

AIR/COMPLIANCE CONSULTANTS, INC.

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ONLINE NEWSLETTER AND REGULATORY UPDATES! *Jill W. Merrill, President*

Air/Compliance Consultants, Inc. (ACCI) is pleased to announce that our newsletter can also be viewed online.

As always, ACCI will work to provide timely, informative and useful information on the environmental front for your use.



Updated articles will be on our home page at: <http://www.air-comp.com>

Click the "Articles" icon to see short summaries and updates on regulations, guidance, and environmental news.

NSR REFORM RULES FINALIZED & ROUTINE MAINTENANCE, REPAIR AND REPLACEMENT PROPOSED

Author: Kimberly D. Coy

On December 31, 2002, EPA published the final rule to improve the New Source Review (NSR) Program and proposed a rule to improve the implementation of the "routine maintenance, repair and replacement" exclusions currently in the NSR rules. The effective date for the rule was March 3, 2003.



PART 1: SUMMARY OF THE FINAL RULE

Emissions Calculation Test for Determination of the Net Emission Increase

The NSR reform regulations revise the method for determining whether a proposed modification results in a significant emission increase with a new procedure for determining baseline actual emission and by supplementing the existing actual-to-potential test with the actual-to-projected actual applicability test. Baseline actual emissions for existing emissions units, except EUSGU's, may be calculated as an average annual emissions rate in tpy using any consecutive 24 months during the 10-year period immediately preceding the modification. For EUSGU's, the baseline actual emissions are determined using the current policy (which is now codified), where the baseline actual emissions is the average rate in tpy at which the unit actually emitted the pollutant during a consecutive 24-month period within the 5-year period immediately preceding actual construction, known as the 2-in-5 years presumption.

For existing emission units, including EUSGU's, post change (projected actual) emissions may be estimated using the maximum emission rate at which the changed units are projected to emit the pollutant in any of the 5-years following the time the unit resumes regular operation, or 10 years if there is an increase in the unit's design capacity or potential to emit. If using post-change projected actual emissions, the facility will be required to track annual emissions for the next 5 year (or 10 years if appropriate). At the end of each year, if the post change emissions exceed the baseline actual emissions by a significant amount from the projections, the facility will need to submit a report with that information, within 60 days after the end of the year (EUSGU's must send this report regardless). Instead of relying on the projected emissions, the facility can continue to use existing actual-to-potential case by using potential emissions of the modified unit. In that case, the facility will not be required to track or report post change emissions.

(cont'd next page)

Plantwide Applicability Limits (PALs)

A PAL is a voluntary option that allows facilities to manage facility-wide emissions without triggering NSR. Actual PALS are a rolling 12-month emission cap [tons per year (tpy)] that includes all conditions necessary to make the limitation enforceable. Once the PAL is established, the facility can modify and install new equipment or modify existing equipment, as long as the modifications do not cause the actual emissions to violate the PAL.

Clean Unit Provisions

The final rule sets a new NSR applicability test for units designated as “Clean Units”, allowing these units to undergo changes without triggering NSR if the emission limitations are not exceeded, work practice standards are still implemented, and the project would not alter any physical or operational characteristics that formed the basis for the BACT or LAER determination.

To automatically qualify as a Clean Unit, the unit must have gone through the NSR permitting process and is complying with BACT or LAER. If the source has not gone through the NSR permitting process, the source must go through the permitting process to determine whether the unit meets the criteria to be designated as a Clean Unit, which means BACT or LAER must be installed and compliance with the NAAQS must be demonstrated.

Pollution Control Project (PCP) Exclusion

Certain work practices, and the installation of qualifying pollution control and pollution prevention projects which benefit the environment, will be excluded from NSR permitting under the “Pollution Control Project Exclusion”, or PCP Exclusion. A PCP is defined as an activity, set of work practices, or project at an existing emissions unit that reduces emissions of air pollution from the unit. A PCP may reduce emissions of one air pollutant while causing an increase in emissions of a “collateral” pollutant. The final rule gives an example of a thermal incinerator, which may have increased NO_x emissions, but had dramatic VOC reductions. The environmental impact of the collateral pollutants’ emissions increase must be evaluated and weighed against the emissions decrease of the primary pollutant to determine whether the PCP provides an environmental benefit.

