

US EPA ARCHIVE DOCUMENT



NESHAP for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing Final Rule

March 23, 2010



Area Source Program

- CAA Section 112(k) includes requirements for addressing HAP emissions from area sources
- Urban air toxics strategy was published on July 19, 1999
 - Identified 30 HAP as Urban HAP
 - Listed 70 area source categories (that emit over 90 percent of these HAP)
 - Asphalt Processing and Asphalt Roofing Manufacturing is “one” area source category
- There is also a major source category for Asphalt Processing and Asphalt Roofing Manufacturing



Not Covered by this Area Source Category

- Hot-mix asphalt concrete plants
- In place built-up roofing
- Major sources covered by MACT



Operations Covered by Rule

- Asphalt Processing
 - “Blowing Stills” which is the refining of asphalt
- Asphalt Coating Operations
 - Central to manufacturing asphalt roofing
 - Consisting of:
 - Surface Coating
 - Saturation, or
 - Both



Affected Sources

- Rule affects about 75 facilities
- Target HAP is PAH (Subset of POM)
- Baseline HAP emissions 3 tpy PAH (primarily from asphalt processing)
- Reduced asphalt use offset production increases
- No anticipated emission reductions
- Imposes no capital cost



Dates to Note

- Rule proposed - July 9, 2009
- Rule promulgated - December 2, 2009
- Initial Notification - within 120 days of promulgation
- Compliance Date - December 2, 2010 [or upon start-up for new sources]
- Notification of Compliance Status - within 180 calendar days of compliance date
- Technical correction notice published March 18, 2010



Standards

- Expressed as production rate emission limit: Lbs PAH per Ton of Production
- Allows PM as a surrogate [expressed as production rate emission limit, also]
- Four subcategories:
 - Asphalt Processing
 - Asphalt Coating
 - Asphalt Saturation
 - Asphalt Coating & Saturation



Title V - SSM

- Area sources are exempt from Title V permitting unless they are already required to have a Title V permit for another reason
- The rule limits apply at all times, however, a longer averaging period (24 hours) was provided for start-up and shutdown to allow sources to average emissions during periods of non-production with periods of production
- No litigations have been filed



Technical Correction

- Published March 18, 2010 [75FR12988]
- Three paragraphs incorrectly assigned
 - In section 63.11563 paragraphs l,m,n become g,h,& l
- Two cross-references also corrected
 - In section 63,11564(c) cross references to 63.11563 (l) & (m) are corrected



Available Implementation Tools

- <http://www.epa.gov/ttn/atw/area/arearules.html#final>
 - Area Source Rule Home Page on TTN
- <http://www.epa.gov/reg3artd/airregulations/delegate/appdet.pdf>
 - How to Review and Issue Clean Air Act Applicability Determinations and Alternative Monitoring (Attachment 1 is July 10, 1998 memorandum from John Seitz delegating Part 63 General Provisions authority to State and local agencies)
- <http://www.epa.gov/Compliance/monitoring/programs/caa/adi.html>
 - Applicability Determination Index.
- <http://regulations.gov>
 - Docket ID: EPA-HQ-OAR-2009-0027 for FR Notices, Correction Notice, facility list, etc.