



# **Mandatory Greenhouse Gas Reporting Rule: EPA's Response to Public Comments**

**Volume No.: 34**

**Subpart CC—Soda Ash  
Manufacturing**

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# **Subpart CC—Soda Ash Manufacturing**

**U. S. Environmental Protection Agency  
Office of Atmospheric Programs  
Climate Change Division  
Washington, D.C.**

## FOREWORD

This document provides EPA's responses to public comments on EPA's Proposed Mandatory Greenhouse Gas Reporting Rule. EPA published a Notice of Proposed Rulemaking in the Federal Register on April 10, 2009 (74 FR 16448). EPA received comments on this proposed rule via mail, e-mail, facsimile, and at two public hearings held in Washington, DC and Sacramento, California in April 2009. Copies of all comments submitted are available at the EPA Docket Center Public Reading Room. Comments letters and transcripts of the public hearings are also available electronically through <http://www.regulations.gov> by searching Docket ID *EPA-HQ-OAR-2008-0508*.

Due to the size and scope of this rulemaking, EPA prepared this document in multiple volumes, with each volume focusing on a different subject area of the rule. This volume of the document provides EPA's responses to the significant public comments received for 40 CFR Part 98, Subpart CC—Soda Ash Manufacturing.

Each volume provides the verbatim text of comments extracted from the original letter or public hearing transcript. For each comment, the name and affiliation of the commenter, the document control number (DCN) assigned to the comment letter, and the number of the comment excerpt is provided. In some cases the same comment excerpt was submitted by two or more commenters either by submittal of a form letter prepared by an organization or by the commenter incorporating by reference the comments in another comment letter. Rather than repeat these comment excerpts for each commenter, EPA has listed the comment excerpt only once and provided a list of all the commenters who submitted the same form letter or otherwise incorporated the comments by reference in table(s) at the end of each volume (as appropriate).

EPA's responses to comments are generally provided immediately following each comment excerpt. However, in instances where several commenters raised similar or related issues, EPA has grouped these comments together and provided a single response after the first comment excerpt in the group and referenced this response in the other comment excerpts. In some cases, EPA provided responses to specific comments or groups of similar comments in the preamble to the final rulemaking. Rather than repeating those responses in this document, EPA has referenced the preamble.

While every effort was made to include significant comments related to 40 CFR Part 98, Subpart CC—Soda Ash Manufacturing in this volume, some comments inevitably overlap multiple subject areas. For comments that overlapped two or more subject areas, EPA assigned the comment to a single subject category based on an assessment of the principle subject of the comment. For this reason, EPA encourages the public to read the other volumes of this document with subject areas that may be relevant to 40 CFR Part 98, Subpart CC—Soda Ash Manufacturing.

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## SUBPART CC–SODA ASH MANUFACTURING

### 1. DEFINITION OF SOURCE CATEGORY

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**Commenter Name:** Otto Schnauber

**Commenter Affiliation:** FMC Corporation

**Document Control Number:** EPA-HQ-OAR-2008-0508-0362.1

**Comment Excerpt Number:** 2

**Comment:** FMC has also developed an additional technique for producing soda ash from a liquid, alkaline feed stock rather than from trona ore. In this process the sodium bicarbonate fraction of the feed stock is converted to sodium carbonate by treatment with sodium hydroxide. Neither equation CC-2 nor equation CC-3 in Subpart CC §98.293 (c) are applicable to this production method, nor does the described process emit any CO<sub>2</sub>. Consequently, FMC requests that EPA exempt soda ash produced utilizing the described technique from all of the requirements of Subpart CC of the proposed rule.

**Response:** EPA has reviewed the information provided by FMC and agrees that this additional, non-emissive, method of manufacturing soda ash exists and does not fall under the definition of the source category. The definition of soda ash has been clarified to state that soda ash produced from a liquid alkaline feed stock is converted to sodium carbonate by treatment from sodium hydroxide is not subject to the requirements of Subpart CC. The facility could be covered under Subpart C (General Stationary Combustion) if it meets the requirements of either §98.2(a)(1) or (2).

