

Supplement I

Presentation of

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Status of the Friction Material

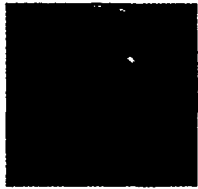
MACT(Maximum Achievable Control Technology)Standard

Presented June 4, 2000, at the

FMSI Annual Meeting

Key Largo, Florida

Status of the Friction Material MACT Standard



Presented at the Annual Meeting
of the FMSI
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Outline



- Overview of EPA's MACT Program
- Friction materials project history
- Preliminary Findings
- Project Schedule
- Questions and Answers

Overview of EPA's MACT Program



- Authorized by Section 112 of the 1990 CAA
- Designed to reduce emissions of Hazardous Air Pollutants (HAP)
- Applies to Major Sources of HAP
 - 10 tpy of any single HAP, or
 - 25 tpy of any combination of HAP
- Technology based standards

Definition of MACT

- Stands for Maximum Achievable Control Technology
- Must meet minimum level of control
 - Average of best 12% sources
 - Average of best 5 when fewer than 30 sources
 - MACT for new sources based on the best controlled similar source
 - Referred to as the MACT Floor
- EPA can set MACT beyond the Floor

Anatomy of a MACT Standard

- Found in 40 CFR Part 63
- Emission limits
- Monitoring requirements
- Recordkeeping and reporting requirements
- General provisions (40 CFR 63 Subpart A)

Friction Materials Project History

- Originally listed as Asbestos Processing (June 16, 1992)
- EPA delisted Asbestos Processing (Nov. 30, 1995)
- EPA added Friction Materials Manufacturing to the source category due to organic HAP emissions (June 4, 1996)
- Industry survey (ICR) sent out in Nov. 1997

Preliminary Findings - Affected Sources

- Standard WILL apply to 22 major sources that manufacture friction material using conventional wet or dry resin technology
- Standard WILL NOT apply to -
 - facilities that only rebuild or assemble friction products
 - facilities that manufacture friction material using the carbonization process

Preliminary Findings - Affected Sources

- The following emission sources will be covered by the rule
 - Solvent based mixers
 - Curing and post back ovens
 - Saturators

Preliminary Findings - Affected Sources

- The following emission sources will not be covered in the Friction materials MACT
 - Halogenated solvent degreasing operations (covered by 40 CFR 63 Subpart T)
 - Metal parts coating operations (covered by 40 CFR 63 Subpart Mmmm)
 - Machining operations (minimal HAP emissions)
 - Asbestos emissions covered by 40 CFR 61 Subpart M

Preliminary Findings - MACT Floor

- Solvent recovery systems are identified as the MACT Floor technologies for solvent based mixers
- Thermal oxidizers are identified as the MACT Floor technology for-
 - Curing and post back ovens
 - Saturators

Project Schedule

- Proposed rule 5/2001
- Promulgated rule 5/2002
- Compliance date will likely be between 2-3 years after promulgation

Questions And Answers