

Air Toxics Program Update

*Presented at the
2004 SBO/SBAP Conference
June 3, 2004*

Keith Barnett

U. S. Environmental Protection Agency
Small Business Issues Coordinator for
The Emissions Standards Division

barnett.keith@epa.gov

919-541-5605

Overview

- Recently Completed Rulemakings
- Residual Risk Program
- Area Source Program
- Title V Program – Area Source Deferrals

MACT Standards Signed in February 2003

- Coke Ovens: pushing, quenching & battery stacks
- Brick, Structural Clay Products, & Clay Ceramics Manufacturing
- Integrated Iron & Steel
- Reinforced Plastic Composites Production
- Flexible Polyurethane Foam Fabrication Operations
- Hydrochloric Acid Production Industry/Fumed Silica Production
- Asphalt Roofing & Processing
- Metal Furniture (Surface Coating)
- Engine Test Cells/Stands
- Semiconductor Production
- Refractory Products Manufacturing
- Wood Building Products (Surface Coating)
- Fabric Printing, Coating & Dyeing

MACT Standards Signed in August 2003

- Lime Manufacturing
- Miscellaneous Organic Chemical Manufacturing (MON)
- Miscellaneous Coating Manufacturing
- Organic Liquids Distribution
- Iron & Steel Foundries
- Combustion Turbines
- Plastic Parts (Surface Coating)
- Miscellaneous Metal Parts & Products (Surface Coating)
- Site Remediation
- Taconite
- Primary Magnesium
- Metal Can
- Chlorine Production

MACT Standards Signed in February 2004

- Industrial, Commercial & Institutional Boilers & Process Heaters
- Reciprocating Internal Combustion Engines (RICE)
- Plywood & Composite Wood Products
- Automobile & Light Duty Truck Mfg. (Surface Coating)

Residual Risk Program

- Follow-up to Technology Standards
- 8 Years After a MACT is Promulgated, a Risk-Based Standard Must Be Set if Any Remaining (“Residual”) Risk

RESIDUAL RISK PROGRAM

- Complete current standards with court ordered deadlines
 - Coke Ovens – final 2005
 - Dry Cleaning – final 2006
 - HON – final 2006
 - Halogenated Solvents – final 2006
- Complete 4 proposals of no further controls by end of 2005
 - Industrial cooling towers
 - Magnetic tape
 - Ethylene oxide sterilizers
 - Gasoline distribution

Some Key Points on Residual Risk

- We are looking for simple ways to do residual risk
- We believe that many facilities will be able to opt out in the initial screening

Total Facility Low Risk Determination

- Facilities can show low risk and avoid future RR standards
- Evaluation based on facilitywide HAP emissions
- Determine cancer & noncancer risk to most exposed individual, and significant ecological impacts
- Analysis based on Site-Specific Risk Assessment Technical Guidance Document (Volume 2)
- Will implement through rulemaking

Urban Air Strategy - Area Sources

- Area sources are those with potential to emit less than 10 tpy for a single HAP and less than 25 tpy for combined HAP
- Collectively, area sources are important air toxics contributors especially in urban areas
 - Represent about 50 percent of national stationary source emissions
 - Many emit air toxic metals which are also fine PM
- However, individual area sources are small emitters, many sources emit less than 100 pounds of HAP

Clean Air Act Requirements

- Create a strategy to control air toxics emissions from area sources in urban areas
- Identify not less than 30 HAP that represent the greatest threat to public health
- List area source categories representing at least 90 percent of the emissions of the listed HAP
- Achieve at least a 75-percent reduction in risk attributable to area source emissions

Status - Area Sources

- 15 standards have been promulgated for 15 area source categories
- 55 source categories remain to be addressed
 - 5 standards have consent decree dates agreed upon with Earth Justice
 - All standards will be initiated by October 2006

Area Source Characteristics

- There are numerous facilities (many small businesses)
- Most sources have not been regulated before
- Most sources are difficult to locate
 - Most are not included in existing inventories
 - Most are not required to report under SARA Title III
 - Many are not represented by trade associations
- There are typically small amounts of emissions per facility

Area Source Voluntary Program

- We are developing a program of voluntary initiatives to obtain air toxic emission reductions from area sources in urban communities
- The initiatives will be developed with the assistance of industry trade associations or similar organizations
- This initiative is being developed to complement the rulemaking process – not replace it
- The programs will be self-certifying

Exemption of Area Sources from Title V Permitting

- Six categories of area sources are currently deferred from title V permitting
- We intend to propose that five of the six will be continue to be exempted - the exception will be secondary lead smelting
- Schedule
 - Propose Summer 2004
 - Final – Winter 2004/5