

DRAFT
National Association of Clean Air Agencies (NACAA)
Major HAP Sources without MACT Standards
February 29, 2016

The following is list of sources emitting major amounts of hazardous air pollutants (HAPs) (i.e., 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs) that do not fall into any of the source categories listed under Section 112(c) of the Clean Air Act and are therefore not subject to a MACT.

Description of Source Category or Activity	Name & Location of Facilities	Estimated Potential Facility-wide Total HAP Emissions (in tpy)	Comments	Contact Person for More Information
Air-floated Kaolin Clay	Kentucky Tennessee Clay Company (KTC) TV-0080-0003 Langley, SC	Methanol 250 TPY		Heinz Kaiser (803) 898-4089 Kaiserh@dhec.sc.gov
Bakeries Emissions from bread & cracker production and reported under SCC 30203299	Pepperidge Farm, Inc Lakeland, FL	No limit on PTE in TV permit. > 10 tpy (acetaldehyde); Actual 2004 emissions: 11 tpy. Actual 2014 emissions: 3 tpy.		Cindy Phillips (850) 717-9098 cindy.phillips@dep.state.fl.us
Casket Manufacturing (surface coating and adhesives)	Batesville Manufacturing Batesville, MS	230 tpy	SIC-3995	B. Hailey B_J_Hailey@deq.state.ms.us
Ceiling Tile Manufacturing (1)	Armstrong World St. Helens, OR	24.5 tpy (formaldehyde)		Jerry Ebersole (503)229-6974 Ebersole.gerald@deq.state.or.us
Citrus Processing Emissions from direct-fired peel dryer and reported under SCC 30299999 (dried peel)	Southern Garden Citrus Processing Corp. Clewiston, FL	No limit on PTE in permit. > 10 tpy (methanol); Actual 2014 emissions: 57 tpy > 25 tpy Total HAPS; Actual 2014 emissions: 78 tpy		Cindy Phillips (850) 717-9098 cindy.phillips@dep.state.fl.us
Coal-fired Rotary Kilns for Calcining Clay	CE Minerals Andersonville, GA	25 tpy HCl >10 tpy HF		Sean Taylor (404) 363-7047 Sean.taylor@dnr.ga.gov
Continuous Strand Fiberglass	PPG Chester, SC	32 tpy	Not subject to wet-formed since it is continuous strand, not web-formed	Heinz Kaiser (803) 898-4089 Kaiserh@dhec.sc.gov
Crude Oil Lightering (2)	Overseas Shipholding Group (OSG) Big Stone Anchorage, DE	~100 – 150 tpy PAHs & VOC-HAPs (2000 – 2011)	Total VOCs emissions ~13 times the PAHs & VOC-HAPs	Jim Snead jsnead@state.de.us
Custom Screenprint Wall Covering Manufacturing	Rainbow Creations, Inc. Ridgeland, MS	119 tpy	SIC-2759	B. Hailey B_J_Hailey@deq.state.ms.us

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Electric Arc Furnaces at Steel Mills	Nucor Steel Huger, SC	HAP 51 TPY		Heinz Kaiser (803) 898-4089 Kaiserh@dhec.sc.gov
Ferroalloys Production - Superalloys	Huntington Alloys Corp. Huntington, WV	191 tpy nickel 56 tpy chromium 9.2 tpy manganese 1.3 tpy cobalt 20 tpy hydrochloric acid 3.7 tpy hydrofluoric acid	40 CFR 63, Subpart XXX only covers melts that start with some type of ore as a raw material. However this facility is considered a superalloy category since it starts with raw materials that have already been refined rather than a raw ore and is therefore not subject to the MACT.	Renu Chakrabarty (304) 926-0499, ext. 1246 renu.m.chakrabarty@wv.gov
Ferroalloy manufacturing producing silicon, ferrosilicon, slags and other alloys	WVA Manufacturing , LLC Alloy, WV	0.4 tpy formaldehyde 6.2 tpy hydrogen fluoride 133.7 tpy hydrochloric acid	40 CFR 63, Subpart XXX only applies to ferromanganese and silicomanganese production.	Renu Chakrabarty (304) 926-0499, ext. 1246 renu.m.chakrabarty@wv.gov
Fiberglass Manufacturing	Owens Corning, Anderson, SC	2,331 tpy	Wet formed fiberglass mat process has no HAP emissions	Heinz Kaiser (803) 898-4089 Kaiserh@dhec.sc.gov
	PPG Industries Fiberglass Products Inc. 0640-0040	HF 15.78 TPY Methanol 32.4 TPY Fluorides 28.31 TPY		
Fiberglass Yarn Manufacturing	AGY Aiken, SC	>300 tpy	Exempt from Wet formed fiberglass mat MACT	
Film Dyeing	CPFilms (2 facilities) Axton, VA Fieldale, VA	>10/25 tpy		Pat Corbett Patrick.corbett@deq.virginia.gov
Flexible Tubing and Ductwork	Flexible Technologies Abbeville, SC TV-0040-0013	HAP 133 TPY		Heinz Kaiser (803) 898-4089 Kaiserh@dhec.sc.gov

