2005 SBO/SBAP National Conference

Addressing Upcoming Area Source NESHAP

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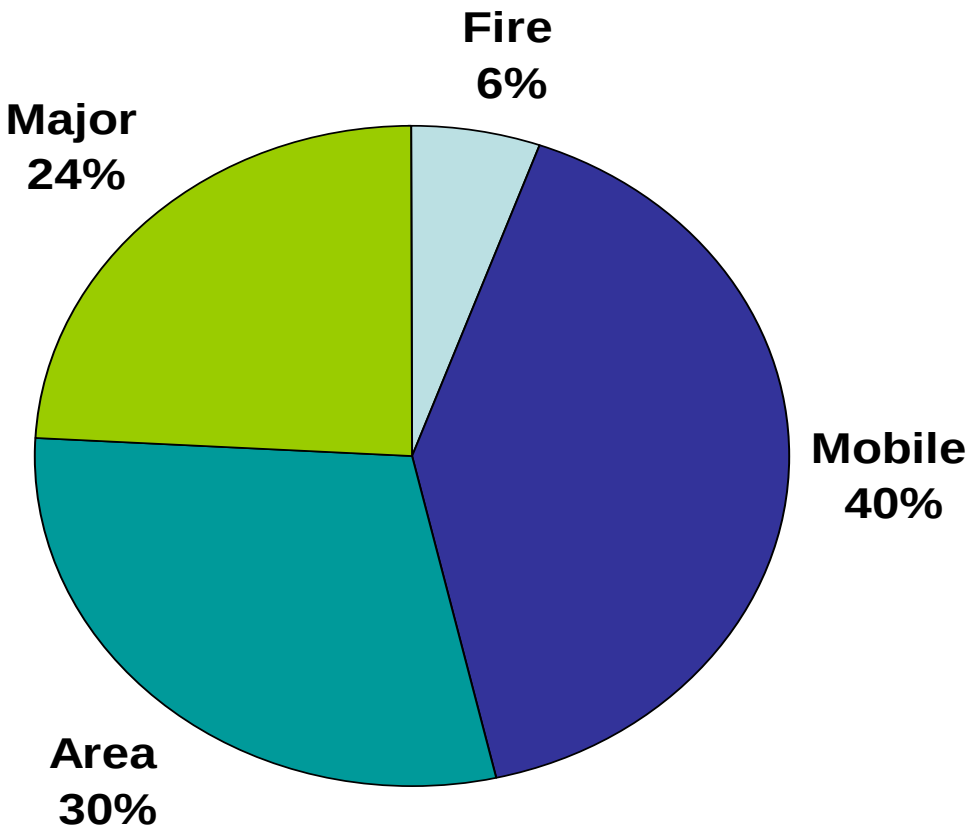
Background