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 22

**Comment:** IMA-NA requests that a subsection (a) be included in this definition section (98.298). IMA-NA believes that it is necessary for this proposal to include a definition for “Calcines.” (a) “Calcines” should be defined to mean the thermal and/or chemical conversion of the bicarbonate fraction of the feed stock to sodium carbonate.

**Response:** EPA has clarified the definition of the source category (§98.290) using the suggested text so that it is clear what “emissive processes” are covered by Subpart CC. We have used the text to clarify what “calcines” means in the context of Soda Ash Production.

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 8

**Comment:** §98.290: Definition of the source category: A soda ash manufacturing facility is any facility with a manufacturing line that calcines trona to produce soda ash. The definition above does not fully capture the definition of the term soda ash manufacturing facility. IMA-NA would like to propose the following language for §98.290: “A soda ash manufacturing facility is any facility with a manufacturing line that calcines trona, sodium sesquicarbonate, sodium bicarbonate, other CO<sub>2</sub> containing mineral, or liquid alkaline feedstock, to produce soda ash.”

**Response:** EPA agrees that the definition of soda ash manufacturing should be expanded to include sodium sesquicarbonate, which is trona. Upon further clarification, IMA-NA indicated that the other likely CO<sub>2</sub> containing minerals, other than sodium bicarbonate used in soda ash production are weghsneiderite (Na<sub>2</sub>CO<sub>3</sub>·3NaHCO<sub>3</sub>) and nahcolite (NaHCO<sub>3</sub>). However, IMA-NA indicated that the current equations CC-2 or CC-3 are not appropriate for estimating emissions from sodium bicarbonate or other CO<sub>2</sub> containing minerals in general because the ratio "factors" in the equations are based on the ratio of CO<sub>2</sub> released to convert trona to soda ash, not other minerals. EPA needs further information before it can expand the rule and include an appropriate method. At this time, EPA had decided not to require reporting of emissions from use of these other CO<sub>2</sub> containing minerals or sodium bicarbonate to produce soda ash.

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## 2. REPORTING THRESHOLD

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**Commenter Name:** Matthew Frank

**Commenter Affiliation:** Wisconsin Department of Natural Resources

**Document Control Number:** EPA-HQ-OAR-2008-0508-1062.1

**Comment Excerpt Number:** 16

**Comment:** It appears as though the one Wisconsin facility in this NAICS category would not be covered under Subpart CC, based on its permit, and thus would not be required to report under this rule. The Department questions whether this is EPA's intent.

**Response:** Based on the information provided, EPA cannot determine whether the facility described by the commenter would be covered under Subpart CC. The facility will be covered under Subpart CC if it falls within the definition under §98.290 and meets the requirements of either §98.2(a)(1) or (2). The facility may also be required to report under this rule under Subpart C (General Stationary Combustion). Please review the section III of the preamble to this rule (see section C, General Stationary Combustion).

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### **3. SELECTION OF PROPOSED GHG EMISSIONS CALCULATION AND MONITORING METHODS**

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**Commenter Name:** Otto Schnauber

