Region 3 MACT Enforcement

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Region 3 MACT Enforcement

- National Priorities
- Compliance Assistance/Enforcement
- Obstacles
- Enforcement Strategy
- Resources
National Priorities for Region 3

• Adopt-a-MACT
  – Polymer and Resins
  – Portland Cement

• Statistically Valid Compliance Rate Project
  – Ethylene Oxide

• Two-year Enforcement Cycle (FY04)
  – Mineral Wool
  – Flexible Polyurethane Foam
National Priorities for Other Regions

• **Adopt-a-MACT:** Flow diagrams, inspection checklists, source identification manuals (e.g., HON, aerospace, degreasing, chrome electroplating, OSWRO)

• **FY2004 inspection targets:** wood furniture, printing & publishing, gasoline distribution, petroleum refineries, secondary aluminum, shipbuilding, pharmaceuticals, natural gas transmission, oil & gas production, pulp & paper
Compliance Assistance/ Enforcement Activities

• **Chrome Electroplating**
  – Tri-Fold mail out
  – Violations included: ignorance of rule, failure to conduct performance test or conduct correctly, MRR
  – Large case lead to RCRA referral

• **Halogenated Solvent Degreasing**
  – Targeted as easy rule for new inspectors
  – Source identification through RCRA database
  – Violations included: ignorance of rule, incorrect hoist speeds & freeboard ratios, incorrect method of determining compliance
  – Changing solvents does not necessarily lead to deregulation
Compliance Assistance/Enforcement Activities

- Gasoline Distribution Terminals
- Pharmaceutical Industry
  - Synthetic minors
- Printing and Publishing
- Shipbuilding
  - Paint sampling
- Medical Waste Incinerators (111(d)/129 standard)
  - Failed performance tests
- Landfills
  - Targeted as NSPS
Compliance Assistance/Enforcement Activities

- Steel Pickling
- Secondary Aluminum
- Philadelphia Risk Project
  - Nine pollutants of concern
  - Stationary sources identified through NATA, TRI, AFS, business directories
  - Investigation of chrome emissions lead to identification of emission inventory errors
Compliance Assistance/Enforcement Activities

• HON
  – Notification of Compliance Status review resulted in TRE calculation errors
  – Incorrect wastewater point of determination
  – Errors in spreadsheet calculations of emissions
  – Wastewater and LDAR sampling

• Benzene NESHAPs (storage, transfer, LDAR, waste operations)
  – Incorrect calibration gas specification
  – Incorrect wastewater point of generation
MACT Enforcement Obstacles

• Number of MACT standards
  – Major and area source standards

• Complexity of rules
  – New test methods (D/F, metals)
  – Operations not previously addressed (wastewater)

• Flexibility within standard
  – Emission averaging
  – Compliance and delegation options

• Synthetic minor sources
Region 3 Enforcement Strategy

• Maintain expertise in rules
• Targeting workgroup
• Air toxics workgroup
• Use of various resources to identify sources
  – MACT prioritization tool, OTIS (other programs)
  – Business directories
  – SIC Code directories
Resources

• Air Toxics Website
  – http://www.epa.gov/ttn/atw/mactfnlalph.html

• Applicability Determination Index
  – http://cfpub.epa.gov/adi/

• MACT Prioritization Tool
  – http://www.epa.gov/idea/mact/

• OTIS Database
  – http://www.epa.gov/idea/otis/
Resources

• North American Industry Classification System/ Standard Industrial Classification

• Business Information
  – Harris Business Directory
  – Good ole Google