PART 2: SUMMARY OF THE PROPOSED ROUTINE MAINTENANCE, REPAIR, & REPLACEMENT RULE

Author: Kimberly D. Coy

The remainder of this article discusses the improvements to the routine maintenance, repair and replacement (RMRR) exclusion.

Under the current approach, the RMRR exclusion is applied on a case-by-case basis by weighing the nature, extent, frequency and cost of the activity to arrive at a conclusion.

Under the proposed rules, there are two categories of activities that will be considered RMRR activities: 1) activities within an annual maintenance, repair and replacement allowance; and 2) replacements that meet the equipment provision criteria. If the activity does not fall under one of these categories, then it could still qualify as a RMRR activity under the current case-by-case test.

The annual maintenance, repair and replacement allowance would allow certain activities that are being implemented to promote the safe, reliable and efficient operation of the facility to be excluded from NSR, provided that the total cost of the activities does not exceed the annual maintenance, repair and replacement allowance (allowance).

The equipment replacement provision would allow the replacement of existing equipment with equipment that serves the same function and that does not alter the basic design parameters of a unit to qualify as RMRR, provided that the cost of the replacement equipment does not exceed a certain percentage of the cost of the process unit to which the equipment belongs.

For more information visit ACCI’s web page or www.epa.gov/



EPA’S NEW WEB SITE FOR COMPLIANCE HISTORY INFORMATION – ECHO

Author: Mark C. Schooley

In November 2002, EPA launched a new web site (<http://www.epa.gov/echo>) named Enforcement and Compliance History Online, or ECHO, to provide a searchable database containing the environmental compliance history of over 800,000 regulated facilities nationwide. The site is operating on a “pilot” basis for now, and EPA is seeking comments until March 31, 2003.

The site will be a single point of access to environmental compliance information drawn from several programs, including the Clean Air Act, Clean Water Act, and Resource Conservation and Recovery Act (RCRA). Demographic information of areas near the facilities will also be available.

ECHO is designed to help citizens, businesses and others instantly access available environmental compliance information on facilities in their communities in an easy, comprehensible format. The site was developed by EPA in partnership with the Environmental Council of the States (ECOS).

EPA PROPOSES NESHAPS FOR STATIONARY COMBUSTION TURBINES

Author: William P. Cowell

On February 13, 2003, the EPA proposed a new rule to establish national emission standards for hazardous air pollutants (NESHAP) for stationary combustion turbines. The EPA has identified stationary combustion turbines as major sources of *(cont'd next page)*

hazardous air pollutants (HAPS). Stationary combustion turbines have been documented to be significant emitters of HAPS, including formaldehyde, toluene, benzene and acetaldehyde. Under the proposed rule, all major sources would be required to meet HAP emission standards reflecting the application of the maximum achievable control technology (MACT) for combustion turbines. The EPA estimates that 20 percent of the stationary combustion turbines affected by the rule will be located at major sources, and that the net effect of the rule would reduce HAP emissions by an estimated 81 tons per year (in the 5th year after the rule is promulgated). This action also proposes to add Method 323 of 40 CFR part 63, Appendix A for the measurement of formaldehyde emissions from natural gas-fired stationary sources.



REVISED SPCC REQUIREMENTS

Author: Mark C. Schooley & Patrick J. Walters

EPA published a revised Spill Prevention Control and Countermeasure (SPCC) rule at Title 40 of the code of regulations Part 112, (40 CFR 112) incorporating revisions proposed in 1991, 1993 and 1997. This new rule became effective on August 16, 2002.

**Title 40
Part 112
(40 CFR 112)**

These regulations affect facilities with the capacity to store more than 1,320 gallons of oil above ground, in 55-gallon drums or in larger containers. Under the new rules, owners and operators of facilities with existing SPCC plans may need to amend their plans to ensure compliance for reviewing and certifying SPCC plans.



EPA will periodically conduct on-site inspections.

To ensure that facilities comply with spill prevention regulations, a copy of a facility's entire SPCC Plan must be available at any facility attended for at least four hours per day. Otherwise, a copy must be kept at the nearest field office.

