From: Chris Greissing [chrisgreissing@ima-na.org] Sent: Tuesday, November 06, 2007 3:39 PM

To: Hanks, Katie P.

cc: markellis@ima-na.org; jerryhurley@ima-na.org; 'Brenda George' Subject: Data for the Industrial Minerals Association - North America

Attachments: IMA-NA_Database Complete.xls; Comments on EPA NSPS Subpart OOO and UUU.doc

Katie,

Please find attached the data and comments for subparts OOO and UUU from the Industrial Minerals Association – North America.

Also, are you available on Thursday for a brief call to confirm that you have received all of the information you need from us, and so that we can get a quick update on where we are in this process?

Thank you very much again for all of your help through this process.

Best Regards,

Chris Greissing

Facility Information	1			Sour	urce Information								Opacity	1	Stack O	outlet Reading	.gs	Str	Stack Inlet/Unc	con. Readin	gs Sta	tack Propertie	es
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nerican Colloid Company	SD Belle Fourche	9	Bentonite	Stack	k Drying	UUU	21-Dec-93	93 Other	r Baghouse	Baghouse BH-02	#3 Rotary Dryer	<u>, </u>	F 20200 2	<u>>></u>	_ ≥ .	0.011		75/-	2 2 2	312121-	- 2 1 - >	<u> </u>	- 0
nerican Colloid Company nerican Colloid Company			Bentonite Bentonite								#3 Rotary Dryer		i	1		0.004 0.08							
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erican Colloid Company	SD Belle Fourche		Bentonite	Stack	k Screening	000	01-Dec-00	00 Engineering	.ig Baghouse	Baghouse BH-44	North Elevator E9, South Elevator E7, Aspirators AS2 and AS4		i	1		0.006							1
nerican Colloid Company nerican Colloid Company	SD Belle Fourche		Bentonite Bentonite								#2 Rotary Dryer		0%	1		0.227 0.0146							
nerican Colloid Company	SD Belle Fourche	9	Bentonite	Stack	k Drying	UUU	J 18-Jan-07	07 Compliance	ince Baghouse ince Baghouse	Baghouse BH-01	#2 Rotary Dryer		0%	1		0.0151	51						
nerican Colloid Company nerican Colloid Company	SD Belle Fourche	9	Bentonite Bentonite	e Stack	k Drying	UUU	22-Feb-07		ince Baghouse	Baghouse BH-02	#3 Rotary Dryer		0% 0%	1		0.076 0.0054							1
nerican Colloid Company			Bentonite						ince Baghouse	Baghouse BH-12	Mix Tanks T33 and T34, Bucket Elevator		0%	1		0.0054							
						•		-· .	·		St. Regis Load Out P1, Bulk Bag Loader		1	1									
merican Colloid Company	Sn Relle Fourche		Bentonite	Stack		000	^08-Mar-07	Or Compliar	ince Baghouse	Baghouse BH-18	BB7, Howell Elevator E4, Packer 3		0%	1		0.0054	EA						ĺ
ienoan conc , ,	3D 55		Do	0			00	Ou	8 Day	Dayocz.	Packer P4, Surge Bin SB2, Imp Hammer		1,000	1									
merican Colloid Company		Colony East	Bentonite				21-Dec-95						i	1		0.013							
	WY Colony	Colony East Colony East	Bentonite Bentonite		k Conveying		21-Dec-95 22-Dec-95			Baghouse BH-27	#22 Air Conveying System		i	1		0.009 0.266	19						
merican Colloid Company	WY Colony	Colony East	Bentonite	Stack	k Drying	UUU	27-Feb-96	96 Other	r Baghouse	Baghouse RD-1	Rotary Dryer		i	1		0.017	7						ĺ
	WY Colony	Colony West Colony West	Bentonite Bentonite	e Stack	k Drying	UUU	J 18-Jul-96	6 Other	r Baghouse	Baghouse DC-01	#2 Rotary Dryer #1 Rotary Dryer		i	1		0.054 0.013	3						
merican Colloid Company merican Colloid Company	WY Colony	Colony West Colony East	Bentonite Bentonite	e Stack	k Drying	UUU	J 05-Sep-96	96 Other	r Baghouse		#2 Rotary Dryer		i	1		0.014 0.008	4						1
merican Colloid Company	WY Colony	Colony East	Bentonite	e Stack	k Drying	UUU		00 Other	r Baghouse	Baghouse RD-1	Rotary Dryer		i	1		0.002	12						ĺ
