

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: TSP SIP Revision

DATE: FEB 04 1988

FROM: Jesse Baskerville, Chief *J. Baskerville*
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TO: Robert Bauman, Chief
SO₂/Particulate Matter Branch, OAQPS (MD-15)

In April, 1985 the State of Maryland submitted a revision to their existing SIP for total suspended particulates (TSP) for glass melting furnaces. The revision was in the form of a relaxation of the TSP and visible emission standards for glass melting furnaces. The change would apply statewide, but affect only three glass manufacturers. The three affected glass melting facilities either border on or are located within the TSP nonattainment portion of the Baltimore Metropolitan Intrastate Air Quality Control Region. One source (Philadelphia Quartz) is located within the primary nonattainment area, the second (Carr Lowery) is located within the secondary nonattainment area, and the third (Maryland Glass) is located just outside the nonattainment area. This SIP is of most concern to Carr Lowery because they are not complying with the current standards. Philadelphia Quartz is currently attaining the standard and Maryland Glass is shutdown.

The revision proposed replacing the 0.03 grains/scfd standard with a mass emission rate (lbs/day) standard based on process weight. Also proposed was a change in the allowable visible emission standard from the present level of 0% to a level of 20%.

The revision relied upon a modeling approach, which has come to be known as "CorSTAR." This approach would attempt to show that the proposed relaxation would not produce any significant air quality impacts. If successful, we as an agency agreed to accept the revision case specifically. The analysis, at the time, was unable to show insignificance and our Agency determined that the CorSTAR approach is generally inadequate as an attainment and maintenance demonstration. In August, 1986 EPA requested that the State submit a full attainment demonstration for TSP. Since that time, the PM₁₀ regulations were promulgated. According to the PM₁₀ transition

policy, a SIP revision which requests a particulate emissions relaxation is not approvable unless attainment and maintenance of the PM₁₀ NAAQS is demonstrated. The area in which the affected sources are located is categorized as Group II. In July 1987, the State was notified that a full scale PM₁₀ demonstration was required.

The State has submitted a modeling protocol. The proposal is to raise the stack at Carr Lowery up to the height at which the ambient impact of the proposed change in emissions is insignificant as defined by PSD significance criteria. The modeling does not call for a full reevaluation of the source's emissions but rather only an evaluation of the additional emissions that will result from the relaxation. The State contends that the SIP revision must only look at the additional emissions that will result from the relaxation since the 1979 SIP approves the present emissions level. However, the Region feels that this revision requires a full evaluation of the source's total emissions.

In addition, the State asserted that this revision should not be reviewed for PM₁₀ NAAQS attainment. The State referred to a November 6, 1987, issue of the Environment Reporter, pg. 1700, which indicated that Deputy Administrator Barnes had approved a recommendation that would make sure that EPA judges changes to State plans based on the policies in effect when the State proposed the revision to EPA. Our Region has not been informed of this policy change and questions how this change, if in existence, will affect this particular revision. Region III stresses that if this policy change does exist it would have major implications on other controversial issues in the Region (e.g. Armstrong redesignation and Kammer GEP).

Carr Lowery has requested to meet with Headquarters to discuss this SIP revision if Region III's review of the revision deems it unapprovable.

Region III requests that the above mentioned issues be reviewed, and that your judgements on these issues be sent to our office by March 4, 1988. Thank you in advance for your cooperation.

cc: Joe Tikvart, Chief
Source Receptor Analysis Branch, OAQPS