

Elizabeth Terranova

From: Watson, Marion <Watson.Marion@epa.gov>
Sent: Thursday, November 2, 2023 10:17 AM
To: Elizabeth Terranova
Cc: Ferrando, Emily (she/her/hers)
Subject: [EXTERNAL] FW: Dynamic Recycling, LLC, 40 CFR 60 NNN Baseline Temperature

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Hi Ms. Terranova/Elizabeth,

I will review the information and the rule and get back with you soon. 😊

Thank you,

Tracy

Marion “Tracy” Watson, P.E. | Environmental Engineer |
Mail Code: 9T25
Air and Radiation Division
Air Analysis and Support Branch
Regulatory and Communities Air Toxics Section
U.S. Environmental Protection Agency, Region 4 | 61 Forsyth Street, SW | Atlanta, GA 30303
Voice: 404-562-8998 | Fax: 404-562-9059 | Email: watson.marion@epa.gov

From: Ferrando, Emily (she/her/hers) <Ferrando.Emily@epa.gov>
Sent: Wednesday, November 1, 2023 11:41 AM
To: Watson, Marion <Watson.Marion@epa.gov>
Subject: FW: Dynamic Recycling, LLC, 40 CFR 60 NNN Baseline Temperature

Hi Tracy,

I hope you're doing well! I received a question from one of TDEC's permit writers regarding getting EPA's approval for the baseline temperature of a unit subject to 40 CFR Part 60 Subpart NNN. I'm not familiar with the process for that and was wondering if you may be able to help provide some guidance for TDEC or point me in the right direction if you aren't the correct contact for this.

Thank you!
Emily

From: Elizabeth Terranova <Elizabeth.Terranova@tn.gov>
Sent: Wednesday, November 1, 2023 7:35 AM
To: Ferrando, Emily (she/her/hers) <Ferrando.Emily@epa.gov>
Subject: Dynamic Recycling, LLC, 40 CFR 60 NNN Baseline Temperature

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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

Chemicals, Food, and Wood Section

Division of Air Pollution Control

Knoxville Environmental Field Office

3711 Middlebrook Pike

Knoxville, Tennessee 37921

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Elizabeth.Terranova@tn.gov

tn.gov/environment

Hours: M-F 7:30 am – 4 pm EST

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