmental Protection Agency or a State, federal, or other agency that has been delegated the authority to implement the provisions of part 63. Under section 112(1) of the Act, States and localities may develop and submit to the Administrator for approval a program for the implementation and enforcement of emission standards. A program submitted by

LIST OF FREQUENTLY USED TERMS, CONTINUED

the State under section 112(1) of the Act may provide for partial or complete delegation of the Administrator's authorities and responsibilities to implement and enforce emission standards.

Operating permit program rule means the rule located in sections 70.1 through 70.11 of part 70 of chapter I of title 40 of the Code of Federal Regulations. This rule implements section 502(b) of title V of the 1990 Clean Air Act Amendments. Under this rule, States are required to develop, and to submit to the EPA, programs for issuing operating permits to major stationary sources (including major sources of hazardous air pollutants listed in section 112 of the Act), sources covered by New Source Performance Standards (NSPS), sources covered by emissions standards for hazardous air pollutants pursuant to section 112 of the Act, and affected sources under the acid rain program. The final rule was published in the Federal Register on July 21, 1992 (57 FR 32250).

Permitting authority means: (1) the State air pollution control agency, local agency, other State agency, or other agency authorized by the Administrator to carry out a permit program under part 70; or (2) the Administrator, in the case of EPA-implemented permit programs under part 71.

Section 112(g) rule means the rule to be located in subpart B of part 63 of title 40 of the Code of Federal Regulations. This rule implements section 112(g) of the 1990 Clean Air Act Amendments. This rule will impose control technology requirements on "constructed, reconstructed or modified" major sources of hazardous air pollutants not already regulated by a section 112(d) or 112(j) MACT standard.

#### LIST OF FREQUENTLY USED TERMS, CONTINUED

Section 112(1) rule means the rule located in subpart E of part 63 of title 40 of the Code of Federal Regulations. Under this rule, a State or locality may submit a program to the Administrator to request partial or complete delegation of the Administrator's authorities and responsibilities to implement and enforce section 112 emission standards. The final rule was published in the Federal Register on November 26, 1993 (58 FR 62262).

Title III means title III of the 1990 Clean Air Act Amendments. Section 112 of the Act authorizes the EPA to establish MACT standards.

Title V means title V of the 1990 Clean Air Act Amendments, which authorizes the EPA to establish the operating permit program.

Title VII means title VII of the 1990 Clean Air Act Amendments. Section 702(b) of the Act authorizes the EPA to establish compliance certification procedures. The part 64 enhanced monitoring rule implements section 702(b).

## 1.0 INTRODUCTION

On December 31, 1992, the U.S. Environmental Protection Agency (EPA) proposed the Hazardous Organic National Emission Standard for Hazardous Air Pollutants (NESHAP) for process units in the synthetic organic chemical manufacturing industry (SOCMI) under section 112(d) of the Clean Air Act (57 FR 62608). Public comments were requested on the proposed standard and comment letters were received from industry representatives, governmental entities, environmental groups, and private citizens. Two public meetings were held, one in Research Triangle Park (RTP), North Carolina, on February 25, 1993, and another in Baton Rouge, Louisiana, on March 18, 1993. Both hearings were open to the public and 5 persons in RTP and 45 persons in Baton Rouge presented oral testimony on the proposed NESHAP.

On August 11, 1993, the General Provisions for part 63 (58 FR 42760) were proposed. In order to allow the public to comment on how the General Provisions relate to the Hazardous Organic NESHAP (HON), a supplemental notice (October 15, 1993; 58 FR 53478) was published. Public comments were requested on the overlap between the General Provisions and the HON and on some specific emissions averaging issues. Comment letters regarding the supplemental notice were received from 80 commenters.

Chapter 2.0 of this BID volume contains an explanation of the docket identification numbers assigned to each public comment received. Chapter 3.0 contains the index of docket identification numbers and the associated person and the organization, industry, or agency they represent. These docket identification numbers were used in the other BID

volumes (2A, 2B, 2C, 2D, and 2E) to identify the commenter. Chapter 4.0 contains a list of commenters who expressed support for other commenters' comments.



## 2.0 EXPLANATION OF THE DOCKET IDENTIFICATION NUMBERS

There are five dockets for the HON: A-90-19 contains process vent and miscellaneous information; A-90-20 contains equipment leaks information; A-90-21 contains storage vessel information; A-90-22 contains transfer operation information; and A-90-23 contains wastewater operation information. Within these four dockets, comments were received under four categories:

- IV-D; indicates the comment was a written comment received within the comment period;
- IV-F; indicates the comment was an oral comment at one of the public hearings or was from a written document given to the EPA at a public hearing. The transcripts for the two public hearings are IV-F-1 (Research Triangle Park, North Carolina) and IV-F-7 (Baton Rouge, Louisiana). In the BID volumes, the actual person making the comment at the public hearing is represented using a number after a decimal point. For example, IV-F-7.6 indicates the sixth person to speak at the Baton Rouge public hearing. All IV-F comments are in the A-90-19 docket;
- IV-G; indicates a written comment received after the public comment period was over; and
- IV-K; indicates a written comment received in response to the Supplemental Notice (58 FR 53478; October 15, 1993). All IV-K comments are in the A-90-19 docket.

Because of multiple dockets and multiple categories in which a comment could be received, a commenter may have multiple identification numbers. In order to accurately identify the person making the comment and document in which the comment was made, the EPA developed the following system.

- For similar comments made by different people within the same docket number, the identification was handled as shown in the following example:  
 (A-90-19: IV-D-31; IV-D-34; IV-F-12)  
 This indicates that there are three written comments, one of which was given to the EPA at a public hearing.
- For similar comments made by different people with different docket numbers, the identification was handled as shown in the following example:  
 (A-90-19: IV-D-73), (A-90-22: IV-D-13)  
 This indicates a similar comment made in two written comments sent to two different dockets within the public comment period.
- For identical comment letters sent to multiple dockets, the identification number associated with the A-90-19 docket was used throughout the BID volumes.
- For identical comments made by the same person, representing the same organization but whose comments are included in different categories, each category number was included and joined with an "and", as shown in the following example:  
 (A-90-19: IV-D-34 and IV-G-4, IV-D-48)  
 This indicates two different commenters. One commenter sent in a comment letter within the comment period and one after the comment period. The other commenter sent in a written comment within the comment period. In each of these letters, the commenter made the same comment.

### 3.0 DOCKET IDENTIFICATION NUMBERS

Hazardous Organic NESHAP (HON): General Information and  
Process Vents  
Docket No. A-90-19  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-1	G. I. Matsumoto, Johnson Wax, to Air Docket Section (A-90-19). January 6, 1993. Comments on HON proposal (57 FR 62608-808h).
IV-D-2	M. M. Orr, Louisiana Environmental Action Network (LEAN); R. Abraham, Texans United; S. Blyskal, Citizens for a Clean Environment; S. C. Harrington, Sierra Club Legal Defense Fund; F. Robinson, North Baton Rouge Environmental Association; W. E. Sanders, OCAW Local 4-449; P. Bryant, Gulf Coast Tenants Organization; D. Nicolai, OCAW Local 4-620; and R. Parry, Galveston-Houston Against Smog Pollution, to W. K. Reilly, EPA Administrator. January 12, 1992. Request to hold a HON public hearing in Baton Rouge, Louisiana.
IV-D-3	M. M. Orr, Louisiana Environmental Action Network (LEAN); R. Abraham, Texans United; W. E. Sanders, OCAW Local 4-449; P. Bryant, Gulf Coast Tenants Organization; S. Blyskal, Citizens for a Clean Environment; S. C. Harrington, Sierra Club Legal Defense Fund; F. Robinson, North Baton Rouge Environmental Association; D. Nicolai, OCAW Local 4-620; and R. Parry, Galveston-Houston Against Smog Pollution, to C. Browner, EPA Administrator-Designate. January 12, 1992. Request to hold a HON public hearing in Baton Rouge, Louisiana.
IV-D-4	D. Driesen, Natural Resources Defense Council, to W. K. Reilly, EPA Administrator. January 13, 1993. Request to hold a HON public hearing in Baton Rouge, Louisiana.