The U.S. Environmental Protection Agency (EPA) has extended by 18 months the compliance dates in the SPCC regulations. Facilities now will have until Aug. 17, 2004, to amend their SPCC plans to conform with revisions to the SPCC regulations that became effective last summer - and until Feb. 17, 2005, to implement those amendments.

For more information, visit the U.S. EPA Oil Program's web site at www.epa.gov/oilspill.

EPA PROMULGATED CASE-BY-CASE MACT (SECTION 112J) REQUIREMENTS (PUBLISHED 12-9-02; 67 FR 72875)

Author: Kimberly D. Coy

With regard to Case-By-Case MACT determinations under the Clean Air Act, Section 112(j), EPA will require the following in response to a settlement agreement with the Sierra Club:

- a new timetable for submission of section 112(j) Part 2 applications;
- the establishment of general procedures for preparation, maintenance and periodic revision of startup, shutdown and malfunction (SSM) plans; and
- a revision to recordkeeping provisions.

Sources that have previously filed applicability determination requests under 40 CFR §63.52(e)(2)(i) that are still pending **must either:**

- (1) resubmit and supplement the applicability determination request within 60 days after EPA finalizes this rulemaking, or
- (2) resubmit and supplement the applicability determination request within 60 days after EPA publishes a promulgated MACT standard for the source category or subcategory in question.

In the above case, the later date applies. If the promulgation of any MACT standard is delayed, EPA has proposed extended compliance dates for applicability determinations and Part 2 applications. So far, the EPA has made good progress in finalizing standards before the Part 2 deadlines were passed. For further information on this requirement, visit www.epa.gov/ttn/atw/112j.

RESTRICTIONS TO BE CONTAINED IN THE PROPOSED MACT RULE FOR LIME MANUFACTURING

Author: Kimberly D. Coy

EPA has proposed the Lime Manufacturing MACT Standard (12/20/02). The primary air toxics found in kiln exhausts are hydrogen chloride and metals such as arsenic, cadmium, chromium, and nickel. The rule, however, only has numeric limits for particulate matter, as a surrogate for non-volatile and semi-volatile HAP metals. The proposed emission limitations are:

- 0.12 lbs of particulate matter (PM)/ton of kiln feed for existing kilns and coolers;
- 0.10 lbs of PM/ton of kiln feed of particulate matter for new kilns and coolers;
- 0.05 grams of PM/dry standard cubic meter and 7% opacity for material processing operations (MPO) vented through a stack;
- For each fabric filter that controls emissions from only an individual, enclosed storage bin, the opacity emissions must not exceed 7%;
- For each building enclosing any MPO, each affected MPO would have to comply individually with the PM and opacity limitation **or** demonstrate no visible emissions from the building, except from a vent, which must meet 0.05 grams of PM/dry standard cubic meter and 7% opacity;
- For each set of multiple storage bins with combined stacks emissions, emissions must not exceed 0.05 grams of PM per dry standard cubic meter and 7% opacity. *(cont'd next page)*

Sources using wet scrubbers to meet the emission limitations will have to maintain the 3-hour rolling average gas stream pressure drop across the scrubber and 3-hour rolling average scrubber liquid flow rate at levels equal to or above the levels established during a performance test. Sources using fabric filters to meet the emission limitations will have to maintain a bag leak detection system alarm or a continuous opacity monitoring system (COMS). Sources using an electrostatic precipitator will have to maintain the 3-hour rolling average current and voltage input to each electrical field, or maintain a COMS.

The MACT will only apply to lime manufacturer's that are major HAP sources. If a lime plant claims to be an area source, the rule would require a source to measure HCl emissions to demonstrate its claim. However, the EPA will not permit the use of EPA Method 26, which may have positive biases attributable to chloride salts rather than to HCl and negative biases due to condensation and removal of HCl on the filter and sampling probe. Instead, the EPA will require testing by either the American Society for Testing and Materials (ASTM) Test Method D-6735-01 or by fourier transform infrared (FTIR) spectroscopy in accordance with EPA Methods 320 and 321.

