DATE: 06/16/95

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Selection Criteria: SUBPART = X

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Title:

DETERMINATION SUBPART X

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STEPHENSON, EARL J., ENFORCEMENT DIVISION REGION

VII

Author:

REICH, EDWARD E., DSSE

Date:

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Comments:

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GRANULAR TRIPLE SUPERPHOSPHATE

PERFORMANCE TEST

Subparts:

X

References:

60.240

60.8(b)(4)

- 1. Does Subpart X apply to granular triple superphosphate storage facilities which are not located at manufacturing plants?
- 2. If the granular triple superphosphate contained in a storage facility is more than 10 days old, can performance testing be waived under 60.8(b)(4)?
- Yes, the regulation does not specify a size cutoff nor does it state that these facilities must be located at the same site as the manufacturing facility.
- Most fluoride emissions from granular triple superphosphate occur in the first 10 days following manufacture, therefore the performance test is not required.

August 11 1977

MEMORANDUM

SUBJECT: NSPS Determination - Subpart X

FROM: Director, DSSE

TO: Earl J. Stephenson, Director

Enforcement Division, Region VII

This is an addendum to an NSPS determination on Subpart X dated June 29, 1977.

Most fluoride emissions from granular triple superphosphate occur only in the first ten days following manufacture. For this reason, if the granular triple superphosphate contained in a storage facility is more than ten days old, then the performance test may be waived under 60.8(b)(4).

If you should have any further questions on this determination, please contact Craig Cobert (FTS 755-2546) of my staff.

Edward E. Reich

(signed)

cc: Larry Jones, OAQPS

DSSE:CCobert:PAH 8/9/77 rm3202 ext52564