

NACAA Request for RTR Date June 6, 2017

NACAA is seeking information from state and local air agencies. EPA is under two court orders to issue 33 Risk and Technology Review (RTR) standards by specified dates. Seven of them will be due by 2018, and the remainder by dates in 2020. (There are also some additional categories, beyond the 33, that EPA still needs to work on, but the dates are not established.) RTR standards are designed to address the risk that remains from sources of hazardous air pollutants after the establishment of Maximum Achievable Control Technology (MACT) standards and to account for advances in control technologies since MACT was implemented.

To view the list of source categories and their rule deadlines, click here:

http://www.4cleanair.org/sites/default/files/Documents/Source_Category_List_for_NACA_A_May_2017.xls

Developing these standards in such a short time is a significant undertaking and it is very likely that state and local agencies have useful information about these sources that would be very helpful to EPA and would help to result in better rules. NACAA is interested in information you may have related to the source categories with 2020 deadlines. EPA is already too far along on the development of the 2018 standards to be able to process a lot of new information. Specifically, we are seeking the following types of information, if you have it:

1. Inventory of facilities subject to each rule
2. List of individual HAP emission sources subject to each rule (by facility)
3. Estimates of annual emissions of each HAP (best from each emission source or point, second best from facility)
4. Stack parameters (e.g., location, latitude, longitude, stack height, stack gas velocity and temperature)
5. Identification of emission controls that are used on each release point

We recognize that this information may not be readily available and that it could be a significant effort to provide information about all the source categories. If that is the case, perhaps you could focus on the source categories about which you have the greatest concern related to residual risk, or the most information, or have had the greatest success in significantly reducing risk.

Several members have asked whether EPA intends to send out Section 114 letters soliciting information from sources. EPA staff have said that there is not enough time in the schedule to do an OMB-approved Information Collection Request (which is a time-consuming process).

If you have information to share, please send it to Mary Sullivan Douglas at mdouglas@4cleanair.org.

Thank you.