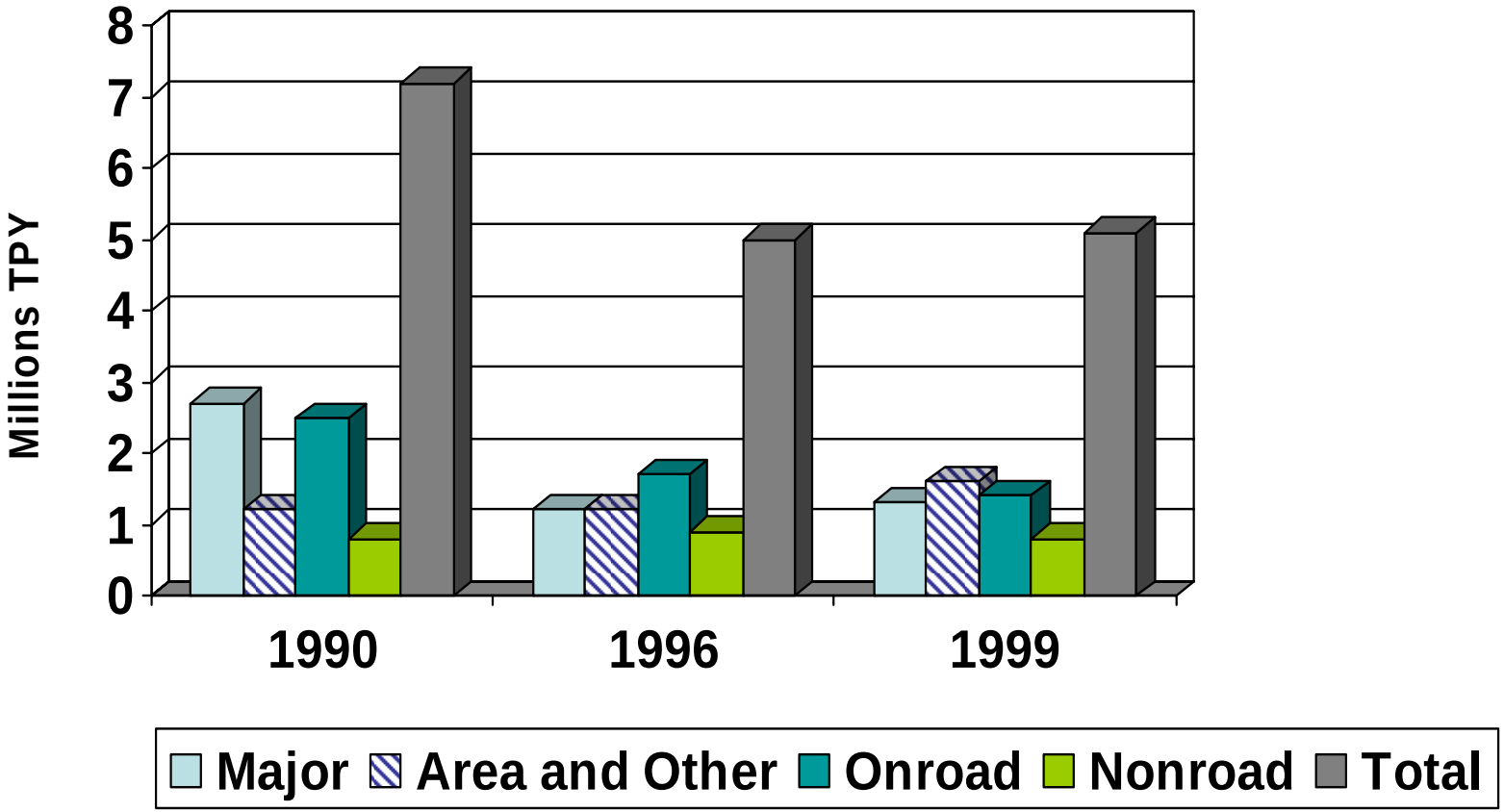
- Individually area sources are small emitters
  - Many sources emit less than 100 pounds of HAPs
- There are numerous facilities
  - Sources are difficult to locate
  - Many are small businesses
  - Most have not been regulated before
- Many sources emit fine particulate matter, precursors for ozone, and lead
- Collectively, these sources are important toxic contributors in urban areas

Area Source Emissions



5.1M tons (1999)

Area Source Emissions



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

- The Integrated Urban Strategy was published July 19, 1999 (64 FR 38706)

- 70 source categories have been listed
  - Listing was completed in November 2002
  - Most source categories were prioritized via a toxicity weighting analysis (i.e., multiplied tons of each HAP emitted by a source category by the potency of each HAP)

Status

- 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
  - Schedule for the remaining source categories in litigation
  - Court decision expected late 2005

HAP Representing Highest Risk in Urban Areas

acetaldehyde	hexachlorobenzene
acrolein	hydrazine
acrylonitrile	lead compounds
arsenic compounds	manganese compounds
benzene	mercury compounds
beryllium compounds	methylene chloride (dichloromethane)
1,3-butadiene	nickel compounds
cadmium compounds	polychlorinated biphenyls (PCBs)
chloroform	polycylic organic matter (POM)
chromium compounds	quinoline
1,2-dichloropropane (propylene dichloride)	2,3,7,8-tetrachlorodibenzo-p-dioxin
1,3-dichloropropene	1,1,2,2-tetrachloroethane
ethylene dichloride (1,2-dichloroethane)	tetrachloroethylene (perchloroethylene)
ethylene oxide	trichloroethylene
formaldehyde	vinyl chloride

