Message

From: Rodney Bonner [rbonner@tmtanf.org]
Sent: 9/14/2020 11:55:08 PM
To: Beckham, Lisa [BECKHAM.LISA@EPA.GOV]; Robert Powell [rpowell@tmtanf.org]; oquiroz@tmtanf.org; 'Rodney Bonner' [rodneybonner44@gmail.com]
Subject: RE: Summary of Clean Air Act Permitting for a Pyrolysis Project

Very good Lisa thank you for the clarifications.

From: Beckham, Lisa [mailto:BECKHAM.LISA@EPA.GOV]
Sent: Monday, September 14, 2020 4:53 PM
To: Rodney Bonner; Robert Powell; Otoniel Quiroz; 'Rodney Bonner'
Subject: RE: Summary of Clean Air Act Permitting for a Pyrolysis Project

Testing is conducted at the stack for the unit while it is operating. There are detailed, specific steps that must be followed to accurately test the emissions in the stack. We usually require 3 test runs of one-hour duration each and then average the results. The "samples" taken from the stack are then transferred to a lab where they are analyzed and used to determine the emission rate.

From: Rodney Bonner <rbonner@tmtanf.org>
Sent: Monday, September 14, 2020 4:47 PM
To: Beckham, Lisa <BECKHAM.LISA@EPA.GOV>; Robert Powell <rpowell@tmtanf.org>; oquiroz@tmtanf.org; 'Rodney Bonner' <rodneybonner44@gmail.com>
Subject: RE: Summary of Clean Air Act Permitting for a Pyrolysis Project

Lisa,
Thank you for the information.
How do you test the machine? Or are you testing the results of what is emitted from the machine?

Thank you for the information for the possible consultants.

Rodney Bonner,
Tribal Senior

From: Beckham, Lisa [mailto:BECKHAM.LISA@EPA.GOV]
Sent: Monday, September 14, 2020 4:25 PM
To: Rodney Bonner; Robert Powell; Otoniel Quiroz; 'Rodney Bonner'
Subject: RE: Summary of Clean Air Act Permitting for a Pyrolysis Project

Hi Rodney,

I agree they are definitely trying to provide information, but it seems to be falling a bit short. I think we operate in a very different regulatory scheme than they do. The updated document appears to identify how a sample was analyzed in the lab. A test method for EPA's purposes is much more detailed and starts much earlier in the testing process. Here's EPA Method 5 for PM testing as an example: https://www.epa.gov/sites/production/files/2019-08/documents/method_5_0.pdf.

We are not able to recommend consultants, but you could try to reach out to ITEP (Institute for Tribal Environmental Professions) for assistance. http://www7.nau.edu/itep/main/.

You may want to try contacting the air quality lead and/or the National Tribal Air Association project director: http://www7.nau.edu/itep/main/About/Team.

Lisa

From: Rodney Bonner <rbonner@tmtanf.org>
Sent: Monday, September 14, 2020 8:08 AM
To: Beckham, Lisa <BECKHAM.LISA@EPA.GOV>; Robert Powell <rpowell@tmtanf.org>; oquiroz@tmtanf.org; 'Rodney Bonner' <rodneybonner44@gmail.com>
Subject: RE: Summary of Clean Air Act Permitting for a Pyrolysis Project

Lisa,
After our conversation and the information you provided, I reached out to the company representative regarding the needs for additional information.
They provided the information in the attachment document.
I don't know if they truly understand what is needed but she is trying.
I have a call scheduled for Wednesday their time which is Tuesday our time to discuss our project.
On another note, you stated I might need a consultant to help complete the application, is there a list of individuals trusted by EPA for this service? If so, can I get this list?

Thank you very much for your time and efforts.

Rodney Bonner,
Tribal Senior

From: Beckham, Lisa [mailto:BECKHAM.LISA@EPA.GOV]
Sent: Thursday, September 10, 2020 4:24 PM
To: Robert Powell; Otoniel Quiroz; Rodney Bonner; 'Rodney Bonner'
Subject: RE: Summary of Clean Air Act Permitting for a Pyrolysis Project

The most immediate next steps are to:

1. Determine the POTENTIAL emissions (assuming the facility overrates continuously, 8760 hours/yr) of each of the pollutants subject to the preconstruction program on a TON PER YEAR basis:
    a. Pollutants are listed here: https://www.epa.gov/caa-permitting/tribal-minor-new-source-review-permitting-epas-pacific-southwest-region-9#thresholds
    b. We would also need information on air toxic emissions for our EJ analysis: dioxin/furans, benzene, HCl, styrene, and polycylic aromatic hydrocarbons (PAHs)
2. When providing data on potential emissions, we need to know the test methods that were used to determine emissions.
    a. EPA's test methods: https://www.epa.gov/emc/emc-promulgated-test-methods
    b. The reason we need this information is because, to my knowledge, this equipment doesn't exist in the U.S., so we don't have any existing data to draw from. For example, when someone builds a power plant we have decades of emissions data based on EPA test methods and we have a high confidence in what we expect the emissions to be. In this case, we may be starting from scratch.
3. I recommend submitting a request for an applicability determination to the EPA to see whether any incineration regulations apply.
4. Once we determine the emissions, type of permit you need, and whether it is considered an incinerator, you will need to submit an application.

a. https://www.epa.gov/caa-permitting/tribal-minor-new-source-review-permitting-epas-pacific-southwest-region-9#instructions At a minimum you will need, to submit the last one listed "New or Modified Minor Sources."
b. When it comes to completing an air permit application, it has some very technical aspects and for a facility like this, and you may want to consider hiring a consultant that is familiar with submitting such applications.

Lisa

-----Original Appointment-----
From: Robert Powell <rpowell@tmtanf.org>
Sent: Wednesday, September 9, 2020 3:18 PM
To: Robert Powell; oquiroz@tmtanf.org; Rodney Bonner; 'Rodney Bonner'; Beckham, Lisa
Subject: RE: Summary of Clean Air Act Permitting for a Pyrolysis Project
When: Thursday, September 10, 2020 3:00 PM-3:30 PM (UTC-08:00) Pacific Time (US & Canada).
Where: Conference call

Audio Only: +1-7605415172,322691#

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