



Chemical Preparations Industry Area Source NESHAP

Warren Johnson
Regulatory Development and Policy Analysis Group
Outreach and Information Division
August 2009



Introduction

- NAICS 311942
 - Spice and extract manufacturing
- NAICS 325199
 - All other basic organic chemical manufacturing
- NAICS 325510
 - Paint and coating manufacturing
- NAICS 325998
 - All other miscellaneous chemical product and preparation manufacturing
- Blending, extrusion, milling & mixing processes
- Listed for regulation under CAA section 112(k)
 - HAP: Metal compounds of chromium, lead, manganese and nickel



Background

- Estimated to impact 26 facilities
- Estimate 10 of these are considered small businesses
 - Small business definition is <500 employees for most facilities
 - Small business definition is <1,000 employees for NAICS 325199



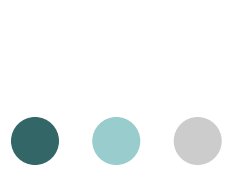
Emissions

- Potential emitting processes
 - Blending, extrusion, milling or mixing equipment
 - Vent Collection Systems
- Expect no additional reductions since facilities already apply GACT



No Subcategorization

- Standards apply to process equipment and associated vent collection systems
- Requesting comment on a grain loading alternative standard for which a subcategory may be created for the final rule.



Proposed GACT

- Standards require sources to route applicable emissions to a 95% efficiency PM control device
 - Fabric Filter
 - Wet Scrubber
- Requesting comment on 0.03 gr/dscf PM alternative outlet concentration limit
- Management practices require monthly inspections of the vent collection systems



Anticipated Costs

- Monitoring Recordkeeping and Reporting
 - \$176,000 annual cost to industry
 - Approximately 6,800/year per facility
- No new capital costs expected



Proposed Notification, Recordkeeping, and Reporting Requirements

- Initial Notification: basic information about facility and its operations (submitted 120 days after publication)
- Notification of Compliance Status: Statement that source has complied with all relevant standards (submitted 120 days after compliance date)
- Require continuous parametric monitoring (e.g., pressure drop, temperature, etc.) recorded on a 3-hour average.



Proposed Notification, Recordkeeping, and Reporting Requirements (cont.)

- Semi-Annual Compliance Report
- May demonstrate compliance with existing tests if run within last 5 years and is also representative
- Records to be kept for at least 5 years, the first 2 onsite



Applicability

- Includes blending, extrusion, milling and mixing operations
- Excludes:
 - Facilities that use no HAP
 - Operations covered by other area source standards:
 - Chemical Manufacturing (Subpart VVVVVV)
 - Paint and Allied Products (Subpart CCCCCC)



Contact Information

Warren Johnson

Johnson.warren@epa.gov

919.541.5124

Comments to Docket:

ID No. EPA-HQ-OAR-2009-0028

www.epa.gov/oar/docket.html. Follow the instructions for submitting comments.

E-mail: a-and-r-Docket@epa.gov. Include Docket ID No. in the subject line.

Fax: (202) 566-9744, Attention Docket ID No. EPA-HQ-OAR-2009-0028