MON Process Vents (PV)

Overview

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What is a PV?

- PV is not defined in the rule, but the batch PV definition and continuous PV definition describe the MON PV universe.
- Continuous and batch PV definitions are independent of whether process has batch operations.
- Every PV that is not a “continuous PV” is a “batch PV”, unless excluded.

What is a PV? (Cont'd)

- In summary, a batch PV is a vent from a unit operation(s), through which a HAP-containing gas stream is, or has the potential to be, released to the atmosphere and is not excluded.
- SS&M and relief device gas streams are PVs, but do not have to meet rule limits.

What is not a PV

- Streams that are excluded from the MON PV world are:
  - Gas streams from other MON or HON regulated equipment, including from surge control vessels and bottoms receivers.
  - Gas streams routed to fuel gas.
  - Gas streams containing <50 ppm HAP.

What is a Continuous PV?

- Continuous PV is defined to match §63.107 of the HON, which is summarized below and on the next slide.
  - A continuous PV is the point of discharge to the atmosphere or entry into a control device of a gas stream if some or all of the gas stream originates as a continuous flow from an air oxidation reactor, distillation unit, or reactor in an MCPU, even if it first passes through a recovery device.
  - The gas stream is in the gas phase from the point of origin to the point of discharge to the atmosphere.

What is not a Continuous PV?

- §63.107 of the HON excludes the following from being Continuous PVs (as modified by the MON)
  - A relief valve discharge.
  - A gas stream exiting a control device used to comply with Table 1 of the MON.
  - A gas stream transferred to other processes for reaction or other use in another process or for fuel value (*i.e.*, net positive heating value), use, reuse, or for sale for fuel value, use, or reuse.
  - A gas stream exiting an analyzer.