**Commenter Affiliation:** FMC Corporation

**Document Control Number:** EPA-HQ-OAR-2008-0508-0362.1

**Comment Excerpt Number:** 1

**Comment:** FMC operates facilities near Green River, Wyoming and has been the leader in developing techniques for producing soda ash from naturally occurring trona deposits. Two of these techniques (the Sesqui process and the Mono process) use trona ore supplied from the company's underground mining operation co-located with its production facilities. The methodology applicable for calculating CO<sub>2</sub> emissions from these processes is described in Subpart CC §98.293 (c) of the proposed rule. (Note: separate industry comments have been submitted with regard to specific errors with the equations contained in §98.293 (c).) A third technique utilizes an alkaline solution that is pumped from the underground mine. This alkaline solution, called mine water, results from naturally occurring influent to the mine and from fluid injected into mine voids to enhance recovery of the trona mineral. In the 1990s FMC developed and patented procedures for producing soda ash directly from mine water and other alkaline solutions. The company's ELDM plant that was subsequently built to utilize this technology is unique in the industry and the methodology proposed for calculating CO<sub>2</sub> emissions proposed in Subpart CC §98.293 (c) is not applicable for this facility. Equation CC-2 is not applicable for the ELDM plant because no trona ore is used by this plant. Equation CC-3 is not applicable because it assumes soda ash production from trona ore. At the ELDM plant CO<sub>2</sub> is emitted from a single point source that receives input from two process vents. If EPA wishes to include the process CO<sub>2</sub> emission associated with soda ash production from the ELDM plant, then an appropriate calculation method must be allowed. In that case FMC proposes the following: 1. Conduct a CO<sub>2</sub> emission test from the point source utilizing appropriate EPA reference test methods. Measure and record the flow data from each of the process vents during the course of the CO<sub>2</sub> emission test. 2. Prepare a CO<sub>2</sub> emission factor based on the test results and corresponding process vent flow data. 3. Perform continuous monitoring and recording of the flow data from each vent during the course of the year and compute the average flow rate for each vent. Sum these values to obtain the total average vent flow rate for the year. 4. Calculate the annual CO<sub>2</sub> emission based on the CO<sub>2</sub> emission factor and the total vent flow rate.

**Response:** A response has been provided in section III of the preamble to this rule (see section CC, Soda Ash Manufacturing).

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### **4. DETAILED GHG EMISSION CALCULATION PROCEDURES/EQUATIONS IN THE RULE**

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1



**Comment Excerpt Number: 10**

**Comment:** The proposal uses equations CC-2 and CC-3 to calculate the annual CO<sub>2</sub> process emissions. IMA-NA believes that it is inappropriate to use the fraction 44/12 in these equations. Including a correction factor for the ration of carbon dioxide to carbon (44/12) is unnecessary. In equation CC-3, the input for (ICs)<sub>n</sub> using ASTM E359 provides decimal fraction for alkalinity or sodium carbonate (Na<sub>2</sub>CO<sub>3</sub>) not for carbon. Therefore it is not appropriate to use the 44/12 fraction, as it would artificially inflate the CO<sub>2</sub> level by 3.67 times the actual amount. Thus, the factor must be removed from the equations. IMA-NA would like to propose that the factor (44/12) be removed from any equation used to calculate soda ash process emissions. Furthermore, IMA-NA would request that all descriptions of this factor be removed from this section of the proposal. IMA-NA would like to propose that this section be modified as follows: “Calculate the annual CO<sub>2</sub> process emissions from each manufacturing line using either Equation CC-2 or CC-3 of this section. [See submittal for revised equations suggested by commenter]” Equation CC-3 does not address plant inefficiencies and will result in under-reporting of CO<sub>2</sub> unless an efficiency factor is included that is specific to each manufacturing line. IMA-NA proposes that each manufacturing facility be given the latitude to provide site specific efficiency factors. These factors must be treated as confidential business information.

**Response:** A response has been provided in section III of the preamble to this rule (see section CC, Soda Ash Manufacturing).

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 9

**Comment:** IMA-NA believes that there are significant errors in both the CC-2 and CC-3 equations defined in this section on how the industry should calculate GHG emissions. More specifically, the terms for “E<sub>k</sub>” and “n” are in need of modification. The definition for E<sub>k</sub> currently states “E<sub>k</sub> = Annual CO<sub>2</sub> process emissions from each calciner (kiln), k (in metric tons/ year), using either Equation CC–2 or CC– 3.” IMA-NA would like to propose the following modification to this definition: “E<sub>k</sub> = Annual CO<sub>2</sub> process emissions from each manufacturing facility, k (in metric tons/year), using either Equation CC-2 or CC-3.” The definition for n currently states “n” = Number of calciners (kilns) located at the facility.” IMA-NA would like to propose the following modification to this definition: “n = Number of manufacturing lines located at the facility.”