merican Colloid Company merican Colloid Company		Colony West Colony West	Bentonite Bentonite		k k Drying	000 UUU	16-Jun-00 J 19-Nov-01	00 Other 01 Other		Baghouse DC-16 Baghouse DC-01	Plant Fugitives #1 Rotary Dryer		,	1		0.003 0.003							
merican Colloid Company	WY Colony	Colony West	Bentonite	e Stack	k Drying	UUU	J 19-Nov-01	01 Other	r Baghouse	Baghouse DC-02	#2 Rotary Dryer		i	1		0.002	2						1
	WY Colony	Colony West Colony West	Bentonite Bentonite	e Stack	k Drying	UUU	J 05-Jan-05	05 Other	r Baghouse		#2 Rotary Dryer #1 Rotary Dryer		i	1		0.04 0.004	14						ĺ
merican Colloid Company merican Colloid Company	WY Colony	Colony East Colony East	Bentonite Bentonite	e Stack	k Packaging	000	28-Nov-05 J 19-Sep-06	05 Other	r Baghouse		#47 Regis Packer Rotary Dryer		i	1		0.003 0.015	13						
merican Colloid Company	WY Lovell	COlony East	Bentonite	e Stack	k	000	12-Dec-95	95 Compliance	ince Baghouse	Baghouse BH-01A	Granular Tower #1		<5%	1		0.015 0.0013							
merican Colloid Company merican Colloid Company			Bentonite Bentonite	e Stack	k Screening	000	12-Dec-95	95 Compliance 95 Compliance	ince Baghouse	Bin Vent BV-05A Baghouse BH-02A	Screen Tower Feed Granular Tower #2		<5% <5%	1									
American Colloid Company American Colloid Company	WY Lovell		Bentonite	e Stack	k	000	13-Dec-95	95 Compliance	ince Baghouse	Baghouse BH-01/3A	3A Granular Tower #3 A Granular Tower #4	3-Run Average	<5%	1		0.0043	.3						ĺ
merican Colloid Company	WY Lovell		Bentonite Bentonite	e Stack	k	000	14-Dec-95	95 Compliance	ince Baghouse	Baghouse DC-06	#4 Raymond Mill	3-Run Average	<5% <5%	1									1
merican Colloid Company merican Colloid Company	WY Lovell		Bentonite Bentonite	e Stack	k Loadout	000	14-Dec-95	95 Compliance	ince Baghouse ince Baghouse	Baghouse DC-23	Bulk Loadout Dry Tank #1	3-Run Average	<5% <5%	1		0.0104	4						1
merican Colloid Company	WY Lovell		Bentonite	e Stack	k	000	15-Dec-95	95 Compliance	ince Baghouse	Bin Vent BV-03	Dry Tank #2		<5%	1		0.04							
merican Colloid Company	WY Lovell		Bentonite Bentonite	e Stack	k	000	20-Jan-04	04 Compliance	ince Baghouse	Baghouse DC-01 Bin Vent BV-07	Rotary Dryer Megatex Feed Hopper		0%	1		0.015							1
merican Colloid Company merican Colloid Company	WY Lovell		Bentonite Bentonite	e Stack	k	000	20-Jan-04	04 Compliance 04 Compliance	ince Baghouse	Bin Vent BV-08 Bin Vent BV-09	Megatex Feed Elevator C/L Elevator	3-Run Average	0% 0%	1									ĺ
merican Colloid Company	WY Lovell		Bentonite	e Stack	k	000	20-Jan-04	04 Compliance	ince Baghouse	Bin Vent BV-10	Fines Elevator	3-Run Average	0%	1									ĺ
merican Colloid Company merican Colloid Company			Bentonite Bentonite					04 Compliance 04 Compliance	ince Baghouse ince Baghouse	Baghouse DC-38 Baghouse DC-07	Megatex Screen Plant Fugitives	3-Run Average 3-Run Average	0%	1		0.0023 0.0023							
merican Colloid Company	WY Lovell		Bentonite Bentonite	e Stack	k Drying	UUU	23-Sep-04		ince Baghouse	Baghouse DC-02		•	0%	1		0.0043 0.0017	143						
merican Colloid Company	WY Lovell		Bentonite	e Stack	k	UUU	J 02-Jun-06	06 Compliance	ince Baghouse	Baghouse DC-01	Fluid Bed Dryer		0% 0%	1		0.0041	141						
merican Colloid Company merican Colloid Company	WY Lovell		Bentonite Bentonite	e Stack	k	000	25-Oct-06	06 Compliance	ince Baghouse		#4 Packer		0%	1		0.0036 0.004	36						1
merican Colloid Company	WY Lovell		Bentonite	e Stack	k	UUU	J 12-Apr-07	07 Other	r Baghouse	Baghouse DC-02	Fluid Bed Dryer			1		0.004	14						ĺ
