

Therriault, John

From: McCambridge, Michael
Sent: Wednesday, September 02, 2015 2:29 PM
To: Therriault, John
Cc: Burke, Jennifer; Westefer, Gary (westefer.gary@epa.gov)
Subject: FW: Consituent-Specific Adjustment Factors

 ORIGINAL

PC#1

Please enter this e-mail as a public comment in docket R16-7.

From: Cozzie, David [mailto:Cozzie.David@epa.gov]
Sent: Wednesday, July 08, 2015 5:32 PM
To: McCambridge, Michael
Subject: RE: Consituent-Specific Adjustment Factors

Michael,

I spoke to a couple of people here and they recommended looking at 40 CFR Part 63 Subpart G – Table 34.

Let me know if that helps. I have also forwarded your email to them to look at that table as well.

David Cozzie
Group Leader
Fuels and Incineration Group

From: McCambridge, Michael [mailto:Michael.McCambridge@illinois.gov]
Sent: Wednesday, July 08, 2015 6:21 PM
To: Cozzie, David
Cc: Burke, Jennifer; Powell, Mark
Subject: Consituent-Specific Adjustment Factors

I am working to incorporate recent hazardous waste amendments into the Illinois regulations. I have encountered a reference to a USEPA group that I cannot find, and which likely no longer exists. I need to locate the current source for the information cited in the hazardous waste rule, that I may cite the source, or the information itself, that I may include in a table or appendix in the Illinois rules.

On December 6, 1994 (59 Fed. Reg. 62896, 62939), OSW adopted air emission standards for tanks and containers used to manage, treat, or store hazardous waste at subpart CC of 40 C.F.R. 265. OSW amended those standards on November 25, 1996 (61 Fed. Reg. 59932, 59974-75) to allow factoring analytical results for organic compounds that have a lower Henry's law constant. See 61 Fed. Reg. at 59942. Thus, Section 265.1084(a)(3)(iii) and (a)(4)(iii) allows data adjustment using "the appropriate constituent-specific adjustment factor (f_{m25D})," reciting that these factors are available from the "Waste and Chemical Processes Group, Office of Air Quality Planning and Standards, Research Triangle Park, NC."

On January 13, 2015, OSW amended the hazardous waste rules to exclude from the definition of "solid waste" certain hazardous secondary materials (HSMs) that are subject of reclamation activities when managed according to specified conditions. One of type of HSM excluded is any of several specified spent solvents that are sent for remanufacturing. One condition for exclusion is control of emissions of volatile organic compounds from tanks and containers used to manage, store, or treat the HSM. OSW essentially copied the requirements of subpart CC of 40 C.F.R. 265 into a new subpart CC of 40 C.F.R. 261. Included in the copying is the language about use of f_{m25D} for data

adjustment, together with the recitation of availability from "Waste and Chemical Processes Group, Office of Air Quality Planning and Standards, Research Triangle Park, NC."

I have tried to locate the Waste and Chemical Processes Group within OAQPS without success. Internet searches for "fm25D" turn up the text of the OSW hazardous waste rules cited above and one interesting document. It appears that EPA contemplated adding an appendix J to 40 C.F.R. 60, How to Determine Henry's Law Constants, Fm Values, Fr Values, and Fe Values for Organic Compounds," between 1998 and 2005. I found two versions of this appendix J on the EPA website: (1) a 2005 EPA staff draft of this document; and a 1998 copy "as signed by Administrator Browner (copies attached). Appendix J would have listed fm25D values for nearly 250 volatile organic compounds.

I need to do one of two things to incorporate the January 13, 2015 OSW amendments into the Illinois hazardous waste regulations. I must either find the current source of the factors and obtain a tangible copy, or I must incorporate a listing of the factors in the Illinois rules—likely as an appendix or table.

Can you help me find the current source of these factors, that I may obtain a current copy of them? I will appreciate whatever you can do to help me.

Michael J. McCambridge
Attorney
Illinois Pollution Control Board
312-814-6924 (M-Th, 9:00 a.m.-7:00 p.m.)
219-614-5082 (personal cell during all other hours)