

## Elizabeth Terranova

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**From:** Elizabeth Terranova  
**Sent:** Wednesday, November 1, 2023 7:35 AM  
**To:** Ferrando.Emily@epa.gov  
**Subject:** Dynamic Recycling, LLC, 40 CFR 60 NNN Baseline Temperature  
**Attachments:** Dynamic Recycling April 2018 (1).pdf; August 2019 baseline temperature letter.pdf

Dear Ms. Ferrando,

I am Elizabeth Terranova, a permit writer from Tennessee's Department of Environment & Conservation under the Division of Air Pollution Control. I am reaching out to you with a situation regarding 40 CFR 60 Subpart NNN: Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations.

The situation in question is an ethanol recycling facility, Dynamic Recycling, LLC, who had a distillation column that was source tested under the federal regulation back in 2018. However, when they did the source testing, the baseline temperature of the vent condenser was overlooked. A letter was later sent to the Division on August 26, 2019, with Dynamic Recycling stating the baseline temperature was 130 F based on calculations from the source test. This was accepted by the Division as a reasonable measurement at the time.

However, with how the EPA is becoming more stringent on the federal regulations, the facility adding a new source (a Wiped Film Evaporator - WFE), and the facility recording temperatures above the 130 F baseline temperature in the past two reports, the Division asked for either EPA approval of the baseline temperature or have the distillation columns retested under 40 CFR 60 Subpart NNN around the time the WFE is tested.

The facility chose to get the EPA's approval for the baseline temperature, and I wanted to reach out first to get some guidance on how the process works. I would appreciate any help on this matter.

I did attach the facility's 2018 Source Test for the distillation columns and the August 2019 letter that was sent to the Division. Let me know if there's any documentation from myself or from the facility that is needed in addition to those sent.

Thank you for your help!

Sincerely,



**Elizabeth Terranova** | Environmental Protection Specialist 2  
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Hours: M-F 7:30 am – 4 pm EST

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