merican Colloid Company	WY Lovell GA Sandersville		Bentonite Kaolin	e Stack Stack					r Baghouse ince Dust Collector	Baghouse DC-38	Megatex Screen #2 Calciner	3-Run Average, Data may be included in the	0% ie	1		0.002 0.0192							1
nerys								•				Georgia Mining Association Database 3-Run Average, Data may be included in the		1									1
merys	GA Sandersville		Kaolin	Stack		UUU	J 01-Jun-83	3 Other	r None Indicated		#2 Calciner	Georgia Mining Association Database		1		0.0287	1						
merys	GA Sandersville		Kaolin	Stack		UUU	J 01-Jun-83	3 Other	r None Indicated		Cooling System	3-Run Average, Data may be included in the Georgia Mining Association Database		1		0.0029	_9						1
merys	GA Sandersville		Kaolin	Stack	á	UUU	08-Mar-83	3 Complian	nce None Indicated		Calciner	3-Run Average, Data may be included in the Georgia Mining Association Database	,	1		0.1206	J6						1
manue	GA Sandersville		Kaolin	Stack	ı.	UUU	J 21-Jan-88	88 Other	r None Indicated		#4 Calciner	2-Run Average, Data may be included in the	à	1		27							
.,.												Georgia Mining Association Database 3-Run Average, Data may be included in the		1									ĺ
erys	GA Sandersville		Kaolin	Stack		UUU	13-Jan-87	Compliance	nce None Indicated		#4 Spray Dryer	Georgia Mining Association Database		1		0.0093	3						ĺ
ierys	GA Sandersville		Kaolin	Stack		UUU	27-Nov-84	84 Compliance	ice Scrubber		#3 Calciner	3-Run Average, Data may be included in the Georgia Mining Association Database		1		0.0178	.8						
merys	GA Sandersville		Kaolin	Stack	á	UUU	27-Nov-84	s4 Complian	nce None Indicated		#3 Cooler	3-Run Average, Data may be included in the Georgia Mining Association Database	,	1		0.0044	44						
man/e	GA Sandersville		Kaolin	Stack					nce None Indicated		#3 Spray Dryer	3-Run Average, Data may be included in the	à	1		0.007	.79						
			Yee-lin	Otack.								Georgia Mining Association Database 3-Run Average, Data may be included in the	ا .	1		0.01	•						
	GA Sandersville		Kaolin	Stack				80 Compliance			#1 Calciner	Georgia Mining Association Database		1		0.0132							
nerys	GA Sandersville		Kaolin	Stack		UUU	26-Feb-80	J Complianc	nce None Indicated		Cooling System	3-Run Average, Data may be included in the Georgia Mining Association Database		1		0.006							1
nerys	GA Sandersville		Kaolin	Stack	ĸ.	UUU	15-Jan-80	.0 Compliand	nce None Indicated		#3 Spray Dryer	3-Run Average, Data may be included in the Georgia Mining Association Database	, i	1		0.0240	40						1
nerys	GA Sandersville		Kaolin	Stack	v	UUU	15-Jan-8∩	80 Compliance	nce Scrubber		#1 Calciner	2-Run Average, Data may be included in the	d I	1		0.0075	75						1
								•				Georgia Mining Association Database 2-Run Average, Data may be included in the	ا .	1									1
	GA Sandersville		Kaolin	Stack					nce None Indicated		Cooling System	Georgia Mining Association Database		1		0.0076							
nerys	GA Sandersville		Kaolin	Stack		UUU	09-Mar-87	87 Compliance	.ce Scrubber		#4 Calciner	3-Run Average, Data may be included in the Georgia Mining Association Database		1		0.1784	A						1
nerys	GA Sandersville		Kaolin	Stack		UUU	09-Mar-87	J7 Complian	nce None Indicated		Cooling System	3-Run Average, Data may be included in the Georgia Mining Association Database	, i	1		0.0073	/3						1
	GA Sandersville		Kaolin	Stack				90 Compliance			Not Indicated	3-Run Average, Data may be included in the	a I	1		0.0012							
												Georgia Mining Association Database 3-Run Average, Data may be included in the	ا .a	1									1
nerys	GA Sandersville		Kaolin	Stack		UUU	14-Nov-9u	90 Compliance	Je Scrubber		Not Indicated	Georgia Mining Association Database	,	1		0.0022	2						1