Hazardous Organic NESHAP (HON): General Information and  
Process Vents

Docket No. A-90-19

Subcategory IV-D

Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-5	D. Driesen, Natural Resources Defense Council, to C. Browner, EPA Administrator-Designate. January 13, 1993. Request to hold a HON public hearing in Baton Rouge, Louisiana.
IV-D-6	G. F. Hoffnagle, TRC Environmental Corporation, to W. G. Rosenberg, EPA Assistant Administrator. January 19, 1993. Inter-program difficulties in implementing the 1990 Clean Air Act Amendments.
IV-D-7	J. Schulze, Ciba-Geigy, to J. S. Meyer, EPA:ESD. February 1, 1993. Problem with definition of chemical manufacturing process.
IV-D-8	P. Dolan, Adsistor Technology, Inc., to EPA Air Docket (A-90-19). February 9, 1993. Alternatives to Method 21 for fugitive emissions compliance testing of chemical process equipment pursuant to the proposed NESHAP regulations (40 CFR part 63, subpart H, 63.180).
IV-D-9	D. B. Hunt, Columbia United Christian Church, to Administrator C. M. Browner, EPA. Undated. Comments regarding HON proposal.
IV-D-10	J. DeBaker, private citizen, to Administrator C. Browner, EPA. Undated. Comments regarding HON proposal.
IV-D-11	S. R. Kniffer, private citizen, to Administrator C. Browner, EPA. March 16, 1993. Comments regarding HON proposal.
IV-D-12	K. A. Muldoon, Powertrol, to R. Rosensteel, EPA:CPB. March 23, 1993. Comments on proposed revisions to 40 CFR Part 63, 63.114(a)(2): process vent provisions-monitoring equipments.
IV-D-13	N. W. Hancock, Oil, Chemical & Atomic Workers (OCAW), to Administrator C. Browner, EPA. January 27, 1993. Request to hold additional HON public hearings in New Orleans and Baton Rouge, Louisiana; Houston, Texas; Philadelphia, Pennsylvania; and Los Angeles, California.

Hazardous Organic NESHAP (HON): General Information and  
Process Vents

Docket No. A-90-19  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-14	D. A. Bingham, Bingham Environmental Technologies, Inc., to EPA Air Docket (A-90-19). March 24, 1993. Comments regarding HON proposal.
IV-D-15	L. P. Guzzetti, Lumur International, Inc., to EPA Air Docket (A-90-19). March 24, 1993. Comments regarding HON proposal.
IV-D-16	B. L. Bailey, General Electric Company, to Air Docket Section (A-90-19). March 26, 1993. Comments regarding HON proposal.
IV-D-17	K. Treen, Specialty Gases, to EPA Air Docket (A-90-19). March 26, 1993. Comments regarding HON proposal.
IV-D-18	R. B. Shirrell, Monitoring Technologies Corporation (on behalf of Photovac), to EPA Air Docket (A-90-19). March 26, 1993. Comments regarding HON proposal.
IV-D-19	D. A. Blair, Monitoring Technologies Corporation (on behalf of Photovac), to EPA Air Docket (A-90-19). March 26, 1993. Comments regarding HON proposal.
IV-D-20	R. M. Carter, Reider Associates, to EPA Air Docket (A-90-19). March 26, 1993. Comments regarding HON proposal.
IV-D-21	D. E. Strayer, Borden Packaging and Industrial Products, to EPA Air Docket (A-90-19). March 29, 1993. Comments on proposed SOCMH HON general provisions.
IV-D-22	D. E. Strayer, Borden Packaging and Industrial Products, to EPA Air Docket (A-90-19). March 29, 1993. Comments on proposed SOCMH HON process vent provisions.
IV-D-23	P. M. Besio, Hazco, to EPA Air Docket (A-90-19). March 29, 1993. Comments regarding HON proposal.

Hazardous Organic NESHAP (HON): General Information and  
Process Vents  
Docket No. A-90-19  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-24	R. W. Wheelhouse, Hazco, to EPA Air Docket (A-90-19). March 29, 1993. Comments regarding HON proposal.
IV-D-25	B. J. Howard, ICS Associates, Inc., to EPA Air Docket (A-90-19). March 29, 1993. Comments regarding HON proposal.
IV-D-26	J. E. Schmidt, FMC Corporation, to EPA's Air Docket (A-90-19 and A-90-20). March 30, 1993. Comments regarding HON proposal.
IV-D-27	P. Buerger, Safety and Environmental Services, Inc., to EPA Air Docket (A-90-19). March 30, 1993. Comments regarding HON proposal.
IV-D-28	R. M. Carter, Reider Associates, to EPA Air Docket (A-90-19). March 26, 1993. Comments regarding HON proposal.
IV-D-29	T. T. Cromwell, Chemical Manufacturers Association (CMA), to M. Dubow, EPA:OAQPS. March 22, 1993. Possible overlap and conflict between the proposed HON and the draft General Provisions.
IV-D-30	M. M. Orr, Louisiana Environmental Action Network (LEAN); R. Abraham, Texans United; W. E. Sanders, OCAW Local 4-449; P. Bryant, Gulf Coast Tenants Organization; S. Blyskal, Citizens for a Clean Environment; S. C. Harrington, Sierra Club Legal Defense Fund; F. Robinson, North Baton Rouge Environmental Association; D. Nicolai, OCAW Local 4-620; and R. Parry, Galveston-Houston Against Smog Pollution, to J. Meyer, EPA:ESD. March 24, 1993. Letter of thanks for attending the public hearing.
IV-D-31	D. Thompson, Enviromega Ltd. (on behalf of the Chemical Manufacturers Association), to J. Meyer, EPA:ESD. April 7, 1993. Comments on Proposed Methods 21, 304, and 305 Contained in the Hazardous Organic NESHAP.
IV-D-32	M. L. Mullins, Chemical Manufacturers Association (CMA), to EPA Air Docket Office, Attn: Docket

Hazardous Organic NESHAP (HON): General Information and  
Process Vents

Docket No. A-90-19

Subcategory IV-D

Additional Comments Received

<u>Item No.</u>	<u>Description</u>
	Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal.
IV-D-33	C. D. Malloch, Monsanto, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal.
IV-D-34	J. C. Hovious, Union Carbide Corporation, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal.
IV-D-35	D. W. Gustafson and J. A. Crites, The Dow Chemical Company, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON (process vents) proposal.
IV-D-36	D. W. Gustafson and J. A. Crites, The Dow Chemical Company, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON (general) proposal.
IV-D-37	D. W. Gustafson and J. A. Crites, The Dow Chemical Company, to EPA Air Docket A-90-19. March 30, 1993. Comments regarding HON (Method 18) proposal.
IV-D-38	D. Fillingame, Citgo, to EPA Air Docket A-90-19. March 18, 1993. Comments regarding HON proposal.
IV-D-39	J. M. Wilson, Bristol-Myers Squibb Company, to EPA Air Docket A-90-19. March 31, 1993. Comments regarding HON proposal.
IV-D-40	M. von der Ahe, Witzel Associates, to EPA Air Docket A-90-19. April 5, 1993. Comments regarding HON proposal.
IV-D-41	B. Warren, Consumer Policy Institute, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 7, 1993. Comments regarding HON proposal.

Hazardous Organic NESHAP (HON): General Information and  
Process Vents  
Docket No. A-90-19  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-42	J. A. Fitzgerald, Argus Supply Company, to EPA Air Docket A-90-19. April 8, 1993. Comments regarding HON proposal.
IV-D-43	H. Bialer, Staten Island Citizens for Clean Air ("SICCA"), to EPA Air Docket A-90-19. April 8, 1993. Comments regarding HON proposal.
IV-D-44	S. Lewis, The Good Neighbor Project for Sustainable Industries, to EPA Air Docket A-90-19. April 11, 1993. Comments regarding HON proposal.
IV-D-45	Oil, Chemical & Atomic Workers (OCAW) to EPA Air Docket A-90-19. April 12, 1992 (date is most likely a typographical error). Statements of W. E. Sanders, OCAWIU and D. Nicolai, Louisiana Labor/Neighbor Project.
IV-D-46	D. W. Marshall, Union Camp, to EPA Air Docket A-90-19. April 12, 1993. Comments regarding HON proposal.
IV-D-47	M. Zeesman, New York City Environment Campaign, to EPA Air Docket A-90-19. April 13, 1993. Comments regarding HON docket.
IV-D-48	R. Skinner, Air Products, to EPA Air Docket A-90-19. April 14, 1993. Comments regarding HON proposal.
IV-D-49	P. P. Baljet, American Lung Association, to EPA Air Docket A-90-19. April 14, 1993. Comments regarding HON proposal.
IV-D-50	D. L. Chapman, The Goodyear Tire & Rubber Company, to EPA Air Docket A-90-19. April 14, 1993. Comments regarding HON proposal.
IV-D-51	D. F. Theiler, State of Wisconsin, Department of Natural Resources, to EPA Air Docket A-90-19. April 15, 1993. Comments regarding HON proposal.
IV-D-52	R. M. Baldisserotto, Hoffmann-La Roche, to EPA Air Docket A-90-19. April 15, 1993. Comments regarding HON proposal.



