

**2005 SBO/SBAP National Conference**  
**Area Source Program Status Update**

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Keith Barnett  
 USEPA  
 Office of Air Quality Planning and Standards

1

**Status**

- 28 Source categories have completed standards
- 42 source categories remain to be addressed
- All if the remaining source categories have a project lead assigned
- Some of the later source categories may change project leads in the next few months (to balance workloads).

2

**HAP Representing Highest Risk in Urban Areas**

acetaldehyde	hexachlorobenzene	3
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	polycyclic 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	

3

**Area Source Standards Completed Prior to 2004**

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

4

**Area Source Standards with Specific Consent Decree Completion Dates**

Area Source Category	Number of Sources	Promulgation Date
Other Solid Waste Incineration - Complete but in litigation	250	11/05
Oil and Natural Gas Production - Complete	2200	12/06
Hospital Sterilizers - Proposed	1900	12/07
Gasoline Distribution Stage I - Proposed	5500	12/07
Stationary Internal Combustion Engines - Proposed	500,000+	12/07

5

**Area Source Categories Recently Completed**

Area Source Category	Number of Facilities
Acrylic Fibers/Modacrylic Fibers Production	1
Carbon Black Production	1
Chemical Manufacturing: Chromium Compounds	2
Flexible Polyurethane Foam Fabrication Operations	160
Flexible Polyurethane Foam Production	340
Lead Acid Battery Manufacturing	58
Polyvinyl Chloride and Copolymers Production	400
Primary Copper Smelting	2
Primary Nonferrous Metal Production	1
Secondary Copper Smelting	3
Wood Preserving	3

6

**Area Source Categories Near Proposal**

Area Source Category	Number of Sources	Project Lead
Paint Stripping Operations	3000	Warren Johnson
Plastic Parts and Products (Surface Coatings)	350	Warren Johnson
Auto Body Refinishing	36,000	Warren Johnson
Clay Ceramics Manufacturing	51	Bill Neuffer
Pressed and Blown Glass and Glassware Manufacture	170	Susan Fairchild
Stainless and Non-stainless Steel Manufacturing EAP (Note 1)	75	Phil Muhline
Steel Foundries	186	Conrad Chin
Iron Foundries	242	Conrad Chin
Industrial Boilers	130,000	Jim Eddinger
Institutional/Commercial Boilers	1 Million+	Jim Eddinger

Note 1 - MACT Standard for Mercury only  
 Note 2 - Solid and liquid fueled boilers will have a MACT Standard for Mercury and POM

7

**Area Source Projects in Preproposal Phase**

Area Source Category	Project Lead
Plating and Polishing	Donna Lee Jones
Fabricated Plate Work (Boiler Shops)	Donna Lee Jones
Heating Equipment, Except Electric	Donna Lee Jones
Electrical and Electronic Equipment - Finishing Operations	Donna Lee Jones
Fabricated Metal Products, Nec.	Donna Lee Jones
Fabricated Structural Metal Manufacturing	Donna Lee Jones
Industrial Machinery and Equipment - Finishing Operations	Donna Lee Jones
Iron and Steel Forging	Donna Lee Jones
Valves and Pipe Fittings	Donna Lee Jones
Primary Metal Products Manufacturing	Donna Lee Jones

8

**Area Source Projects in Preproposal Phase**

Area Source Category	Project Lead
Agricultural Chemicals and Pesticides	Randy McDonald
Industrial Organic Chemical Manufacturing	Randy McDonald
Misc. Organic Chemical Manufacturing (MON)	Randy McDonald
Synthetic Rubber	Randy McDonald
Pharmaceutical Production	Randy McDonald
Industrial Inorganic Chemical Manufacturing	Randy McDonald
Cyclic Crude and Intermediate Production	Randy McDonald
Plastic Materials and Resins Manufacturing	Randy McDonald
Ferroalloys Production: Ferromanganese and Silicomanganese	Conrad Chin
Secondary Nonferrous Metals	Susan Fairchild

