Supplement I

Presentation of

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Status of the Friction Material

MACT(Maximum Achievable Control Technology)Standard

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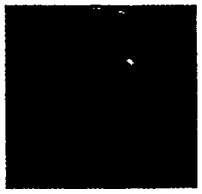
Status of the Friction Material MACT Standard



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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