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<u>Item No.</u>	<u>Description</u>
IV-D-53	V. E. Messick, Vista Chemical Company, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal.
IV-D-54	D. A. Woodring, BP Chemicals, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal.
IV-D-55	T. Tepedino, CITGO Petroleum Corporation, to EPA Air Docket A-90-19. April 15, 1993. Comments regarding HON proposal.
IV-D-56	P. M. King, PPG Industries, to EPA Air Docket A-90-19. April 15, 1993. Comments regarding HON proposal.
IV-D-57	S. Engelman, Hoechst Cleanese Corporation, to EPA Air Docket A-90-19. April 15, 1993. Comments regarding HON proposal.
IV-D-58	P. C. Bailey, American Petroleum Institute (API), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal.
IV-D-59	T. A. Kovacic, Dow Corning, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-60	A. T. Roy, Allied Signal, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal.
IV-D-61	B. J. Price, Phillips Petroleum Company, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-62	P. T. Cavanaugh, The Chevron Companies, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal.

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<u>Item No.</u>	<u>Description</u>
IV-D-63	S. J. H. Manekshaw, Pennzoil Company, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-64	B. D. Patterson, Exxon Company, U.S.A., to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-65	D. G. Berkebile, The Goodyear Tire & Rubber Company, to EPA Air Docket A-90-19. April 16, 1993. (See comments dated April 14, 1993--IV-D-50). Comments regarding HON proposal.
IV-D-66	E. J. Flynn, Louisiana Chemical Association, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-67	R. D. Truelove, Conoco, Inc., to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal.
IV-D-68	E. A. Fisher, Rohm and Haas, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-69	D. C. Copeland and F. P. Collis, OxyChem, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, and A-90-21. April 16, 1993. Comments regarding HON proposal.
IV-D-70	W. R. Campbell, Texas Air Control Board, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal.
IV-D-71	G. R. Reynolds and M. O. Tanzer, GE Plastics, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-72	J. W. Vinzant, Kaiser Aluminum, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.

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IV-D-73	B. L. Taranto, Exxon Chemical Americas, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-74	E. L. DuSold, Eli Lilly and Company, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-75	R. R. Kienle, Shell Oil Company, to EPA Air Dockets A-90-19 and A-90-23. April 16, 1993. Comments regarding HON proposal.
IV-D-76	V. W. Chen, Louisiana State University Medical Center, J. Meyer and EPA Air Docket A-90-19. April 16, 1993. Monograph on cancer in Louisiana (Volume VII).
IV-D-77	R. C. Phelps and J. L. Woolbert, Eastman Kodak (Texas), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal.
IV-D-78	A. J. Dawson, American Cyanamid Company, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-79	W. P. Leonard, Borden Chemicals and Plastics, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-80	J. T. Sell, National Paint & Coatings Association, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 18, 1993. Comments regarding HON proposal.
IV-D-81	G. D. Strickland, Chemical Manufacturers Association (Diisocyanates Panel of CMA), to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-82	J. E. Gilchrist, American Mining Congress, to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.

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IV-D-83	R. T. Paul, The Coalition for Clean Air Implementation, to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-84	G. D. Strickland, Chemical Manufacturers Association (Phthalate Esters Panel of CMA), to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-85	D. Driesen, Natural Resources Defense Council, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal.
IV-D-86	S. L. Edwards, Synthetic Organic Chemical Manufacturers Association, Inc. (SOCMA), to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-87	D. J. Ames, State of California, Air Resources Board, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal.
IV-D-88	V. McIntire, Eastman Chemical Company, to EPA Air Docket A-90-19. April 15, 1993. Comments regarding HON proposal.
IV-D-89	R. T. Richards, Texaco, Inc., to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-90	T. M. Allen, New York State Department of Environmental Conservation, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-91	C. D. Bennett, Ashland Petroleum Company, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-92	N. Dee, National Petroleum Refiners Association, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal.

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<u>Item No.</u>	<u>Description</u>
IV-D-93	M. Zaw-Mon, Maryland Department of the Environment, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal.
IV-D-94	M. E. Johnson, John Muir (Wisconsin) Chapter of the Sierra Club, to C. Browner, EPA Administrator. April 16, 1993. Comments regarding HON proposal.
IV-D-95	J. Schulze, Ciba Geigy, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-96	S. C. Harrington, Sierra Club Legal Defense Fund, Inc., to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal.
IV-D-97	J. A. Dege, DuPont, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal.
IV-D-98	Comments of the American Forest and Paper Association. April 19, 1993. Comments regarding HON proposal.
IV-D-99	I. N. Vaughan (Association of Local Air Pollution Control Officials [ALAPCO], and T. M. Allen (State and Territorial Air Pollution Program Administrators [STAPPA]), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal.
IV-D-100	M. J. Bradley, Northeast States for Coordinated Air Use Management (NESCAUM), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal.
IV-D-101	G. D. Strickland, Chemical Manufacturers Association (Olefins Panel of CMA), to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.

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IV-D-102	G. D. Strickland, Chemical Manufacturers Association (Ethylene Oxide Industry Panel of CMA), to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-103	P. L. DeFur, E. K. Silbergeld, and L. Epstein, Environmental Defense Fund, to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-104	D. P. Bowers, Merck & Co., Inc. to EPA Air Docket, Attn: Docket Numbers A-90-19 and A-90-20. April 19, 1993. Comments regarding HON proposal.
IV-D-105	S. C. Tautfest, Keller and Heckman (on behalf of the Vinyl Institute), to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-106	L. Williams, The Aluminum Association, to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-107	R. J. Connor, Manufacturers of Emission Controls Association (MECA), to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-108	T. X. White, Pharmaceutical Manufacturers Association, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, and A-90-23. April 19, 1993. Comments regarding HON proposal.
IV-D-109	D. S. Freedman, U. S. Small Business Administration, to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-110	W. Caffey Norman, Patton, Boggs & Blow (on behalf of the Halogenated Solvents Industry Alliance [HSIA]), to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-111	J. S. Berry, Rhone-Poulenc, to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.

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IV-D-112	D. E. Davis, Vulcan Chemicals, to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-113	W. R. Quanstrom, Amoco Corporation, to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-114	M. M. Orr, Louisiana Environmental Action Network (LEAN); R. Abraham, Texans United; W. E. Sanders, OCAW Local 4-449; P. Bryant, Gulf Coast Tenants Organization; S. Blyskal, Citizens for a Clean Environment; S. C. Harrington, Sierra Club Legal Defense Fund; F. Robinson, North Baton Rouge Environmental Association; D. Nicolai, OCAW Local 4-620; and R. Parry, Galveston-Houston Against Smog Pollution, to J. Meyer, EPA:ESD. March 24, 1993. Letter of thanks for attending the public hearing.
IV-D-115	S. Lopez, Bay Area Air Quality Management District, to EPA Air Docket, Attn: Docket Nos. A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal.
IV-D-116	B. C. Henderson, R.J. Reynolds Tobacco Company, to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-117	D. Stevens, Jr., Louisiana Environmental Action Network (LEAN), to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal.
IV-D-118	R. Abraham, Texans United Education Fund, to C. M. Browner, EPA Administrator. March 1, 1993. Comments regarding HON proposal.
IV-D-119	C. Robinson, private citizen, to C. Browner, EPA Administrator. March 16, 1993. Comments regarding HON proposal.
IV-D-120	B. Mannchen, private citizen, to C. Browner, EPA Administrator. April 14, 1993. Comments regarding HON proposal.

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<u>Item No.</u>	<u>Description</u>
IV-D-121	D. W. Gustafson, J. A. Crites, and T. A. Threet, The Dow Chemical Company, to Chief, EPA Information Policy Branch. April 16, 1993. Comments regarding HON proposal.
IV-D-122	M. L. Brisker, private citizen, to C. Browner, EPA Administrator. Undated. Comments regarding HON proposal.
IV-D-123	D. Makin, private citizen, to C. Browner, EPA Administrator. Undated. Comments regarding HON proposal.
IV-D-124	N. Paravicini, private citizen, to C. M. Browner, EPA Administrator. March 27, 1993. Comments regarding HON proposal.
IV-D-125	N. F. Parks, Sierra Club, Pennsylvania Chapter, to C. M. Browner, EPA Administrator. March 31, 1993. Comments regarding HON proposal.
IV-D-126	T. K. Elliott, Photovac, to EPA's Air Docket. March 23, 1993. Comments regarding HON proposal.
IV-D-127	Figure A - Sampling System for Hydrocarbons and Other Emissions. Attachment inadvertently omitted from Item No. IV-D-16 (letter from B. L. Bailey, General Electric Company, to Air Docket Section (A-90-19) [in letter, referred to as "the attached sketch."] March 26, 1993. Comments regarding HON proposal.



