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

DEC 23 1988

Ref: 8AT-AP

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

Dear Mr. Chaffee:

EPA Region VIII personnel have reviewed the proposed changes to Montana's air quality rules regarding wood-waste burners and aluminum plants as submitted in your letter to the EPA dated December 1, 1988. There are several comments on these proposed changes that are summarized in the remainder of this letter. The comments are expressed in order to aid the state in making effective changes to the existing air quality regulations for these facilities.

In regards to the wood-waste burners the following comments are expressed:

1. Section 16.8.1407 subsection 4 proposes that the emission standard for wood-waste burners be modified from 0.1 grs/scf to 0.25 grs/scf.

   a. No support information was provided in your letter documenting the state's estimate that the current 0.1 grs/scf emission standard for wood-waste burners is unattainable. What evidence does the state have to support the statement expressed in your Notice of Public Hearing for Amendment of Rules that "the existing grain loading standard is unreasonable because it does not reflect continual operation of wood-waste burners."?

   b. Can Montana DHES document that an increase in emissions from wood-waste burners will not seriously affect Montana's commitment in their SIP to reach attainment of the PM-10 standard in Group I & II areas?

2. Section 16.8.1407 subsection 7 proposes that wood-waste burners that can not maintain 700°F will be exempt from maintaining the 700°F temperature and the 0.25 grs/scf emission limit for a period of five years. Subsection 7 also indicates that wood-waste burners

that are located in Group III PM-10 areas or whose emissions would contribute to Group I & II PM-10 areas would be exempt from the temperature requirement and emissions limits.

a. Clarification of subsection 7 is needed, as the subsection is now written EPA has interpreted it to mean that all wood-waste burners would be exempt from the temperature requirement and emission limit set forth in the previous sections of the regulation. This is because it is inconceivable that a wood-waste burner would not either be located in a Group III area or contribute to Group I and II areas. Definition of the term contribute and a further explanation of the intent of subsection 7 might better clarify the purpose of the proposed rule change.

b. The MDHES should provide documentation on how exempting wood-waste burners, who cannot maintain 700°F operating temperature, for a five year period does not adversely impact their control strategies schedule for attainment of the PM-10 standard for selected areas as outlined in the current SIP.

3. Subsection 8 of the same Section proposes that a written daily log of the wood-waste burner's operation may be required by MDHES. The current regulation requires that this log be maintained. The relaxation of the proposed regulation to require an operating log is inadvisable for the following reasons.

a. Determination by state or EPA personnel of the compliance of the wood-waste burner to existing emission and operating limitations will be made more difficult without the benefit of reviewing the operating log book for the particular installation being inspected.

b. Regarding proposed changes to subsection 12 of Section 16.8.1407, how will the MDHES know that a wood-waste burner has not been in operation for a two year period if a log is not clearly required?

With regards to the proposed changes to Section 16.8.1501 regarding Aluminum plant potrooms, the following comments are expressed.

1. The proposed definition of "potroom group" should be modified to read:



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"An uncontrolled potroom, a potroom which is controlled individually, or a group of potrooms or potroom segments ducted to a common control system."

The above wording appears in the Code of Federal Regulations (40 CFR 60.191) for "potroom group".

2. It should be noted that the opacity limitation proposed in Subsection 1 of Section 16.8.1503 for the Columbia Falls Aluminum plant is unenforceable due to the interference of plumes that occur from the potroom emission from buildings 1 through 10. The existing rule is equally unenforceable for the same reason.

Additional comments to the proposed changes involve typographical errors or additional wording to help alleviate any possible confusion to the reader of the document. These comments are provided in a marked copy of the proposed changes enclosed with this letter.

These comments are being provided in order to assist the State of Montana in making revisions to Section 16.8.1407 and 1503 of the Montana Air Quality Rules. Should you have any comments regarding these suggestions please contact Mark Komp, EPA Region VIII Air Programs Branch, at (303) 293 - 1768.

Sincerely,

J Dean Gilson for

Douglas M. Skie, Chief
Air Programs Branch

Attachment:



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