

From: Phil Gordon
Sent: Thursday, October 07, 2004 11:52 AM
To: Jesse Goldsmith
Subject: STAR Program and Asphalt Plants

Jess, the asphalt association (PAIKY) has brought Pro-Tek into the fray on the STAR program. I am currently identifying all of the TACs that appear in AP-42 (not as easy or quick as I thought). As I identify all of these very, very small emission factors for the TACs, a thought occurred to me.

The STAR Program applies to facilities roughly based upon two criteria:

1. Title V source; and
2. FEDOOP source.

My question relates to this shotgun approach to regulation. To your knowledge, has anyone considered the fact that these types of facilities may be major or conditionally major for pollutants other than TACs, e.g., VOC or PM10? Some of them may not even emit TACs. I do know that using AP-42 emission factors, the emissions of TACs will be darn near negligible from an asphalt plant. It seems that these new regulations should only be triggered by a meaningful level of TAC emissions, not merely the fact that a source possesses a certain type of permit - a type of permit that may or may not have been required because the source emits TACs. Because compliance with the STAR Program will impose additional expenses on a source, it only seems fair that the regulations only impact those sources that can actually have an effect on the ambient concentrations of TACs (analogous to a MACT regulation). When the emission factor of a TAC from an asphalt plant is $3.9E-4$, based on traditional throughput levels, it is hard to believe that the plant can have much of an effect on ambient concentrations.

I am curious as to whether these issues have been discussed within the LMAPCD. We have a meeting scheduled with Art next week. I assume we will see you there.

Phil