

May 4, 2001

MEMORANDUM

To: Section Chiefs  
Regional Supervisors

From: Alan Klimek

Subject: NC DAQ Procedure to Quantify Condensible Particulate Matter

This memorandum supercedes an earlier memorandum on the same subject dated October 6, 1999. This re-issuance of policy regarding condensible particulate matter is being made in accordance with an agreement entered into on March 12, 2001 between DAQ and the North Carolina Citizens for Business and Industry (NCCBI).

DAQ is currently pursuing a study whereby virtually all sources are being requested to include analysis for condensible particulate matter whenever the measurement of particulate matter is required. The purpose of this data is to allow DAQ to apply certain provisions of 15A NCAC 2D .0501 (c)(3) in a uniform way. The requirements of 2D .0501 (c)(3) include a statement that "certain sources are known to emit organic material (oil, pitch, plasticizers, etc.) which exist as finely divided liquid droplets at ambient conditions," and that "[t]hese materials cannot be satisfactorily collected by means of [...] Method 5." The same section in 2D .0501 provides that for those cases "the Commission may require the use of Method 5 as proposed on August 17, 1971 in the Federal Register, Volume 36, Number 159." [The proposed Method 5 is considered functionally equivalent to combining the current Method 5 with Method 202.] DAQ will end this data gathering project when sufficient data are collected for each type of source to determine whether or not the organic material noted above is present. As data is gathered, source types where little or no organic material is found will likely be exempted from further requirements to analyze for condensible particulate matter. These exemptions will be established by the issuance of a memorandum for each source type. By the same token, if the data shows significant quantities of condensible particulate for a particular source type a memorandum will be issued indicating that condensible particulate measurement will be required on a permanent basis for that source type. These memoranda will be issued by the Stationary Source Compliance Branch.

During the course of the study sources that are believed to emit only filterable particulate matter (such as a rock crusher crushing granite) may not be required to analyze for condensible particulate. These determinations will be made on a case by case basis as part of the test protocol.

## Condensable Particulate Matter

May 4, 2001

Page 2

Any condensable particulate matter data gathered will also be used for emissions inventories, fees and permit classifications (Title V, Synthetic Minor, small).

In accordance with the NCCBI agreement compliance determinations will be made on the basis of filterable and condensable particulate in only two cases:

1. In accordance with paragraph 1(a) of the NCCBI agreement, "in cases where 'sources are known to emit organic material (oil, pitch, plasticizers, etc.) which exist as finely divided liquid droplets at ambient conditions,' as set forth in 15A NCAC 2D .0501 (c)(3), if stack sampling is the method used to determine compliance with the particulate standards, compliance will be determined in accordance with Method 5 and EPA reference Method 202. ("Method 202")."
2. The NCCBI agreement acknowledges that "DAQ may require controls or impose permit restrictions on both filterable particulate matter, as measured by Method 5, and condensable particulate matter (organic and inorganic), as measured by Method 202, as necessary to prevent an exceedance of the ambient air quality standards of 15A NCAC 2D .0400." For such situations, condensable particulate matter will not only be measured, but will also be used to determine compliance with permit restrictions placed on condensable particulate.

Except for those cases noted in items 1 and 2 above compliance determinations for particulate emissions will be made on the basis of filterable particulate only.

The requirements to collect data for the above mentioned study should be communicated to facility representatives during the course of planning a test, by correspondence from the regional office, and in the process of reviewing test protocols. Facilities may also be advised that compliance determinations are limited to the two cases noted above.

In accordance with the NCCBI agreement, permit conditions may only require condensable testing if organic material is known to exist as noted in Item 1 above.

The NCCBI agreement pertains to certain emission standards within 15A NCAC 2D .0500, namely .0503 through .0515 and .0536. Nevertheless, for purposes of the study we are requesting condensable particulate determinations from NSPS sources as well. Furthermore, any NSPS source that is known to emit organic material is also subject to the SIP particulate standard for that source category and compliance with that standard should be determined based on total particulate (filterable and condensable).

cc: Keith Overcash  
Michael Aldridge  
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Condensable Particulate Matter  
May 4, 2001  
Page 3