

FACT SHEET
Proposed Amendments to the Air Toxics Standards for
Chemical Manufacturing Area Sources

ACTION

On January 8, 2025, the U.S. Environmental Protection Agency (EPA) proposed amendments to the 2009 National Emission Standards for Hazardous Air Pollutants that apply to chemical manufacturing area sources, known as the CMAS NESHAP. An area source is a source that emits fewer than 25 tons per year (tpy) of hazardous air pollutants (HAP) and fewer than 10 tpy of any single HAP.

- This action proposes amendments that would reduce emissions of HAP, also known as air toxics, emitted by CMAS including ethylene oxide (EtO), 1,3-butadiene, and ethylene dichloride.
- Following a technology review conducted in accordance with Section 112(d)(6) of the Clean Air Act (CAA), the EPA is proposing to lower emissions of HAP produced by CMAS by:
 - Updating leak detection and repair practices for both equipment and heat exchanger systems to reflect improvements in technology and practices since the original rulemaking.
 - Subjecting emissions from pressure relief devices and pressure vessels to regulation by setting new standards pursuant to CAA section 112(d)(5).
 - Requiring performance testing to ensure continued compliance with the standards.
 - Correcting technical and editorial errors in the rulemaking.

In addition, the EPA is proposing to list a new area source category for regulation as part of the CMAS NESHAP to address emissions of ethylene oxide (EtO) from CMAS.

- The EPA completed a risk assessment of CMAS and identified a need to propose EtO-specific standards.
- The proposed area source standards and practices to address EtO emissions include:
 - Fenceline monitoring and corrective action when a specified “action level” is exceeded, along with public reporting of data.
 - Stringent control of emissions from process vents and storage tanks in EtO service, including reductions of EtO emissions by greater than or equal to 99.9 percent.
 - Monitoring of flares to ensure proper function.
 - Flaring is a high-temperature oxidation process used to burn gaseous waste.
 - Quarterly leak monitoring of heat exchange systems in EtO service and a reduction in the amount of time allowed to complete repairs.
 - Monthly leak monitoring of all valves, connectors, and pumps in EtO service.
 - Removal of EtO from wastewater to ensure it is not emitted to the atmosphere.

- The EPA estimates that these proposed amendments to the CMAS NESHAP would reduce EtO emissions by approximately 4.6 tons per year (tpy), emissions of other HAPs by approximately 158 tpy, and emissions of smog-forming VOCs by 1,557 tpy.
- The EPA will accept comments on this proposal from interested stakeholders including the public for 60 days after its official publication in the *Federal Register*.

TECHNOLOGY REVIEW

- The CAA requires the EPA to assess, review and revise air toxics standards as necessary, taking into account developments in practices, processes and control technologies.
- For non-EtO HAP emitted by CMAS, the proposed options include:
 - Quarterly monitoring of large heat exchange systems via the Modified El Paso method.
 - The Modified El Paso method is more sensitive to leaks than the current water monitoring program and is required in multiple other chemical sector rulemakings.
 - Requirement of annual instrument monitoring via EPA Method 21 to detect leaks from pumps, valves, and connectors and require repair.
 - Removal of a threshold in the definition of a metal HAP process vent to clarify the applicability of the standards.
 - Repeated performance testing of control devices to ensure sources are complying with the process vent standards.

HOW TO COMMENT

- The EPA will accept comments for 60 days after the proposal is published in the *Federal Register*.
- Comments, identified by Docket ID No. EPA-HQ-OAR-2024-0303. May be submitted via one of the following methods:
 - Go to <https://www.regulations.gov/> and follow the online instructions for submitting a comment.
 - Send an email message to a-and-r-docket@epa.gov, Attention Docket ID No. EPA-HQ-OAR-2024-0303.
 - Mail your comments to: EPA Docket Center, Environmental Protection Agency, Mail Code: 28221T, 1200 Pennsylvania Ave, NW, Washington, DC 20460, Attention Docket ID No. EPA-HQ-OAR-2024-0303.
 - Deliver comments in person to: EPA Docket Center, 1301 Constitution Ave., NW, Room 3334, Washington, DC. Note: In-person deliveries (including courier deliveries) are only accepted during the Docket Center's normal hours of operation. Special arrangements should be made for deliveries of boxed information.

For More Information

- Interested parties can download a copy of the final rule from the EPA's website at the following address: <https://www.epa.gov/stationary-sources-air-pollution/chemical-manufacturing-area-sources-national-emission-standards>.
- Today's action and other background information are also available online at <https://www.regulations.gov/>, the EPA's electronic public docket and comment system.