Facility Information	1		Source	e Information							Opacity	Stack Outlet Readings	Stack Inlet/Uncon. Readings Stack Properties
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										to	acity?	lowra latter latter latter	FM) CFM) atter fatter fatter natter
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Company	State City GA Sandersville	city) Mineral Type Kaolin	Type	Process Type		Test Date	Other) Device Type Compliance None Indicated	APCD ID	Sources Product Receiver Vent	Comments 3-Run Average, Data may be included in the	<u> </u>	0.0016	> > > 5 ± 0,1 0,1 0,1 0,1 0,1 0,1 0,1 0,1 0,1 0,1
Imerys	GA Sandersville	Kaolin	Stack			05-Oct-73	Other None Indicated		Spray Dryer	Georgia Mining Association Database 3-Run Average, Data may be included in the	•	0.0100	
,										Georgia Mining Association Database 3-Run Average, Data may be included in the	•		
Imerys	GA Sandersville	Kaolin	Stack				Compliance None Indicated		#1 Spray Dryer	Georgia Mining Association Database 3-Run Average, Data may be included in the)	0.0684	
Imerys	GA Sandersville	Kaolin	Stack				Compliance None Indicated		#2 Spray Dryer	Georgia Mining Association Database 3-Run Average, Data may be included in the		0.0192	
Imerys	GA Sandersville	Kaolin	Stack		UUU		Compliance None Indicated		#1 Spray Dryer	Georgia Mining Association Database 3-Run Average, Data may be included in the		0.0526	
Imerys	GA Sandersville	Kaolin	Stack				Compliance Baghouse		Bagger	Georgia Mining Association Database 3-Run Average, Data may be included in the		0.0030	
Imerys	GA Jasper	GCC	Stack				Compliance Baghouse		Dust Collector E94	Georgia Mining Association Database 3-Run Average, Data may be included in the		0.0111	
Imerys	GA Sandersville	Kaolin		Mill		08-Mar-83	None Indicated		#1 Post Mill	Georgia Mining Association Database 3-Run Average, Data may be included in the		0.0052	
Imerys	GA Sandersville	Kaolin	Stack	Mill		08-Mar-83	None Indicated		#2 Post Mill	Georgia Mining Association Database 3-Run Average, Data may be included in the		0.0063	
Imerys	GA Sandersville	Kaolin	Stack	Mill		08-Mar-83	None Indicated		#1 Post Mill	Georgia Mining Association Database 3-Run Average, Data may be included in the		0.0012	
Imerys	GA Sandersville	Kaolin	Stack	Mill	000	08-Mar-83	None Indicated		#2 Pre Mill	Georgia Mining Association Database		0.0038	
Imerys	GA Sandersville	Kaolin	Stack	Mill		27-Nov-84	None Indicated		#3 Pre Mill	3-Run Average, Data may be included in the Georgia Mining Association Database 3-Run Average, Data may be included in the		0.0016	
Imerys	GA Sandersville	Kaolin	Stack	Mill	000	27-Nov-84	None Indicated		#3 Post Mill	3-Run Average, Data may be included in the Georgia Mining Association Database		0.0001	
Imerys	GA Sandersville	Kaolin	Stack	Mill	000	26-Feb-80	None Indicated		Bauer Pre-Mill	3-Run Average, Data may be included in the Georgia Mining Association Database		0.0014	
Imerys	GA Sandersville	Kaolin	Stack	Mill	000	26-Feb-80	None Indicated		Bauer Post-Mill	3-Run Average, Data may be included in the Georgia Mining Association Database		0.0019	
Imerys	GA Sandersville	Kaolin	Stack	Mill	000	09-Mar-87	None Indicated		#4 Pre-Mill	3-Run Average, Data may be included in the Georgia Mining Association Database		0.0028	
Imerys	GA Sandersville	Kaolin	Stack	Mill	000	09-Mar-87	None Indicated		#4 Post-Mill	3-Run Average, Data may be included in the Georgia Mining Association Database		0.0012	
Imerys	GA Sandersville	Kaolin	Stack	Conveying	000	09-Mar-87	None Indicated		Pneumatic Conveying System	3-Run Average, Data may be included in the Georgia Mining Association Database	•	0.0022	
Imerys	GA Sandersville	Kaolin	Stack	Mill	000	15-Nov-90	None Indicated		Bauer Mill	3-Run Average, Data may be included in the Georgia Mining Association Database	•	0.0019	
Imerys	GA Sandersville	Kaolin	Stack		000	22-Sep-99	None Indicated		Fugitive Dust Collector	2-Run Average, Data may be included in the Georgia Mining Association Database	•	0.0045	
Imerys	GA Jasper	GCC	Stack	Receiving	000	15-Jan-03	Baghouse		Pelletized Lime Baghouse	3-Run Average, Data may be included in the Georgia Mining Association Database	•	0.0007	
Imerys	GA Jasper	GCC	Stack	Screening	000	14-Jan-03	Baghouse		#4 Midwestern Screen	3-Run Average, Data may be included in the Georgia Mining Association Database		0.0171	
Imerys	GA Jasper	GCC	Stack	Bin	000	29-Apr-98	Baghouse		Dust Collector F44	3-Run Average, Data may be included in the Georgia Mining Association Database)	0.0073	
Imerys	GA Jasper	GCC	Stack	Bin	000	29-May-96	Baghouse		Dust Collector E96	3-Run Average, Data may be included in the Georgia Mining Association Database		0.0137	
Imerys	GA Jasper	GCC	Stack	Bin	000	30-May-96	Baghouse		Dust Collector E97	3-Run Average, Data may be included in the Georgia Mining Association Database		0.0010	