Completed Area Source Standards

Area Source Category	Date Completed
Chromic Acid Anodizing	01/95
Decorative Chromium Electroplating	01/95
Hard Chromium Electroplating	01/95
Commercial Sterilization Facilities	12/98
Dry Cleaning Facilities	09/93
Halogenated Solvent Cleaners	12/94
Hazardous Waste Incineration	09/99
Medical Waste Incinerators	09/97
Municipal Waste Combustors (small)	12/00
Municipal Landfills	01/03
Portland Cement	06/99
Publicly Owned Treatment Works	10/99
Secondary Aluminum Production	03/00
Secondary Lead Smelting	06/97
Mercury Cell Chlor-Alkali Plants	12/03

Standards with Consent Decree Completion Dates

Area Source Category	Proposal Date	Promulgation Date
Oil and Natural Gas Production	06/05	12/06
Stationary Internal Combustion Engines	10/06	12/07
Hospital Sterilizers	10/06	12/07
Other Solid Waste Incineration	11/04	11/05
Gasoline Distribution Stage I	10/06	12/07

Active Area Source Projects

Area Source Category Project	Lead Engineer
Agricultural Chemicals and Pesticides	Warren Johnson
Auto Body Refinishing	Kim Teal
Chemical Preparations	Jeff Telander
Clay Ceramics Manufacturing	Charlene Spells
Cyclic Crude and Intermediate Production	Warren Johnson
Fabricated Plate Work (Boiler Shops)	In Transition
Ferroalloys Production: Ferromanganese and Silicomanganese	Conrad Chin
Flexible Polyurethane Foam Production	Maria Noel
Industrial Boilers	Jim Eddinger
Industrial Inorganic Chemical Manufacturing	Rick Colyer
Industrial Organic Chemical Manufacturing	Warren Johnson
Institutional/Commercial Boilers	Jim Eddinger
Iron Foundries	Conrad Chin
Lead Acid Battery Manufacturing	Bob Schell