FOUR ADDITIONAL SOURCE CATEGORIES SUBJECT TO THE GENERIC MACT

Author: Kimberly D. Coy

Ethylene production, carbon black production, cyanide production and spandex production facilities will now have to comply with the provisions of the generic MACT standards codified in 40 CFR Part 63, Subpart YY. This addition was published by the EPA in a final rule on July 12, 2002 (67 FR 46258 – 46289). The standards initially applied to acetal resin production, acrylic and modacrylic fiber production, hydrogen fluoride production and polycarbonate production facilities.



The generic MACT standards include the following regulations in 40 CFR Part 63:

- Subpart SS – General MACT standards for closed vent systems, HAP control and recovery devices, and fuel gas systems and other processes to which HAP emissions are routed;
- Subpart TT – General MACT Level 1 controls for fugitive HAP emissions from equipment;
- Subpart UU – General MACT Level 2 controls for fugitive HAP emissions from equipment;
- Subpart WW – General MACT Level 2 controls for HAP-containing storage vessels; and
- Subpart YY – Generic MACT standards.

The new final rule adds Subpart XX which specifies control requirements for waste streams from ethylene production units. The new rule also revises each subpart to specify which

authorities EPA will retain, clarifies the conditions in which certain test methods can be used to measure the percent HAP reduction across a control device, and clarifies bypass line monitoring requirements.

The additional source categories which are existing must comply with the rule within three (3) years of rule promulgation, or by July 12, 2005. New sources that begin construction or reconstruction after December 6, 2000, but before the effective date would be given to July 12, 2005 to comply if the applicable final MACT standard provisions are more stringent than the proposed rule and the source complies with the proposed version of the applicable provisions during the three (3) year interim period. Sources beginning construction or reconstruction after the effective date must comply upon start-up.

EPA PROPOSED NESHAP/MACT STANDARDS BRICK AND STRUCTURAL CLAY PRODUCTS MANUFACTURING

(40 CFR PART 63 SUBPART JJJJJ) CLAY CERAMICS MANUFACTURING

(40 CFR Part 63 Subpart KKKKK) July 22, 2002, 67 FR 47894

Author: Nancy M. Hirko

EPA proposed two National Emission Standards for Hazardous Air Pollutants (NESHAP) rules for Brick and Structural Clay Products (BSCP) Manufacturing and for Clay Ceramics Manufacturing. The draft rules are currently available at http://www.access.gpo.gov/su_docs/aces/aces140.html.

The proposed rule does not establish Maximum Available Control Technology (MACT) standards for the clay minerals processing or lightweight aggregate manufacturing industries. EPA will not issue MACT standards for these two related source categories as originally planned.

Potentially affected facilities manufacture a variety of products, including porcelain bathroom fixtures, adobe brick, roofing tiles, pressed floor and wall tile, and earthenware. There may be many other manufactured items that may meet the rule applicability criteria.

The following standard industrial classification (SIC) categories are affected:

- 3251 Brick and structural clay tile
- 3253 Ceramic wall and floor tile
- 3259 Other structural clay products
- 3261 Vitreous plumbing fixtures (sanitaryware)

The facility must be a major source of HAP emissions. A major HAP facility is one that emits or has the potential to emit 10 tons per year of any one HAP or 25 tons per year of a combination of HAPs.

EPA has determined that during the kiln drying process, the following Hazardous Air Pollutants (HAPs) may be emitted: hydrogen fluoride (HF), hydrogen chloride (HCl), sulfur dioxide (SO₂) and particulate matter (PM) containing antimony (Sb), arsenic (As), beryllium (Be), cadmium, chromium, cobalt, mercury, manganese, nickel, lead and selenium. *(cont'd next page)*

BSCP Manufacturing (40 CFR Part 63 Subpart JJJJJ)**Affected Sources**

Existing: Tunnel Kiln with design capacity ≥ 10 tons per hour

New or Reconstructed: All kilns constructed or reconstructed after July 22, 2002, regardless of size.

If the kiln vents through a sawdust dryer and the dryer was in use prior to July 22, 2002, then the kiln would not be an affected source.

Also excluded are those tunnel kilns that have design capacities < 10 tons per hour or those that have federally enforceable permit conditions that limit operation to < 10 tph of fired product on a 30-day rolling average basis. Kilns used for R&D purposes or for setting glazes on already-fired products are not subject to Subpart JJJJJ.