Imerys	GA Jasper	GCC	Stack	Bin	000	30-May-96	Baghouse		Dust Collector E98	3-Run Average, Data may be included in the Georgia Mining Association Database)	0.00043	
Imerys	GA Jasper	GCC	Stack	Drying	000	29-Apr-96	Baghouse		Dust Collector E94	3-Run Average, Data may be included in the Georgia Mining Association Database	•	0.0111	
Imerys	GA Jasper	GCC	Stack	Bucket Elevator	000	01-May-96	Baghouse		Dust Collector E93	3-Run Average, Data may be included in the Georgia Mining Association Database		0.0108	
R. T. Vanderbilt Company R. T. Vanderbilt Company		Dixie Clay Kaolin Dixie Clay Kaolin	Stack Stack		000	Aug-99 Aug-99	Compliance Baghouse Compliance Baghouse		Bagging Station Supersack Station	Goorgia mining / Goodiation Batabado	0% 0%	0.0006 0.0008	
R. T. Vanderbilt Company		Dixie Clay Kaolin	Fugitive		000	Sep-99	Compliance None ³		Enclosed Bucket Elevator	³ This bucket elevator is enclosed so fugitive		0.0000	
R. T. Vanderbilt Company		Souverneur Talc Talc	Stack		000	Jun-00	Compliance Note Compliance Baghouse		Packing Station	emissions were the only thing tested.	0%	0.0035	
R. T. Vanderbilt Company R. T. Vanderbilt Company		Souverneur Talc Talc Talc	Stack		000	Jun-00 Jun-00	Compliance Baghouse		Screen		0%	0.0035 0.0105	
									Classifier, Silos, Packer, Screws and	⁴ This equipment is located within a building and does not have an emissions point. The			
R. T. Vanderbilt Company	NY Gouverneur G	Souverneur Talc Talc	Fugitive		000	Jun-00	Compliance None ⁴		Classifier, Silos, Packer, Screws and Elevators	standard for these sources is found in 40 CFR 60.672(e). Method 22 was used to	No Visible Emissions		
B. T. Vandart it Co	NV Courses	Counterpour Tolo	Ctor!		000	lue 00	Compliance Peaks:		Superpool Station T T	determine if there were any visible emissions	s. 0%		
R. T. Vanderbilt Company R. T. Vanderbilt Company	NY Gouverneur G	Souverneur Talc Talc Souverneur Talc Talc	Stack Stack		000	Jun-00 Jun-00	Compliance Baghouse Compliance Baghouse		Supersack Station and Feed Tank Supersack Station and Feed Tank		0%		
R. T. Vanderbilt Company R. T. Vanderbilt Company	NY Gouverneur G	Souverneur Talc Talc Souverneur Talc Talc	Stack Stack		000		Compliance Baghouse Compliance Baghouse		Supersack Station and Feed Tank Bulk Loading Station and Weigh Tank		0% 0%	0.0007	
R. T. Vanderbilt Company R. T. Vanderbilt Company	NC Robbins St	tandard Mineral Pyrophyllite tandard Mineral Pyrophyllite	Stack Stack		000	Aug-01 Jun-02	Compliance Baghouse Compliance Baghouse		Supersack Station Supersack Station		0% 0%	0.0037 0.0011	
R. T. Vanderbilt Company Searles Valley Minerals	CA Trona A	'anderbilt Minerals Smectite urgus Plant Soda Ash		Truck Loadout	000	Jun-05 Oct-94	Compliance Wet Scrubber Compliance Baghouse		Spray Dryer Soda Ash Storage Truck Loadout		0% 0%	0.002	
Searles Valley Minerals Searles Valley Minerals	CA Trona Ti	rgus Plant Soda Ash rona Plant Soda Ash, Borax		Truck Loadout Packaging Warehouse	000	Aug-98 Feb-99	Compliance Baghouse Compliance Baghouse		BFB 1 Truck Loadout Packaging Warehouse		0% 0%	0.008 0.003	
Searles Valley Minerals Searles Valley Minerals	CA Trona A	rgus Plant Soda Ash rgus Plant Soda Ash	Stack Stack	Conveying Conveying	000	Feb-01 Feb-01	Compliance Baghouse Compliance Baghouse		BFB 1 Conveyor Transfer 1 BFB 1 Conveyor Transfer 2		0% 0%	0.005 0.008	
Searles Valley Minerals Searles Valley Minerals	CA Trona A	rgus Plant Soda Ash rgus Plant Soda Ash	Stack Stack	Conveying Conveying	000	Feb-01 Feb-01	Compliance Baghouse Compliance Baghouse		BFB 1 Conveyor Transfer 3 BFB 2 Conveyor Transfer 1		0% 0%	0.007 0.003	
Searles Valley Minerals Searles Valley Minerals	CA Trona A	rgus Plant Soda Ash rgus Plant Soda Ash	Stack Stack	Conveying Conveying	000	Feb-01 Feb-01	Compliance Baghouse Compliance Baghouse		BFB 2 Conveyor Transfer 2 BFB 2 Conveyor Transfer 3		0% 0%	0.01 0.006	
Searles Valley Minerals Searles Valley Minerals	CA Trona A	rgus Plant Soda Ash rgus Plant Soda Ash	Stack Stack	Conveying Conveying	000	Feb-02 Feb-02	Compliance Baghouse Compliance Baghouse		MFB 2 Conveyor Transfer 1 MFB 2 Conveyor Transfer 2		0% 0%	0.003 0.005	
Searles Valley Minerals Searles Valley Minerals	CA Trona A	rgus Plant Soda Ash rgus Plant Soda Ash	Stack Stack	Conveying Truck Loadout	000	Feb-02 Jan-04	Compliance Baghouse Compliance Baghouse		MFB 2 Conveyor Transfer 3 BFB 1 Truck Loadout		0% 0%	0.004 0.003	
Searles Valley Minerals Searles Valley Minerals	CA Trona Ti	rona Plant Soda Ash, Borax rgus Plant Soda Ash	Stack	Packaging Warehouse Conveying	000	Mar-04 Mar-06	Compliance Baghouse Compliance Baghouse		Packaging Warehouse BFB 1 Conveyor Transfer 2		0% 0%	0.005 0.018	
Searles Valley Minerals Searles Valley Minerals	CA Trona A	rgus Plant Soda Ash rgus Plant Soda Ash	Stack	Conveying Conveying	000	Mar-06 Mar-06	Compliance Baghouse Compliance Baghouse		BFB 1 Conveyor Transfer 3 BFB 2 Conveyor Transfer 1		0% 0%	0.009 0.004	
, , will consider		J			- 50							0.001	1