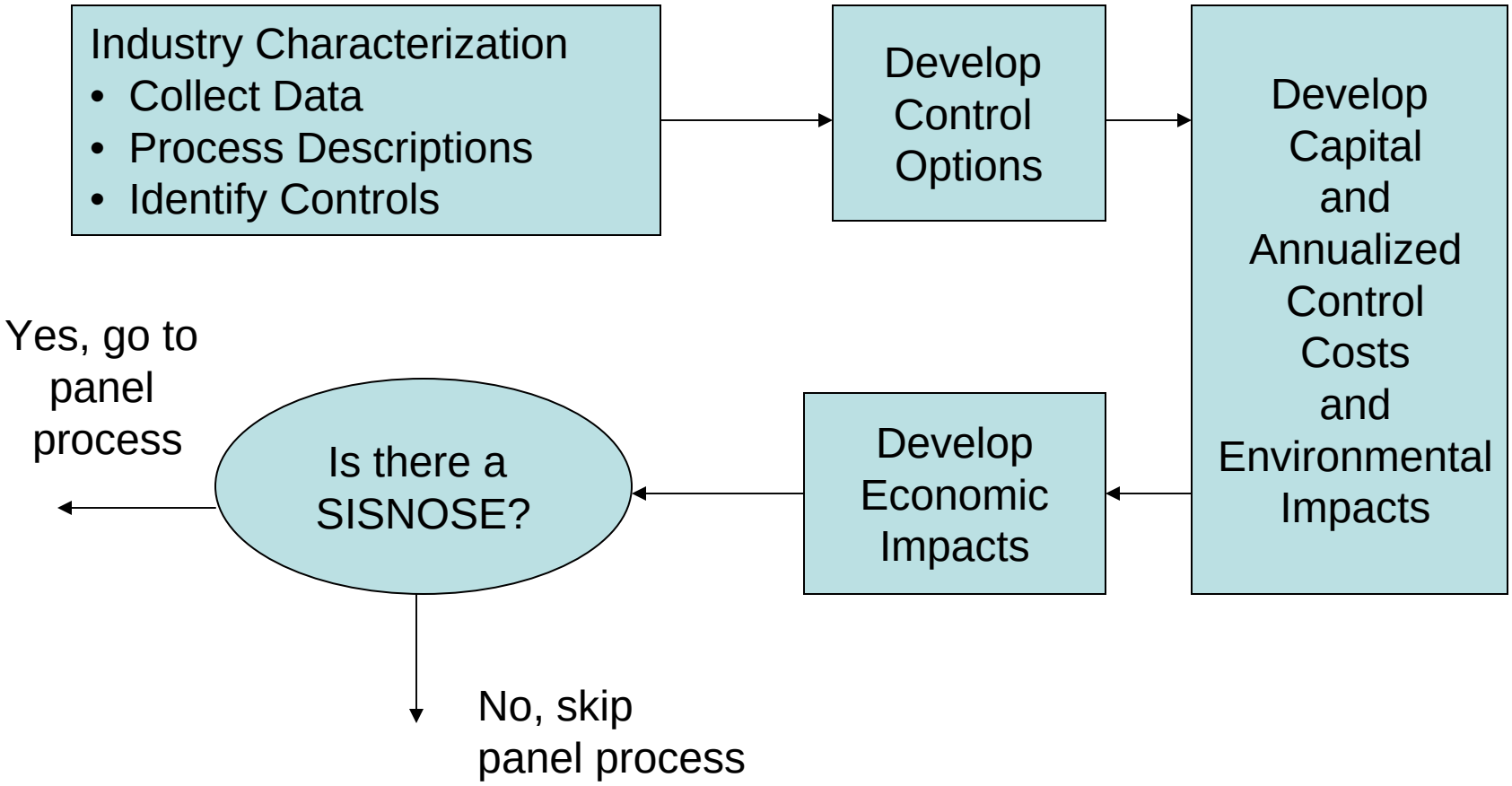
Active Area Source Projects

Area Source Category Project	Lead Engineer
Misc. Organic Chemical Manufacturing (MON)	Warren Johnson
Paint Stripping Operations	Bob Rosensteel
Paint and Allied Products	John Schaefer
Plastic Parts and Products (Surface Coatings)	Kim Teal
Plastic Materials and Resins Manufacturing	Bob Rosensteel
Plating and Polishing	Phil Mulrine
Pressed and Blown Glass and Glassware Manufacture	Susan Fairchild
Primary and Secondary Copper (2 source categories)	Karen Rackley
Primary Nonferrous Metal Production	Karen Rackley
Secondary Nonferrous Metals	Iliam Rosario
Stainless and Non-stainless Steel Manufacturing Electric Arc Furnaces	Mary Tom Kissell
Steel Foundries	Conrad Chin
Synthetic Rubber	Bob Rosensteel

Future Starts

Iron and Steel Forging	Valves and Pipe Fittings
Pharmaceuticals Production	Copper Foundries
Sewage Sludge Incineration	Heating Equipment, Except Electric
Wood Preserving	Inorganic Pigments Manufacturing
Asphalt Processing and Asphalt Roofing Manufacturing	Nonferrous Foundries, nec
Carbon Black Production	Prepared Feeds Manufacturing
Industrial Machinery and Equipment: Finishing Operations	Primary Metals Products Manufacturing
Electrical and Electronic Equipment: Finishing Operations	Brick and Structural Clay Products Manufacturing
Fabricated Metal Products, nec	Chemical Manufacturing: Chromium Compounds
Fabricated Structural Metal Manufacturing	Polyvinyl Chloride and Copolymers Production
Flexible Polyurethane Foam Fabrication	Acrylic Fibers / Modacrylic Fibers Production

