UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

JAN 17 1989

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Ref: 8AT-AP

Jeffrey T. Chaffee, Chief
Air Quality Bureau
Department of Health and
Environmental Sciences
Cogswell Building
Helena, Montana 59620

RE: Enforceability of Opacity Limits at Columbia Falls Aluminum

Dear Jeff:

I understand that the Montana Board of Health and Environmental Sciences has adopted some changes to Montana Air Quality Rules 16.8.1501 and 16.8.1503. When you submit the proposed SIP revision package for these rule changes to EPA, please include any proposed permit modification language that outlines how the rules will be enforced at Columbia Falls Aluminum (CFA). We will need to review this language to ensure that the revision to the SIP is enforceable.

When developing the permit modification language, please consider some alternatives that were inadvertently left out of our December 23, 1988 letter. The alternatives we had intended to provide are:

1. The Bureau may prefer to develop permit restrictions which would include enforceable operational or procedural limitations for the potrooms.

2. A State requirement indicating that the venting of each potroom's emissions shall take place from its own individual stack may alleviate the difficulty in enforcing the opacity limit.

Also, when Kris Knutson returned after the holidays, she was able to discuss CFA with Kirk Foster of EPA's Office of Air Quality Planning and Standards in Research Triangle Park, North Carolina. In an effort to assist the State as quickly as possible, Kris phoned Harry Keltz of your staff on January 5, 1989, to discuss the information she received from Kirk Foster, before the proposed rule change was acted on by the Board on

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January 6, 1989. The suggestion she received from Kirk Foster for evaluating the opacity of emissions from the potroom groups at CFA is provided below:

> The inspector should attempt to evaluate the most dense portion of any plume emitted from the potrooms through any of the 10 roof monitors at CFA, in accordance with Method 9. The evaluation of plumes from monitors on buildings 2 through 9 can be achieved by placing a portable 6' x 6' section of plywood, painted black, behind the plume. The inspector can then take readings from between buildings without encountering any plume interference. If the distance between the buildings is so narrow as to cause a distortion in the readings because of the slant angle involved, the reader should attempt to elevate his or her position, perhaps by climbing a portable ladder.

Of course, the approach suggested by Mr. Foster would require a great deal of effort. As you can see, an opacity limit for potroom groups can be difficult to enforce at CFA or any other "existing" aluminum facility. Therefore, the Bureau may prefer to go with enforceable operational or procedural limitations for the potrooms at CFA, rather than an opacity limitation. Ease of enforceability is a major consideration. Whatever approach is selected, the Bureau must provide some mechanism to determine compliance with an enforceable limit.

I hope these comments are helpful. Please call if you wish to discuss them with me.

Sincerely,

Douglas M. Skie, Chief
Air Programs Branch

cc: John Wardell, 8MO

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