Facility Information	Source Information	Opacity	Stack Outlet Readings	Stack Inlet/Uncon. Readings Stack Properties
Facility Name (other than Company State City city) Mineral Type	Test Reason (Compliance, Source NSPS Engineering, or Air Pollution Control Type Process Type Category Test Date Other) Device Type APCD ID Sources	Test Avg Opacity% Test Avg Opacity% Min 6-min Avg Opacity% Opacity% Method 22 VE%	Volumetric Flowrate (PGERM) (PGERM) Moisture (%) Moisture (%) (%) Particulate Matter (gr/dscf) Particulate Matter (flos/hor) Particulate Matter (flos/hor) Method Matter (flos/hor) Method Matter (flos/hor) Method	Velocity (ACFM) Velocity (IOSCFM) Moisture (%) Tempic (deg F) O2 (%) Pearculate Matter (%) (EMC) Emchan Method Met
Searies Valley Minerals CA Trona Argus Plant Soda Ash Searies Valley Minerals CA Trona Argus Plant Soda Ash Searies Valley Minerals CA Trona Argus Plant Soda Ash Searies Valley Minerals CA Trona Argus Plant Soda Ash Searies Valley Minerals CA Trona Argus Plant Soda Ash Searies Valley Minerals CA Trona Argus Plant Soda Ash Searies Valley Minerals CA Trona Argus Plant Soda Ash UNIMIN MS Aberdeen Bentonite Clay Bento	Stack Drying non-UUU 12-Aug-03 Other Other Electrostatic Precipitator Rotary Dryer Stack Drying non-UUU 18-Aug-05 Other Electrostatic Precipitator Rotary Dryer Stack Drying non-UUU 27-Oct-05 Other Electrostatic Precipitator Rotary Dryer Stack Drying non-UUU 14-Sep-01 Other Baghouse Fluid Bed Dryer	0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 23-Run Average 0% 3-Run Average 0% 3-Run Average 0% 5-Run Average 0% 5-Run Average 0% 5-Run Average 0% 5-Run Average 0%	0.010 0.009 0.014 0.003 0.017 0.003 0.017 41282 18.234 39.97% 254.29 16.17% 0.012 1.86 4 44754 20.877 35.53% 263.62 17.5% 0.016 2.58 4 44773 19.038 38% 250 0.157 25.8 5 41975 20.299 35.84% 230.61 16.33% 0.086 15.33 15661 15.585 7.06% 124 14.33% 0.0061 15.33	8.7266 8.7266 6.7266 3.41
UNIMIN VA Gore Silica Sand UNIMIN IN Huntingburg Fire Clay UNIMIN IN Huntingburg Fire Clay UNIMIN IN Huntingburg Fire Clay UNIMIN CA Ione Silica Sand UNIMIN CA Ione Limestone UNIMIN CA Ione Silica Sand UNIMIN MN Kasota Silica Sand UNIMIN MN Kasota Silica Sand	Stack Bagging OO 65-Oct-04 Compliance Baghouse DC-307 Paper Bagging System Stack Bagging OO 07-Oct-04 Compliance Baghouse DC-912 Bulk Bagging System Stack Loadout OO 08-Oct-04 Compliance Baghouse DC-754 Rail Car Loader Stack Drying non-UUU 07-Feb-84 Other Wet Scrubber Fluid Bed Dryer, Roto-clone scrubber Stack Drying non-UUU 09-Oct-85 Other Wet Scrubber Fluid Bed Dryer Wet Scrubber Stabust Stack Drying non-UUU 07-Sep-87 Other Wet Scrubber Rotary Dryer Stack Drying UUU 31-Aug-04 Compliance Wet Scrubber Fluid Bed Dryer Stack Drying UUU 31-Aug-04 Compliance Wet Scrubber Rotary Dryer Stack Drying UU 31-Aug-04 Compliance Rotary Dryer Rotary Dryer	6 3-Run Average 17 3-Run Average 0% 17 3-Run Average 0% 18 3-Run Average 9 3-Run Average 9 3-Run Average 9 3-Run Average 10 3-Run Average 118 3-Run Average 18 3-Run Average 18 3-Run Average 18 3-Run Average	57440 46,060 10% 123.9 18.3% 0.0159 6.282 5.244 2,397 0.7% 72 20.9% 0.0023 0.05 2801 2,727 1.4% 74 20.9% 0.002 0.05 767 717 14.1% 122 19% 0.069 16.4 5.895 5.14% 122 19% 0.069 16.4 5.895 5.14% 120 19% 0.029 1.5 5.3138 29.279 8.48% 1107 19.3% 0.0027 0.68 5.3138 29.279 8.48% 1107 19.3% 0.0027 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.68 5.49% 10.0007 0.0007 0.68 5.49% 10.0007 0.0007 0.49 5.49% 10.0007 0.0007 0.49% 10.0007 0.0007 0.49% 10.0007 0.0007 0.49% 10.0007 0.0007 0.49% 10.0007 0.49% 10.0007 0.0007 0.49% 10.0007 0.0007 0.49% 10.0007 0.49% 10.0007 0.49% 10.0007 0.49% 10.0007 0.29% 10.0007 0.0007 0.49% 10.0007 0.49% 10.0007 0.49% 10.0007 0.0007 0.49% 10.0007	
UNIMIN	Stack Loadout non-OOO 17-Apr-79 Other Wet Scrubber Loading Belt Conveyors Stack Screening non-OOO 18-Apr-79 Other Wet Scrubber Screen House Stack Cooler non-OOO 19-Apr-79 Other Wet Scrubber Cooler Stack Drying non-UUU 01-May-79 Other Wet Scrubber Dryer Stack Drying non-UUU 06-Sep-01 Other Wet Scrubber Rotary Dryer DR-01 Stack Drying UUU 08-May-02 Compliance Wet Scrubber Rotary Dryer DR-02 Stack Drying UUU 20-Nov-02 Compliance Wet Scrubber Dryer Dryer DR-02 Demisted and Wetscrubbed (Rotary Dryers, Cooler, Screen house sources)	11 3-Run Average 11 3-Run Average 11 3-Run Average	22478 22.029 1.81% 64.17 0.00237 0.457 5 22124 21.440 2.08% 71.04 0.0118 2.225 8 24523 24,797 3.49% 82.09 0.02149 4.186 5 22927 18,129 10.64% 130.42 0.04879 7.386 5 23666 19,66 15% 125.20.99% 0.0049 0.83 5 23899 17,696 10.71% 114 17.93% 0.017 2.62 0.030 5 83376 67,632 9.24% 114 18.77% 0.01 5.89 0.018 5 48.87 38 9.9% 148.6 20.9% 0.0601 19.292	6.04 9 9 7.80 7.792