Typical Rulemaking Process

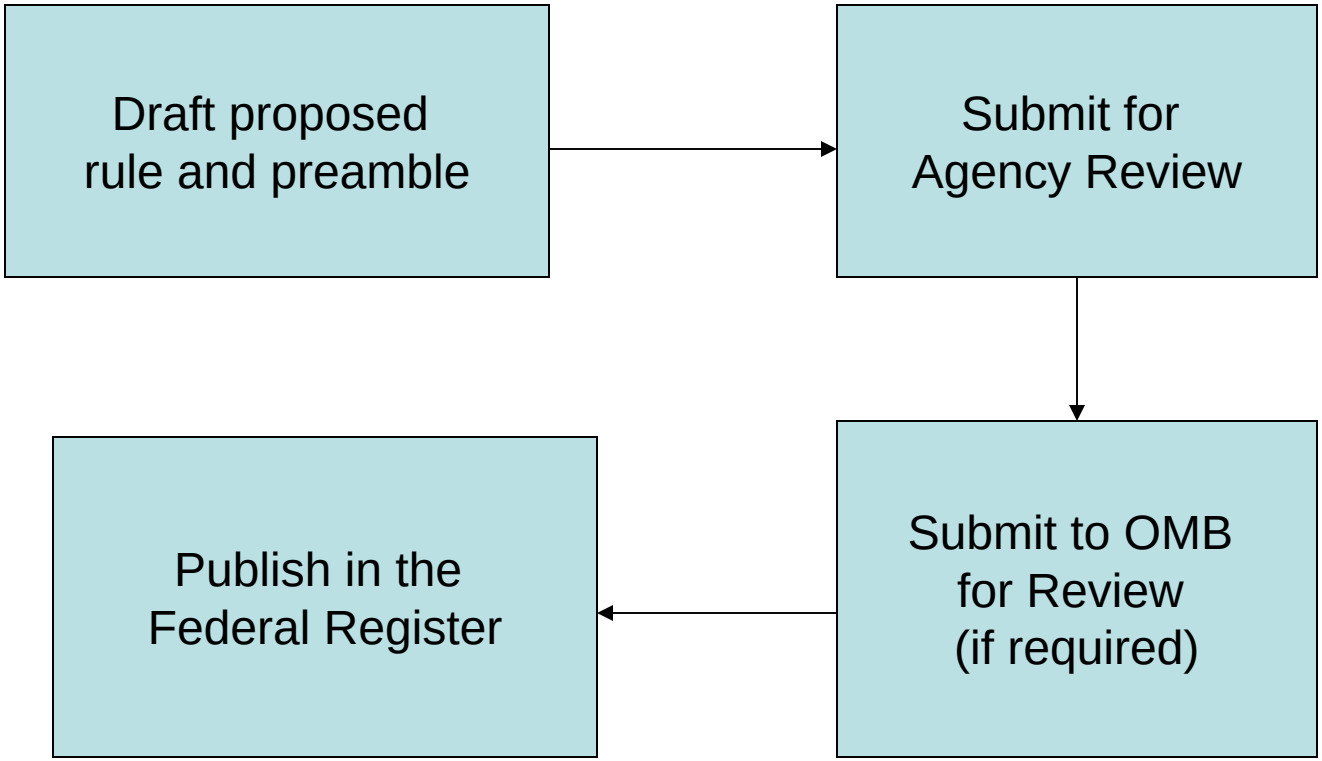


SBREFA Panel Process

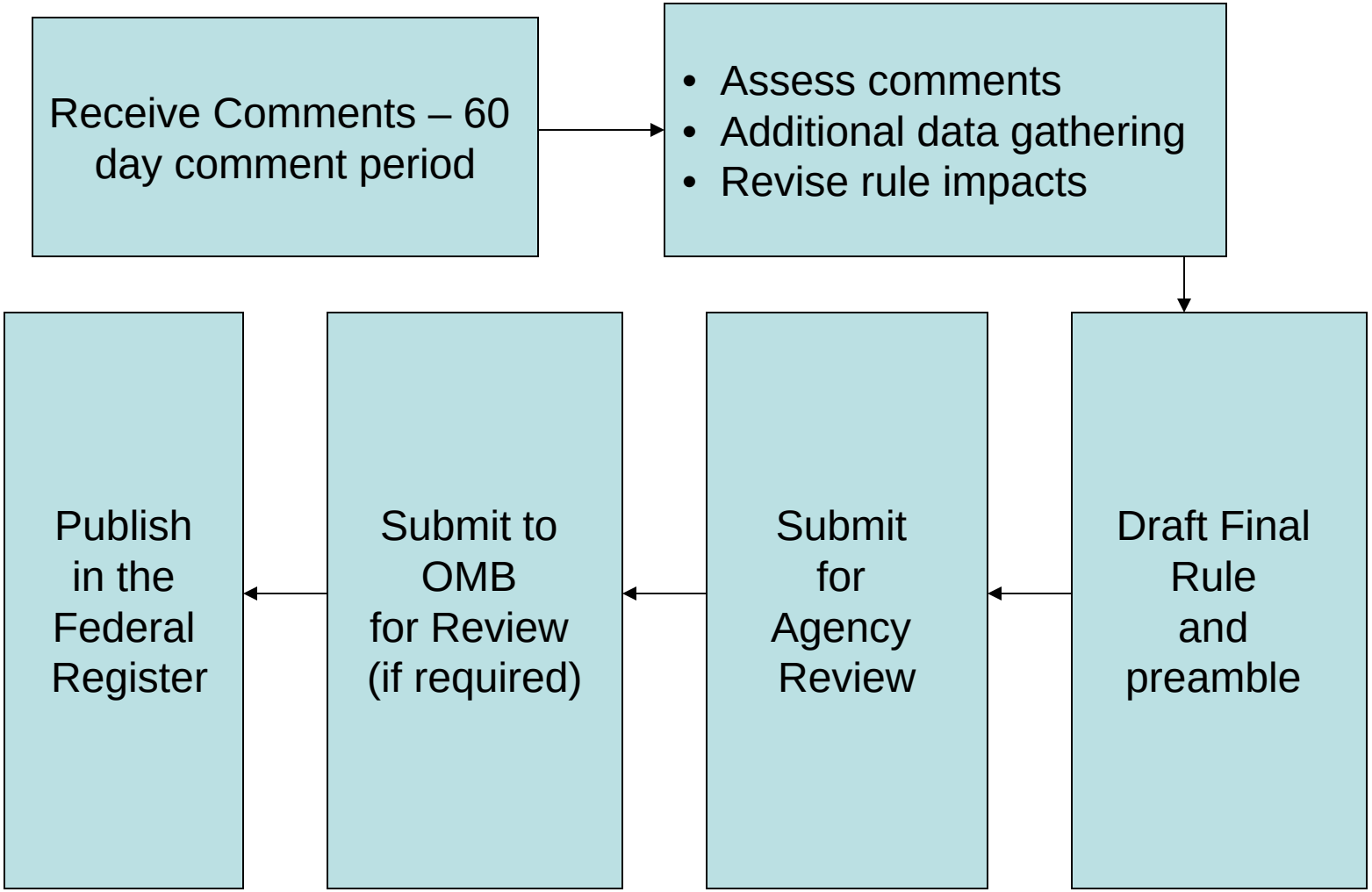
- Prepanel Process – at least 3 months
  - Develop information for stakeholders and SBA
  - Small business outreach

- Panel Process – 2 months
  - Panel convening meeting
  - Development of potential regulatory alternatives
  - Panel meeting with small entity representatives
  - Site visit(s)
  - Writing the final panel report

