



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
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4APT-ARB

Ronald W. Gore, Chief
Air Division
Alabama Department of
Environmental Management
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

Dear Mr. Gore:

Thank you for your letter dated September 23, 1999, requesting information on the condensate testing averaging time for the Pulp and Paper MACT standard, 40 C.F.R. Part 63, Subpart S. I appreciate your concern about the lack of pre-established averaging times for continuous compliance determinations and process parameter monitoring; however, they were not "unaddressed" and left completely to the permitting authority's "discretion." Granted, the initial averaging times are relatively short, but the continuous compliance and parameter monitoring averaging times may be adjusted by the permitting authority as part of the Title V permitting process, provided that the permitting authority has reasonable justification that longer averaging times are necessary due to consideration of mill-specific factors. Your three specific questions and our response to each follow:

1. Regarding condensate characterization study, is there an optimum time period for which the mills should perform characterization studies of their effluent streams?

The optimum time period for characterizing condensate streams may vary from mill to mill, depending on each mill's study results which represent normal mill operation. Because Subpart S compliance for condensates will be based on the results of the characterization study (and any supplemental information such as engineering assessment and manufacturers recommendations), mills should strive for accurate and representative results which may yield various time periods used by mills to characterize condensate streams. However, any information from the characterization study which is used to document an alternative request for performance or compliance testing purposes should be carefully scrutinized by the permitting authority before approval is given (using the criteria given in the answer to question # 3).

2. Regarding initial performance testing of condensates, what should be the maximum averaging time period for tests?

Subpart S was amended (see Federal Register dated April 12, 1999, Final interpretation and technical amendments, page 17558) to clarify that the initial performance test for condensates must consist of a minimum of three test runs and that the minimum sampling time for each run is 1 hour (i.e., 4 grab samples per 1 hour test run for 3 test runs). The Environmental Protection Agency (EPA) recognized in the preamble to the amendments that additional initial performance tests or longer sampling times may be needed to demonstrate compliance under normal operating conditions where process equipment have multiple operating scenarios. Multiple operating scenarios may vary the amount or characterization of the generated condensate. For mills without multiple operating scenarios that effect the amount or character of generated condensates, this would mean that the minimum sampling time (i.e., three 1-hour test runs) is appropriate to determine initial compliance. Other mills are allowed additional tests or longer sampling run times, provided that the need is demonstrated by the mill to the satisfaction of the permitting authority (again, using the criteria given in the answer to question # 3, plus a demonstration that multiple operating scenarios affect the amount or character of generated condensates at the mill). Please note that any mill requesting to extend the number of test runs for the initial performance test should not request a time period exceeding the time period to be used for continuous compliance tests.

3. Regarding continuous compliance determinations for condensates, what, if any, averaging times did EPA consider for these determinations when developing the rule?

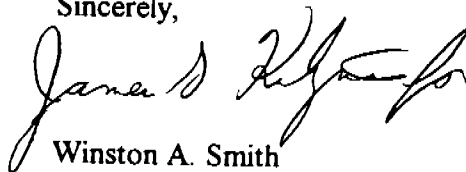
Due to the many various equipment designs and configurations found in the pulp and paper industry and also to differences in operations and processes between mills, the flexibility to develop site specific monitoring values were included in the rule. However, this flexibility is a cause for concern with many permitting authorities, trying to implement Subpart S. To assist you in implementation efforts, there are certain criteria (provided below) that should be considered when approving a mill's site specific monitoring plan.

- * The burden is on the mill to demonstrate what continuous compliance averaging time is appropriate for that particular mill. That is, the mill must submit for approval by the permitting authority the data used (as determined during sampling) to set continuous parameter values, ranges, and averaging times (63.453(n)(4)). As you know, industry has been providing exchanging data. The site specific determination is required to be made based on data collected during the performance test, but can be supplemented by engineering assessments (i.e., data from industry or site specific technical studies) and manufacturer recommendations (63.453(n)(2)). Therefore using data submitted from other mills is permissible as a supplement to the data collected during the site specific performance test, but they must show that it represents the specific mill's equipment, operations, and processes.

- * Additionally, the operating parameters and values must be identified and monitored during performance test sampling, to correlate continuous compliance parameter values, ranges, and averaging times to the standard (63.453(n)(1)). These operating parameters are not only necessary to establish relationships with continuous compliance monitoring, but also necessary for the mill and permit authority to determine proper operation of equipment, determine if startup, shutdown and malfunction (SSM) has been properly considered, and to be used to address any anomalies in the submitted data.
- * The demonstration should include data on all "named streams" in Subpart S (see 63.446(b)). Limiting the data set allows intermittent streams and fewer condensate streams to improperly influence the operating parameter averaging time and range.
- * The demonstration must represent proper and normal operations that result in good air pollution practices (63.6(e)(1)(i), 63.7(e)(1)). As an example, is the process equipment properly operated to collect and condense condensates and is that level of operation representative of how the process equipment will continue to operate and maintain compliance? (Note: modified condensates require a new determination (63.446(h))).
- * The demonstration should address SSM considerations and relationships to the SSM plan. Double counting of SSM and longer parameter value averaging times or broader ranges, are not appropriate. The demonstration should identify and eliminate from consideration data that represents the period of SSM.

The above responses were coordinated with staff from the EPA's Office of Air Quality Planning and Standards and the Office of Enforcement and Compliance Assurance. If you have any questions concerning the comments, please contact Mr. Lee Page of the EPA Region 4 staff at (404) 562-9131.

Sincerely,



Winston A. Smith

Director

Air, Pesticides and Toxics

Management Division