



REGION 7

LENEXA, KS 66219

October 14, 2025

Mr. Matthew S. McClure
Vice President Roofing Operations
SGI Annapolis Plant
1 Hillcrest Drive
Annapolis, Missouri 63620

Dear Mr. McClure:

In your June 25, 2025, letter you asked if Rotary Dryer RD-1 at Specialty Granules, LLC's Annapolis, Missouri facility is exempt from 40 Code of Federal Regulations Part 60 Subpart UUU's, Standards of Performance for Calciners and Dryers in Mineral Industries, daily Environmental Protection Agency Method 9 opacity monitoring requirements because the unit's actual particulate matter emissions are less than 11 tons per year.

Subpart UUU, at Section 60.734(a), requires affected facilities subject to this subpart that use a dry control device to comply with the mass emission standard to monitor opacity with a continuous opacity monitoring system. In lieu of a COMS, Section 60.734(b) allows roofing granules rotary dryers, like RD-1, and others to monitor emissions using daily Method 9 readings. The option for certain units to use daily Method 9 opacity reading in lieu of a COMS was a result of comments on the proposed rule and was discussed starting at 57 FR 44500 in the Federal Register notice promulgating the final rule on September 28, 1992. In that notice we said:

As a result of the analysis, the Administrator has determined that it is reasonable to require the installation of COMS's on all dryers and calciners of a certain type within an industry where the typical size unit of that type has **potential emissions** [emphasis added] after NSPS control equal to or greater than 22.7 Mg/yr (25 tons/yr) but greater than or equal to 10 Mg/yr (11 tons/y), the Administrator has determined that owners or operators may perform daily visible emissions observations in lieu of installing a COMS. The Administrator has also determined that typical units with emissions less than 10 Mg/yr (11 tons/yr) should be exempt from any monitoring requirements.

Per the preamble discussion, the final rule created Section 60.734(b) allowing Method 9 in lieu of COMS. The rule sets forth the types of units that typically have potential emissions that are less than 25 tons/yr and more than 11 tons/yr after NSPS control devices. This list includes roofing granules

rotary dryers. The final rule also created Section 60.734(c) which exempts certain types of units with potential emissions typically less than 11 tons/yr from the monitoring requirements.

“Calciners and Dryers in Mineral Industries – Background Information for Promulgated Standards”, EPA-450/3-85-025b, also discusses the final rule allowing Method 9 in lieu of COMS for some units and exempting other units. The discussion, in section 2.10.5, starts on page 2-37. It says that the analysis for creating the list of sources was based on a source’s **potential to emit** after application of all appropriate Federal regulations such as NSPS.

Therefore, we have determined that RD-1 is subject to the monitoring requirements of Section 60.734 and would either need to have a COMS or do daily Method 9 readings. The reason for this determination is that Section 60.734(b) specifically lists roofing granules rotary dryers. We would have to ignore the plain reading of Section 60.734(b) to determine RD-1 is not subject to the monitoring requirements.

Please contact Ward Burns, of my staff, at (913) 551-7960 or burns.ward@epa.gov if you have any questions regarding this letter.

Sincerely,

**AMY
BOOKE**

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AMY BOOKE
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Amy Algae-Booke
Supervisor
Air Permitting and Planning Branch
Air and Radiation Division

cc: Ms. Lindsay Boyd
Chief, Compliance and Enforcement Section
Air Pollution Control Program