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Transcript of Public Hearings

<u>Item No.</u>	<u>Description</u>
IV-F-1	PUBLIC HEARING IN THE MATTER OF: Proposed Hazardous Organic NESHAP. Transcript of Hearing held in the EPA Administrative Building, Research Triangle Park, NC. February 25, 1993.
IV-F-2	V. S. Everette, Radian Corporation, to Docket No. A-90-19, HON. Public hearing on the proposed hazardous organic NESHAP (HON). List of panel, speakers, and attendees. February 25, 1993.
IV-F-3	Statement of J. Hovious on behalf of the Chemical Manufacturers Association before the Environmental Protection Agency on the Proposed Hazardous Organic NESHAP for the SOCM I Industry. February 25, 1993.
IV-F-4	Statement of P. Jann on behalf of the Chemical Manufacturers Association before the Environmental Protection Agency on the Proposed Hazardous Organic NESHAP for the SOCM I Industry. February 25, 1993.
IV-F-5	Testimony of R. T. Paul on behalf of the Coalition for Clean Air Implementation (CCAI) before the Environmental Protection Agency on the Proposed Hazardous Organic NESHAP for the SOCM I Industry. February 25, 1993.
IV-F-6	Oral statement of F. D. Gealy, Atlantic Richfield Company (ARCO), Chairman of the Air Toxics Task Force for the American Petroleum Institute, before the Environmental Protection Agency on the Proposed NESHAP Standards for the Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry and Seven Other Processes. February 25, 1993.
IV-F-7	PUBLIC HEARING IN THE MATTER OF: Proposed Hazardous Organic NESHAP. Transcript of Hearing held in the Conservation Hearing Room of the Louisiana Department of Natural Resources, Baton Rouge, Louisiana. March 18, 1993.

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Transcript of Public Hearings

<u>Item No.</u>	<u>Description</u>
IV-F-8	V. S. Everette, Radian Corporation, to Docket No. A-90-19, HON. April 15, 1993. Second public hearing on the proposed hazardous organic NESHAP (HON). List of panel, speakers, and attendees for the Baton Rouge public hearing held March 18, 1993.
IV-F-9	Remarks of P. Bryant, Gulf Coast Tenants Organization, before the Environmental Protection Agency on the Proposed Hazardous Organic NESHAP for the SOCM I Industry public hearing held in Baton Rouge, Louisiana, March 18, 1993.
IV-F-10	Remarks of F. T. Robinson, North Baton Rouge Environmental Association, before the Environmental Protection Agency on the Proposed Hazardous Organic NESHAP for the SOCM I Industry public hearing held in Baton Rouge, Louisiana, March 18, 1993.
IV-F-11	Remarks of V. Alexander, Enviro-Medicine Associates, before the Environmental Protection Agency on the Proposed Hazardous Organic NESHAP for the SOCM I Industry public hearing held in Baton Rouge, Louisiana, March 18, 1993.
IV-F-12	Statement of D. M. Driesen, Natural Resources Defense Council, before the Environmental Protection Agency on the Proposed Hazardous Organic NESHAP for the SOCM I Industry public hearing held in Baton Rouge, Louisiana, March 18, 1993.

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Late Public Comments Received

<u>Item No.</u>	<u>Description</u>
IV-G-1	M. H. Levin, Nixon, Hargrave, Devans & Doyle (on behalf of Can Manufacturers Institute [CMI]), to EPA Air Docket A-90-19. April 20, 1993. Comments regarding HON proposal.
IV-G-2	D. Driesen, Natural Resources Defense Council (NRDC), to EPA Air Docket A-90-19. April 21, 1993. Comments regarding HON proposal.
IV-G-3	D. M. Driesen, Natural Resources Defense Council (NRDC), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 23, 1993. Comments regarding HON proposal.
IV-G-4	J. C. Hovious, Union Carbide Corporation, to EPA Air Docket, Attn: Docket Nos. A-90-18, A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. (Believe A-90-18 is a typographical error--no such docket number). April 29, 1993. Comments regarding HON proposal.
IV-G-5	M. L. Mullins, Chemical Manufacturers Association, to EPA's Air Docket No. A-90-19. May 27, 1993. Comments on the "Interlaboratory Study."
IV-G-6	D. M. Driesen and R. White, American Lung Association and Natural Resources Defense Council, to M. Shapiro, EPA:OAR. June 4, 1993. Comments regarding HON proposal.
IV-G-7	D. M. Driesen and R. White, American Lung Association and Natural Resources Defense Council, to M. Shapiro, EPA:OAR. June 4, 1993. Comments regarding HON proposal.
IV-G-8	D. Driesen and R. White, American Lung Association and Natural Resources Defense Council, to C. Fox, EPA:OA. June 4, 1993. Comments regarding HON proposal.
IV-G-9	D. M. Driesen and R. White, American Lung Association and Natural Resources Defense Council, to A. Eckert, EPA:OGC. June 4, 1993. Comments regarding HON proposal.

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<u>Item No.</u>	<u>Description</u>
IV-G-10	A. Shelton, NOVA Engineering, Inc., to J. S. Meyer, EPA:SDB. July 8, 1993. Comments regarding HON proposal.
IV-G-11	B. L. Taranto, Exxon Chemical Americas, to EPA Air Docket No. A-90-19. July 9, 1993. Clarifications of Exxon Chemicals Americas Comments on the Proposed HON (57 FR 62608).
IV-G-12	A. Shelton, NOVA Engineering, Inc., to EPA Air Docket No. A-90-19. July 9, 1993. Comments regarding HON proposal.
IV-G-13	D. Driesen, Natural Resources Defense Council, to B. Jordan, EPA:OAQPS. July 15, 1993. Comments regarding HON proposal.
IV-G-14	V. Di Tizio, private citizen, to C. Browner, EPA Administrator. Undated. Comments regarding HON proposal.
IV-G-15	A. Wallos, private citizen, to C. Browner, EPA Administrator. Undated. Comments regarding HON proposal.
IV-G-16	T. T. Cromwell, Chemical Manufacturers Association, to EPA Air Docket No. A-90-19. July 28, 1993. Additional comments regarding HON proposal.
IV-G-17	N. L. Morrow, Exxon Chemical Americas, to EPA Air Docket No. A-90-19. July 27, 1993. Additional comments regarding HON proposal.
IV-G-18	D. Driesen, NRDC, et. al., to C. Browner, EPA Administrator. August 23, 1993. Additional comments regarding HON proposal.
IV-G-19	W. D. Binder, Thermatrix Inc., to D. L. McMurrer, EPA:ESD. April 26, 1993.
IV-G-20	D. G. Hawkins, D. A. Sheiman, D. Driesen, and S. Buccino, Natural Resources Defense Council (NRDC), to M. Nichols, EPA:AA. December 2, 1993. Thank-you letter for meeting with NRDC.

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Public Comments Received in Response to  
Request for Supplemental Comments

<u>Item No.</u>	<u>Description</u>
IV-K-1	D. Driesen, Natural Resources Defense Council, to EPA Air Docket No. A-90-19. Undated. Response to request for supplemental comments.
IV-K-2	L. Williams, The Aluminum Association, to EPA Air Docket No. A-90-19. October 15, 1993. Response to request for supplemental comments.
IV-K-3	D. E. Strayer, Borden Packaging and Industrial Products, to EPA Air Docket A-90-19. October 28, 1993. Response to request for supplemental comments.
IV-K-4	C. W. Ensign, Sinclair Oil Corporation, to EPA Air Docket No. A-90-19. November 3, 1993. Response to request for supplemental comments.
IV-K-5	J. M. Willcox, The Louisiana Land and Exploration Company, to EPA Air Docket No. A-90-19. November 5, 1993. Response to request for supplemental comments.
IV-K-6	A. Lee, Texaco, Inc., to EPA Air Docket No. A-90-19. November 9, 1993. Response to request for supplemental comments.
IV-K-7	S. Engelman, Hoechst Celanese Corporation, to EPA Air Docket No. A-90-19. November 9, 1993. Response to request for supplemental comments.
IV-K-8	G. E. Sutherland, Phillips 66 Company, to EPA Air Docket No. A-90-19. November 9, 1993. Response to request for supplemental comments.
IV-K-9	R. H. Collom, Georgia Department of Natural Resources, to EPA Air Docket No. A-90-19. November 10, 1993. Response to request for supplemental comments.
IV-K-10	B. Hartsock, Texas Natural Resource Conservation Commission, to EPA Air Docket No. A-90-19. November 10, 1993. Response to request for supplemental comments.

