



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

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OFFICE OF  
AIR AND RADIATION

Ms. Jennifer Snyder  
Senior Director of Regulatory Affairs  
Corn Refiners Association  
1701 Pennsylvania Avenue, Suite 950  
Washington, DC 20006

Dear Ms. Snyder:

Thank you and your group for your work in developing a new test procedure for measuring volatile organic compound (VOC) emissions from corn wet-milling facilities, referred to in your letter as "USEPA Method 18 Pre-Survey Procedure for Corn Wet-Milling Facility Emission Sources." We appreciate the opportunity to collaborate with the Corn Refiners Association (CRA) on a test method with the objective of quantifying total VOC mass emissions on an individual VOC species basis. Your Association's suggested method has the potential to advance significantly the understanding of VOC emissions from wet corn mills. We have reviewed your method and the supporting information that accompanied it, and we have concluded that it is an acceptable procedure for measuring VOC emission from corn wet-milling facilities. Because this is a new method, we will work as expeditiously as practicable to promulgate the method in Title 40, Part 51, Appendix M of the Code of Federal Regulations. In the interim, we will post the test method on our Emissions Measurement Center Website at <http://www.epa.gov/ttn/emc/tmethods.html>. Facilities in the corn wet-milling industries should refer to that website for information on the procedures to follow for using alternative methods. We look forward to working with CRA towards implementation of this method.

As we implement the new test method that you developed, we realize that the changing measurement procedures and changing basis for expressing VOC emissions will create issues for the EPA programs that require reporting of VOC emissions. The Agency is willing to work with your organization to resolve these issues. We expect, too, that timely consultation between the Office of Air Quality Planning and Standards and the Air Enforcement Division of EPA's Office of Enforcement and Compliance Assurance will help to ensure the appropriate applications of methods in individual circumstances. For example, as new methods are used that could show higher emission levels, it will be important to include a photochemical reactivity assessment as part of control determinations to ensure installation of controls is environmentally beneficial. The following is a summary of these potential issues and how we believe that they might be resolved.

1. **New Measurement Methods.** The new method, “USEPA Method 18 Pre-Survey Procedure for Corn Wet-Milling Facility Emission Sources,” that you developed represents a new measurement technique that may produce results that differ from those of existing methods. The use of this new measurement technique will produce improved and expanded VOC emission information, so we would recommend that these improved results be applied to actions and decisions that occur after this method is initially placed into use.
2. **Revising Measures of Air Quality.** As with other methods, any new procedures approved by EPA will produce information that will be incorporated into the tools used to assess the attainment of air quality standards such as emission inventories and air quality modeling. We would recommend that these programs incorporate the results from this new method only when they have an existing need to update or revise these tools. We would not recommend revising past analyses. We would still have the opportunity to review past actions based on previous data, but that would be only for our information.
3. **NAAQS Control Strategies.** In addressing control strategies, we believe that the appropriate time to include data from the new method is during the development of the State Implementation Plans (SIPs) to address the revised 8-hr ozone and PM 2.5 standards. As part of the revision process, there will be significant review and new analysis of emission sources and reassessment of application of reasonably available control technology (RACT). We would recommend this as a convenient opportunity to add information from the new method into program development. We would not recommend using the information from the new method to revise the analysis of the previous 1-hr ozone SIPs. We recognize that in some cases an existing RACT limit has been based on an identified technology, and that the data used to characterize the performance of that technology and establish the limits understated the total mass of VOC emissions. In such cases, EPA or a State cannot simply apply a new VOC test methodology to determine compliance with the old limit without evaluating the nature of the change in the method, because that could have the effect of making the limit more stringent and possibly forcing the installation of different control technology than that already established as RACT.
4. **State-based Programs.** Many States have developed complementary programs to enhance the effectiveness of their air pollution control efforts, such as cap and trade systems and emissions banking. Where these programs are based on State rules, we would adopt as a general principle that the individual State should determine the appropriate time for incorporating the information from the new method or if these rules are incorporated into an approved SIP, that the State should handle them as described in Item 3.

As the States make changes that affect these programs, they must maintain the integrity of the system that they use for accounting and tracking emission credits. Comparing prior emission reductions that were calculated on an as-carbon basis with planned emission increases expressed as total mass of VOC would be comparing “apples to oranges” and would generally result in requiring greater emissions reductions than are

needed to offset the planned emissions. If the information from the new method leads to a change in reported facility mass emissions, the State must develop a procedure for adjusting previous valuations so that there is a reasonable equivalence between emissions determined by using different methods. This will ensure that past emission reductions are not undervalued when compared to future emission increases and, similarly, that future emission reductions are not overstated. Although we have not yet fully evaluated all of the calculations involved, we believe that a system can be developed that will establish equivalence for offsets and reductions that meet the federal minimum requirements. We do not believe it is necessary, however, to revisit emission reduction credits that have already been used to offset emissions increases.

5. **Establishing Facility Emission Limits and Measuring Compliance.** Many emission limitations and periodic monitoring and reporting requirements are determined by State regulations or specified in State permits. We will defer to the individual State's judgment whether and at what time it is appropriate to revise their emission limits or operating permits to incorporate information from the new method. For sources who have received synthetic minor permits under Title V, we may consider information from the new method in reviewing the appropriateness of the permit prior to its renewal time. Facilities reassessing synthetic minor limits using VOCs estimates expressed in terms of the new method may no longer be considered minor sources and may be subject to major source rules going forward. Such sources may, however, choose to modify their operating conditions and accept permit limitations in order to remain minor sources.
6. **Completed BACT and Other Technology Determinations.** We would recommend that information from the new method be used to make decisions about future control technology. We would not recommend reopening past decisions where sources and regulators relied on the best data available at the time in deciding if and what control requirements applied.

I appreciate the ongoing work that the CRA is performing with us on investigating new methods for your industries. If you have questions about the process of developing and implementing the new methods, please contact Gary McAlister at (919) 541-1062.

Sincerely,

A handwritten signature in black ink, appearing to read 'W L Wehrum', with a long horizontal flourish extending to the right.

William L. Wehrum  
Acting Assistant Administrator