

M E M O R A N D U M

MEMO #: PS93-03

To: Stationary Sources Permitting and Enforcement Staff
From: Jim Geier
Date: March 1993
Subject: Burnout ovens

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We have had numerous applications for burnout ovens usually used in the automotive parts industry. These ovens are typically used to burn grease and paint/varnish off metal parts prior to repainting. Most times the emissions are below the levels which would require an APEN or permit, however, concern has existed as to whether we should classify these units as incinerators. Reg. 3 states that all incinerators must have a permit, and demonstrate that they can meet the emission standard of .1 gr/dscf.

1. Because the process does constitute incineration it is not practical to exclude these units from the incinerator classification.

Since most of these units have small emissions it will be our policy not to require stack tests to demonstrate compliance with the .1 gr/dscf standard.

2. If compliance problems are noted by inspectors, such as opacity violations, we will retain the authority to require stack tests on an as needed basis.

We do have copies of some stack test reports (see Jim Geier or Dennis Myers for a copy) which indicate that properly operated units can easily meet the .1 gr/dscf standard. Permits will include the grain loading standard.