

# AREA SOURCE PROGRAM STATUS

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# What we'll cover

- ⦿ Background
- ⦿ EPA Strategy
- ⦿ Status
- ⦿ Bins
- ⦿ National Issues
- ⦿ DAQ Strategy & Efforts
- ⦿ Tools
- ⦿ Most Significant GACTs

# Background

- ◎ CAA Section 112(k) requires EPA to:
  - develop an urban air toxics strategy
  - identify at least 30 urban HAPs
  - list area source categories that ensure 90% of the emissions from area sources are subject to standards (by November 15, 2000) ...oops

# Urban Air Toxics Strategy

- EPA published the Integrated Urban Air Toxics Strategy on July 19, 1999. The Strategy identified 8 metals and 22 organics as the “dirty 30”
- A total of 70 area source categories have been listed
- Collectively, the listed source categories account for at least 90% of the emissions of each of the 30 area source urban HAP
- EPA did not finish the promulgation of the 70 categories so they were sued, and thus now have a schedule of court ordered deadlines.

# Current Status

- May 2003 and March 2006 court orders set a schedule for completing the Area Source Program:
  - Standards have been promulgated for 40 area source categories
  - 30 source categories remain to be addressed
  - Program to be completed on June 15, 2009
  - EPA highly committed to meeting deadlines

# Bin 3 - Promulgated Dec 15, '07

- ⦿ Developed 9 rules in 4 FR Packages:
  - Clay Ceramics Mfg, Glass Mfg, Secondary Nonferrous Metals Processing
  - Paint Stripping and Miscellaneous Coating Operations (includes Autobody Refinishing)
  - Iron and Steel Foundries
  - Stainless/Nonstainless Steel Mfg/Electric Arc Furnaces

# Three more promulgated – Dec '07

- ⦿ Separate court order from 2003:
  - Hospital Sterilizers
  - Gasoline Distribution
  - Reciprocating Internal Combustion Engines for new sources (This rule will not address existing engines – that rule to promulgate in 2009/2010)

# Ten for June 15, '08

- ◎ Fabricated Metal Products:
  - Electrical and Electronic Equipment Finishing Op.
  - Fabricated Metal Products, nec
  - Fabricated Plate Work (Boiler Shops)
  - Fabricated Structural Metal Manufacturing
  - Heating Equipment, Except Electric
  - Industrial Machinery and Equipment – Finishing Operations
  - Iron and Steel Forging
  - Primary Metal Products Manufacturing
  - Valves and Pipe Fittings
  - Plating and Polishing (Proposal published March 14)

# Ten for December 15, '08

- ⦿ Agricultural Chemicals and Pesticides Manufacturing
- ⦿ Cyclic Crude and Intermediate Production
- ⦿ Industrial Inorganic Chemical Manufacturing
- ⦿ Industrial Organic Chemical Manufacturing
- ⦿ Inorganic Pigment Manufacturing
- ⦿ Misc. Organic Chemical Manufacturing (propose May '08)
- ⦿ (MON) Pharmaceutical Production
- ⦿ Plastic Materials and Resins Manufacturing
- ⦿ Synthetic Rubber
- ⦿ Ferroalloys Production: Ferromanganese and Silicomanganese

# Ten for December 15, '08 (cont'd)

- ⦿ Nine chemical manufacturing source categories will be consolidated
- ⦿ Affected sources
  - Source manufactures chemical(s) described by NAICS code 325
  - Chemical manufacturing operations that use or produce any of the 16 of 30 listed urban HAP
- ⦿ Processes covered by other area source standards will be exempt

# Emission Points for Chemical Manufacturing Categories

- ◎ Eight emission points
  - Continuous process vents (CPV)
  - Batch process vents (BPV)
  - Metal particulate process vents (PV metals)
  - Cooling towers (CT)
  - Wastewater (WW)
  - Equipment leaks (EL)
  - Storage tanks (ST)
  - Transfer operations (TO)