9

### Area Source Projects in Preproposal Phase

Area Source Category	Project Lead
Asphalt Processing and Asphalt Roofing Manufacturing	Jeff Telander
Nonferrous Foundries, Nec.	Conrad Chen
Copper Foundries	Conrad Chen
Chemical Preparation	Jeff Telander
Paint and Allied Products	Mohamed Seragudin
Inorganic Pigments Manufacturing	Sharon Nizich
Sewage Sludge Incineration	Sil Neuffer
Prepared Feeds Materials	Mohamed Seragudin
Brick and Structural Clay Products	Jeff Telander

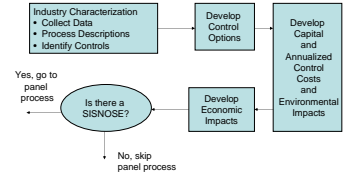
10

### Focus on GACT

- Can develop standards or requirements
- 112(d)(5) – use of Generally Available Control Technologies **or** management practices
- Advantages to using GACT:
  - Allows more flexibility
  - There is no floor to calculate
  - Cost effectiveness is considered

11

### Typical Rulemaking Process



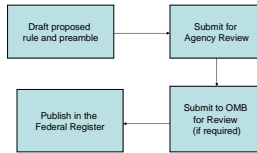
12

### Typical SBREFA Panel Process

- Prepanel Process
  - Develop information for stakeholders and SBA
  - Small business outreach
- Panel Process
  - Panel convening meeting
  - Development of potential regulatory alternatives
  - Panel meeting with small entity representatives
  - Site visit(s)
  - Writing the final panel report

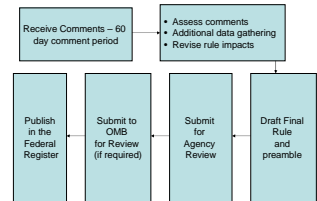
13

### Develop Proposed Rule



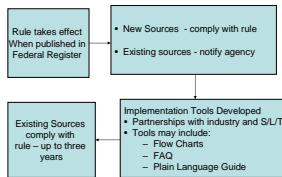
14

### Develop Final Rule



15

### Rule Implementation



16

### Implementation

- Currently working with the Outreach and Information Division
- Evaluating implementation tools
- Working to make the implementation materials more timely
- Asking for input from SBAP/SBO programs on implementation (this is an area we think SBAP can really help)
  - Recommend you review Bin 1 and 2 final rules and Bin 3 proposals
  - What tools or other materials are needed
  - Participation in implementation tool review groups

17

### Implementation Challenges

- Many states don't have resources to take delegation
- EPA will have to implement program where states do not take delegation
- Need to minimize burden for all levels -- especially small businesses

18

## Suggestions

- Read the Bin 1 and 2 final rules and Bin 3 proposals - they provide insights on GACT
- If you receive communication from a project lead - send feedback - even if it is just to say you have no comments or concerns
- If you see something that you perceive as a problem – let us know – regardless of the rule schedule
  - We will be plagiarizing the early rules to complete the later rules
  - Any errors/problems with early rules may get propagated to later rules if we don't know about them

19

## Things you should know

- The actual regulated entities are defined in the rule applicability section
- Regulate entities may not be exactly same as the original source category descriptions
- If we don't respond to a comment or concern on a particular rule it may still be useful for future rules (but we will respond to comments made during the comment period)
- All the project leads meet every two weeks to discuss common issues or problems

20

## Program Contacts

- Keith Barnett, OAQPS Small Business Coordinator, 919-541-5605, [barnett.keith@epa.gov](mailto:barnett.keith@epa.gov)
- Sharon Nizich, overall area source project coordinator, 919-541-2825, [nizich.sharon@epa.gov](mailto:nizich.sharon@epa.gov)
- Individual project leads (previously listed)
- Steve Fruh, first level manager of area source program, 919-541-2837, [fruh.steve@epa.gov](mailto:fruh.steve@epa.gov)

21

## Program Goals

- Fulfill EPA's statutory and court ordered mandates
- Provide flexibility in how states and/or EPA addresses area source categories
- Provide states with mechanism to achieve maximum reductions in their local areas
- Reduce unnecessary burden on states and small businesses
- Achieve maximum co-benefit emission reductions

22