OPPORTUNITIES FOR SYNERGY VOC AND AIR TOXIC RULES

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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
Proposed, July 14, 2008 Federal Register. To be issued by September 30, 2008.	Consumer and Commercial Products: Control Techniques Guidelines in Lieu of Regulations for Miscellaneous Metal Products Coatings, Plastic Parts Coatings, Auto and Light-Duty Truck Assembly Coatings, Fiberglass Boat Manufacturing Materials, and Miscellaneous Industrial Adhesives.

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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)**

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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 BBBBBB
  - Gasoline Distribution, Bulk Terminals, and Bulk Plants

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Miscellaneous Regulations

- **Stage I RACT rule**
- **Mobile Source Air Toxics Rule**
  - **(40 CFR 59 Subpart F)**

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CTG vs MACT vs OTC MODEL RULE

- Similar sources are covered
- Goal of rules are different
- Geographic coverage is different

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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

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CTG – CONTROL TECHNOLOGY GUIDANCE

- CONTROL RECOMMENDED FOR SOURCES WITH GREATER THAN 15 LB/DAY OF ACTUAL VOC EMISSIONS
- SYNTHETIC MINORS ENCOURAGED

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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

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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.

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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

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CTG – CONTROL TECHNOLOGY GUIDANCE

- Questions or discussion?

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