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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 9, 1995

Mr. David Gossman
President
Gossman Consulting, Inc.
45W962 Plank Road
Hampshire, Illinois 60140

Dear Mr. Gossman:

This is in response to your October 9, 1995, letter reminding us that we have not responded to your April 3 letter concerning the use of metal surrogates in complying with the Boiler and Industrial Furnace (BIF) Rule. We appreciate your continued interest in developing a system that eliminates unnecessary testing and that minimizes the risk from metal spiking as part of the emissions tests under 40 CFR 266.106(c) and (d).

Although we have been tardy in providing a written response, I understand that Bob Holloway, Dwight Hlustick and others along with our technical support contractor discussed with you in September the concerns that we have about using metal surrogates under the BIF rule. Although the BIF rule requires that a feedrate be established for each metal based on testing, the rule does not specifically prohibit the use of testing with surrogate metals. The issue, however, is how to address the problem that system removal efficiency (SRE), and therefore emissions, are a function of metal feedrate.

Generally, SRE decreases at lower feedrates. Thus, even though we should be able to agree on which of the regulated metals have similar volatilities (e.g., based on the volatility groupings that will be proposed for the MACT rule) and could be used as surrogates for each other, the use of surrogates currently has limited practicability under the BIF rule. This is because the surrogate metal must be fed at the maximum individual feedrate for any of the metals for which it is acting as a surrogate. (Otherwise, SRE would be overestimated.)

I understand that you are particularly concerned about spiking beryllium because of its cost and toxicity. Unfortunately, it is not practicable to use another low volatility regulated metal (e.g., arsenic, chromium) as a surrogate for beryllium because these other regulated metals normally require much higher feedrates than beryllium. If you were to utilize those higher feedrates for the surrogate, the source may exceed the BIF emission limits for beryllium. I understand you discussed with my staff the possibility of industry testing to identify a surrogate, non-regulated metal that is not normally present in cement kiln feedstreams at levels higher than the feedrate desired for beryllium. We would be happy to work with the industry to provide advice on such a testing program and to take the necessary steps to allow the use of such a surrogate.

Thank you for your continued interest in this matter. Please feel free to contact Bob Holloway to discuss these issues further.

Sincerely,

Michael Shapiro, Director
Office of Solid Waste

cc:
Waste Combustion Permit Writers