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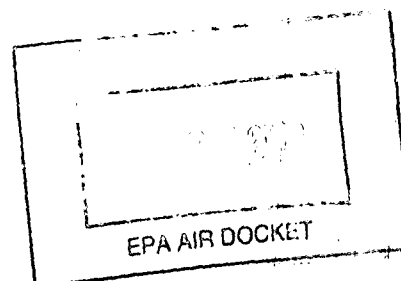
Docket Number:

A-97-59

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II-C-4UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

February 15, 1996

Ms. Kimberly Cutchins
National Peanut Council
1500 King St., Suite 301
Alexandria, VA 22314



Dear Ms. Cutchins:

The U.S. Environmental Protection Agency's Office of Air Quality Planning and Standards (OAQPS) has initiated a study to determine the emissions and the emission control practices currently being used by the Vegetable Oil Industry. The study will provide guidance to State and local agencies regarding the control of volatile organic compounds (VOC) for purposes of attaining the national ambient air quality standards for ozone. In addition, it will assist EPA to develop Maximum Achievable Control Technology (MACT) standards for hazardous air pollutants (HAPs) under authority of Section 112(d) of the Clean Air Act.

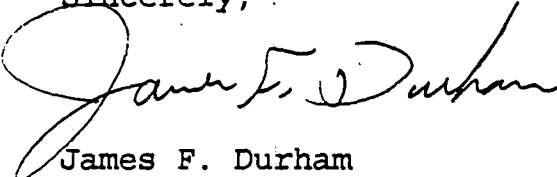
OAQPS plans to develop MACT standards for the vegetable oil industry through the "Presumptive MACT" process - a process of active participation among industry, regulatory agencies and other interested parties. As you may know, MACT standards must be based on the most efficient emission control practices currently in use within specific industries. Our review of the open literature and discussions with State and local regulatory agencies indicates that the available information is 10 to 15 years old and therefore may not represent current practices for minimizing solvent losses.

Therefore, certain basic information will be needed in order to make intelligent decisions regarding MACT standards. The enclosed draft questionnaire reflects our initial thoughts on such information. It solicits information to determine the current emissions, the relative importance of the various emission sources and the methods currently being used to control the emissions. Also, it asks for information regarding ownership, products and production rates in order to assess the economic impact of potential MACT standards. Lastly, the information on equipment age and design is intended to assist in determining if specific MACT standards are needed for certain plant designs rather than one standard for the entire industry.

Our plan is to distribute the questionnaire to each vegetable oil plant in the U.S. and to enter the reported information into a data file that would be available for general use but would be coded to protect confidential business information. We are soliciting your suggestions on improving the clarity and usefulness of the questionnaire.

I will call you in a few days to arrange for a teleconference or meeting to discuss the questionnaire. In the meantime please feel free to call me at 919/541-5672 if you have questions. Your assistance will be appreciated.

Sincerely,

A handwritten signature in cursive script, reading "James F. Durham". The signature is written in dark ink and is positioned above the printed name.

James F. Durham