

DAK Americas



FIBERS, MONOMERS & RESINS

SITE MACT IMPLEMENTATION

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CAPE FEAR SITE MACT'S

- HON
- P&R IV
- MON
- INDUSTRIAL BOILERS/HEATERS

INITIAL ACTIVITIES

- Determine parts of process that are affected
 - Attention to process definitions
 - Attention to boundaries of process
 - Adjacent facilities
- Initial Notification - Usually 120 days after promulgation
- Develop compliance strategy

1st STEP - COMPLIANCE STRATEGIES

Classify all of your emission points

- Continuous process vent
- Batch process vent
- Wastewater streams/Waste management units
- Storage Tanks
- Transfer racks
- Fugitive Emissions/Heat Exchanges
 - Surge Control Vessels

2nd STEP - COMPLIANCE STRATEGIES

Classify Emission Points into Proper Category
Depends on MACT

- Must have good information on emissions per point
- Some points require accurate production information
- For MACT's that require segregation within the process, such as the P&R IV, it may be good to get agreement from your state agency prior to proceeding with a compliance plan

3rd STEP - COMPLIANCE STRATEGIES

Determine compliance status of each point

- TRE Values
- Percent Emission Reduction
- Emissions per pound of product
- Vapor pressure of HAP's at ambient conditions and storage conditions
- HAP concentration of wastewater/waste streams

4th - STEP COMPLIANCE STRATEGIES

- Develop compliance plan for points/sources that do not meet MACT requirements
- Recheck any point/source that is questionable
- Document compliance status of each point
- Document compliance plan for all points including testing and capital plans
 - List all applicable dates
 - Estimate costs
- Share with your site leadership and obtain their agreement on pathforward
- Agree on a routine review schedule with leadership

SUMMARY

- Begin as soon as MACT is issued if not before - You will need the three years
- Ensure accurate and specific emissions data
- Get clarity from state on process clarifications/boundaries
- Ensure site leadership is aware of the overall plan and ensure they are updated on progress