

Use of AP-42 Factors for Emissions Calculations

It appears to us that the draft permit continues the practice of using AP-42 factors for the calculation of emissions. The AP-42 document itself states that EPA does not recommend this practice, because “. . . using an AP-42 emission factor would result in half of the sources being in noncompliance.” (4A-02) It is our opinion that, for the sake of accuracy, emissions data should be initially derived from a test of the actual source (4A-03), such as that required by paragraphs 23 and 24, pages 6 and 7, of the draft permit.

For continued accuracy and safety beyond the initial boiler stack test, the permit should require continuous emission monitoring (4A-03) of the boiler stack's carbon monoxide (4A-05) output (correlatable with the presence of hazardous air pollutants which are products of incomplete combustion, recognized by means of the carbon monoxide presence). Use of the CO emissions data as a screening tool should then be required: statistically elevated CO emissions would indicate a change in operations and should prompt an investigation (by the source and/or the VDEQ) to determine the cause(s) and corrective action.