

U.S. EPA PROPOSES AMENDMENTS TO NEW SOURCE PERFORMANCE STANDARDS SUBPARTS 000 AND Y

The United States Environmental Protection Agency (U.S. EPA) recently proposed amendments to the New Source Performance Standards for Nonmetallic Mineral Processing Plants (Subpart 000) and for Coal Preparation Plants (Subpart Y). Both proposed amendments would impose new requirements for affected new or reconstructed equipment that is installed after April 2008. For Subpart 000, this covers new or reconstructed crushing and grinding equipment, whether installed at new or existing plants. For Subpart Y, this covers new or reconstructed coal handling equipment at plants that handle more than 200 tons of coal per day. Subpart Y also includes revisions that are applicable to existing coal preparation plants.

Companies affected by these rules should review the proposed amendments carefully.

Subpart 000

NSPS Subpart 000 applies to certain equipments at facilities that crush and/or grind nonmetallic minerals; the standard does not apply to facilities that only process nonmetallic minerals without any crushing or grinding. Nonmetallic minerals covered by the standard include: crushed and broken stone, including limestone, dolomite, granite, traprock, sandstone, quartz, quartzite, marl, marble, slate, shale, oil shale, and shell; sand and gravel; clay including kaolin, fireclay, bentonite, fuller's earth, ball clay, and common clay; rock salt; gypsum; sodium compounds, including sodium carbonate, sodium chloride, and sodium sulfate; pumice; gilsonite; talc and pyrophyllite; boron, including borax, kernite and colemanite; barite; fluorspar; feldspar; diatomite; perlite; vermiculite; mica; and kyanite, including andalusite, sillimanite, topaz, and dumortierite.

US EPA has proposed to amend a number of aspects of the rule. All of the amendments would affect all units that are new, modified or reconstructed after April 22, 2008.

The proposed amendments include numerous changes, foremost among them the following amendments:

- A reduced Particulate Matter (PM) emission limits for facilities with capture systems from 0.05 to 0.02 grains/dry standard cubic meter.
- Eliminate the stack opacity limit for dry control devices, and impose monitoring of baghouses using quarterly Method 22 inspections or a bag leak detection system.
- Reduce fugitive visible emission limits for crushers from 15% to 10% and from 10 % to 7% for grinding mills, screening operations, bucket elevators, belt conveyors, bagging operations, storage bins, and enclosed truck or railcar loading stations.

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- Impose a fugitive emissions limit of 7% at building openings, except for powered vent openings.
- Impose the obligation to repeat performance testing of certain units every five years, for units that do not have ongoing monitoring requirements. The amendments would also change some of the testing procedures relating to the duration of Method 9 testing of fugitive emissions and storage bins and loading stations that operate less than one hour at a time.
- Fugitive emissions controlled by water sprays would not be subject to repeat performance testing, but would get a monthly inspection requirement for the water sprays.
- Modify the time frame for performance testing, after initial startup, to allow for seasonal shutdown of process equipment.
- Exempt wet material processing operations that have no potential for PM emissions. These units are already exempt from testing requirements, but are currently subject to a notification requirement and a no visible emissions limit, and the proposed amendment would relieve such units from these requirements as well. The proposed amendments would add definitions to help clarify which equipment is subject to this exemption.
- Reduce the notification requirements to eliminate notification requirements for commencement of construction and to require notice to be submitted either to the relevant State or US EPA, but not both.
- The proposal contains additional clarifications as to the applicability of Subpart OOO, including, with respect to the interaction of Subpart OOO and Subpart HH for lime manufacturing, that the crushing or grinding of lime does not subject plants to Subpart OOO.

Subpart Y

NSPS Subpart Y applies to coal preparation plants that process more than 200 tons of coal per day. US EPA is proposing to strengthen and add PM emissions limits for affected sources constructed after April 28, 2008. The proposal also adds new monitoring requirements and clarifies how emissions are to be measured at affected sources.

The proposal contains minor amendments that would affect existing Subpart Y sources. These changes include revisions to the definitions of coal and bituminous coal, and the addition of flow rate monitoring as an alternate measure of performance for venturi scrubbers. The bulk of the proposed changes only affect new or reconstructed sources:

- The proposal includes tightened PM emissions limits for thermal dryers and pneumatic coal cleaning equipment, as well as revised opacity limits (down to 5%) for coal processing and conveying equipment, coal storage systems, and transfer and loading systems.



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- For enclosed coal processing and conveying equipment, coal storage systems, and transfer and loading systems for other than bituminous coals, the proposal would require that PM emissions be vented to a stack and subject to a 0.011 g/dscm limit.
- The proposal includes increased monitoring requirements for various affected sources including continuous emissions monitoring systems (CEMS) and bag leak detections systems, although the proposal does eliminate the opacity limit for sources that operate a PM CEMS.
- Affected coal processing and conveying equipment, coal storage systems, and transfer and loading systems would be subject to monthly Method 22 observations, and a follow-up Method 9 observations if visible emissions are detected.
- Recordkeeping requirements would be strengthened to require the keeping of a logbook for recording opacity observations, amounts of chemical stabilizer or water purchased to control PM emissions and the amount and ranks of coal processed each month.

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