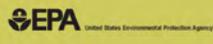


US EPA ARCHIVE DOCUMENT



MACT EEE Training Workshop

Dallas, Texas

November 3-7, 2008

AECOM

D.3 ADI Database

 EPA United States Environmental Protection Agency

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ADI Database

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ADI Database

- ADI – Applicability Determination Index
- US EPA’s Website at <http://cfpub.epa.gov/adi/>
- Interpretation Letters and Memoranda
- Computerized Database
- Can Search by Date, Office of Issuance, Subpart, Rule Citation, Control Number, or String Word Searches



During this module, we will discuss the Applicability Determination Index.

The Applicability Determination Index, or ADI, can be accessed at US EPA’s website at address “<http://cfpub.epa.gov/adi/>”. This website contains letters and memoranda issued by US EPA interpreting several rule categories. The ADI database can be searched by date, office of issuance, rule subpart, rule citation, the ADI control number, or by word searches.

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ADI Database

- Office of Enforcement and Compliance Assurance, Compliance Assessment and Media Programs Division maintains ADI database
- User Guidance on Review and Issuance of Applicability Determinations



The ADI database is maintained by OECA's, the Office of Enforcement and Compliance Assurance, Compliance Assessment and Media Programs division. The database has a user guidance document that provides instruction for review and issuance of the determinations in the ADI. The guidance document is available on line at the ADI website.

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Applicability Determination

- EPA currently issues over 100 letters or memoranda per year on Clean Air Act applicability or monitoring issues
- Programs covered include
 - New Source Performance Standards (NSPS, Part 60)
 - National Emission Standards for Hazardous Air Pollutants (NESHAP, Parts 61 and 63)
- These written responses termed “applicability determinations”



US EPA issues over 100 letters or memoranda each year covering Clean Air Act applicability and associated monitoring issues. The programs covered by the database are New Source Performance Standards (NSPS) promulgated at 40 CFR Part 60, National Emission Standards for Hazardous Air Pollutants (NESHAP) Parts 61 and 63. The letters and memoranda are responses to requests for determination and are termed “applicability determinations.”

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Applicability Determination

- General Provisions of Parts 60 and 61 provide that a source owner or operator may
 - request a determination of whether certain intended actions constitute the commencement of construction, reconstruction, or modification (“applicability determinations”); or
 - seek permission to use monitoring or record keeping which is different from the promulgated NSPS and NESHAP standards (“alternative monitoring”)



The General Provisions of Parts 60 and 61 provide that the owner or operator of a source may request a determination concerning whether certain actions constitute construction, reconstruction, or modification. These requests are requests for applicability determinations. Source owners or operators can also requests changes in monitoring or record keeping requirements that are different from the promulgated standards. These requests are called alternative monitoring.

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Applicability Determination

- EPA issues applicability determinations to a particular source pursuant to Part 63, even though the general provisions do not contain a specific provision under which source owners or operators may request determinations



US EPA uses the ADI database to issue applicability determinations for Part 63 issues, even though the General Provisions of Part 63 do not contain the provisions. Therefore, owners or operators may requests determinations of Part 63 requirements as well as for Parts 60 and 61.

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ADI

- To ensure national consistency in implementing NSPS and NESHAP programs, EPA Headquarters maintains a compilation of applicability letters and memoranda from first issue
- This compilation is the Applicability Determination Index (ADI) database Web site



US EPA maintains a compilation of letters and memoranda on applicability issues on the NSPS and NESHAP rules from the first issue to ensure consistency in implementing these rules. The compilation is embodied in the ADI database.

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- The ADI also contains “regulatory interpretations” which are written responses that apply to the broad range of NSPS and NESHAP regulatory requirements as they pertain to a whole source category; and applicability determinations issued pursuant to the chlorofluorocarbons (CFC) regulations, cited in Part 82



The ADI includes regulatory interpretations written by EPA in response to a broad range of NSPS and NESHAP requirements. The interpretations generally apply to an entire source category of the particular rule. In addition to the Parts 60, 61 and 63 interpretations, ADI also includes interpretations concerning chlorofluorocarbon regulations of Part 82.

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MACT EEE ADI

- As of 9/15/08, 24 entries in ADI
- Word file is 145 pages
- Areas Covered by Interpretation
 - Monitoring
 - OPL
 - Testing
 - Control



The ADI database, as of September 15, 2008, contained 24 entries for MACT EEE, the Hazardous Waste Combustor MACT. A download of these letters and memoranda comprises 145 pages of text. The areas that are most covered are monitoring, operating parameter limits, testing and control equipment.

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ADI for MACT EEE

- M070016 – Hydrogen Chloride CEM
- M060005 – Liquid-to-Gas Ratio Operating Parameter Limit
- M050030 – Stack Test Waiver for a Portland Cement Plant Kiln
- M070024 – OPL to ensure good operation of waste firing system, Liquid
- M070021 – Monitoring Procedure System and Time Delay for AWFCO
- M070018 – Monitoring of Scrubber System Solid Content



The next 5 slides list the 24 ADI entries for MACT EEE.

ADI for MACT EEE

- M050003 – Alternative Span for CO Monitors in High Oxygen Applications
- M070019 – Alternative Measure to Control Combustion Gas Leaks
- M050005 – Alternative Monitoring for Hazardous Waste Incinerator
- M070027 – Flue Gas or Production Gas Flow Rate, pH of the Scrubber Liquid
- M040020 – Waivers/Alt. Monitoring for Condenser/Absorber & Scrubber

ADI for MACT EEE

- M070026 – Data in lieu of (DILO), Operating Parameter Limits, DRE, Metal Feed Rate Extrapolation, Rolling Average Computation
- M060009 – Alternative Monitoring Plan for Hazardous Waste Combustor
- M040021 – Waivers/Alt. Monitoring for Condenser/Absorber & Scrubber
- M040019 – Waivers/Alternative Monitoring for Incinerator and Scrubber
- M040022 – Waivers/Alt. Monitoring for Condenser/Absorber & Scrubber

ADI for MACT EEE

- M070028 – Low Energy Scrubber minimum feed pressure, Rolling Averages for constituent feed rates, Air atomization pressure, Waste feed rate measurement
- M070030 – Scrubber systems solid content, Caustic Scrubber System liquid pressure drop limit, Liquid Feed Pressure limit to scrubber, Time delay for AWFCO during combustion system leak, Loss of HRA & 12-HRA calculating data historian system
- M070029 – Scrubber systems solid content, Liquid Feed Pressure limit to scrubber, Waiver to measure combustion gas flow rate, Loss of HRA & 12-HRA calculating data historian system

ADI for MACT EEE

- M070025 – HWC MACT Constituent Feed Rates, Maximum Baghouse Inlet Temperature, Bag Leak Detection System, Particulate Control, Operation of Waste Firing System
- M030062 – Alternative Monitoring for a Hazardous Waste Incinerator
- M030061 – Alternative Monitoring for a Hazardous Waste Incinerator
- M040004 – Alternative Monitoring for Automatic Waste Feed Cutoff
- M060008 – Alternative Monitoring Locations and Parameters