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<u>Item No.</u>	<u>Description</u>
IV-K-11	D. E. Byars, Commonwealth Oil Refining Company, Inc. (CORCO), to EPA Air Docket No. A-90-19. November 10, 1993. Response to request for supplemental comments.
IV-K-12	B. Warren, Consumer Policy Institute, to EPA Air Docket No. A-90-19. November 11, 1993. Response to request for supplemental comments.
IV-K-13	R. R. Kienle, Shell Oil Company, to EPA Air Docket No. A-90-19. November 11, 1993. Response to request for supplemental comments.
IV-K-14	D. F. Hunter, Phillips Petroleum Company, to EPA Air Docket No. A-90-19. November 11, 1993. Response to request for supplemental comments.
IV-K-15	N. L. Renfro, Valero Refining Company, to EPA Air Docket No. A-90-19. November 11, 1993. Response to request for supplemental comments.
IV-K-16	S. Nichols, Diamond Shamrock, to EPA Air Docket No. A-90-19. November 11, 1993. Response to request for supplemental comments.
IV-K-17	N. J. Carman, Sierra Club--Lone Star Chapter, to C. Browner, EPA Administrator. November 11, 1993. Response to request for supplemental comments.
IV-K-18	F. Barron, Placid Refining Company, to EPA Air Docket No. A-90-19. November 11, 1993. Response to request for supplemental comments.
IV-K-19	P. M. Bitter, The Chevron Companies, to EPA Air Docket No. A-90-19. November 11, 1993. Response to request for supplemental comments.
IV-K-20	D. J. Tippeconnic, Phillips Petroleum Company, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-21	C. D. Malloch, Monsanto, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.

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<u>Item No.</u>	<u>Description</u>
IV-K-22	R. W. Skinner, Air Products, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-23	A. Farmer, Tosco Refining Company, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-24	D. W. Gustafson and T. A. Threet, The Dow Chemical Company, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-25	M. S. Kelly, Total Petroleum, Inc., to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-26	S. J. H. Manekshaw, Pennzoil Company, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-27	R. C. Phelps, Eastman Chemical Company, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-28	G. R. Reynolds, Jr., GE Plastics, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-29	E. R. Lewis, Texas Petrochemicals Corporation, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-30	D. Theiler and R. Colby, State and Territorial Air Pollution Program Administrators/Association of Local Air Pollution Control Officials (STAPPA/ALAPCO), to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-31	L. W. Cresswell, Kerr-McGee Refining Corporation, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.

Hazardous Organic NESHAP (HON): General Information and  
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Public Comments Received in Response to  
Request for Supplemental Comments

<u>Item No.</u>	<u>Description</u>
IV-K-32	D. K. McCormick, Wyoming Refining Company, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-33	D. W. Gates, Ashland Petroleum Company, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-34	R. P. Strieter, The Coalition for Clean Air Implementation, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-35	J. W. Vinzant, Kaiser Aluminum, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-36	R. J. Weiss, Jr., Crown Central Petroleum Corporation, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-37	D. F. Theiler, State of Wisconsin/Department of Natural Resources, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-38	J. A. Dege, Jr., DuPont, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-39	M. H. Levin, Nixon, Hargrave, Devans & Doyle (on behalf of the Can Manufacturers Institute [CMI]), to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-40	J. S. Berry, Jr., Rhone-Poulenc, Inc., to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-41	L. Fields and G. Collins, National Association for the Advancement of Colored People (Austin Branch), to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.



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<u>Item No.</u>	<u>Description</u>
IV-K-42	T. X. White, Pharmaceutical Manufacturers Association, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-43	J. G. Gerard, American Furniture Manufacturers Association (AFMA), to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-44	P. P. Baljet, American Lung Association, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-45	B. M. Harney, Mobil Oil Corporation, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-46	P. C. Bailey, Jr., American Petroleum Institute (API), to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-47	N. Dee, National Petroleum Refiners Association, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-48	M. W. Abernathy, Fina Oil and Chemical Company, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-49	B. D. Patterson, Exxon Company, U.S.A., to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-50	J. Thompson, CITGO Petroleum Corporation, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-51	J. M. Christman, Powerine Oil Company, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.

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Public Comments Received in Response to  
Request for Supplemental Comments

<u>Item No.</u>	<u>Description</u>
IV-K-52	C. C. Barnard, The UNO-VEN Company, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-53	K. I. Roane, National Cooperative Refinery Association, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-54	M. J. Hansel, Koch Industries, Inc., to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-55	M. J. Bradley, Northeast States for Coordinated Air Use Management (NESCAUM), to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-56	S. L. Edwards, Synthetic Organic Chemical Manufacturers Association, Inc. (SOCMA), to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-57	J. C. Hovious, Union Carbide Corporation, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-58	J. Nichols, Pride Refining Inc., to EPA Air Docket No. A-90-19. November 9, 1993. Response to request for supplemental comments.
IV-K-59	N. F. Seppi, Marathon Oil Company, to EPA Air Docket No. A-90-19. November 10, 1993. Response to request for supplemental comments.
IV-K-60	S. T. Bottom, Philbro Energy USA, Inc., to EPA Air Docket No. A-90-19. November 11, 1993. Response to request for supplemental comments.
IV-K-61	F. P. Collis, Occidental Chemical Corporation (OxyChem), to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.

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Public Comments Received in Response to  
Request for Supplemental Comments

<u>Item No.</u>	<u>Description</u>
IV-K-62	E. L. DuSold, Eli Lilly and Company, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-63	G. Smith, Sierra Club--Lone Star Chapter, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-64	C. A. O'Neil, State of Washington, Department of Ecology, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-65	E. K. Silbergeld, Environmental Defense Fund, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-66	J. J. Mayhew, Chemical Manufacturers Association (CMA), to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-67	B. Mannchen, Galveston-Houston Association for Smog Prevention (GHASP), to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-68	B. Bateman, Bay Area Air Quality Management District (BAAQMD), to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-69	R. W. Curtis, American Airlines Maintenance & Engineering Center, to EPA Air Docket No. A-90-19. November 15, 1993. Response to request for supplemental comments.
IV-K-70	B. L. Taranto, Exxon Chemical Americas, to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.

Hazardous Organic NESHAP (HON): General Information and  
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Docket No. A-90-19  
Subcategory IV-K  
Public Comments Received in Response to  
Request for Supplemental Comments

<u>Item No.</u>	<u>Description</u>
IV-K-71	D. Theiler and R. Colby, State and Territorial Air Pollution Program Administrators/Association of Local Air Pollution Control Officials (STAPPA/ALAPCO), to EPA Air Docket No. A-90-19. November 12, 1993. Response to request for supplemental comments.
IV-K-72	C. Kemper, State of Missouri Department of Natural Resources, to EPA Air Docket No. A-90-19. November 22, 1993. Response to request for supplemental comments.
IV-K-73	R. C. Kaufmann, American Forest & Paper Association, to EPA Air Docket No. A-90-19. November 23, 1993. Response to request for supplemental comments.
IV-K-74	M. Zaw-Mon, Maryland Department of the Environment, to EPA Air Docket No. A-90-19. November 24, 1993. Response to request for supplemental comments.
IV-K-75	D. W. Gustafson and T. A. Threet, The Dow Chemical Company, to EPA Air Docket No. A-90-19. December 2, 1993. Response to request for supplemental comments regarding HON wastewater requirements.

Hazardous Organic NESHAP (HON): Equipment Leaks  
Docket No. A-90-20  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-1	P. Dolan, Adsistor Technology, Inc., to EPA Air Docket (A-90-20). February 9, 1993. Alternatives to Method 21 for fugitive emissions compliance testing of chemical process equipment pursuant to the proposed NESHAP regulations (40 CFR part 63, subpart H, 63.180). <b>This item is identical to Docket No. A-90-19, Item No. IV-D-8.</b>
IV-D-2	S. Hennigan, The Foxboro Company, to EPA's Air Docket, Attn: A-90-20. February 26, 1993. Comments on HON proposal.
IV-D-3	T. A. Kittleman, Du Pont, to R. Colyer, EPA:ESD. March 9, 1993. HON equipment leak regulation.
IV-D-4	T. R. McCully, ABATECH/Raven, to U.S. EPA (Docket No. A-90-19). March 10, 1993. Comments regarding HON proposal.
IV-D-5	J. E. Schmidt, FMC Corporation, to EPA's Air Docket (A-90-19 and A-90-20). March 30, 1993. Comments regarding HON proposal.
IV-D-6	C. Walsh, The Upjohn Company, to EPA's Air Docket (A-90-20). April 2, 1993. Comments regarding HON proposal.
IV-D-7	J. M. Wilson, Bristol-Myers Squibb Company, to EPA Air Docket A-90-20. March 31, 1993. Comments regarding HON proposal.
IV-D-8	B. Warren, Consumer Policy Institute, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 7, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-41.</b>
IV-D-9	D. L. Chapman, The Goodyear Tire & Rubber Company, to EPA Air Docket A-90-20. April 14, 1993. Comments regarding HON proposal.
IV-D-10	M. L. Mullins, Chemical Manufacturers Association (CMA), to EPA Air Docket A-90-20. April 15, 1993. Comments regarding HON proposal.

