



North Carolina Department of Environment and Natural Resources
DIVISION OF AIR QUALITY

Michael F. Easley, Governor

William G. Ross Jr., Secretary
Alan W. Klimek, Director

MEMORANDUM:

To: Section Chiefs
DAQ Regional Supervisors

From: Keith Overcash

Date: November 8, 2001

Subject: Condensible Particulate Matter testing for Woodwaste Boilers

On October 6, 1999, guidance was issued to require the quantification of condensible particulate matter (CPM) whenever sources were required to test for particulate matter. It was intended that CPM be counted toward compliance and the so called "New Information Policy" would allow time to come into compliance if necessary. The October 6, 1999 guidance was modified on May 4, 2001, in response to an agreement reached with North Carolina Citizens for Business and Industry (NCCBI). The May 4, 2001 guidance removed the provision for counting the CPM for compliance except in certain cases where organic materials were known to exist or where there was an expected threat to the ambient air quality standard. In all other situations, the effort to collect CPM data was for informational purposes only.

Since woodwaste boilers did not fall into either of the two special case categories, CPM data from woodwaste boilers was an "information only" initiative. Since October 6, 1999, CPM information has been evaluated for 47 woodwaste boilers. The test data for those boilers indicates that there is very little organic material present (on the order of 1 to 2 percent of the total on average). Inorganic CPM is present in amounts that constitute about 17 percent on average. For the majority of boilers, inorganic CPM is less than 10 percent of the total emissions. The average is higher only because of a very few boilers that have a very high percentage of inorganic CPM. Preliminary investigation by the SSCB staff suggests that these high numbers were a peculiarity of the testing for those boilers and not conclusive evidence of high CPM emissions.

Effective today, particulate emissions testing required for woodwaste boilers will include filterable particulate only. This does not change the requirement for any other source group to provide CPM data when performing particulate testing.

SSCB will continue its investigation into the high inorganic CPM values discussed above and some provisions may be made in future rulemaking to allow the inclusion of CPM for cases where boilers are smoking or appear to demonstrate other combustion related problems.

cc: Alan Klimek

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