

Message

---

**From:** O'Sullivan, Bill [Bill.O'Sullivan@dep.nj.gov]  
**Sent:** 6/1/2018 5:43:56 PM  
**To:** Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]  
**CC:** Colby Bob (bcolby@chattanooga.gov) [bcolby@chattanooga.gov]; Mary Douglas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user06eec440]; Tsirigotis, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d19c179f3ccb4fadb48e3ae85563f132-PTSIRIGO]; Lamason, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=15fa0409a80b41cd83875fdb40777c65-BLAMASON]; Dunkins, Robin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=50505af25af94494ad34ee072a4f1e45-RDUNKINS]  
**Subject:** MACT for methyl bromide fumigation  
**Attachments:** NACAASourceCategoryListLetter3-21-16.pdf

Hi Bill

At the NACAA meeting last week and the NACAA Board meeting earlier this year, I raised the issue of methyl bromide fumigation and NACAA's concerns about the risk to public health from this source category. We appreciate your attendance and attention at both these meetings. As promised, I am sending you the 3/21/16 NACAA MACT letter, which was acknowledged by the last administration, but not acted upon.

That letter expresses concern that there are sources emitting major amounts of hazardous air pollutants that are currently unregulated by national Maximum Achievable Control Technology (MACT) standards. We requested that EPA evaluate the completeness of the source category list under Section 112(c) and, further, that the agency develop a MACT standard for a category of special concern – the methyl bromide fumigation source category. See the section titled "Fumigation with Methyl Bromide" on pages 2 and 3.

Many state and local agencies have public health concerns about large scale fumigation with methyl bromide, especially at and near ports, and have also expressed difficulty in regulating at the state and local level; hence, the request that EPA pursue a national MACT standard.

We realize that the EPA air toxics staff is very busy with the mandatory Residual Risk and Technology reviews, which are necessary and appropriate, but less likely to result in significant additional reductions in risk. In contrast, methyl bromide fumigation is a major source category without a MACT standard, and there is the potential for major risk reduction if a MACT is developed. We request that EPA fit into its air toxics priorities the review and regulation of major sources of methyl bromide fumigation. And we stand ready to assist where we can with information on existing sources and controls in use on methyl bromide fumigation operations.

Bill O'Sullivan and Bob Colby, Cochairs, NACAA Air Toxic Committee