

**POWC MACT-  
Applicability Examples**

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**Does this Rule Apply to You?**

- Are you a major source of HAP?
- Do you have an affected source?
  - Do you coat "paper and other web products?"
  - Are your operations excluded from the regulation?

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**Step 1: Are you a major source ?**

Do you emit or have the potential to emit...

- 10 tons per year of a single HAP?  
[Remember some "single HAP" are actually a group of compounds]
- 25 tons per year of all HAP?
- Remember, this is determined at fenceline for the entire facility

***If (and only if) you answer yes...***

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## Step 2: Do you have an affected source?

- Depends on rule language
- Determined process by process

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## For major source rules (like this one!)

### If you don't meet the major source definition, you are done!



(even if you have some of the listed sources at your facility)

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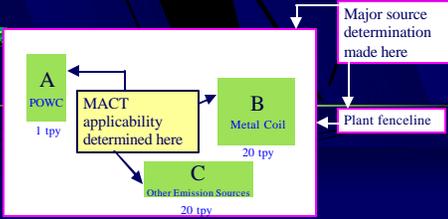
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## That being said...you don't have to be major for the regulated category...



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## Are you included in the affected source definition?

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## Affected Source

- ◆ Term used to define portion of a facility treated as a unit
  - determining “new” vs. “existing”
  - unit that when reconstructed is considered “new”
- ◆ EPA has defined broad (e.g., entire facility), narrow (e.g., kiln), and in-between

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## New vs. Existing Affected Sources

<p style="text-align: center;"><u>NEW</u></p> <ul style="list-style-type: none"> <li>◆ Begins construction <u>on or after</u> the day rule is <b>PROPOSED</b></li> <li>◆ Reconstructed affected sources treated as new</li> <li>◆ Compliance due at start-up or <b>PROMULGATION</b>, whichever is later</li> </ul>	<p style="text-align: center;"><u>EXISTING</u></p> <ul style="list-style-type: none"> <li>◆ Begins construction <u>before</u> the day rule is <b>PROPOSED</b></li> <li>◆ Addition to broad affected source</li> <li>◆ Compliance due 3 years after <b>PROMULGATION</b></li> </ul>
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This MACT defines  
affected source very  
broadly...

...this is GOOD

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### Impact of Broad Source

- A line added to your facility is not automatically a “new affected source”
- EPA (and the General Provision language) state that no addition to an affected source is a reconstruction unless something is replaced.

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### Another Benefit...

- Averaging across all affected coating lines
- Allows “credit” for non-HAP coatings applied by lines within your affected source...
- ...Even if only aqueous is applied on the line!

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## Some Applicability Examples

Remember: Major source

- $\geq 10$  tpy of any single HAP
- $\geq 25$  tpy of total HAP

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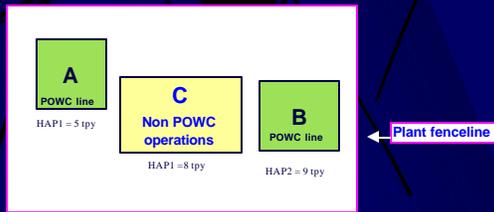
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### Example 1- Are these lines covered?"



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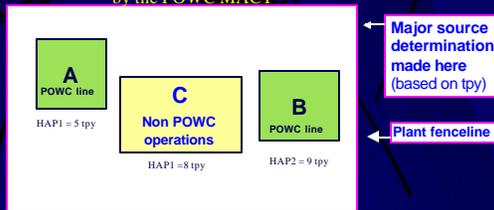
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### Example 1- Are these lines covered?"

