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Environmental Quality Board
P. O. Box 8477
Harrisburg, PA 17105-8477

RE: Measurement and Reporting of Condensable Particulate Matter Emissions

Dear Sir or Madam:

With this letter, Graymont (PA) Inc. ("Graymont") is providing formal comments on the proposed rulemaking contained in the *Pennsylvania Bulletin* Issue 42, Volume 4363 dated July 7, 2012.

Graymont is providing these comments, as instructed in Section J of the preamble, on the measurement and reporting of condensable particulate matter proposed as an amendment to Chapters 121 and 139 of "25 PA Code."

In the proposed rulemaking, the Board defines both filterable and condensable particulate matter to be consistent with Federal definitions. Also, the Board adopts EPA Methods 201A and 202 for measuring condensable particulate matter emissions from stationary sources.

Graymont believes that Methods 201A and 202 represent significant improvements for measuring fine particulate matter relative to the "older version" of the method. However, because accurate measurement of particulate matter becomes more and more difficult at low concentrations, Graymont requests that the Board adopt EPA Conditional Test Method (CTM) 039 as an equivalent alternate to Method 201A/202 for compliance demonstration purposes. Graymont proposes this for sources that have very low condensable PM permit limits because of the known issues associated with long sample runs of Method 202¹.

In general, CTM 039 has a particulate matter in-stack sizing device for the capture and speciation of PM10 and PM 2.5 (same as Method 201A). CTM 039 employs a dilution tunnel followed by a filter for the measurement of

¹ In order to obtain a representative catch weight it is expected that 2-3 hour sample runs will be required at some sources. Longer runs generally equate to high bias in Method 202 because the artifacts of reactions between SO₂, NH₃ and HCl have a longer time during the run, before the purge, to occur. Method 039 employs dilution of the stack gas to mimic atmospheric reactions and thus minimize particulate matter artifacts due to reactions of hot stack effluent on relatively cold glass impingers.

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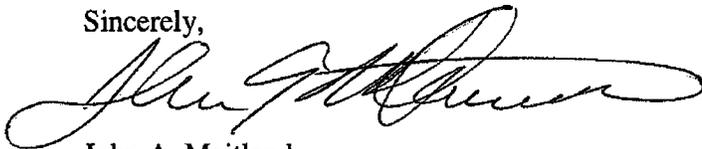
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condensable PM instead of "dry impingers" and filter as in Method 202. A complete description of the method can be found at the below reference².

In summary, Graymont requests that the Board adopt CTM 039 for sampling PM 2.5 (in addition to its adoption of Methods 201A and 202). Graymont believes CTM 039 more closely approximates actual atmospheric conditions associated with formation of condensable fine PM 2.5, and that measurement of these very low concentrations may require a more refined method such as CTM 039. Recent discussions with the USEPA³ indicate that CTM 039 provides similar results as EPA Method 201A/202 and that it should be an allowed alternate.

We very much appreciate the opportunity to provide these comments to the Environmental Quality Board. If you have any questions or comments related to this letter I may be reached at (814) 353-2106.

Sincerely,



John A. Maitland

Eastern U. S. Environmental, Health, and Safety Manager

Cc: Muhammad Zaman – PA DEP NCRO
Thomas Calhoun – PA DEP NCRO

² <http://www.epa.gov/ttn/emc/ctm/ctm-039.pdf>

³ Ron Myers, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards Sector Policy and Programs Division, Measurement Policy Group, D243-05, RTP NC 27711
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