EPA was receptive to development of a risk-based rule using two separate approaches. In the first, there would be an applicability cutoff for threshold pollutants under CAA Section 112(d). The other approach involves subcategorization and delisting under CAA Sections 112(c)(7) and (c)(9).

Emission Limits

For the existing, new, and reconstructed sources mentioned above:

HF ≤ 0.027 lb/ton of product fired: Reduce uncontrolled HF emissions by $\geq 95\%$

HCl ≤ 0.037 lb/ton of product fired: Reduce uncontrolled HCl emissions by $\geq 90\%$

PM ≤ 0.12 lb/ton of product fired

Operating limits on various parameters such as fabric filter inlet temperature, lime feed hopper settings, dry lime scrubber water injection rates, average scrubber pressure drops, average scrubber liquid flow rates, average scrubber liquid pH, and average scrubber chemical feed rates will be established during performance testing. A bag leak detection system must be in place on fabric filters. Note that EPA rejected dry lime adsorbers (DLA) as MACT.

Clay Ceramics Manufacturing (40 CFR Part 63 Subpart KKKKK)**Affected Sources**

New or Reconstructed: Tunnel or roller kilns constructed or reconstructed after July 22, 2002, regardless of size.

Excluded are existing tunnel or roller kilns at clay ceramic manufacturing facilities. Kilns used for R&D purposes or for setting glazes on already-fired products or for refiring products are not subject to Subpart KKKKK.

Emission Limits

For the new and reconstructed sources mentioned above:

HF ≤ 0.027 lb/ton of product fired: Reduce uncontrolled HF emissions by $\geq 95\%$

HCl ≤ 0.037 lb/ton of product fired: Reduce uncontrolled HCl emissions by $\geq 90\%$

PM ≤ 0.12 lb/ton of product fired

As with Subpart JJJJJ, operating limits on various parameters such as fabric filter inlet temperature, lime feed hopper settings, dry lime scrubber water injection rates, average scrubber pressure drops, average scrubber liquid flow rates, average scrubber liquid pH, and average scrubber chemical feed rates will be established during performance testing. A bag leak detection system must be in place on fabric filters.

EPA PROPOSES NESHAP FOR SURFACE COATING OF MISCELLANEOUS METAL PARTS AND PRODUCTS

Authors: Kimberly D. Coy & Mark C. Schooley

On August 13, 2002, the EPA proposed a new rule to establish national emission standards for hazardous air pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products (Subpart MMMM). This rule will affect a wide range of facilities, and is summarized below.

COMPLIANCE DATES

- Proposal Date: August 13, 2002
- Tentative Promulgation Date: August 13, 2003
- Tentative Compliance Date, Existing Sources: August 13, 2006
- For new sources constructed before August 13, 2003, the compliance date is August 13, 2003
- For new sources constructed after August 13, 2003, the compliance date is the initial date of start-up.

INITIAL NOTIFICATION

- For new sources, no later than 120 days after initial start-up or 120 days after final promulgation, whichever is later.
- For existing sources, within one (1) year after final promulgation

AFFECTED SOURCE DEFINITIONS

- Applies to all coating operations at facilities that are major sources for HAPs
- Applies to all storage containers and mixing vessels in which coatings, thinners and cleaning materials are stored and mixed
- Applies to all manual and automated equipment and containers used for conveying coatings, thinners and cleaning materials
- Applies to all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation

EMISSION LIMITATIONS**Existing Sources**

- For use of both high performance and general use coatings, HAP emissions must be no greater than the limit calculated per Equation 2 of the regulations, during each 12-month compliance period (lb HAP/gal coating solids)
- If using only one coating type (i.e. general use or high performance):
 - General use limit of 2.60 lb HAP/gal coating solids

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- High performance coating limit of 27.54 lb HAP/gal coating solids
- For magnet wire sources, organic HAPs limited to no more than 1.0 lb HAP/gal coating solids during each 12-month compliance period.
- For rubber to metal sources, organic HAPs limited to no more than 37.70 lb HAP/gal coating solids during each 12-month compliance period.