# Seven for June 15, '09

- ⦿ Aluminum Foundries (propose fall '08)
- ⦿ Copper Foundries
- ⦿ Nonferrous Foundries, nec
- ⦿ Paint and Allied Products (propose fall '08)
- ⦿ Prepared Feeds Materials
- ⦿ Chemical Preparation
- ⦿ Asphalt Processing and Asphalt Roofing Manufacturing

# Status of Select Rulemakings

- Industrial Boilers - Settlement discussions ongoing; proposal expected 2009
- Sewage Sludge Incineration – Settlement discussions ongoing; proposal expected 2009
- Brick and Structural Clay Products – Pollutants of concern were covered by the Clay Ceramics Area Source Rule, 72FR73180, found at:

<http://www.epa.gov/ttn/atw/area/fr26de07.pdf>

# BIG Issues

- ⦿ Will states accept delegation?
  - NC adopted all by reference in mid-'90s
  - SC will also take delegation
  - Other states are still deciding
  - Balking at resource issues
    - Identifying/notifying so many sources, even without permitting and inspecting
  - EPA is threatening 105 grant funds
- ⦿ In NC – Last MACT/GACT may trigger toxics
- ⦿ Enforcement for missed compliance dates

# SC Thoughts

- ⦿ Registration
- ⦿ Self-certification
- ⦿ Environmental Results Program (ERP)

# NC DAQ Efforts

- ⦿ MACT team is taking lead
  - Planning, permits, compliance, toxics, local programs
- ⦿ Carefully consider resources versus benefits
  - Intent is to avoid burdening regions/facilities with a new layer of permits and inspections
- ⦿ Work with sister agencies where possible
  - Examples are dry cleaner, Stage I
- ⦿ Work closely with Small Business (SBEAP) and Pollution Prevention (DPPEA)
  - Some rules may be implemented through an information campaign

# General Approach

- Identify leader for each rule
- Review the rule and develop a short summary
- Expand to sub-group if necessary
- Estimate the affected source population of permitted and unpermitted facilities (InfoUSA)
- Identify questions with the rule
- Evaluate the environmental benefits of the rule

# General Approach (cont.)

- Suggest implementation approach (including the resources needed)
- Recommend an implementation strategy back to the MACT Workgroup
- MACT Workgroup recommends an implementation strategy to NCDAQ management.

# Area source MACT compliance strategy

- ◎ Depends on answer to questions:
  - Is the facility permitted?
  - Does the MACT cause significant concern to toxics or attainment strategy?
  - Has compliance date passed?
    - Some area source MACTs are effective on date of promulgation

# Area source compliance strategy (cont.)

- ◎ Depending on answers
  - Add to existing permit
  - Send notification letter to known facilities
  - Public outreach through trade associations, vendors, SBEAP, etc.

# Tools

- EPA Factsheet
- EPA Brochure
- EPA “Example” Forms



# Technology Transfer Network Air Toxics Web Site

Contact Us Search:  All EPA  This Area

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## Area Source Standards

- [General Area Source Information](#)
  - [What are area sources?](#)
  - [List of area source categories](#)
  - [All Air Toxics Rules and Associated Contacts](#)
  - [Deadlines](#)
- [Current Standards](#)
- [Standards to be Promulgated](#)
- [Implementation Tools](#)
- [Most Recent Rules/Notices](#)

### General Information

Under the Urban Air Toxics [Strategy](#), EPA is [developing standards](#) to control toxic air pollutants from area sources. "Area" sources are those sources that emit less than 10 tons annually of a single hazardous air pollutant or less than 25 tons or more annually of a combination of hazardous air pollutants. All of the National Emission Standards for Hazardous Air Pollutant (NESHAP) rules are listed in one [table](#). Here you will find in alphabetical order, the links to the final rules, latest fact sheets, and other pertinent information on each category, including both area sources and major sources.

The Clean Air Act (CAA) requires EPA to identify a list of at least 30 air toxics that pose the greatest potential health threat in urban areas, and for the Strategy, EPA identified a [list of 33](#) air toxics.