Proposed Changes to NSPS Subpart A Subpart OOO and Subpart UUU

The Industrial Minerals Association-North America would like to take this opportunity to provide suggested changes to the New Source Performance Standards Subpart A, Subpart OOO and Subpart UUU.

Subpart A

§60.2- Definitions

We would like to see the definition for Capital Expenditures clarified. A capital expenditure is an expenditure for a physical or operational change to an existing facility which exceeds the product of the applicable "annual asset guideline repair allowance percentage" specified in the latest edition of Internal Revenue Service (IRS) Publication 534 and the existing facility's basis, as defined by section 1012 of the Internal Revenue Code. However, the total expenditure for a physical or operational change to an existing facility must not be reduced by any "excluded additions" as defined in IRS Publication 534, as would be done for tax purposes.

§60.7 (a) (6) and 60.8 (d) Notification of Anticipated Date for Conducting Initial Performance Test

A 30 day advance notice should be reduced to a 7 day notice. Many state agencies no longer send staff to witness initial performance testing, therefore a 30 day advance notice is no longer appropriate or necessary.

§60.8 (a) Performance Testing

The 60 and 180 calendar day thresholds for conducting initial performance tests should be modified to allow for periods when a plant may be shut down for the winter or due to lack of inventory. We suggest this be changed to 60 and 180 **production** days.

Subpart 000

§60.670- Applicability and Designation of Affected Facilities

Storage Bins- Open top storage bins, as well as those not controlled by a collection device, should be removed from the list of affected facilities, because they are static structures that do not break, move, or agitate the material, and they produce minimal emissions.

Facilities Exempted by Plant Type/Capacity- The rates should be increased for the aggregates industry sector of Subpart OOO to a production level that is consistent with today's current lowest production rates of aggregate processing plants. The current threshold capacities (25 tons per hour for fixed plants and 150 tons per hour for portable plants) are too low for aggregate processing.

Add (a)(3)- The provisions in this subpart do not apply to any affected facility as defined in paragraph (a)(1) of this section that processes wet material as defined in $\S60.671$

(f)- comments for Table 1

60.7 Notification and Record Keeping- new comments should read- Except in (a)(1),(2), and (3), notification date of construction, anticipated date of initial start up, and date of actual start up are not required

60.11 Compliance with standards and maintenance requirements- new comments should read- Except in (b), under certain conditions (§§60,675(c)(3) and (c)(4)) Method 9 observations may be reduced from 1 hour to 30 minutes. Some affected facilities exempted from Method 9 tests (§60.675 (h))

§60.671 Definitions

Opacity Test- Clarify where the opacity test must be completed for a performance test on a belt conveyor. By the current definition, the opacity must be measured where material is transferred to or from a belt conveyor. The opacity test should be completed on the discharge point of the belt conveyor.

Crushing- Means to reduce the particle size of the non-metallic mineral material by means of physical impaction of the crusher upon the material

Grinding Mill- Means a machine used for dry fine crushing of any nonmetallic mineral. Grinding mills include, but are not limited to, the following types: hammer, roller, rod, pebble and ball, and fluid energy. The grinding mill includes the air conveying system, air separator, or air classifier, where such systems are used.

Wet Material- Means any nonmetallic mineral material that has an average free moisture content of no less than 12 percent.

Transfer point means a point in a conveying operation where the nonmetallic mineral is transferred from a belt conveyor except where the nonmetallic mineral is being transferred to a stockpile.

Truck Dumping – The definition of truck dumping should be expanded to exclude all mechanical dumping utilizing mobile or stationary loading equipment to charge various plant feed points.

Grizzly Screens – Truck dumping into any screening operation is exempt from the rule. Grizzly screens associated with truck dumping (or other mechanical dumping or static separation techniques) should also not be subject to the rule. Grizzly feeders/"screens" do not have a mesh surface as per the screening definition in 60.671.

Rated Capacity- Subpart 000 of the New Source Performance Standards does not define rated capacity; however, under 40 CFR 60.671, "initial crusher" is defined as "any crusher into which non-metallic minerals can be fed without prior crushing.

A good definition might be: Tons per hour of new feed to the initial crusher or grinder or, the production in tons per hour a crusher or grinder produces on-specification material. In situations where the crusher or grinder has a recirculation load, the load which is being recirculated has already been crushed; hence, it would not be counted as part of the rated capacity.

Since the primary purpose of a crushing and grinding circuit is to crush and grind off-specification material to produce an on-specification material, the rated capacity of crushers or grinders is determined by the ability of a crusher or grinder to produce on-specification crushed or ground material. In situations where the crusher or grinder has a recirculation load, the load which is being recirculated has already been crushed; hence, it would not be counted as part of the rated capacity. On a simple recirculating crushing or grinding circuit, only the new feed or the on-specification product produced can be considered the rated capacity of the circuit.

Since there appears to be no set standard or industry definition or regulatory definition for the rated capacity of initial crushers, the above definition has been derived to be consistent with the intent of the EPA's definition of an initial crusher:

§ 60.672 Standard for Particulate Matter

(a)(2)- Clarify that opacity Testing is not required for facilities using a wet scrubber. Shown below is proposed language:

Exhibit greater than 7 percent opacity, unless the stack emissions are discharged from an affected facility using a wet scrubbing control device. Facilities using a wet scrubber must comply with the reporting provisions of §60.676 (c), (d), (e), and an initial opacity test is not required.

- (b), (c), (f), and (h) Change the requirement of the time required meet compliance with opacity standard of 60.672 (b), (c), (f), and (h). Since most companies are continually trying to increase production (maximum production), the regulation should be changed to just state that the opacity limit must be met no later than 180 days after initial startup. Shown below is proposed language.
- (b) After achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under §60.11 of this part, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any fugitive emissions which exhibit greater than 10 percent opacity, except as provided in paragraphs (c), (d), and (e) of this section.
- (c) After achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under §60.11 of this part, no owner or operator shall cause to be discharged into the atmosphere from any crusher, at which a capture system is not used, fugitive emissions which exhibit greater than 15 percent opacity.
- **(f)** After achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under §60.11 of this part, no owner or operator shall cause to be discharged into the atmosphere from any baghouse that controls emissions from only an individual, enclosed storage bin, stack emissions which exhibit greater than 7 percent opacity.
- (h) After achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, no owner or operator shall cause to be discharged into the atmosphere any visible emissions from:

- (e) The opacity limit should be the same as the equipment in the building. Vent fans are difficult to conduct a Method 5 stack test on due to numerous reasons (isokinetic flow, low flow, no stack, position, etc). Shown below is proposed language.
- (e) If any transfer point on a conveyor belt or any other affected facility is enclosed in a building, then each enclosed affected facility must comply with the emission limits in paragraphs (a), (b) and (c) of this section, or the building enclosing the affected facility or facilities or vents must not exhibit greater than 10 percent opacity.