**Response:** EPA agrees that the definition of “E<sub>k</sub>” and “n” in Equations CC-2 and CC-3 should be modified. EPA agrees that, for the purposes of this rulemaking, collecting data across manufacturing lines, as opposed to at the kiln level, is more consistent with business practices at soda ash facilities. A manufacturing line may include one or more kilns. EPA revised the rule text where applicable by modifying the equation terms “E<sub>k</sub>” and “n” so that k represent emissions from a manufacturing line and “n” represents the number of manufacturing lines, respectively.

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 11

**Comment:** ASTM D4839 is not a method commonly used in the industry. The correct ASTM to use in terms of CO<sub>2</sub> released would be ASTM E359, as it is an industry standard to do so. IMA-NA requests that equation CC-2 be modified as follows: ASTM E359 assay \* 1.421 \* Trona Tons \* 2000/2205 \* 0.097 = metric tons of CO<sub>2</sub>. It is necessary to also define the term 1.421. The definition can be placed at the end of §98.293 (c) below the definition for “0.138/1.” The number 1.421 in the equation should be defined as follows: “0.138/1 = Ratio of ton of CO<sub>2</sub> emitted for each ton of natural soda ash produced; 1.421 = the conversion formula for molecular weight from soda ash to trona.” When including the equations above, we feel it is important to note that certain industry facilities produce soda ash using liquid feed stocks rather than from dry-mined trona ore. If these facilities are to be included in Subpart CC, then an alternative method for calculation of CO<sub>2</sub> emissions from the facilities will be necessary since neither Equation CC-2 nor CC-3 is appropriate.

**Response:** EPA agrees that ASTM E359 is the correct ASTM standard to use and has retained references to this method, but removed references to ASTM D4839 under 98.294 “Monitoring and QA/QC procedures. However, EPA disagrees that the conversion factor “1.421” is needed in Equation CC-2. The conversion factor duplicates the existing conversion factor and would introduce error if applied again. EPA, therefore, has not included the conversion factor “1.421” in Equation CC-2. Also see the response to comment EPA-HQ-OAR-2008-0508-0362.1, excerpt 1.

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## **5. MONITORING AND QA/QC REQUIREMENTS**

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 13

**Comment:** ASTM E359-00(2005) describes a manual titration method, using a methyl orange endpoint, for determining the total alkalinity of soda ash. Procedures that use autotitrators with fixed endpoint titration are commonly used in the industry and should be allowed as an acceptable (equivalent) alternative. Examples of industry standards for determining total alkalinity of soda ash are in the attached appendix. [See DCN:EPA-HQ-OAR-2008-05080705.1] IMA-NA would like to propose that the words “or equivalent” be added after “ASTM E359-00 (2005).” “If you calculate CO<sub>2</sub> process emissions based on soda ash production, you must determine the inorganic carbon content of soda ash using ASTM E359-00 (2005), or equivalent. The inorganic carbon content of soda ash can be directly expressed as the total alkalinity of the soda ash.”

**Response:** A response has been provided in section III of the preamble to this rule (see section CC, Soda Ash Manufacturing). EPA reviewed the examples submitted by IMA-NA and agrees that that suitable autotitrators may be used while conducting ASTM E359 to obtain comparable data. The revised text states that although “ASTM E359-00(2005)e1 uses manual titration, suitable autotitrators may also be used for this determination.”

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 12

**Comment:** The daily sampling requirement of each line is an unnecessary and potentially extremely costly requirement. The testing should be completed as a weekly composite analysis which would then be used in calculating the monthly average. IMA-NA would like to propose the following modification to this section: “You must determine the inorganic carbon content of the trona or soda ash by using a weekly composite analysis which would then be used in calculating the monthly average value for each soda ash manufacturing line.”

**Response:** A response has been provided in section III of the preamble to this rule (see section CC, Soda Ash Manufacturing).