The CAA also requires EPA to identify and list the area source categories that represent 90 percent of the emissions of the 30 urban air toxics associated with area sources and subject them to standards under the CAA (section 112(d)). Through three separate listings (including a list in the Urban Air Toxics Strategy), EPA has identified a total of 70 area source [categories](#) which represent 90 percent of the emissions of the 30 listed air toxics. Of these 70 area source categories, 28 had been regulated by June 2007 and the remaining area source standards are under development. The EPA was recently put on a [court ordered](#) schedule to issue the area source rules listed under the Urban Air Toxics Strategy. A 2003 court ordered and a 2006 court order resulted in the deadlines listed below.

### Implementation Tools

Implementation tools can be found on the source category specific rule pages and/or listed below. Please note that not all source categories will need implementation tools. Development of tools will be based on the complexity of the rule.

Date	Description	File Download
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## Implementation Tools

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<i>Date</i>	<i>Description</i>	<i>File Download</i>
3/2008	Hospital Sterilizers using Ethylene Oxide Brochure	
3/2008	Reciprocating Internal Combustion Engines Brochure	
3/2008	Paint Stripping and Miscellaneous Surface Coating Operations Brochure	
3/2008	Lead Acid Batteries Area Source Implementation Brochure	
12/2007	Secondary Nonferrous Metals Processing Industry Area Source Implementation Brochure	
12/2007	Clay Ceramics Manufacturing Industry Area Source Implementation Brochure	
12/2007	Glass Manufacturing Industry Area Source Implementation Brochure	
3/2008	Flexible Polyurethane Foam Production and Fabrication Industry Area Source Implementation Brochure	
11/2008	Wood Preserving Implementation Brochure	
3/2008	Gasoline Dispensing Facilities Brochure	
3/2008	Bulk Terminals and Bulk Plants Brochure	

## Initial Notification Examples

Important Note: There is no specific form required for the initial notification. In the initial notification, the owner/operator simply needs to provide the information specified in the rule to their EPA Regional Office. States where the rule has been delegated, the initial notification needs to go to the EPA Regional Office and the delegated state or delegated local permitting authority. You may submit the information required in another form or format. It is highly recommended that you talk with your permitting authority before using any of these examples as potential templates.

<i>Date</i>	<i>Description</i>	<i>File Download</i>
3/2008	Example Initial Notification for 40 CFR 63, subpart RRRRRR National Emission Standards for Hazardous Air Pollutants for Clay Ceramics Manufacturing Area Sources	
3/2008	Example of initial notification for Paint Stripping and Miscellaneous Surface Coating Area Source Rule Subpart HHHHHH 40 CFR 63.11169 – 63.11180	
3/2008	Example of initial notification of Compliance Status for 40 CFR 63, subpart WWWW: National Emission Standards for Hospital Ethylene Oxide Sterilization	
3/2008	Example of initial notification for 40 CFR 63, subpart SSSSS National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources	
3/2008	Example of initial notification for 40 CFR Part 63, Subpart CCCCC - National Emission Standards for Hazardous Air Pollutants for Area Source Category: Gasoline-Dispensing Facilities and for 40 CFR Part 63, Subpart A - National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart A - General Provisions (section 63.9(b)).	
3/2008	Example of initial notification for 40 CFR Part 63, Subpart BBBBB - National Emission Standards for Hazardous Air Pollutants for Area Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities and for 40 CFR Part 63, Subpart A - National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart A - General Provisions (section 63.9(b)).	

# Tools

- ⦿ EPA Factsheet
- ⦿ EPA Brochure
- ⦿ EPA “Example” Forms
- ⦿ DAQ Summary
- ⦿ Misc. Tools
  - Summaries
  - Hyperlinked Rules
  - Tables
  - Flowcharts


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Table of Area Source NESHAPs