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Foam Insulation Board Manufacturing	Kingspan Winchester, VA	>10/25 tpy		Pat Corbett Patrick.corbett@deq.virginia.gov
Glass & Mirror Manufacturing - Miscellaneous glass products (beveling assembly & silverline process)	Renin US, LLC, a Division of Renin Corporation (was The Stanley Works) Tupelo, MS	40 tpy	SIC – 3231, 3471	B. Hailey B_J_Hailey@deq.state.ms.us
Graphite Electrodes	Showa Denko Carbon Ridgeville, SC TV-0900-0025	>25 tpy		Heinz Kaiser (803) 898-4089 Kaiserh@dhec.sc.gov
Industrial Gas Production	Air Products and Chemicals, Inc. Wilmington, CA	Total HAP emissions: 25 tpy in 2010 HAPS >10 tpy: Methanol, 24 tpy in 2010		Ian MacMillan (909) 396-3244 imacmillan@aqmd.gov
Inorganic Pigment Manufacturing	EMD Millipore Corp. Savannah, GA	>10 tpy HCl	HCl used in production of bismuth oxychloride	Sean Taylor (404) 363-7047 Sean.taylor@dnr.ga.gov
Kaolin Proppants	Pyramax Wrens, GA	100 tpy HCl 40 tpy methanol		Sean Taylor (404) 363-7047 Sean.taylor@dnr.ga.gov
	Carbo Ceramics Toombsboro, GA	100 tpy HCl 40 tpy methanol		
	Carbo Ceramics Millen, GA	100 tpy HCl 40 tpy methanol		
	Carbo Ceramics McIntyre, GA	100 tpy HCl 40 tpy methanol		
	Imerys Oilfield Minerals Andersonville, GA	100 tpy HCl 40 tpy methanol		
Methyl Bromide Fumigation Operations	Dundalk Marine Terminal Baltimore, MD	30 tpy of methyl bromide	There are also fumigation facilities at ports outside of MD that are major HAP sources. EPA Region III is aware of this.	Suna Yi Sariscak Suna.sariscak@maryland.gov
	Royal Pest Solutions Suffolk, VA Western Fumigation Suffolk, VA	>10 tpy (Methyl Bromide)		Pat Corbett Patrick.corbett@deq.virginia.gov
	Royal Fumigation Wilmington, DE	Typically, a 5- month/year operation ~35 – 50 tpy (MeBr)	PTE – 85 tpy 51 tpy (2014)	Jim Snead jsnead@state.de.us

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	Tioga Marine Terminal Philadelphia, PA	PTE >10/25 tpy (actual ~24 tpy)		Edward Wiener (215) 685-9426 Edward.wiener@phila.gov
	Pier 84 Philadelphia, PA	PTE >10/25 (actual ~9tpy – could be synthetic minor)		
Mica Production	Mica Co. of Canada, Inc. Newport News, VA	123 tpy		Pat Corbett Patrick.corbett@deq.virginia.gov
Microporous Membrane Manufacturing (1)	Emark or Entek Lebanon, OR	95 tpy TCE		Jerry Ebersole (503) 229-6974 Ebersole.gerald@deq.state.or.us
Musical Instrument Manufacturing	Peavey Electronics Plant3 Meridian, MS	245 tpy	SIC-3651	B. Hailey B_J_Hailey@deq.state.ms.us
	Peavey Electronics Plant2 Meridian, MS	197 tpy		
Needle Manufacturing Emissions from needle lube mixing sterilization and reported under SCC 49099999	Covidien LP Deland, FL	Individual HAP (Hexane) < 65 tpy; Actual 2014 emissions: 37 tpy Total HAPS < 65 tpy Actual 2014 emissions: 38 tpy		Cindy Phillips (850) 717-9098 cindy.phillips@dep.state.fl.us
Nitrogen Fertilizer Manufacturing	Koch Fertilizer Fort Dodge LLC (formerly Koch Nitrogen) Fort Dodge, IA	5.51 tpy reported for 2014 (actual methanol emissions) The total HAPs noted are actuals, not potentials. The facility is probably consistently high enough in its potentials that it is still considered major for HAP.	Not covered under MON. NOTE: Facility has a diesel generator subject to the RICE NESHAP (subpart ZZZZ) and several boilers and process heaters subject to the Boiler MACT (subpart DDDDD)	Christine Paulson (515) 725-9510 Christine.paulson@dnr.iowa.gov
Non-Stainless Steel Manufacturing – Electric Arc Furnace (EAF) Operation, Stainless Steel Manufacturing – EAF Operation (1), (3)	Evraz Rivergate Plant, OR	70 tpy >10 tpy benzene, xylenes, MEK, ethylbenzene		Jerry Ebersole (503) 229-6974 Ebersole.gerald@deq.state.or.us
Nutritional Yeast (for animal consumption)	Diamond V Mills Cedar Rapids, IA	> 48.79 tpy reported for 2014 (actual, acetaldehyde emissions)	Supbart CCCC only covers yeast for human consumption. NOTE: Facility has 2 natural gas-fired boilers subject to Boiler MACT (subpart DDDDD)	Christine Paulson (515) 725-9510 Christine.paulson@dnr.iowa.gov