§ 60.674 Monitoring of Operations

(a), (b) Manufacturers may produce a device that does not require annual calibration or no calibration at all. Shown below is proposed language.

The owner or operator of any affected facility subject to the provisions of this subpart which uses a wet scrubber to control emissions shall install, calibrate, maintain and operate the following monitoring devices:

60.674(a)

(a) A device for the continuous measurement of the pressure loss of the gas stream through the scrubber. The monitoring device must be certified by the manufacturer to be accurate within ± 250 pascals ± 1 inch water gauge pressure and must be calibrated by accepted engineering practices or in accordance with manufacturer's instructions or frequency.

60.674(b)

(b) A device for the continuous measurement of the scrubbing liquid flow rate to the wet scrubber. The monitoring device must be certified by the manufacturer to be accurate within ± 5 percent of design scrubbing liquid flow rate and must be calibrated by accepted engineering practices or in accordance with manufacturer's instructions or frequency.

§ 60.675 Test Methods and Procedures

(c)(3) & (4) Duration of Method 9 Opacity Observations for Fugitive Emissions

There should be a reduction in testing duration from 1 hour to 30 minutes if certain conditions are met similar to what is in the existing regulation. For sources with a 10% opacity limit, the 30-minute test would be allowed as long as there are not more than 3 readings of 10% within that 30-minute period; and there are no individual readings greater than 10% opacity. For sources with a 15% opacity limit, the 30-minute test would be allowed as long as there are not more than 3 readings of 15% within that 30-minute period; and there are no individual readings greater than 15% opacity.

For items that fail to meet the 30-minute cutoff conditions, Method 9 testing should be reduced from 3 hours to 60 minutes.

(d) New Language- In determining the compliance with §60.672 (e), the owner or operator shall use Method 22 to determine fugitive emissions. The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 50 minutes in duration, with each side of the building and the roof being observed for at least 10 minutes.

(h)(1) & (2) Initial Method 9 Performance Test Exemptions

Uncontrolled process equipment at the same production facility is exempt from initial Method 9 testing if an opacity test, showing zero opacity, exists for another piece of like equipment handling the same material at an equivalent or less throughput rate.

Add paragraph (i)- Initial Method 5 performance tests under §60.11 of this part and §60.675 of this subpart are not required for: 1) any affected facility that is operated on an intermittent basis and cannot effectively be operated for a period of greater than one-hour, including affected facilities such as, but not limited to, loadouts, silos, and storage bins; and 2) any new affected facility for which an equivalent affected facility has already been tested given that the equivalent affected facility has the same capacity, has an initial startup date within 12 months of the initial startup date of the new affected facility, and is processing the same material as the new affected facility.

§ 60.676 Reporting and recordkeeping.

- (d) Upper limits on scrubber pressure loss and liquid flow rates should be removed. Increased liquid flow rates and pressure differential will increase the efficiency of the particulate removal. Shown below is proposed language.
- (d) After the initial performance test of a wet scrubber, the owner or operator shall submit semiannual reports to the Administrator of occurrences when the measurements of the scrubber pressure loss and liquid flow rate differ by more than -30 percent from the average determined during the most recent performance test.

(h) Notification Requirements for Anticipated and Actual Dates of Startup for Affected Facilities

The Subpart A requirement under Section 60.7(a)(2) for notification of the date construction commenced should be deleted.

(i) Required Notifications

Required notifications do not need to go to the EPA Administrator if authority has been delegated to the state or local authority.

Subpart UUU

§60.734 Monitoring of Emissions and Operations

Add in (a) – with the exception of the process units described in paragraphs (b), (c), (d), and (e)...

Add Paragraph (e)- In lieu of a continuous opacity monitoring system, the owner or operator of an affected facility may install, calibrate, maintain, and continuously operate a bag leak detection system as specified below:

- (i): The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.
- ii): The bag leak detection system sensor must produce output of relative PM emissions
- iii): The bag leak detection system must be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected and the alarm must be located such that it can be seen or heard by the appropriate plant personnel.
- iv): A triboelectric bag leak detection system or equivalent technology shall be installed, operated, adjusted, and maintained in a manner consistent with the U.S. Environmental Protection Agency guidance, "Fabric Filter Bag Leak Detection Guide" (EPA 454/R-98-015, September 1997).
- v): Initial adjustment of the system shall, at a minimum, consist of establishing the baseline output by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.
- vi): Following the initial adjustment, the owner or operator shall not adjust the range, averaging period, alarm setpoints, or alarm delay time unless a compliance test is performed to demonstrate compliance with the PM emissions standard after the adjustments are made.

§60.735 Recordkeeping and Reporting Requirements

Add paragraph (e)

The subpart A requirements under §60.7 (a)(1)-(a)(3) for notification of the date of construction (or reconstruction as defined under §60.15) of an affected facility and notification of the anticipated date of initial startup of an affected facility shall be waived for owners or operators of affected facilities regulated under this subpart

§60.737 Delegation of Authority

(a) In delegating implementation and enforcement authority to a state under section 111(c) of the Act, the authorities contained in paragraph (b) of this section shall be retained by the Administrator and not transferred to a State. Where a state has been delegated implementation and enforcement authority per Section 111 (c) of the Act, the term Administrator shall be given the meaning of permitting authority per Subpart A of this Part.