

INTER-OFFICE COMMUNICATION

PS Memo #: PS96-007

TO: Stationary Sources Program and Local Agency Staff
FROM: Dennis M. Myers
DATE: September 26, 1996
RE: Emission Factor Change Issues and Final Approval
Asphalt Batch Plants and CO emissions

Many of the emission factors that have been used in the past for processing initial approval permits have been updated. In some cases, the emission factor change is significant. As a result, all permits that are having final approval processed should have the emission factors reviewed as a part of the FA process.

If the emission factors have increased from when the IA permit was processed, then the FA permit should incorporate the change in emission factors, and emission limits contained in the permit should be adjusted accordingly, unless the IA required stack testing and the testing conducted shows compliance with the emission limit in the IA permit. If the material throughput, fuel use, etc. have not changed, then the source will not be required to submit a revised APEN, even though the emissions have increased. The I&S group will need to be informed of the emissions change though, and a note should be added to the FA permit that the emission limits have been changed from the IA permit to reflect the most current emission factors available. If the source has exceeded the throughput limits on the permit, then a revised APEN would need to be filed.

It is possible that some of these emission factor changes could trigger major mods, the need for a OP permit, or the need to further restrict production, throughput, etc. in order to avoid OP requirements. In these cases the review engineer should inform his or her supervisor of the situation, so that the best way to proceed can be discussed.

In regard to asphalt plants and CO emissions, recent stack testing has shown that the CO emission factors listed in AP42 may be underestimating actual emissions. Data is very limited though, so at this point it is difficult to develop our own emission factors based on the testing that has been done. The best information currently available is as follows:

EF Source	CO (lbs/ton)			
	Oil	Batch N.Gas	Drum Oil	N.Gas

AP-42	.069	.34	.036	.056
Testing	nda	.819	.39	.55

nda= no testing data available

When reviewing applications for asphalt plants, please use the test data listed above, and inform the source of this. If the source objects, give it the option of having its CO emissions calculated based on AP-42, but require a stack test to verify. If the above testing data is used, a stack test would only be required if the source is close to the major source threshold for OP purposes.