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Onshore calcining of raw (green) coke	Rain CII Carbon LLC Moundsville, WV	42 tpy nickel compounds		Renu Chakrabarty (304) 926-0499, ext. 1246 renu.m.chakrabarty@wv.gov
Plastisol Burn-off Oven	Rack Processing, Inc. Dayton, OH	37 tpy HCl (estimated PTE)	Subject under 111, but no rule exists(4)	Eileen Moran (937) 225-4004 emoran@rapca.org
Rubber & Latex Products Manufacturing - Gloves, catheters, etc.	North Safety Products Clover, SC	Permitted amounts 284 tpy (total HAPs): 56 tpy ethylbenzene 28 tpy toluene 199 tpy xylene 0.6 tpy chlorine		Heinz Kaiser (803) 898-4089 Kaiserh@dhec.sc.gov
	C.R. Bard Moncks Corner, SC	Permitted amounts 262 tpy (total HAPs): 15 tpy methanol 247 thylene chloride 0.01 ethylene biphenyl isocyanate 0.15 methyl isobutyl ketone 0.0003 toluene 0.0005 hexane		
- Rubber hoses, belts	Goodyear Norfolk, NE	30 tpy		Carrie Wiese (402) 471-6624 Carrie.wiese@nebraska.gov
- Miscellaneous rubber products (adhesives and cleaning solvents applied by hand) (1)	SMR Technologies West Virginia	16.7 tpy toluene 7.2 tpy hexane 0.5 tpy misc. HAPs <0.5 tpy formaldehyde		Renu Chakrabarty (304) 926-0499 ex.t 1246 Renu.m.chakrabarty@wv.gov
Sodium Chlorate & Hydrogen Peroxide Production	AKZO Noel Pulp & Performance Chemicals (was Eka Chemicals, Inc.) Columbus, MS	711 tpy	SIC-2819	B. Hailey B_J_Hailey@deq.state.ms.us
Synthetic Textile Fibers/Carbon Fiber	Cytec Carbon Fibers Rockhill, SC	200 tpy	Received Exemption from Textile MACT	Heinz Kaiser (803) 898-4089 Kaiserh@dhec.sc.gov
Thermochemical Pulping	Resolute FP US, Inc., Grenada Operations (was Bowater, which was Newsprint South, Inc.) Grenada, MS	128 tpy	SIC-2621	B. Hailey B_J_Hailey@deq.state.ms.us
Thermomechanical Pulping	Bowater Catawba, SC	> 10/25 tpy		Heinz Kaiser (803) 898-4089 Kaiserh@dhec.sc.gov
Titanium Dioxide Pigment Production	Chemours Company FC LLC (was E.I. Dupont de Nemours) Delisle Plant, MS	1,849 tpy	SIC-2816	B. Hailey B_J_Hailey@deq.state.ms.us

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Titanium Refining/Smelting	TDY Industries Albany, OR	671 tpy methyl isobutyl ketone 65 tpy gaseous chlorine and chloride		Jerry Ebersole (503) 229-6974 Ebersole.gerald@deq.state.or.us
Travel Trail and Campers Manufacturing	Custom Fibreglass Mfg. Co., DBA Snugtop Long Beach, CA	Total HAP emissions: 35 tpy in 2011 HAPS >10 tpy: Styrene, 33 tpy in 2011		Ian MacMillan (909) 396-3244 imacmillan@aqmd.gov
Used Shingle Recycling	Recovery Technology Solutions, Jackson, GA	100 tpy toluene		Sean Taylor (404) 363-7047 Sean.taylor@dnr.ga.gov

(1) A “Source Category List Change Request” Form has already been submitted to the EPA for these categories.

(2) In the preamble to the original May 13, 1994 proposed rule for “National Emission Standards for Hazardous Air Pollutants for Marine Tank Vessel Loading Operations” (40 CFR Part 63 Subpart Y), the EPA stated the following “. . . Nor does this source category include emissions from offshore vessel-to-vessel bulk liquid transfer operations (i.e., lightering operations). Lightering operations do not take place at onshore terminals. **The Agency may consider addressing lightering operations in a separate source category.**” (emphasis added) <http://www.epa.gov/ttn/atw/marine/fr13my94.pdf>

(3) Categories that have been delisted by the EPA

(4) The source is an incinerator, so it falls under Section 111. The Commercial and Industrial Solid Waste Incineration (CISWI) rule considered burn-off ovens (including rack reclamation units like this one), but they were not included in the final rule.

Please provide updated information to Mary Sullivan Douglas of NACAA at mdouglas@4cleanair.org.