New Sources

- For use of both high performance and general use coatings, HAP emissions must be no greater than the limit calculated per Equation 1 of the regulations, during each 12-month compliance period
- If using only one coating type (i.e. general use or high performance):
 - General use limit of 1.94 lb HAP/gal coating solids
 - High performance coating limit of 27.54 lb HAP/gal coating solids
- For magnet wire sources, organic HAPs limited to no more than 0.44 lb HAP/gal coating solids during each 12-month compliance period.
- For rubber to metal sources, organic HAPs limited to no more than 6.80 lb HAP/gal coating solids during each 12-month compliance period.

COMPLIANCE OPTIONS FOR MEETING EMISSION LIMITATIONS

- **Compliant Material Option** – Demonstrate that the organic HAP content of each coating used is less than or equal to the limit and that each thinner and each cleaning material used contains no organic HAP.
 - No operating limits to meet
 - No work practice standards to meet
 - Initial Compliance Demonstration – Calculation using Coating Properties for compliance period (starting on compliance date and ending on the last day of the 12th month).
 - Continuous Compliance Demonstration for each 12-month compliance period – Maintenance of records, such as the calculation of the organic HAP content of each coating, etc.
- **Emission Rate Without Add-On Controls Option** – Demonstrate that, based on the coatings, thinners and cleaning materials used in the coating operation, the organic HAP emission rate for the coating operation is less than or equal to the emission limit, calculated as a rolling 12-month emission rate and determined on a monthly basis.
 - No operating limits to meet
 - No work practice standards to meet
 - Initial Compliance Demonstration – Calculation using Coating Properties for compliance period (starting on compliance date and ending on the last day of the 12th month).



- Continuous Compliance Demonstration for each 12-month compliance period – Maintenance of records, such as the calculations of the total mass organic HAP emissions, etc.
- **Emission Rate With Add-On Controls Option** - Demonstrate that, based on the coatings, thinners and cleaning materials used in the coating operation, and the emissions reduction achieved by emission capture systems and add-on controls, the organic HAP emission rate for the coating operation is less than or equal to the emission limit, calculated as a rolling 12-month emission rate and determined on a monthly basis.
 - Meet operating limits as specified in Table 1 of the rule (i.e., for thermal oxidizers, the average temperature in any 3-hour period must not fall below the combustion temperature established during performance demonstration)
 - Work Practices – must develop and implement a work practice plan
 - Initial Compliance Demonstration – Calculations and Performance Test by compliance date
 - Continuous Compliance Demonstration – Calculation of mass organic HAP emission rate for each month, operating and work practice requirements, maintenance of records

HAZARDOUS AIR POLLUTANTS: COKE-OVEN PUSHING, QUENCHING, AND BATTERY STACKS

Authors: Nancy M. Hirko & Jill W. Merrill

On April 14, 2003, the EPA published a final NESHAP for Coke Oven Pushing, Quenching and Battery Stack operations (68 FR18007). The regulations apply to sources at Coke Plants that are also Major Hazardous Air Pollutant (HAP) Sources.

Major sources are those that emit 10 tons per year (tpy) of a single HAP or 25 tpy of a combination of HAPS.

The MACT Establishes:

- Emission limitations
- Work practice standards
- O&M requirements
- Initial & continuous compliance requirements

The compliance dates are:

- Existing sources by April 14, 2006
- New sources upon startup

Pushing:

- Limit: 0.01 gr/dscf for a coke side shed
- Limit: 0.02 gr/dscf for a moveable hood vented to a control device
- Limit: 0.03 lb/ton or 0.01 lb/ton for mobile scrubber cars that do not capture during travel for a short or long battery, respectively
- Limit: 0.04 lb/ton for mobile scrubber car that does capture during travel

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- A Venturi scrubber will require daily average pressure drop and scrubber water flow rate measurements
- A hot water scrubber will require daily average water pressure and water temperature measurements
- Each capture system will require daily average fan motor amperage or volumetric flow rate measurements at the inlet to the control device
- A baghouse will require a bag leak detection system, differential pressure monitoring across each cell daily, and visual inspections weekly and monthly
- Prepare a plan with procedures for inspections, preventative maintenance, and corrective actions for control device
- Prepare a written plan to minimize incomplete coking
- Conduct tests of any control device at least twice every 5 years
- Include compliance information in Semiannual Report