Source Category	Subpart	Promulgation Date	ComplianceDate (existing)
Acrylic & Mon acrylic Fibers Production	LLLLLL	07/16/2007	07/16/2008
Carbon Black Production	MMMMMM	07/16/2007	07/16/2007
Chemical Manufacturing: Chromium Production	NNNNNN	07/16/2007	01/16/2008
Clay Ceramics Manufacturing	RRRRRR	12/16/2007	12/26/2007
Electric Arc Furnace Steelmaking Facilities	YYYYY	12/28/2007	12/28/2010
Flexible Polyurethane Foam Production & Fabrication	OOOOOO	07/16/2007	07/16/2008
Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities	BBBBBB	01/10/2008	01/10/2011
Glass Manufacturing	SSSSSS	12/26/2007	12/28/2009
Hospital Ethylene Oxide Sterilizer	WWWWW	12/28/2007	12/29/2008
Iron and Steel Foundries	ZZZZZ	01/02/2008	various
Lead Acid Battery Manufacturing	PPPPPP	07/16/2007	07/16/2008
Oil & Natural Gas Production and Storage	HH	01/03/2007	various
Paint Stripping and Miscellaneous Surface Coating Operations	HHHHHH	01/08/2008	01/11/2011
Polyvinyl Chloride & Copolymers Production	DDDDDD	01/23/2007	01/23/2007
Primary Copper Smelting	EEEEEE	01/23/2007	01/23/2007
Primary Nonferrous Metals Production	GGGGGG	01/23/2007	01/23/2007
Secondary Copper Smelting	FFFFFF	01/23/2007	01/23/2007
Secondary Nonferrous Metals	TTTTTT	12/26/2007	12/26/2007
Wood Preserving	QQQQQQ	07/16/2007	07/16/2007



### Acrylic & Monoacrylic Fibers Production

- [EPA Final Rule](#)
- [DAQ Rule Summary U:\Area Source NESHAPs\Subpart LLLLLL- Acrylic and Modacrylic Fibers\Subpart LLLLLL Summary.doc](#)
- [EPA Fact Sheet](#)

### Carbon Black Production

- [EPA Final Rule](#)
- [EPA Fact Sheet](#)

### Chemical Manufacturing: Chromium Production

- [EPA Final Rule](#)
- [EPA Fact Sheet](#)

### Clay Ceramics Manufacturing

- [EPA Final Rule](#)
- [DAQ Rule Summary U:\Area Source NESHAPs\Subpart RRRRRR - Clay Ceramics Manufacturing\Subpart RRRRRR Summary.doc](#)
- [Clay Ceramics Manufacturing Implementation Brochure](#)
- [EPA Fact Sheet](#)

### Electric Arc Furnace Steelmaking Facilities

- [EPA Final Rule](#)
- [DAQ Rule Summary U:\Area Source NESHAPs\Subpart YYYYYY - Electric Arc Furnace Steelmaking Facilities\Subpart YYYYYY Summary.doc](#)
- [EPA Fact Sheet](#)

### Flexible Polyurethane Foam Production & Fabrication

- [EPA Final Rule](#)
- [DAQ Rule Summary U:\Area Source NESHAPs\Subpart OOOOOO\Subpart OOOOOO Summary.doc](#)
- [Flexible Polyurethane Foam Production & Fabrication Brochure](#)
- [EPA Fact Sheet](#)

### Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

- [EPA Final Rule](#)

# Most Significant Area Sources

- M: Perc Drycleaner
- 6H: Paint Stripping and Misc. Coating (Autobody Refinishing)
- 4Z: Reciprocating Internal Combustion Engines (RICE)
- 6C: Gasoline Dispensing Facilities
- 6O: Flexible Polyurethane Foam

# Sample Area Source – 6H

- ◎ Proposal could've hit 100s of thousands
- ◎ SBEAP Tech. Sub. Commented
- ◎ Final – Target HAPs only
- ◎ Collision Repair Campaign – DVD
  - Production Company – Many Awards
  - Features Jeff Gordon (Rick Hendrick/DuPont)
  - 15-20 min. Intro to rule – Dual Language
- ◎ Duke Eng. Intern

# For more information

- Sharon Nizich EPA 919/541-2825
- Donnie Redmond DAQ 919/733-1481
- Tony Pendola SBEAP 877/623-6748
  
- EPA Area Source website
  - <http://www.epa.gov/ttn/atw/area/arearules.html>
- DAQ website
  - [http://www.ncair.org/planning/area\\_source/](http://www.ncair.org/planning/area_source/)

