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**
  - http://www.census.gov/epcd/www/naicstab.htm
- **Business Information**
  - http://www.webstersonline.com/default.asp
  - http://www.business.com/
  - http://www.siccode.com/index.php
  - Harris Business Directory
  - Good ole Google