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Docket No. A-90-20  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-11	V. E. Messick, Vista Chemical Company, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-52.</b>
IV-D-12	R. M. Baldisserotto, Hoffmann-La Roche, to EPA Air Docket A-90-20. April 15, 1993. Comments regarding HON proposal.
IV-D-13	D. A. Woodring, BP Chemicals, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-53.</b>
IV-D-14	J. Schulze, Ciba-Geigy Corporation, to EPA Air Docket A-90-20. April 16, 1993. Comments regarding HON proposal.
IV-D-15	N. Dee, National Petroleum Refiners Association, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-92.</b>
IV-D-16	M. Zaw-Mon, Maryland Department of the Environment, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-93.</b>
IV-D-17	J. A. Dege, DuPont, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-97.</b>
IV-D-18	C. D. Malloch, Monsanto, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-33.</b>

Hazardous Organic NESHAP (HON): Equipment Leaks  
Docket No. A-90-20  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-19	D. W. Gustafson and J. A. Crites, The Dow Chemical Company, to EPA Air Docket A-90-20. April 16, 1993. Comments regarding HON (equipment leaks) proposal. <b>Attachment 1 to this item is identical to Docket No. A-90-19, Item No. IV-D-35.</b>
IV-D-20	T. A. Kovacic, Dow Corning, to EPA Air Docket A-90-20. April 16, 1993. Comments regarding HON proposal.
IV-D-21	A. T. Roy, Allied Signal, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-60.</b>
IV-D-22	B. D. Patterson, Exxon Company, U.S.A., to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-64.</b>
IV-D-23	R. D. Truelove, Conoco, Inc., to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-67.</b>
IV-D-24	D. G. Berkebile, The Goodyear Tire & Rubber Company, to EPA Air Docket A-90-20. April 16, 1993. Comments regarding HON proposal.
IV-D-25	E. A. Fisher, Rohm and Haas, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-68.</b>
IV-D-26	B. L. Taranto, Exxon Chemical Americas, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-73.</b>
IV-D-27	E. L. DuSold, Eli Lilly and Company, to EPA Air Docket A-90-20. April 16, 1993. Comments regarding HON proposal.

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Docket No. A-90-20  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-28	R. C. Phelps and J. L. Woolbert, Eastman Kodak (Texas), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-77.</b>
IV-D-29	W. P. Leonard, Borden Chemicals and Plastics, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal (equipment leaks).
IV-D-30	J. T. Sell, National Paint & Coatings Association, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 18, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-80.</b>
IV-D-31	I. N. Vaughan (Association of Local Air Pollution Control Officials [ALAPCO], and T. M. Allen (State and Territorial Air Pollution Program Administrators [STAPPA]), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-99.</b>
IV-D-32	M. J. Bradley, Northeast States for Coordinated Air Use Management (NESCAUM), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-100.</b>
IV-D-33	T. X. White, Pharmaceutical Manufacturers Association, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, and A-90-23. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-108.</b>
IV-D-34	D. P. Bowers, Merck & Co., Inc. to EPA Air Docket, Attn: Docket Numbers A-90-19 and A-90-20. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-104.</b>



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Docket No. A-90-20  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-35	M. L. Mullins, Chemical Manufacturers Association (CMA), to EPA Air Docket Office, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-32.</b>
IV-D-36	T. G. Dittman, TRC Environmental Corporation, to EPA Air Docket A-90-20. April 19, 1993. Comments regarding HON proposal.
IV-D-37	J. C. Hovious, Union Carbide Corporation, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-34.</b>
IV-D-38	A. Claassen, Latham & Watkins (on behalf of BASF Corporation and Miles Inc.), to EPA Air Docket A-90-20. April 19, 1993. Comments regarding HON proposal.
IV-D-39	S. L. Edwards, Synthetic Organic Chemical Manufacturers Association, Inc. (SOCMA), to EPA Air Docket A-90-20. April 19, 1993. Comments regarding HON proposal. <b>The enclosure to this item is identical to Docket No. A-90-19, Item No. IV-D-86.</b>
IV-D-40	S. Lopez, Bay Area Air Quality Management District, to EPA Air Docket, Attn: Docket Nos. A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-115.</b>
IV-D-41	J. D. Spurgeon, Circo-Flex Corporation, to EPA Air Docket No. A-90-20. Comments regarding HON proposal.

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Docket No. A-90-20  
Subcategory IV-G  
Late Public Comments Received

<u>Item No.</u>	<u>Description</u>
IV-G-1	D. M. Driesen, Natural Resources Defense Council (NRDC), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 23, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-G-3.</b>
IV-G-2	J. C. Hovious, Union Carbide Corporation, to EPA Air Docket, Attn: Docket Nos. A-90-18, A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. (Believe A-90-18 is a typographical error--no such docket number). April 29, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-G-4.</b>
IV-G-3	L. L. Jackson, Dow U.S.A., to EPA Air Docket No. A-90-20. May 14, 1993. Comments regarding HON proposal.
IV-G-4	C. D. Malloch, Monsanto, to EPA Air Docket No. A-90-19. July 12, 1993. Additional comments regarding HON proposal.

Hazardous Organic NESHA (HON): Storage  
Docket No. A-90-21  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-1	D. E. Strayer, Borden Packaging and Industrial Products, to EPA Air Docket (A-90-21). March 29, 1993. Comments on proposed SOCMH HON storage vessel provisions.
IV-D-2	W. P. Leonard, Borden Chemicals and Plastics, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-79.</b>
IV-D-3	R. C. Phelps and J. L. Woolbert, Eastman Kodak (Texas), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-77.</b>
IV-D-4	S. L. Edwards, Synthetic Organic Chemical Manufacturers Association, Inc. (SOCMA), to EPA Air Docket A-90-21. April 19, 1993. Comments regarding HON proposal. <b>The enclosure to this letter is identical to Docket No. A-90-19, Item No. IV-D-86.</b>
IV-D-5	B. L. Taranto, Exxon Chemical Americas, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal. <b>The enclosure to this letter is identical to Docket No. A-90-19, Item No. IV-D-73.</b>
IV-D-6	E. A. Fisher, Rohm and Haas, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-68.</b>
IV-D-7	D. G. Berkebile, The Goodyear Tire & Rubber Company, to EPA Air Docket A-90-21. April 16, 1993. Comments regarding HON proposal.
IV-D-8	R. D. Truelove, Conoco, Inc., to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-67.</b>

Hazardous Organic NESHAP (HON): Storage  
Docket No. A-90-21  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-9	B. D. Patterson, Exxon Company, U.S.A., to EPA Air Docket A-90-21. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-64.</b>
IV-D-10	P. T. Cavanaugh, The Chevron Companies, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-62.</b>
IV-D-11	A. T. Roy, Allied Signal, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-60.</b>
IV-D-12	J. T. Sell, National Paint & Coatings Association, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 18, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-68.</b>
IV-D-13	P. C. Bailey, American Petroleum Institute (API), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-58.</b>
IV-D-14	D. A. Woodring, BP Chemicals, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-54.</b>
IV-D-15	V. E. Messick, Vista Chemical Company, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-53.</b>

Hazardous Organic NESHA (HON): Storage  
Docket No. A-90-21  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-16	B. Warren, Consumer Policy Institute, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 7, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-41.</b>
IV-D-17	D. W. Gustafson and J. A. Crites, The Dow Chemical Company, to EPA Air Docket A-90-21. April 16, 1993. Comments regarding HON (storage vessels) proposal. <b>Attachment 1 to this item is identical to Docket No. A-90-19, Item No. 35.</b>
IV-D-18	J. C. Hovious, Union Carbide Corporation, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-34.</b>
IV-D-19	C. D. Malloch, Monsanto, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-33.</b>
IV-D-20	M. L. Mullins, Chemical Manufacturers Association (CMA), to EPA Air Docket Office, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-32.</b>
IV-D-21	I. N. Vaughan (Association of Local Air Pollution Control Officials [ALAPCO], and T. M. Allen (State and Territorial Air Pollution Program Administrators [STAPPA]), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-99.</b>

Hazardous Organic NESHAP (HON): Storage  
Docket No. A-90-21  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-22	M. J. Bradley, Northeast States for Coordinated Air Use Management (NESCAUM), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-100.</b>
IV-D-23	P. L. DeFur, E. K. Silbergeld, and L. Epstein, Environmental Defense Fund, to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-103.</b>
IV-D-24	N. Dee, National Petroleum Refiners Association, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-92.</b>
IV-D-25	M. Zaw-Mon, Maryland Department of the Environment, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-93.</b>
IV-D-26	W. R. Quanstrom, Amoco Corporation, to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-113.</b>
IV-D-27	J. A. Dege, DuPont, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-97.</b>
IV-D-28	S. Lopez, Bay Area Air Quality Management District, to EPA Air Docket, Attn: Docket Nos. A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-115.</b>

Hazardous Organic NESHAP (HON): Storage  
Docket No. A-90-21  
Subcategory IV-G  
Late Public Comments Received

<u>Item No.</u>	<u>Description</u>
IV-G-1	D. M. Driesen, Natural Resources Defense Council (NRDC), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 23, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-G-3.
IV-G-2	J. C. Hovious, Union Carbide Corporation, to EPA Air Docket, Attn: Docket Nos. A-90-18, A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. (Believe A-90-18 is a typographical error--no such docket number). April 29, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-G-4.
IV-G-3	B. Mannchen, private citizen, to C. Browner, EPA Administrator. April 14, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-120.

