

responsibility to collect sufficient data to demonstrate to the permitting agencies' satisfaction that the source is in "continuous compliance with the applicable emission standard".

Q7: May a site-specific monitoring parameter and its range(s) be established prior to conducting the IPT or prior to the facility's compliance date if the proper sampling procedures and test methods were followed?

A7: Yes. Site-specific monitoring parameters and its ranges may be established and tested during the Mixing Zone Study.

Q8: Is it necessary to provide notification to EPA prior to conducting a mixing zone study?

A8: Yes. Because the Mixing Zone Study is part of the Initial Performance Test, 60-day notification requirements in 40 CFR 63.7 would apply.

Q9: Does a facility have to notify EPA a minimum of 60 days before a performance test?

A9: Yes. 40 CFR 63.7(b)(1) requires that an affected source notify the Administrator in writing of its intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin. Also, 40 CFR 63.7(c)(2)(i) requires the submission of site-specific test plans upon request by the delegated authorities.

Abstract for [M030007]

Q: Will EPA approve NWAC's site-specific test plan and the modified versions of EPA's Air Sampling Methods 13B and 14A?

A: Yes. EPA approves of NWAC's request.

Abstract for [M030008]

Q: Will EPA approve the parametric monitoring plan for Alcoa Wenatchee Works?

A: Yes. EPA approves Alcoa's Parametric Monitoring Plan as having met the requirements in 40 CFR 63.847(h) and 63.848(f), (j) and (k).

Abstract for [M030009]

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. The source is still required to satisfy all the applicable requirements of the Pulp and Paper NESHAP.

Abstract for [M030010]

Q1: Will EPA allow the monitoring of the operational status of a scrubber fan in lieu of the monitoring of the scrubber vent gas inlet flow rate when performing its initial performance test?

A1: 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.

Q2: Will EPA approve a 1,000 ppmv calibration standard in lieu of the 10,000 ppmv calibration standard for measuring leaks in closed-vent systems?

A2: Yes. EPA approves this request because the requested 1,000 ppmv calibration standard would provide more accurate detection of a leak.

Abstract for [M030011]

Q: Do the requirements of NESHAP Subpart RRR for Secondary Aluminum Production apply to the scalpers at Kaiser's Trentwood Works in Spokane, Washington?

A: No. Based on Kaiser's description, the scalpers do not engage in activities related to secondary aluminum production and do not fall within the definition of "aluminum scrap shredders."

Abstract for [M030012]

Q: Will EPA approve the continuous monitoring of scrubber gas exhaust gas flow rate and air evacuation fan gas flow rate in lieu of monitoring vent gas inlet flow rate for the pulping process at the Wausau-Mosinee Brokaw, Wisconsin, magnesium-based sulfite mill?

A: Yes. EPA approves the request under the conditions that the mill continuously monitor both the total vent gas flow rate at the stack outlet and the air evacuation vent gas flow rate, and that the former not exceed 86,912 actual cubic feet per minute (ACFM) at any time. That flow rate was the maximum that occurred during the initial performance test. The mill must still monitor the pH or the oxidation/reduction potential of the scrubber effluent, and the scrubber liquid influent flow rate.

Abstract for [M030013]

Q: Will EPA approve the alternative monitoring methods to monitor phosgene concentration in lieu of monitoring total organic HAPs as required by 40 CFR 63.990(c) for caustic scrubbers (absorbers) that are used as control devices for organic HAPs? The source also proposes to monitor phosgene concentration in lieu of pH,

scrubber liquid flow, and gas stream flow as required by § 63.994(c)(1) for halogen scrubbers.

A: EPA conditionally approves the request. The approvals do not conclude whether the phosgene monitors meet any applicable monitor requirements such as 40 CFR 63.998(b). The approvals are contingent on the results of two performance tests, one for total HAPs and another for hydrogen halides and halogens. Based on the test results and the phosgene monitoring data, the source must submit the rationale for the value(s) of the phosgene concentration to be used to reflect continuous compliance with the standards for total HAPs, and for halogen and halides. The source must also meet the notification requirements of § 63.999(b)(3).

Abstract for [M030014]

Q: Will EPA approve the use of an Excel-based artificial neural network (ANN) predictive computer model for continuously monitoring methanol emissions from the UNOX closed biological treatment system at International Paper's Kaukauna mill?

A: Yes. The company has more than a year of operating data and effluent methanol concentrations. These data show that the measurement of several process parameters, such as the dissolved oxygen in the system and the oxygen uptake rate of the mixed liquor, adequately demonstrates that the ANN model provides continuous monitoring of the UNOX methanol concentration.

Abstract for [M030015]

Q: Will EPA approve the continuous monitoring of fan amperage and scrubbing liquid flow rate in lieu of scrubber pressure drop for the smelt dissolving tank scrubber at the International Paper Quinnesec, Michigan mill?

A: Yes. Pressure drop does not govern particulate removal efficiency for this dynamic scrubber that operates near atmospheric pressure, and fan amp monitoring will suitably indicate scrubber performance. EPA approves the request under the condition that the mill establish operating ranges for the monitoring parameters in the initial performance test.

Abstract for [M030016]

Q: Will EPA approve the alternative monitoring for the UNOX closed biological treatment system at the Wausau-Mosinee mill in Mosinee, Wisconsin? The mill proposes to continuously monitor the foul condensate flow rate to the UNOX system, the valve position of the feed lines to the foul condensate tank, and