June 10, 1993

REGION V
AIR AND RADIATION DIVISION

AIRBORNE LEAD INITIATIVE
MAJOR LEAD SOURCES

SOURCE	LOCATION	EMISSIONS LBS/YR (CP) = LEAD COMPOUND	DESIGNATION STATUS	COMPLIANCE STATUS	LATEST PLANT VISIT	AMBIENT MONITORS	ASSESS NEED FOR OPACITY MONITORS	AMBIENT MODELING
MINNESOTA								
NORTH STAR STEEL	ST PAUL MN	14,700 (CP)	UNCLASS-IFIED	IN COMPLIANCE	5/15/92	NO	YES	YES
GOPHER SMELTING	EAGAN MN	15,200	NONATTAIN-MENT	ON SCHEDULE	6/90	YES	YES	NO
OHIO								
OI-NEG PRODUCTS	COLUMBUS OH	28,500	UNCLASS-IFIED	IN COMPLIANCE	8/21/91	YES	YES	NO
COPPERWELD STEEL	WARREN OH	16,416	UNCLASS-IFIED	IN COMPLIANCE	9/24/91	NO	YES	YES
MASTER METALS	CLEVELAND OH	578 (CP)	UNCLASS-IFIED	IN VIOLATION	6/92 5/93	YES	YES	NO
THOMSON CONSUMER ELECTRON-ICS	CIRCLEVILLE OH	9,650 (CP)	UNCLASS-IFIED	IN COMPLIANCE	8/21/91	YES	YES	NO
DUPONT	TOLEDO OH	7,560 (CP)	NO DESIGNATION	IN COMPLIANCE	3/19/92	NO	NO	NO

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MORGAN MATROC	BEDFORD OH	2,980 (CP)	NO DESIGNATION	IN COMPLIANCE	~~NONE~~ Q4	NO / NO	NO
GE	NILES OH	2,686 (CP)	NO DESIGNATION	IN COMPLIANCE	8/18/92 Q4	NO / NO	NO
NORTH STAR STEEL	YOUNGSTOWN OH	2,050 (CP)	NO DESIGNATION	IN COMPLIANCE	4/28/92 Q4	NO / NO	NO
EMPIRE DETROIT	MANSFIELD OHIO	3,465	UNCLASS-IFIED	IN COMPLIANCE	12/91	NO / YES	NO

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Dave:
we assessed the need for opacity monitors in FY'92 at seven sources including Gopher Smelting and Master metals. The conclusion, even in these sizable/known lead emitters, is that opacity monitors are not recommended. The reasoning is that we can't justify it w/o extensive testing to determine the site specific opacity - mass correlation and w/o confirming there is a consistent percentage of lead in the PM emitted. Also, NSPS for secondary lead smelters (Subpart L)

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does not have any COM requirement. At some source, I believe I was informed by technical staff a while ago, ~~that~~ the lead emitted is in gaseous form and not particulate.

Perhaps we should discuss on the next agenda for lead, whether we should continue this activity. I have attached the COM analysis we did for OI-NEG TV Products as an ~~example~~ example of a glass plant where we reached the same conclusion for different reasons. The question is, should we continue? ~~[illegible]~~

Shirley