



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OCT 12 2006

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Commissioner David Littell
Department of Environmental Protection
State of Maine
17 State House Station
Augusta, Maine 04333-0017

RE: Emissions Factor Review for External Combustion Boilers

Dear Commissioner Littell:

Thank you for your letter of April 19, 2006, sent on behalf of the Maine Air Toxics Advisory Committee, which requests prioritization of the review of hazardous air pollutant emissions factors for combustion boilers. Your Committee suggests that we can improve the emissions estimates for external combustion boilers via resource reallocation to combine and review two separate stack test datasets. Specifically, your Committee requests prioritization of the review and validation of two stack test datasets, along with other relevant information, to refine AP-42 emissions factors for the external combustion boiler sector. I understand your concern that the current AP-42 emissions factors do not reflect the more current stack test data that were collected during development of the air toxics rule for Industrial, Commercial, and Institutional Boilers and Process Heaters, particularly with respect to the wide variation among hazardous air pollutant emissions factors and the potential consequences of applying emissions factors developed as industry averages for a specific site.

My office is in the process of revamping the emissions factors program in order to address concerns such as those expressed by your Committee. The revised program is designed to provide an easy-to-use emissions factor development process, a means to account for the uncertainty associated with the development and use of emissions factors, and a way to smoothly integrate the results of new emissions factor data with existing data. We believe these revised program components will address recommendations made by the Environmental Protection Agency's (EPA's) Office of Inspector General as part of its recent review of the emissions factor program. In addition to revamping the program, we are engaged in reviewing and responding to requests, such as the one proposed by your Committee, from a number of other stakeholders. We continue to assess and prioritize our work on all AP-42 emissions factors as part of our efforts to improve the whole overall program.

Internet Address (URL) • <http://www.epa.gov>

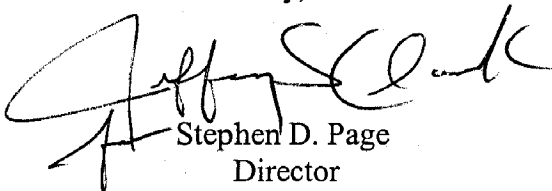
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We are developing this easy-to-use, 9-step emissions factor development process in recognition of the fact that we may not be able to respond to stakeholder emissions factor revision requests as quickly as we or they would like. Through use of this process individuals or groups, such as your Committee, can use their resources to acquire, process, and generate data for creation or revision of AP-42 emissions factors. These draft procedures, entitled *Detailed Procedures for Preparing Emissions Factors*, are available at the following internet address: www.epa.gov/ttn/chief/efpac/procedures/index.html. Your Committee may use these draft procedures, and, given our involvement in the generation of the combustion boiler emissions data, your Committee may be able to skip one or more of the relevant steps should it decide to proceed in advance of our activity. If you have questions or comments concerning the emissions factors development process, contact Ronald Myers, in the Measurement Policy Group, via telephone on (919) 541-5407 or via electronic mail at myers.ron@epa.gov.

Finally, as mentioned in the Introduction to AP 42, Volume I, Fifth Edition, the use of emissions factors may not be appropriate in all situations, particularly for emission limits, standards, source-specific permit limits, and/or in compliance determinations. This Fifth Edition can be found at: <http://www.epa.gov/ttn/chief/ap42/index.html>>). When representative source-specific data cannot be obtained, use of emissions factors may be necessary as a last resort. Whenever emissions factors are used, users should be aware of the limitations in accurately representing a particular facility, and the risks of using emissions factors in such situations should be evaluated against the costs and benefits of further testing or analyses. Should your Committee or external combustion boiler owners or operators in Maine find that the emissions factors may not provide emissions estimates appropriate for the sources, your Committee or the owners or operators always have the option of conducting and reporting emissions testing or continuous monitoring data from those sources in lieu of using emissions factors.

For more information concerning our air toxics rule on Industrial, Commercial and Institutional boilers and process heaters, please contact Bob Wayland at (919) 541-1045. For more information concerning the emissions factor program redesign, please contact Bob Schell of our Measurement Policy Group at (919) 541-4116.

Sincerely,



Stephen D. Page
Director
Office of Air Quality Planning
and Standards

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