

To: Bob Holloway/DC/USEPA/US@EPA
From: RobertElam@americanchemistry.com
Date: 03/24/2006 01:08PM
Subject: Initial ACC Thoughts on the "Information Needs" Paper

Bob-

As I mentioned in my voice mail today, we can talk more about some of this on Monday if you're available. Here are the initial thoughts of ACC members:

Option A Items:

A1: The analytical questions listed under this section are at least partially answerable (especially A1d and A1e) from the revised survey results spreadsheet that I sent recently. For many streams, the spreadsheet includes the "limits that could be achieved" column. Beyond a revised look at the spreadsheet, we'll likely need to get in touch with Nan Thomey again. She's my best and most willing source for information on what "can be achieved" on the analytical front. I can set up another call with her and your staff if you think that would be helpful.

A2: EPA now has the latest survey results.

Option B Items:

B1: This question should be largely answerable using the most recent spreadsheet.

B2: This appears to be the "new" option that you mentioned in a previous message. Our initial concern with this set of conditions is that it may preclude any option of CO monitoring that is not done by CEMs. ACC would prefer that EPA propose the CO limit of 100 ppmv and request comment on whether CEMs is necessary.

B3: Per your previous message, we did not evaluate this condition closely.

B4: Our initial reaction to the 4a condition is that this is a potential "deal-breaker." It would virtually eliminate the possibility of off-site combustion of off-spec fuels, as most receiving facilities have RCRA permit conditions that prohibit accepting off-site manifested hazardous waste. It would also be a problem for on-site use, as the full HW storage requirements would likely minimize any potential benefit. With respect to B4b, our reaction depends on the level of stringency of what is finalized under DSW. Again, most members feel that requiring full HW manifesting, handling, and storage is a deal-breaker.

I hope this is helpful as an initial response. We can talk about each of the conditions in more detail on Monday.

Best Regards,

Bob

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