

Inclusion of Soot-Blowing Emissions in Subpart D Compliance Testing

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460
AUGUST 31, 1987
OFFICE OF AIR AND RADIATION

MEMORANDUM

FROM:

John S. Seitz, Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

TO:

David Kea, Director
Air Management Division, Region V

In response to your concerns, we have completed a reanalysis of the method for evaluating soot-blowing emissions in compliance testing. The stack test data submitted by your office shows that the effect of soot-blowing is negligible for sources controlled by a high efficiency ESP or bag house, but is dramatic for controlled sources. This confirms our original information averaging could affect compliance determinations are sources which do not blow soot continuously and which do not have a high efficiency control device. Unfortunately, from the data submitted we cannot assess the relative effects of the soot-blowing averaging methods (i.e., time weighted vs. arithmetic) on compliance determinations because the data does not include information concerning two variables necessary to complete the time weighted averaging equation:

- (1) average hours of operation per hour day;
- (2) average hours of soot-blowing per 24 hour day.

Nevertheless it is our belief that depending on the number on non soot-blowing test runs and whether soot-blowing lasts the entire time of the soot-blowing test run, arithmetic averaging can be a more stringent method of determining compliance. While this may be true and, therefore, may be good from the standpoint that more uncontrolled sources would be induced to use better control devices, it may only be true for sources which do not blow soot continuously. This could have the unintended effect of penalizing sources for not blowing soot continuously. The time weighted averaging equation stated in the March 6, 1979 memo (attached) was designed to ensure a uniform compliance

determination method which would not be affected by the number and duration of non soot-blowing. It is because a strict reading of 60.8 arguably does not provide for testing of soot-blowing in any of the three required test runs that the March 6, 1979 determination was made. Based on this reanalysis it continues to be this division's policy that the inclusion of soot-blowing for Subpart D compliance testing be consistent with that stated in our March 6, 1979 memorandum.

This, however, may not fully address the problem where this concern arises in the context of State Implementation Plans. While the technical and policy considerations may be identical from the Federal viewpoint, there may be some difficulties associated with State interpretations. Where these interpretations have an adverse impact upon an area's ability to attain and maintain NAAQS, then it would be more appropriate to address it through the SIP process.

I want to thank you for your cooperation in assisting us in our efforts to reach a national policy on this issue. Should you have any additional questions, please contact Jim Engel of my staff at 382-2877.

Attachment

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