Yes, both A and B are covered by the POWC MACT



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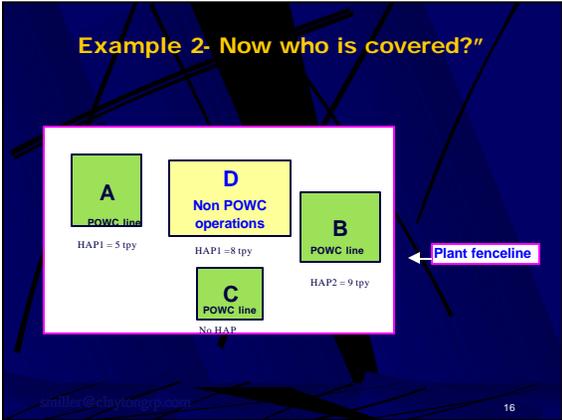
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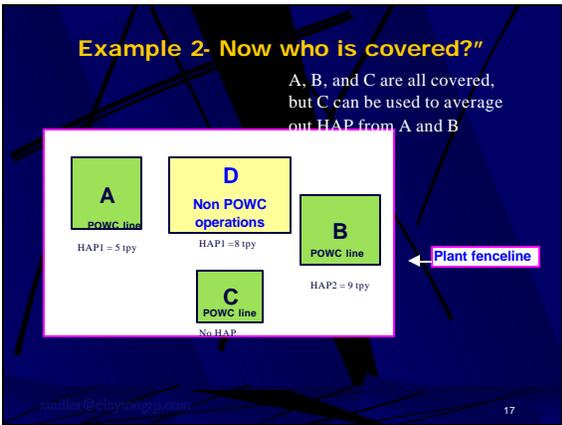
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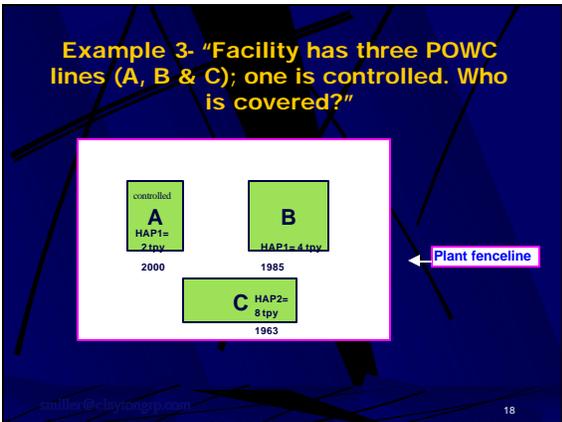
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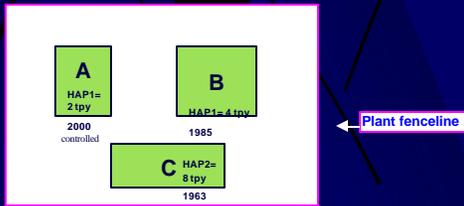
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Example 3- "Facility has three POWC lines (A, B & C); one is controlled. Who is covered?"



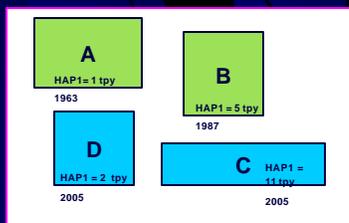
**ANSWER:**  
NONE- The facility is not a major source.

Does it matter if a control device was used to keep facility from being major??

**NONE**

Not unless the facility was operated at a major source level after applicable compliance date

Example 4- Facility has two existing POWC lines (A & B); the facility is not a major source. They wish to add 2 lines (C & D), which will make the facility a major source. What is covered?




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## Are the new lines POWC?

[For this, use EPA's interpretation of reconstruction]

- If they are **not** POWC, what happens?
  - When is compliance due?
- If they **are** POWC, what happens?
  - When is compliance due?

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## What if....

Instead of being new lines, C and D replaced old lines [Assume that the facility still not major until after C and D are replaced and functioning]

- Where do you draw the line to check for 50%?
- Is it existing or new?
- Does it matter when it became major?

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## One to make you go...Hmmm

What if the facility had been major, but will be non-major after?

- Once In, Always In applies?
- Pollution Prevention project?
  - Non-HAP coatings?
  - Carbon Adsorber?
  - Oxidizer?
- Switches from existing source MACT (Line A and B) to new source MACT (ABCD)?

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