Hazardous Organic NESHAP (HON): Transfer  
Docket No. A-90-22  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-1	R. C. Phelps and J. L. Woolbert, Eastman Kodak (Texas), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-77.</b>
IV-D-2	B. L. Taranto, Exxon Chemical Americas, to EPA Air Docket A-90-22. April 16, 1993. Comments regarding HON proposal. <b>The attachments to this letter are identical to Docket No. A-90-19, Item No. IV-D-73.</b>
IV-D-3	R. D. Truelove, Conoco, Inc., to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-67.</b>
IV-D-4	B. D. Patterson, Exxon Company, U.S.A., to EPA Air Docket A-90-22. April 16, 1993. Comments regarding HON proposal. <b>The attachments to this letter are identical to Docket No. A-90-19, Item No. IV-D-64.</b>
IV-D-5	P. T. Cavanaugh, The Chevron Companies, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-62.</b>
IV-D-6	A. T. Roy, Allied Signal, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-60.</b>
IV-D-7	D. G. Berkebille, The Goodyear Tire & Rubber Company, to EPA Air Docket A-90-22. April 16, 1993. Comments regarding HON proposal.
IV-D-8	J. T. Sell, National Paint & Coatings Association, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 18, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-80.</b>



Hazardous Organic NESHAP (HON): Transfer  
Docket No. A-90-22  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-9	P. C. Bailey, American Petroleum Institute (API), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-58.</b>
IV-D-10	D. A. Woodring, BP Chemicals, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-54.</b>
IV-D-11	V. E. Messick, Vista Chemical Company, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-53.</b>
IV-D-12	B. Warren, Consumer Policy Institute, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 7, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-41.</b>
IV-D-13	D. W. Gustafson and J. A. Crites, The Dow Chemical Company, to EPA Air Docket A-90-22. April 16, 1993. Comments regarding HON (transfer operations) proposal. <b>Attachment 1 of this item is identical to Docket No. A-90-19, Item No. IV-D-35.</b>
IV-D-14	J. C. Hovious, Union Carbide Corporation, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-34.</b>
IV-D-15	C. D. Malloch, Monsanto, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-33.</b>

Hazardous Organic NESHAP (HON): Transfer  
Docket No. A-90-22  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-16	M. L. Mullins, Chemical Manufacturers Association (CMA), to EPA Air Docket Office, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-32.</b>
IV-D-17	I. N. Vaughan (Association of Local Air Pollution Control Officials [ALAPCO], and T. M. Allen (State and Territorial Air Pollution Program Administrators [STAPPA]), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-99.</b>
IV-D-18	M. J. Bradley, Northeast States for Coordinated Air Use Management (NESCAUM), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-100.</b>
IV-D-19	N. Dee, National Petroleum Refiners Association, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-92.</b>
IV-D-20	M. Zaw-Mon, Maryland Department of the Environment, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-93.</b>
IV-D-21	J. A. Dege, DuPont, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-97.</b>

Hazardous Organic NESHAP (HON): Transfer  
Docket No. A-90-22  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-22	S. Lopez, Bay Area Air Quality Management District, to EPA Air Docket, Attn: Docket Nos. A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-115.

Hazardous Organic NESHAP (HON): Transfer  
Docket No. A-90-22  
Subcategory IV-G  
Late Public Comments Received

<u>Item No.</u>	<u>Description</u>
IV-G-1	D. M. Driesen, Natural Resources Defense Council (NRDC), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 23, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-G-3.</b>
IV-G-2	J. C. Hovious, Union Carbide Corporation, to EPA Air Docket, Attn: Docket Nos. A-90-18, A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. (Believe A-90-18 is a typographical error--no such docket number). April 29, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-G-4.</b>
IV-G-3	B. Mannchen, private citizen, to C. Browner, EPA Administrator. April 14, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-120.</b>

Hazardous Organic NESHAP (HON): Wastewater  
Docket No. A-90-23  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-1	G. A. Brier, The Upjohn Company, to EPA's Air Docket, Attn: A-90-23. March 18, 1993. Comments on proposed HON wastewater provisions.
IV-D-2	D. E. Strayer, Borden Packaging and Industrial Products, to EPA Air Docket A-90-19. April 7, 1993. Comments on HON wastewater provisions for group 1 wastewater.
IV-D-3	B. Warren, Consumer Policy Institute, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 7, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-41.</b>
IV-D-4	R. Skinner, Air Products, to EPA Air Docket A-90-23. April 14, 1993. Comments regarding HON proposal.
IV-D-5	D. A. Woodring, BP Chemicals, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-54.</b>
IV-D-6	V. E. Messick, Vista Chemical Company, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-53.</b>
IV-D-7	W. P. Leonard, Borden Chemicals and Plastics, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-79.</b>
IV-D-8	R. C. Phelps and J. L. Woolbert, Eastman Kodak (Texas), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-77.</b>
IV-D-9	E. L. DuSold, Eli Lilly and Company, to EPA Air Docket A-90-23. April 16, 1993. Comments regarding HON proposal.

Hazardous Organic NESHAP (HON): Wastewater  
Docket No. A-90-23  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-10	B. L. Taranto, Exxon Chemical Americas, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal. <b>The attachments to this item are identical to Docket No. A-90-19, Item No. IV-D-73.</b>
IV-D-11	E. A. Fisher, Rohm and Haas, to EPA Air Docket A-90-19. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-68.</b>
IV-D-12	R. D. Truelove, Conoco, Inc., to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-67.</b>
IV-D-13	B. D. Patterson, Exxon Company, U.S.A., to EPA Air Docket A-90-23. April 16, 1993. Comments regarding HON proposal. <b>The attachment to this item is identical to Docket No. A-90-19, Item No. IV-D-64.</b>
IV-D-14	N. A. Kilbourn, Sun Company, Inc., to EPA Air Docket. April 16, 1993. Comments regarding HON proposal.
IV-D-15	P. T. Cavanaugh, The Chevron Companies, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-62.</b>
IV-D-16	A. T. Roy, Allied Signal, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. <b>This item is identical to Docket No. A-90-19, Item No. IV-D-60.</b>
IV-D-17	D. G. Berkebile, The Goodyear Tire & Rubber Company, to EPA Air Docket A-90-23. April 16, 1993. Comments regarding HON proposal.
IV-D-18	T. A. Kovacic, Dow Corning, to EPA Air Docket A-90-23. April 16, 1993. Comments regarding HON proposal.

Hazardous Organic NESHA (HON): Wastewater  
Docket No. A-90-23  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-19	P. C. Bailey, American Petroleum Institute (API), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-58.
IV-D-20	D. W. Gustafson and J. A. Crites, The Dow Chemical Company, to EPA Air Docket A-90-23. April 16, 1993. Comments regarding HON (wastewater operations) proposal. Attachment 1 to this item is identical to Docket No. A-90-19, Item No. IV-D-35.
IV-D-21	J. Schulze, Ciba-Geigy, to EPA Air Docket A-90-23. April 16, 1993. Comments regarding HON proposal.
IV-D-22	C. D. Malloch, Monsanto, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-33.
IV-D-23	N. Dee, National Petroleum Refiners Association, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-92.
IV-D-24	M. Zaw-Mon, Maryland Department of the Environment, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-93.
IV-D-25	J. A. Dege, DuPont, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 16, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-97.

Hazardous Organic NESHAP (HON): Wastewater  
Docket No. A-90-23  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-26	J. T. Sell, National Paint & Coatings Association, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 18, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-80.
IV-D-27	M. L. Mullins, Chemical Manufacturers Association (CMA), to EPA Air Docket Office, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-32.
IV-D-28	R. C. Fortuna, Hazardous Waste Treatment Council, to EPA Air Docket A-90-23. April 19, 1993. Comments regarding HON proposal.
IV-D-29	I. N. Vaughan (Association of Local Air Pollution Control Officials [ALAPCO], and T. M. Allen (State and Territorial Air Pollution Program Administrators [STAPPA]), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-99.
IV-D-30	M. J. Bradley, Northeast States for Coordinated Air Use Management (NESCAUM), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-100.
IV-D-31	G. D. Strickland, Chemical Manufacturers Association (Ethylene Oxide Industry Panel of CMA), to EPA Air Dockets A-90-19 and A-90-23. April 19, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-102.



