

## Therriault, John

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**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: Constituent-Specific Emission Factors for Hazardous Waste and Hazardous Secondary Materials Tanks and Containers Emissions Calculations

 ORIGINAL

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

PC# 2

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**From:** Atagi, Tracy [mailto:Atagi.Tracy@epa.gov]  
**Sent:** Friday, August 28, 2015 11:18 AM  
**To:** McCambridge, Michael  
**Cc:** Westefer, Gary; Burke, Jennifer; Roepe, Wayne; Sheridan, MaryBeth  
**Subject:** Re: Constituent-Specific Emission Factors for Hazardous Waste and Hazardous Secondary Materials Tanks and Containers Emissions Calculations

Thank you for your email, Michael. You are correct that the new provisions in 40 CFR 261 were derived from 40 CFR 265 - the intent was to make them technically equivalent, with the only difference being no permit would be required under the 40 CFR 261 provisions.

I'll look into the specifics of your comments, but in general as long as the new provisions are equivalent to the parallel state provisions for hazardous waste tanks and containers, I believe we'd consider them equivalent to the federal program. I'll follow up with our state authorization experts and tank experts and get back to you.

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**From:** McCambridge, Michael <Michael.McCambridge@illinois.gov>  
**Sent:** Thursday, August 27, 2015 5:46 PM  
**To:** Atagi, Tracy  
**Cc:** Westefer, Gary; Burke, Jennifer  
**Subject:** Constituent-Specific Emission Factors for Hazardous Waste and Hazardous Secondary Materials Tanks and Containers Emissions Calculations

New 40 C.F.R. 261.1084(a)(3)(iii) obviously derives from 40 C.F.R. 265.1084(a)(3)(iii) (and (b)(3)(iii)). These provisions allow use of a "constituent-specific adjustment factor ( $f_{m25D}$ )" for data adjustment. Both provisions state that the factors are available from the Waste and Chemical Processes Group, Office of Air Quality Planning and Standards, Research Triangle Park, NC. When adopting 40 C.F.R. 265.1083(a)(3)(iii) and (b)(3)(iii), EPA stated as follows with regard to the  $f_{m25D}$  factors:

Because these methods measure the total concentration of various constituents, owners and operators may choose to "correct" these measured values to equate to the values that would be measured using Method 25D. This is accomplished by multiplying the total concentration measured values times the appropriate compound-specific adjustment " $f_m$  factor" to obtain the Method 25D VO concentration. The EPA has published lists of the compound-specific adjustment factors in other rulemakings; see Table 1 in the Off-Site Waste and Recovery Operations NESHAP (40 CFR part 63, subpart DD) and Table 34 in the HON (40 CFR part 63, subpart G). Compound specific adjustment factors ( $f_m$  factors) for additional compounds can be obtained by contacting the Waste and Chemical Processes Group, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711.  
61 Fed. Reg. 59931, 59942-43 (Nov. 25, 1996).

There are problems incorporating 40 C.F.R. 261.1084(a)(3)(iii) into the Illinois hazardous waste regulations. These problems are duplicated with regard to 40 C.F.R. 265.1084(a)(3)(iii), previously incorporated into the Illinois regulations as 35 Ill. Adm. Code 725.984(a)(3)(C).

First, I cannot find the Waste and Chemical Processes Group, Office of Air Quality Planning and Standards. It is possible that this office was eliminated or absorbed by another office in one of the reorganizations that occurred since EPA adopted the provision in 40 C.F.R. 265.1083(a)(3)(iii) allowing use of the factors nearly 20 years ago. See 61 Fed. Reg. 59931, 59974-79 (Nov. 25, 1996). The most recent reference to the Waste and Chemical Processes Group found in a search of Government Printing Office documents was in the December 29, 2005 issue of the *Federal Register*, at 70 Fed. Reg. 77117.

I need to affirmatively identify any factor that is to be used to achieve compliance with a regulation. I can do this by setting forth the factor in the body of the regulations or by incorporation by reference. Since it appears that EPA considers the  $f_{m304}$  factors in Table 1 to subpart DD of 40 C.F.R. 63 and the  $f_m$  factors in Table 34 to subpart G of 40 C.F.R. 63 available for use as  $f_{m25D}$ , it is possible to use these two tables as the source of constituent-specific adjustment factors for the chemical compounds listed. The problem with this approach is that the combined list from Table 1 and Table 34 includes fewer than 100 chemical compounds.

An Internet search for " $f_{m25D}$ " disclosed two additional resources for constituent-specific emission factors. Both appear to be draft versions of an appendix J to 40 C.F.R. 60. One is a staff draft dated September 30, 2005, and the other is Table 2 in "Appendix J to part 60—as signed by Administrator Browner (28 Sep 98) and corrected for FR format." Analysis of these Appendix J table 2 tables is ongoing, but it appears at present that Table includes about 1,300 chemical compounds, and very few of these compounds is duplicated in the two tables from 40 C.F.R. 63.

Can you provide me with information that will help the Pollution Control Board determine how to overcome the problems with the provisions that rely on the  $f_{m25D}$  constituent-specific emission factors.

1. Can you identify the USEPA office that now executes the functions of the former Waste and Chemical Processes Group?
2. Can you identify any reference document that provides  $f_{m25D}$  values for chemical compounds?
3. Can you identify any website or organization that can provide  $f_{m25D}$  values?
4. What was the ultimate fate of the draft Table 2 in appendix J to 40 C.F.R. 60?

We will appreciate any information you can provide that will help us find the  $f_{m25D}$  values.

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)