Quenching:

- Limit for quench water TDS of 1,100 mg/L or a site specific limit for the sum of benzene, benzo(a)pyrene and naphthalene
- Must use acceptable quench water
- Must allow no more than 5% of cross sectional area of tower to be open
- Must wash baffles once/day (if temp. > 30°F)
- Must continuously record ambient temperature on days baffles not washed
- Implement a baffle inspection, repair & replacement program
- Must conduct testing for TDS or alternative site specific limit
- Include compliance information in Semiannual Report

Battery Stacks:

- Install Continuous Opacity Monitoring Systems (COMS)
- Limit: < 15% for normal coking cycle, daily average
- Limit < 20% for extended coking cycle, daily average
- Prepare Quarterly Reports

Soaking:

- Prepare a Work Practice Plan
- Train operators to recognize emissions that need corrective action
- Damper the Oven off the collector Main prior to opening standpipe
- Take corrective actions for emissions of collector main or notify responsible party if emissions are caused by incomplete coking
- Include compliance information in Semiannual Report (SA)

General:

- Sources will be required to prepare written Startup, Shutdown and Malfunction (SSM) Plans
- Includes procedures for operating and a program of corrective action for malfunctioning process and air pollution control equipment
- Specific reporting requirements for malfunction events
- Include compliance information in SA Report

EPA ISSUES NESHAP FOR: REINFORCED PLASTIC COMPOSITES PRODUCTION

(Subpart WWW) – Issued 4/21/2003)

Author: Mark C. Schooley

On April 21, 2003, EPA issued the final MACT rule for reinforced plastic composites (RPC) production facilities. The exact text of the rule can be found at the following link: <http://www.epa.gov/ttn/atw/rpc/rpcpg.html>.

RPC facilities produce products such as fiberglass bath tubs and showers, automobile vehicle parts, storage tanks, ladders, and many more items. The main HAP of concern at RPC facilities is styrene, which is present in resins and gel coats. EPA estimates that there are over 400 major RPC plants that will be affected by this rule.

Existing major sources will be required to incorporate pollution-prevention techniques in their production processes, including using raw materials containing low amounts of air toxics, non-atomized resin application, and covering open resin baths and tanks. These requirements will also apply to new RPC sources that have a potential to emit less than 100 tons per year.

New large facilities (greater than 100 tpy), will be required to install air pollution control equipment.

MISCELLANEOUS NEWS

USEPA ADMINISTRATOR WHITMAN RESIGNS



Christine Todd Whitman has tendered her resignation as Administrator of the EPA to President Bush. The resignation will take effect June 27, 2003.

The following are some excerpts from her letter of resignation:

"It has been a singular honor to be entrusted with the responsibility to lead the EPA in its effort to leave America's air cleaner, its water purer, and its land better protected than it was when this Administration took office....I am proud of the work this Agency (EPA) has done and of the contributions it has made to the success of your Administration. The people who serve our country as employees of the EPA are as dedicated and as committed a group as can be found in federal service. It has been a true honor to be able to lead this Agency as it worked to implement the innovative, effective environmental policies to which you are so clearly committed."

HAPS NEWS



On May 30, 2003, EPA proposed to remove methyl ethyl ketone (MEK) from the HAP (Hazardous Air Pollutant) list. They are taking comments for 60 days.

This could have a wide-ranging impact, since many coatings, inks, and thinning solvents contain MEK. Any facilities that currently are major sources due to MEK emissions, could conceivably become non-major and, thus, not be subject to MACT Standards.



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- Stack Testing
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- Ambient air sampling
- Odor sampling
- Indoor air quality sampling and monitoring
- Air emission inventories
- Air quality impact assessments
- Major PSD/NSR and minor permits
- Title V operating permits
- Dispersion modeling
- Multimedia compliance auditing
- ISO-14000
- Phase I environmental site assessments
- Control equipment evaluation and troubleshooting
- BACT/MACT/RACT and LAER analysis
- SARA Form R and Tier I/Tier II reporting
- Storm water management plans
- Soil and water sampling
- Risk management plan development