March 27, 1998

Mr. Richard D. Wilson
Acting Assistant Administrator
Office of Air and Radiation (6101)
Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

Dear Mr. Wilson:

Enclosed are recommendations concerning direct-fired process heaters which have been developed by the Industrial Combustion Coordinated Rulemaking (ICCR) Federal Advisory Committee (a.k.a. ICCR Coordinating Committee). The Committee is submitting these recommendations to the Environmental Protection Agency (EPA) for EPA's consideration in the development of regulations under Sections 112 and 129 of the Clean Air Act.

The ICCR Coordinating Committee was established by the EPA under the Federal Advisory Committee Act (FACA) in September, 1996. The purpose of the Committee is to develop recommendations for consideration by EPA in the development of regulations for the following stationary combustion source categories: combustion turbines; internal combustion engines; industrial-commercial-institutional boilers; process heaters; and non-hazardous waste incinerators (excluding municipal waste combustors and medical waste incinerators). Sections 112 and 129 direct the EPA to develop regulations limiting emissions of hazardous air pollutants (and several criteria air pollutants) from these source categories by November, 2000.

To assist in efforts to develop recommendations for EPA, the ICCR Coordinating Committee has established seven Work Groups - one work group for each of the five source categories listed above, one for economic analysis, and one for emission testing and emission monitoring. In addition, where the Coordinating Committee considers it warranted, subgroups are established to examine an issue and develop recommendations for consideration by the Committee.

The Coordinating Committee met six times in fiscal year 1997 and, to date, has met twice in fiscal year 1998. Notice of all meetings of the Committee was published in advance in the Federal Register and all meetings were open to the public.

In March, 1997, the Coordinating Committee provided recommendations to EPA concerning information collection and an Information Collection Request (ICR). In November, 1997, the Coordinating Committee provided recommendations to EPA concerning the following areas: (1) the definition of the term "solid waste"for the purpose of regulations developed under Section 129 of the Act (Section 129 directs EPA to develop regulations for solid waste incinerators); (2) a list of hazardous air pollutants to test for in any additional emission testing the EPA might undertake for internal combustion engines, as well as recommendations for additional emission testing by EPA for internal combustion engines; and (3) a list of hazardous air pollutants to test for in any additional emission testing the EPA might undertake for combustion turbines.

In February, 1998, the Coordinating Committee met to discuss recommendations for consideration by EPA concerning direct-fired process heaters. At this meeting, the Coordinating Committee reached closure, as well as consensus on the enclosed recommendations.

Sincerely,

[Signed By]	[Signed By]
Richard F. Anderson, Ph.D.	Fred L. Porter
Stakeholder Co-Chair	EPA Co-Chair
ICCR Coordinating Committee	ICCR Coordinating Committee

cc: Bruce C. Jordan - Director, Emission Standards Division
John S. Seitz - Director, Office of Air Quality Planning and Standards

ICCR COORDINATING COMMITTEE RECOMMENDATION
DIRECT-FIRED PROCESS HEATERS

Both direct- and indirect-fired process heaters were included in the initial scope of the Industrial Combustion Coordinating Rulemaking (ICCR). However, EPA has established separate rulemaking projects for development of MACT standards for direct-fired process heaters and the ICCR Coordinating Committee recognizes that direct-fired process heaters will be addressed in these projects. Therefore, the Committee forwards the following findings and recommendations to EPA:

- The Committee recommends that EPA communicate to these direct-fired process heater MACT projects future findings and recommendations on controlling pollutants from combustion developed by the ICCR Coordinating Committee.

- The Committee also recommends that EPA refer back to the ICCR Coordinating Committee any direct-fired process heaters not adequately addressed by other MACTs.

- The focus of the Committee will be indirect-fired process heaters.

- The Committee recommends that direct-fired process heaters be addressed through the various source specific MACT rulemaking proceedings that the EPA is undertaking, and that the EPA do so in a timely manner.

- If, in the course of review and deliberations, a category of direct-fired process heaters that would not otherwise be addressed by the EPA is identified that appears to be an appropriate candidate for MACT standards then this category could be considered for inclusion in the ICCR.

BACKGROUND

Definition

Direct-fired process heaters are devices where the products of combustion mix with process materials and the combined emissions exit the same stack.

Statement of Issue

The ICCR Coordinating Committee has been discussing indirect- versus direct-fired process heaters for some time. Indirect-fired process heaters are within the scope of the ICCR, but some question whether direct-fired process heaters should be within the scope of the ICCR. In November, EPA staff assigned to the ICCR stated that their focus will be on indirect-fired process heaters at this time.

Considerations

Indirect-fired process heaters burn a fuel (gas, liquid or solid) or combination of fuel and waste (as defined by the solid waste subgroup) to produce heat or energy for a process. The products of combustion do not mix with the process. The emissions result only from the combustion of this fuel or waste. Indirect-fired process heaters should be addressed in their own category.

Direct-fired process heaters are much different. The products of combustion (from gas, liquid or solid fuels and/or waste) mix with the process emissions and exit from the same stack. Here are some facts that affect direct-fired process heater emissions:

1. There are a wide variety of processes that are included. These include lithographic ovens, paint drying ovens, asphalt batch plants, limestone driers, metal coil drying ovens, plastics manufacturing processes, chemical manufacturing process, polyester resin plants, reinforced fiberglass part curing ovens, farm and commercial grain and feed dryers, food related process dryers and ovens, secondary aluminum smelting furnaces and hundreds more.

2. Many of these direct-fired sources have their own industry specific MACT requirements due by November 15, 2000. Emissions from these direct-fired process heaters will be covered under these MACTs.

3. The emissions from all of these hundreds of processes vary with the type of process materials used, the type of fuels burned, and the type of control equipment applied to the source.

4. The emissions from direct-fired process heaters are source and industry specific. The only way to properly identify air pollutants that may be emitted from these source specific direct-fired process heaters is to have specific knowledge of the process and the raw materials used in that process.

5. The ICCR Coordinating Committee is technically prepared to address the emissions from the combustion of fuels and wastes, but does not have enough information to address air pollutants that may be emitted from the wide variety of direct-fired process heaters. The technical representation from the hundreds of industries using direct-fired process heaters in the ICCR is limited and not sufficient to address emissions from these direct-fired sources.