Hazardous Organic NESHAP (HON): Wastewater  
Docket No. A-90-23  
Subcategory IV-D  
Additional Comments Received

<u>Item No.</u>	<u>Description</u>
IV-D-32	T. X. White, Pharmaceutical Manufacturers Association, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, and A-90-23. April 19, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-108.
IV-D-33	W. Caffey Norman, Patton, Boggs & Blow (on behalf of the Halogenated Solvents Industry Alliance [HSIA]), to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-110.
IV-D-34	W. R. Quanstrom, Amoco Corporation, to EPA Air Docket A-90-19. April 19, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-113.
IV-D-35	S. L. Edwards, Synthetic Organic Chemical Manufacturers Association, Inc. (SOCMA), to EPA Air Docket A-90-23. April 19, 1993. Comments regarding HON proposal. The enclosure to this item is identical to Docket No. A-90-19, Item No. IV-D-86.
IV-D-36	J. C. Hovious, Union Carbide Corporation, to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 19, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-34.
IV-D-37	S. Lopez, Bay Area Air Quality Management District, to EPA Air Docket, Attn: Docket Nos. A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 15, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-115.

Hazardous Organic NESHAP (HON): Wastewater  
Docket No. A-90-23  
Subcategory IV-G  
Late Public Comments Received

<u>Item No.</u>	<u>Description</u>
IV-G-1	D. M. Driesen, Natural Resources Defense Council (NRDC), to EPA Air Docket, Attn: Docket Numbers A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. April 23, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-G-3.
IV-G-2	D. Driesen, Natural Resources Defense Council (NRDC), to EPA Air Docket A-90-23. April 23, 1993. Comments regarding HON proposal.
IV-G-3	J. C. Hovious, Union Carbide Corporation, to EPA Air Docket, Attn: Docket Nos. A-90-18, A-90-19, A-90-20, A-90-21, A-90-22, and A-90-23. (Believe A-90-18 is a typographical error--no such docket number). April 29, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-G-4.
IV-G-4	Final report entitled "Modeling of Tray-Type Steam Stripping Columns." Submitted by A. Stanley, Chemical Manufacturers Association. April 30, 1993 (revised May 10, 1993). This item should be considered an addendum to Docket No. A-90-90, Item No. IV-D-32.
IV-G-5	A. Shelton, NOVA Engineering, Inc., to EPA Air Docket No. A-90-23. July 9, 1993. Comments regarding HON proposal.
IV-G-6	B. Mannchen, private citizen, to C. Browner, EPA Administrator. April 14, 1993. Comments regarding HON proposal. This item is identical to Docket No. A-90-19, Item No. IV-D-120.
IV-G-7	A. Stanley, Chemical Manufacturers Association (CMA), to J. Meyer, EPA:SDB. April 9, 1993. Letters relating to CMA's proposed wastewater configurations and further language and revised schematics.
IV-G-8	B. C. Davis, Exxon Chemical Company, to J. Meyer, EPA:SDB. April 13, 1993. Henry's Law and ASPEN.

#### 4.0 COMMENTERS IN SUPPORT OF OTHER COMMENTERS

Many commenters stated in their comment letters that they supported another commenters' comments. These are listed in this chapter.

A number of commenters (A-90-19: IV-D-55; IV-D-61; IV-D-62; IV-D-63; IV-D-64; IV-D-67; IV-D-89; IV-D-113; IV-K-13; IV-K-20) (A-90-23: IV-D-14) supported comments submitted by the American Petroleum Institute (A-90-19: IV-D-58).

Many commenters (A-90-19: IV-D-33; IV-D-34; IV-D-36; IV-D-46; IV-D-48; IV-D-54; IV-D-56; IV-D-59; IV-D-61; IV-D-62; IV-D-68; IV-D-69; IV-D-71; IV-D-75; IV-D-78; IV-D-79; IV-D-81; IV-D-84; IV-D-86; IV-D-89; IV-D-97; IV-D-98; IV-D-102; IV-D-110; IV-D-111; IV-D-113; IV-K-6; IV-K-13; IV-K-19; IV-K-21; IV-K-22; IV-K-27; IV-K-38; IV-K-57; IV-K-61), (A-90-20: IV-D-20), (A-90-23: IV-D-4; IV-D-9; IV-D-18) supported comments submitted by the Chemical Manufacturer's Association (CMA) (A-90-19: IV-D-32).

One commenter (A-90-19: IV-D-67) supported comments submitted by DuPont (A-90-19: IV-D-97).

Numerous commenters (A-90-19: IV-D-55; IV-D-89; IV-D-113; IV-K-13; IV-K-20; IV-K-25; IV-K-32; IV-K-36) supported comments submitted by the National Petroleum Refineries Association (NPRA) (A-90-19: IV-D-92).

Two commenters (A-90-19: IV-D-34; IV-D-77) supported comments submitted by the Olefins Panel of Chemstar Division of CMA (A-90-19: IV-D-101).

Two commenters (A-90-19: IV-D-34; IV-D-77) supported comments submitted by the Ethylene Oxide Industry Council of Chemstar Division of CMA (A-90-19: IV-D-102).

One commenter (A-90-19: IV-D-79) supported comments submitted by the Vinyl Institute (A-90-19: IV-D-105).

Several commenters (A-90-19: IV-D-51; IV-D-90; IV-D-93; IV-D-100) supported comments submitted by the State and Territorial Air Pollution Program Administrators/Association of Local Air Pollution Control Officers (STAPPA/ALAPCO) (A-90-19: IV-D-99).

Four commenters (A-90-19: IV-D-87; IV-D-115; IV-K-64; IV-K-74) supported comments submitted in a STAPPA/ALAPCO letter dated March 23, 1993.

One commenter (A-90-19: IV-D-94) supported comments submitted by the Wisconsin Department of Natural Resources (A-90-19: IV-D-51) re: considering toxicity for emissions averaging. One commenter (A-90-19: IV-K-4) supports the NPRA comment regarding emissions averaging.

One commenter (A-90-19: IV-D-94) supported the testimony at the March 18, 1993 public hearing regarding risk-based standards of STAPPA/ALAPCO (A-90-19: IV-F-7.6).

One commenter (A-90-19: IV-D-97) supported comments submitted by the Synthetic Organic Chemical Manufacturing Association (A-90-19: IV-D-86).

Numerous commenters (A-90-19: IV-D-82; IV-D-98; IV-K-6; IV-K-19; IV-K-45; IV-K-46; IV-K-73) (A-90-23: IV-D-14) supported comments submitted by the Coalition for Clean Air Implementation (A-90-19: IV-D-83).

One commenter (A-90-19: IV-D-46) supported comments submitted by the American Forest and Paper Association.

Two commenters (A-90-19: IV-D-43; IV-D-47) agreed with all comments submitted by the Consumer Policy Institute, Consumers Union.

One commenter (A-90-19: IV-D-105) supported comments submitted by Dow Chemical Company.

One commenter (A-90-19: IV-D-72) supported comments submitted by the Aluminum Association (A-90-19: IV-D-106).

One commenter (A-90-19: IV-D-115) supported comments submitted by the California Air Resources Board (A-90-19: IV-D-87).

# **TECHNICAL REPORT DATA**

*(Please read Instructions on the reverse before completing)*

1 REPORT NO EPA-453/R-94-003f		2	3 RECIPIENT'S ACCESSION NO	
4 TITLE AND SUBTITLE  Hazardous Air Pollutant Emissions from Process Units in the Synthetic Organic Chemical Manufacturing Industry--Background Information for Final Standards Volume 2F: Commenter Identification List			5 REPORT DATE <b>March 1994</b>	
			6. PERFORMING ORGANIZATION CODE	
7 AUTHOR(S)			8 PERFORMING ORGANIZATION REPORT NO	
9 PERFORMING ORGANIZATION NAME AND ADDRESS  Office of Air Quality Planning and Standards U.S. Environmental Protection Agency Research Triangle Park, North Carolina 27711			10 PROGRAM ELEMENT NO	
			11 CONTRACT/GRANT NO  68D10117	
12 SPONSORING AGENCY NAME AND ADDRESS  Director, Office of Air Quality Planning and Standards Office of Air and Radiation U.S. Environmental Protection Agency Research Triangle Park, North Carolina 27711			13. TYPE OF REPORT AND PERIOD COVERED	
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15 SUPPLEMENTARY NOTES				
16. ABSTRACT  A final rule for the regulation of emissions of organic hazardous air pollutants (HAP's) from chemical processes of the synthetic organic chemical manufacturing industry (SOCMI) is being promulgated under the authority of sections 112, 114, 116, and 301 of the Clean Air Act, as amended in 1990. The emission standards were proposed in the <u>Federal Register</u> on December 31, 1992 (57 FR 62608). Public hearings were held. A supplemental notice was published in the <u>Federal Register</u> on October 15, 1993 (58 FR 53478). This volume of the background information document contains the commenter identification list.				
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