OPPORTUNITIES FOR SYNERGY
VOC AND AIR TOXIC RULES

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MARAMA
Area Source Regulations

EPA-453/R-06-001  CTG for Industrial Cleaning Solvents
EPA-453/R-06-002  CTG for Offset Lithographic Printing and Letterpress Printing
EPA-453/R-06-003  CTG for Flexible Package Printing
EPA-453/R-06-004  CTG for Flatwood Paneling Coatings
EPA-453/R-07-003  CTG for Paper, Film, and Foil Coatings
EPA-453/R-07-004  CTG for Large Appliance Coatings
EPA-453/R-07-005  CTG for Metal Furniture Coatings


OTC Model Rules:

Phase I:
- 2002: Architectural, Industrial and Maintenance Coatings
- 2002: Mobile Equipment Repair and Refinishing
- 2002: Portable Fuel Containers
- 2002: Solvents and Cleaners
- 2002: Consumer Products

Phase II:
- Portable Fuel Containers after 1/1/07 (Phase II)
- Adhesives and Sealants (Phase II)
- Consumer Products FINAL (Phase II)
MACTs and GACTs

• 40 CFR 63 Subpart T
  – Halogenated Solvent Cleaning

• 40 CFR 63 Subpart HHHHHH
  – Paint Stripping and Miscellaneous Surface Coating Operations

• 40 CFR 63 Subpart XXXXXX
  – Nine Metal Fabrication and Finishing Source Operations

• 40 CFR 63 Subpart CCCCCC
  – Gas Dispensing Facilities

• 40 CFR 63 Subpart BBBBBBB
  – Gasoline Distribution, Bulk Terminals, and Bulk Plants
Miscellaneous Regulations

• Stage I RACT rule
• Mobile Source Air Toxics Rule
  – (40 CFR 59 Subpart F)
CTG vs MACT vs OTC MODEL RULE

- Similar sources are covered
- Goal of rules are different
- Geographic coverage is different
CTG – CONTROL TECHNOLOGY GUIDANCE

• NONATTAINMENT AREAS ONLY
• SIP MUST INCLUDE RACM INCLUDING RACT
  – (Reasonably available control measures)
  – (Reasonably available control technology)
• 80% OF TOTAL VOC MUST BE COVERED BY RACM
• MANY SMALL SOURCES ADD UP TO 80%
• CTGs PROVIDE GUIDANCE FOR RACT FOR SOURCES THAT WOULD BE CONSIDERED AREA SOURCES OUTSIDE OF NONATTAINMENT AREAS
CTG – CONTROL TECHNOLOGY GUIDANCE

- CONTROL RECOMMENDED FOR SOURCES WITH GREATER THAN 15 LB/DAY OF ACTUAL VOC EMISSIONS
- SYNTHETIC MINORS ENCOURAGED
CTG – CONTROL TECHNOLOGY
GUIDANCE – What is in the document?

- State by state estimate of number of facilities affected
- Control measure cost estimation
- Description of source categories and potential controls
- Summary of state rules
CTG – CONTROL TECHNOLOGY GUIDANCE – Why the interest now?

• Seven CTGs have been recently released.
• States are in the process of writing rules to respond
• Synergy is possible between VOC and Air Toxic Rules and Enforcement.
CTG – CONTROL TECHNOLOGY GUIDANCE - What is MARAMA Doing?

- Established a work group – 2 teleconference this summer
- Distribute summary products developed by VA and PA personnel
- Provided space on MARAMA FTP site to house documents of interest to the group
CTG – CONTROL TECHNOLOGY GUIDANCE

• Questions or discussion?