



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

FEB 17 1994

OFFICE OF  
WATER

MEMORANDUM

SUBJECT: Monitoring of Total Hydrocarbons by Sewage Sludge Incinerators

FROM: Michael B. Cook, Director *Michael Cook*  
Office of Wastewater Enforcement and Compliance

TO: Water Management Division Directors  
Regions I - X

This memo addresses the February 19, 1994, date for compliance with the total hydrocarbon (THC) emissions limitation for sewage sludge incinerators. The Clean Water Act requires compliance with the sewage sludge regulations issued pursuant to section 405, no later than one year after publication of the regulations (February 19, 1994), unless compliance requires the construction of new pollution control facilities, in which case the date is extended for no more than one year.

The sewage sludge regulations (40 C.F.R. Part 503 Standards for the Use or Disposal of Sewage Sludge) require that the monthly average concentration for THC emissions from a sewage sludge incinerator stack not exceed 100 ppm "when measured using the instrument required by section 503.45(a)." Section 503.45(a) requires monitoring of THC emissions using an instrument that is installed, calibrated, operated, and maintained "as specified by the permitting authority." Consequently, until the permitting authority (EPA or an authorized State) specifies the section 503.45(a) conditions for a THC monitor, compliance or non-compliance with the THC emissions limitation cannot be determined.

A permit or a rulemaking is required to make specific section 503.45(a) conditions binding on the regulated community. This office plans to propose a rule soon that would specify the conditions for installing, calibrating, operating, and maintaining THC monitors. EPA will also propose a deadline for how quickly facilities must comply with this requirement. Given the fact that operators have had almost a year now to purchase THC monitors, we are considering a period of less than a year for facilities to come into compliance.



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This office recently sent each Region a draft of a Headquarters continuous emissions monitoring (CEM) document for comment. This document will serve as the basis of the proposed federal register notice.

If you have any questions please call Cynthia Dougherty at (202) 260-9545 or have your staff contact Wendy Bell at (202) 260-9548.

cc: Regional Permits Branch Chiefs