



Air Pollution Control Board
Greg Cox District 1
Dianne Jacob District 2
Pam Slater District 3
Ron Roberts District 4
Bill Horn District 5

NOTICE OF WORKSHOP

FOR DISCUSSION OF IMPLEMENTATION OF A FEDERAL SUBPART AAAA - NATIONAL EMISSION STANDARDS FOR MUNICIPAL SOLID WASTE LANDFILLS

The San Diego County Air Pollution Control District (District) will hold a public meeting to discuss the implementation of 40 CFR Subpart AAAA, National Emission Standards for Municipal Solid Waste Landfills, that was promulgated by the Environmental Protection Agency (EPA) on January 16, 2003. Comments concerning this proposal may be submitted in writing before, or made at, the workshop which is scheduled as follows:

DATE: Monday, December 15, 2003
TIME: 1:00 p.m. - 3:00 p.m.
**PLACE: San Diego Air Pollution Control District
 Conference Room 139
 9150 Chesapeake Drive
 San Diego, CA**

Subpart AAAA applies to any landfill that has accepted waste at anytime since November 8, 1987, or has additional capacity for waste deposition and meets either of the following conditions:

1. The landfill is a major source for Hazardous Air Pollutants (HAP) or is collocated with a major HAP source, or
2. The landfill has a design capacity ≥ 2.5 million megagrams (2.8 million tons) by mass and ≥ 2.5 million cubic meters (88 million cubic feet) by volume and
 - (a) