

ADI DETERMINATIONS UPLOADED ON MAY 2, 2003—Continued

| Control No. | Category | Subpart | Title |
|---------------|------------|--------------|--------------------------------------------|
| 0300034 | NSPS | Da, GG | Alternative Monitoring |
| 0300035 | NSPS | A, GG | Initial Performance Test Waiver |
| 0300036 | NSPS | WWW | Common Control for Landfill |
| 0300037 | NSPS | VVV | Applicability to Pultrusion Facilities |
| 0300038 | NSPS | WWW | Responsibility for Compliance with Subpart |

Abstracts*Abstract for [A030001]*

Q1: Is there a point at which abandoned underground utility steam lines wrapped in friable asbestos which enter commercial and residential structures are no longer regulated and fall under the residential exemption of 40 CFR 61.141?

A1: No. The lines remain a facility component regulated under the asbestos NESHAP, even if they are abandoned. Determination of which specific requirements of the asbestos NESHAP would apply to future demolitions or renovations would be based, in part, on the amount of asbestos involved.

Q2: Would abandonment of such lines at a residence cause the location to be considered an active waste disposal site under 40 CFR 61.154? If no more asbestos-containing material is buried there for a year, would the location be an inactive waste disposal site per 40 CFR 61.151(e) and 40 CFR 61.154(h)?

A2: No. The residential location would not be considered an active or inactive waste disposal site. If the lines are disturbed, the asbestos NESHAP may apply depending on the type of activity and how it affects the lines.

Q3: When a utility steam line is abandoned at a residence or a commercial property, must the utility or the property owner place a notation on the deed of the property per 40 CFR 61.151(e)?

A3: No. Because the mere existence of these lines does not make the property an inactive waste disposal site, 40 CFR 61.151(e) does not apply. Should the property become an inactive waste disposal site, the property owner would need to insure that a notation was placed on the deed and any other instrument normally examined during a title search.

Q4: Would the asbestos NESHAP regulate the removal of underground utility steam lines from the yard of a residence?

A4: The asbestos NESHAP would apply if the amount of asbestos being removed exceeds the regulatory threshold. Because the lines were once part of an affected facility, they remain potentially subject despite the fact that

they are abandoned by the utility and are on residential property.

Abstract for [M030001]

Q: Will EPA approve the parametric monitoring plan for the Kaiser Aluminum reduction plant?

A: Yes. EPA approves the Parametric Monitoring Plan because the source has met the requirement in 40 CFR 63.848(f).

Abstract for [M030002]

Q: Will EPA allow the monitoring of an alternate parameter, scrubber fan amperage, in lieu of measuring gas scrubber inlet gas flow rate as required in 40 CFR 63.453(c)(2)?

A: Yes. Based on EPA's guidance document entitled "Questions and Answers for the Pulp and Paper NESHAP" dated September 22, 1999, EPA approves the request as long as a successful initial performance test of the gas scrubber is conducted while the fan is operating at maximum speed. Fort James is still required to satisfy all the applicable requirements of the Pulp and Paper NESHAP.

Abstract for [M030003]

Q: Will EPA approve the Parametric Monitoring Plan (Revision 2) for Potlines 1 through 4 at the Alcoa—Wenatchee Works?

A: Yes. EPA's review of the source's report indicates that it satisfies the requirements of 40 CFR 63.847(h) and 40 CFR 63.848(f), (j) and (k).

Abstract for [M030004]

Q: May the parametric limits for alumina ore feed to the control system and air flow from the potline be reduced in proportion to the reduction in operating pots for potline #1?

A: Yes. However, an emissions test shall be conducted on the operating primary air pollution control device for potline #1 and the test report submitted to EPA.

Abstract for [M030005]

Q: Is Potlatch correct in concluding that it is not required to begin the daily monitoring under 40 CFR 63.453(j) until after the initial performance test (IPT) is conducted?

A: No. Potlatch's interpretation is not entirely correct. EPA believes that any required monitoring parameter that is not established by the results of the IPT should be monitored beginning on the compliance date. For certain conditions, the monitoring of some parameters would not be required to begin on the compliance date.

Abstract for [M030006]

Q1: Potlatch proposes to perform 3 test runs from 18 sampling locations to characterize and delineate the mixing zones in a 102-acre secondary treatment aeration pond. Is this study duration and scope acceptable for hazardous air pollutants (HAPs) compliance evaluations?

A1: EPA believes that the scope and duration of the Mixing Zone Study would depend on the design and operation of the treatment lagoon, and on the statistical validity of the results. Therefore, Potlatch should be prepared to perform more than 3 test runs as necessary.

Q2: Does the facility need approval prior to conducting the Study and performance tests?

A2: No. However, the requirements in 40 CFR 63.7(b) and (c) apply.

Q3: Do these three test runs have to be done within a 24-hour period or completed on 3 consecutive days?

A3: No. However, each test run should be completed within a 24-hour period.

Q4: Potlatch proposes to collect one grab sample per sampling location during each day of the Mixing Zone Study and performance tests. Is that acceptable?

A4: Yes. Therefore, a study period of more than 3 days may also be necessary.

Q5: May the durations of the initial performance test (IPT), quarterly performance test (QPT) and performance test (PT) for an excursion be different?

A5: Yes. EPA recommends that once the IPT is completed, the statistical variability of the data would be used to design the QPT and PT for excursion.

Q6: What duration of sampling is required for establishing site-specific parameter ranges and averaging times?

A6: In reference to 40 CFR 63.453(n)(4), it is the source's