

**MACT UPDATE**  
**What's New in Title III**

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**Key Words:** air regulations, MACT, CAA Title III, Hazardous Air Pollutant, HAP, air toxics

**Abstract:** This presentation will summarize:

- MACT standards finalized to-date;
- Pending MACT standards applicable to several types of sources;
- Other air toxics programs derived from Title III of the 1990 Clean Air Act Amendments; and
- The future of air toxics programs at the federal and state levels.

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**Abstract (continued)**

Differing viewpoints will be presented on the effectiveness of these Hazardous Air Pollutant rules, and how these rules have and will effect industrial sources.

Discussion of these and other Title III issues will be encouraged as part of the air issues panel to follow the individual presentations.

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**MACT UPDATE**  
**What's New in Title III**

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**MACT UPDATE**

- Review Status of Various MACT Programs
- Review MACTs that have Current Impacts
- Review MACT which will have Impacts Soon
- Discuss Other Impacts of the MACT Standards on the Industry

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**EPA VIEW OF MACT PROGRESS**

- **EPA Report to Congress**
  - Proceeding well on 2-year and 4-year standards;
  - Regulated 47 categories of industrial sources to date;
  - Already have reduced significant amount of air toxics in the air (980,000 tons);
  - Also, regs. have resulted in reductions of Criteria Pollutants (VOCs);
  - Involvement of Stakeholders in the regulatory development process;

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**COUNTERPOINT VIEW**

- Delays in setting and passing standards; When schedule becomes issue - schedule becomes more important than content of regulation;
- Stakeholder participation varies greatly among the regulations;
- Litigation required to keep EPA within authority;
- \$\$\$ spent with net benefit to health and environment debated.

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**REGULATIONS - CURRENT**

- **40 CFR 63**
  - TOC Included in back of Handouts
- **EPA Websites**
  - Office of Air Quality Planning and Standards (OAQPS)
    - *OAD Policy and Guidance (OAD P&G)*
    - *Unified Air Toxics Website (UATW)*
  - <http://www.epa.gov/ttn/oarpg>
  - <http://www.epa.gov/ttn/uatw>

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**PROPOSED AND SCHEULDED STANDARDS**

- Remaining 7 year standards
- Remaining 10 year standards
- Upcoming Standards have Broad Applicability
  - Combustion MACT
  - Coatings MACT

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**SCHEDULED STANADRDS**

- “Final” HON
- Misc. Organic NESHAP (MON)
- “Generic” MACTs
- Organic Liquids Distribution
- Other specific chemicals (alumina, antimony oxides, carbon black, cellulose, chlorine, cyanide, ethylene, silica, flexible polyurethane foam, hydrochloric acid, lime, polyvinyl chloride, and magnesium)

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**SCHEDULED STANDARDS**

- **Industrial/ Commercial/ Institutional Boilers**
- **Process Heaters**
- **Site Remediation**
- **Several Surface Coating Standards**
- **FACT SHEETS in Handouts**

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**BEYOND THE CATEGORY STANDARDS**

- **Residual Risk Standards**
  - Report to Congress
  - HON first up
- **Integrated Urban Air Toxics Strategy**
  - Above and beyond industry standards
  - Area sources included
- **Impact on Great Waters**
  - MACT standards sufficient

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**Other 112 Sections**

- **112(g) requirements enforced by state permit programs**
- **112(j) revisions finalized, and could come into play soon**
- **112(r)**
  - 1st round done,
  - Watch for future applicability,
  - SOURCES ARE ON THE WEB

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**OTHER EFFECTS OF MACT STANDARDS**

- **MACT Standards, 112(r), SARA 313**
  - Companies rethink HAP use
  - Limit production to “arbitrary” levels
  - Follow PSD-like thinking in designing plants to below thresholds
  - Reduce use of HAPs for PR and Community relations

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**OTHER EFFECTS OF MACT STANDARDS**

- **MACT Forced Reductions**
  - Required reformulations (degreasers, coatings)
  - Required “bans” on HAP (Aerospace, Tire Manufacturing)

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**OTHER EFFECTS OF MACT STANDARDS**

- **MACT Compliance Efforts**
  - Required record keeping key
  - Reporting can be more frequent than other reporting requirements
  - Enforcement Priority by US EPA
  - Track new and modified regs, and case law developments

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