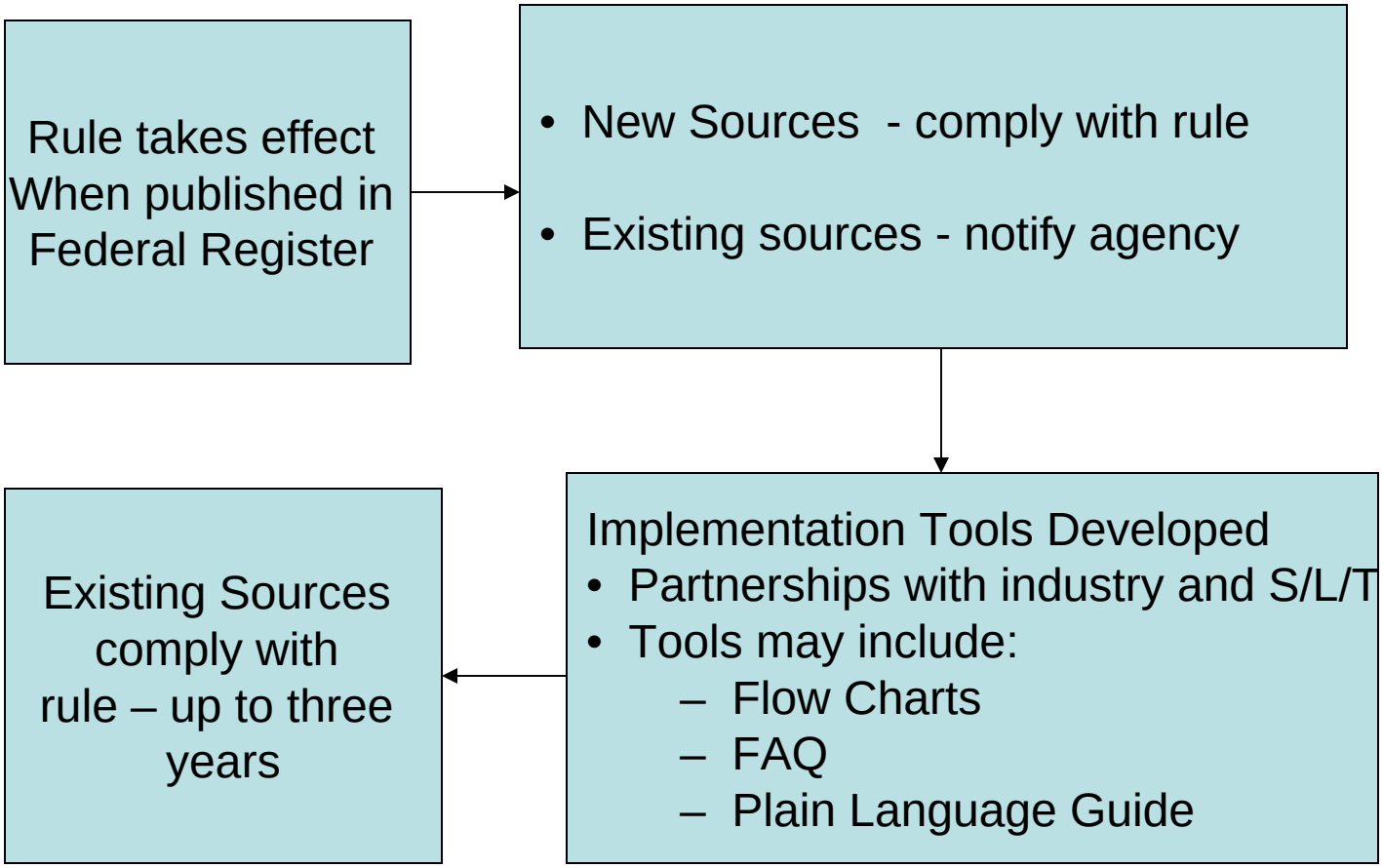
Develop Proposed Rule



Develop Final Rule



Rule Implementation



Lessons Learned from Reinforced Plastics NESHAP

- Early involvement is critical
- Meet early and as many times as necessary
- If you don’t raise an issue we can’t resolve it
- We (sometimes) can’t resolve everything prior to proposal