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 14

**Comment:** The weighing of soda ash at truck or rail loadout points is a measure of soda ash shipped, not soda ash produced. Soda ash facilities typically have storage silos and the amount of soda ash produced in a given month incorporates the amount of soda ash shipped plus silo storage. Silo reconciliation must be included if monthly production data are to be comprehensive. There is currently no practical alternative to this. The reconciliation of trona mined versus what is measured on belt scales is common and must be taken into account for accurate reporting purposes. IMA-NA would like to propose the following changes to this section: strike the words “using either belt scales or by weighing the soda ash at the truck or rail loadout points of your facility,” and put a period “.” after the word “basis.” “You must measure the mass of trona input or soda ash produced by each soda ash manufacturing line on a monthly basis.” IMA-NA would also like to propose that the following sentences then be added: “The mass of trona input using belt scales may be adjusted based on reconciliation with data derived from underground surveying of mined out trona deposits and/or above ground surveying of trona stockpile mass quantities. The mass of soda ash produced as determined by weighing the soda ash at the truck or rail loadout points may be adjusted based on data derived from reconciliation with silo inventories.”

**Response:** EPA agrees that the current rule language does not sufficiently reflect the methodologies used by soda ash facilities to estimate quantities of trona consumed or soda ash produced. For the purposes of this rulemaking, allowing these methods for estimation of trona or soda ash will not result in significant loss of accuracy. In order to included the mass measurement procedures occurring at soda ash manufacturing facilities raised in the comment, we have revised the rule text under 98.294 “Monitoring and QA/QC procedures” with more general language stating that trona and soda ash must be measured on a monthly basis using “plant instruments or methods used for accounting purposes.” Following this statement we have added the recommend language for reconciling trona consumed and adjusting mass of soda ash produced verbatim.

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## **6. PROCEDURES FOR ESTIMATING MISSING DATA**

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 16

**Comment:** Section 98.295 calls for a complete record of all measured parameters used in the GHG emissions calculations. There needs to be a provision made for equipment malfunction or other instances that may lead to data unavailability. A 100 percent data requirement is not only unrealistic, but also is a requirement that has never been made in any situation similar to this one by EPA. IMA-NA would request that the data requirement be 95 percent, as that is a much more reasonable and appropriate level. That being said, if the proposal made by IMA-NA under §98.294 (a) on page 6 of these comments were accepted by EPA and the testing requirements for determining the inorganic carbon content of trona or soda ash be done on a weekly composite basis rather than a daily basis, the 100 percent data requirement would be acceptable.

**Response:** EPA has revised §98.295 to address the issues raised and allow for missing data. We agree that while some of this data should be readily available and collected as a part of normal business practices, circumstances could arise where data could be missing.

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## **7. DATA REPORTING REQUIREMENTS**

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 20

**Comment:** This provision (98.296(f)) should be eliminated from the proposed rule. This data is not used in any of the calculations. The reporting requirements should be deleted or an explanation provided for requiring its inclusion. If the data must be reported, then a definition of “operating hour” is needed as it applies to soda ash processing lines.

**Response:** EPA needs information on a soda ash manufacturing line’s annual operating hours for use in an additional equation we have added to the rule text under 98.296. The annual operating hours of a soda ash manufacturing line are a necessary element in Equation CC-6 and, therefore, are required to be reported and retained (see the response to comment EPA-HQ-OAR-2008-0508-0362.1, excerpt 1). In general, a record of annual operating hours is needed for verification of emissions estimates. Such information can help identify any anomalies in the reported emissions due to temporary shutdowns for repairs or maintenance. Note: we have updated the rule text to request operating hours for each soda ash manufacturing line.

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 17

**Comment:** IMA-NA would request that the line “and annual soda ash production capacity” (in 98.296(e)) be struck from the proposal. The capacity level is irrelevant to the total amount of greenhouse gases emitted, and thus there is no purpose in including this in any report. The line should read: §98.296 (c) Data Reporting Requirements – Annual soda ash production (metric tons) Furthermore, reporting of annual soda ash production should only be required if emission data are based on soda ash production rather than trona consumption. Annual soda ash production, if reported, must be treated as confidential business information.

