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# ***OAR Box 1608***

*Prepped by Keeia Richards*

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***Document Number:***

**83) II-C-8**

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***Docket Number:***

**A-97-13**



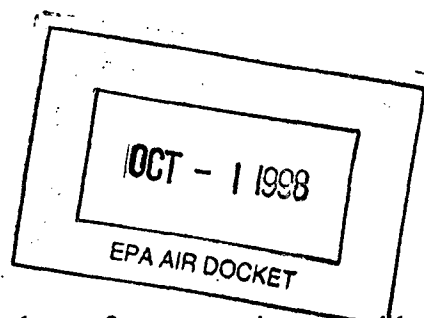
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

A-97-13  
II-C-8

MAY 12 1997

Mr. Herbert Barnett  
Plant Manager  
Fleishmann's  
2743 Riverport Road  
Memphis, TN 38109

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS



Dear Mr. Barnett:

The purpose of this letter is to first, thank you for your assistance with Mr. Klammer of the Midwest Research Institute (MRI) and second, is to provide you with some documentation that should give you some assurance of EPA's and MRI's obligations during the conduct of the testing. Finally this letter provides my understanding of the need for the testing as well as a request for your assistance.

As you know, the U.S. Environmental Protection Agency (EPA) has undertaken a program to develop national emission standards for hazardous air pollutants (NESHAP) for the Baker's Yeast Manufacturing industry that emit acetaldehyde from the production of yeast under Section 112 of the Clean Air Act (CAA), as amended November 1990. As part of this activity, we have evaluated several yeast production operations and associated air emissions including previous testing of emission by the industry. In the course of evaluating initially submitted testing information, differences in the techniques used to obtain the data results in concern as to the comparability of the testing methods and the data for establishment of an emission standard for your industry. As a result of EPA's analyses of the two emission test methods used in the industry, additional tests of two facilities to gather comparative test method data and acetaldehyde emissions versus production levels for standards development has been found necessary.

This is to formally notify you that based on our evaluations of the two proposed methods and the associated emissions data gathered previously, we have concluded that additional testing is necessary. In addition, emissions tests conducted at your facility would serve to provide information on the emissions potential in conjunction with obtaining an accurate comparison of the two available test methods under field conditions. Your cooperation in accommodating an emissions source test would be greatly appreciated.

Field testing would be conducted by an EPA designated contractor at the direction of a representative of EPA's Emission Measurement Center (EMC). The test contractor assigned to this test is Midwest Research Institute (MRI). The EMC test leader will be Mr. Gary McAlister.

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Mr. Klamm of MRI has met with you regarding the upcoming testing. The site survey is needed to determine the suitability of locations for sampling and to identify any modifications, such as the installation of sampling ports or scaffolding, that may be necessary. A site survey typically takes about a half day to complete.

As Mr. Klamm indicated to you, field testing is anticipated to be conducted in June and would require 5 to 7 days to complete. Testing would consist of nine paired test runs of one hour duration for each run for the individual three final phases of yeast production. The test team would consist of Mr. McAlister and six (6) persons for MRI (3 during the day and 3 during the night). One aspect of the testing program that is extremely important for assuring a relatively precise correlation of emissions to yeast production is the monitoring and recording of normal yeast production process parameters during the tests. Though arrangements could be made to have the EPA contractor monitor this information, I would be interested in the possibility of having a representative of your facility identify the appropriate parameters to monitor yeast production and conduct the monitoring during the testing. This latter opportunity to participate is based on your company's expertise as to the process and production of yeast. Please let me know your interest in lending your expertise and personnel to coordinated a emission test plan.

I also would like to provide some additional information to you regarding information gathering by the Agency. As noted, the authority for EPA's information gathering is included in Section 114 of the CAA (42 U.S.C. 7414). Enclosure 1 contains a summary of this authority. Enclosure 2 and 3 provide information regarding the handling of Confidential Business Information. Inclosure 4 provides information on EPA's designated agent. If you have any questions regarding this authority or this letter, please contact me at (919) 541-5439.

Sincerely,



Anthony P. Wayne  
Policy, Planning and Standards Group  
Emission Standards Division

Enclosure

cc: Gary McAlister, EMC/EMAD  
Rubin Deza, Maryland Dept. Of Air Management  
Roger Fritz, Wisconsin Department of Natural Resources  
Scott Klamm, MRI