UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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4APT-ARB

Mr. Gerald Kissel, P.E.
Air Permitting Supervisor
Department of Environmental Protection
Division of Air Resource Management
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

SUBJECT: Opacity Monitoring Waiver Requested for Sand/Limestone Dryer at Pre-Mix Industries, Inc.

Dear Mr. Kissel:

The purpose of this letter is to provide you with a written determination regarding an opacity monitoring waiver that was requested for the referenced source in a September 14, 1998, letter that Air Observations, Incorporated sent to Region 4 and to your office. The dryer in question is subject to 40 C.F.R. Part 60, Subpart UUU (Standards of Performance for Calciners and Dryers in Mineral Industries), and the opacity monitoring requirements for this unit involve collecting visible emission (VE) data at the outlet of the baghouse used to control emissions from the dryer. These requirements are promulgated at 40 C.F.R. §60.734(b), and under these provisions, the U.S. Environmental Protection Agency (EPA) Method 9 must be used to collect 18 minutes of VE data at the baghouse outlet each operating day.

In its September 14 letter, Air Observations referenced a particulate potential emission rate of 5.26 ton/year for the sand/limestone dryer at Pre-mix industries, and due to this low emission rate, questioned whether the opacity monitoring requirements in Subpart UUU are applicable to the dryer. After reviewing the information provided by Air Observations with its request, we have concluded that all opacity monitoring requirements for the dryer at Pre-Mix Industries can be waived if the post-control particulate emission rate from the dryer is less than 11 tons/year. We have also determined that the particulate emission rate estimate provided by Air Observations does not, by itself, constitute an adequate basis for waiving the opacity

monitoring requirements for this dryer. In order to obtain approval for an opacity monitoring waiver, Pre-Mix Industries must submit the results from the initial performance test on its dryer and use these results to verify that annual particulate emission rates are less than 11 ton/year.

When Subpart UUU was promulgated, EPA determined that calciners and dryers with post-control particulate emission rates of less than 11 tons/year should be exempt from all opacity monitoring requirements. When it promulgated Subpart UUU, the Agency listed 15 types of calciners and dryers that are exempt from opacity monitoring requirements due to the expectation that their post-control particulate emission rates would be less than 11 ton/year. EPA did not, however, explicitly state in the final rule that all units with an emission rate of less than 11 tons/year are exempt from opacity monitoring requirements. Therefore, any calciners or dryers that are not on the list of those that are exempt from monitoring by default must be evaluated on a case-by-case basis to determine whether a waiver of opacity monitoring would be appropriate.

The Air Observations' request for Pre-Mix Industries included copies of two previous EPA determinations that address monitoring requirements for Subpart UUU facilities that have particulate emission rates of less than 11 tons/year. In the first of these determinations EPA Headquarters indicated that a metal catalyst production facility would be exempt from the opacity monitoring requirements in Subpart UUU if documentation to confirm that potential emissions are less than 11 tons/year is maintained by the facility owner or operator. In the other determination provided by Air Observations, Region 6 concluded that a calciner was not subject to opacity monitoring requirements under Subpart UUU because testing indicated that the particulate emission rate from the facility was less than 0.0032 tons/year.

Based upon the previous determinations included with Air Observations' request, it is clear that documentation to verify that particulate emissions are less than 11 tons/year must be maintained in order to qualify for a waiver of the opacity monitoring requirements under Subpart UUU if a particular calciner or dryer is not on the list of those for which opacity monitoring is waived by default. Furthermore, in the one case

where EPA specifically granted a waiver of the requirement for opacity monitoring under Subpart UUU, the decision was based upon the results of stack testing at the facility for which a waiver was requested.

Taking the previous EPA determinations into consideration, we have concluded that a decision regarding whether to waive the opacity monitoring requirement for the sand/limestone dryer at Pre-Mix Industries must be based upon the results of the initial stack test at this facility, rather than upon emission factors from EPA Publication AP-42. The basis for this conclusion is that AP-42 factors are generic, and actual emissions at any individual facility may be higher or lower than the AP-42 estimates for a variety of reasons. Therefore, a case-by-case determinations regarding whether to waive opacity monitoring requirements under Subpart UUU should be made on the basis of source-specific stack tests whenever possible. Since Air Observations has asked for a waiver of opacity monitoring, but has not requested a waiver of the initial stack testing requirement for the sand dryer at Pre-Mix Industries, we presume that an initial stack test will be conducted at the facility within the time frame specified in 40 C.F.R. 60.8(a). For the reasons discussed previously, any decision regarding the applicability of the opacity monitoring provisions under Subpart UUU at Pre-Mix Industries must be based upon these data, rather than upon AP-42 factors.

If you have any questions regarding the determination provided in this letter, please contact Mr. David McNeal of my staff at 404/562-9102.

Sincerely,

Douglas Neeley

R. Douglas Neeley
Chief
Air and Radiation Technology
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Management Division