**Response:** EPA disagrees with the comment. Both production of soda ash and trona consumed are parameters in the methods to calculate emissions. Both are needed regardless of method to verify whether the estimates are reasonable of the reported emissions. If you use trona consumption to estimate CO<sub>2</sub> process emissions, you can verify that these reported emissions are reasonable based on the quantity of soda ash produced, or vice versa. Similarly, production capacity can help EPA assess whether the reported emissions fall within a reasonable range. The reported process CO<sub>2</sub> emissions from Soda Ash production should not exceed estimated emissions based on production capacity of soda ash. See the preamble section II for the response on the emissions verification approach. Also, see the preamble for the general discussion of CBI.

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 19

**Comment:** IMA-NA requests that the words “daily measurements and” (in 98.296(e)) be struck, and for the second line to read: “of trona or soda ash by monthly average depending on the components...” Also, the proposal incorrectly states that fractional purity (i.e., organic carbon content). This line should instead read as follows: “Data Reporting Requirements – Fractional purity (i.e., inorganic carbon content)... “Data Reporting Requirements – Fractional purity (i.e.

inorganic carbon content) of trona or soda ash by monthly average depending on the components used in Equation CC-2 or CC-3 of this subpart. This data should be treated as confidential business information.”

**Response:** EPA agrees and has corrected the data reporting requirements. The reporting requirement should request fractional purity in terms of “inorganic carbon contents” not “organic carbon contents.” Further we agree this parameter should be reported according to the methodology used. If you estimate emissions based on trona consumed – the reported value should correspond to the fractional purity of trona, not soda ash. See the preamble for the response on CBI.

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 18

**Comment:** The reporting of annual trona consumption should only be required if CO<sub>2</sub> emission data are based on that parameter rather than on soda ash production. Annual trona consumption, if reported, must be treated as confidential business information.

**Response:** See the response to comment EPA-HQ-OAR-2008-0508-0705.1, excerpt 17. See the preamble for the response on the emissions verification approach. See the preamble for the response on CBI.

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## **8. RECORDS THAT MUST BE RETAINED**

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 15

**Comment:** IMA-NA would like to propose this section be modified as follows: “You must keep a record either of all trona consumed or soda ash produced depending upon the CO<sub>2</sub> calculation methodology chosen. You also must document the procedures used to ensure the accuracy of the monthly measurements of trona consumed or soda ash production.”

**Response:** EPA has decided to retain these recordkeeping provisions for verification purposes as they are also essential calculation parameters. Having data on both quantities of trona consumed and soda ash produced can help EPA verify and assess the reasonableness of the emissions estimates reported. See the response to comment EPA-HQ-OAR-2008-0508-0705.1, excerpt 17.

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**Commenter Name:** Chris Greissing

**Commenter Affiliation:** Industrial Minerals Association - North America (IMA-NA)

**Document Control Number:** EPA-HQ-OAR-2008-0508-0705.1

**Comment Excerpt Number:** 21

**Comment:** This provision (98.297(d)) should be eliminated from the proposed rule. This data is not used in any of the calculations. The reporting requirements should be deleted or an explanation provided for requiring its inclusion. If the data must be reported, then a definition of “operating hour” is needed as it applies to soda ash processing lines.

**Response:** See the response to comment EPA-HQ-OAR-2008-0508-0705.1, except 20.

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## **9. OTHER SUBPART CC COMMENTS**

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**Comment:** Generally across the rule, commenters requested clarification on use of standards and in some cases proposed alternative standards for determining particular parameters used to estimate emissions.

**Response:** For Subpart CC, we decided to specify the use of a specific ASTM standard for a key calculation parameter (inorganic carbon contents of trona or soda ash) and allow flexibility in application of this method per public comments (i.e. use of autotitrators). For other key parameters, EPA has not prescribed specific methods, but provided guidance, requiring that facilities use methods and/or plant instruments used for accounting purposes. Where we have prescribed specific methods, there are few methods for determining inorganic carbon contents of trona or soda ash. We have prescribed a standard that the industry recommended and uses on a regular basis as to minimize burden. For the purposes of this rulemaking, use of this method ensures consistency in the determination of key parameters and calculated emissions from the soda ash manufacturing industry.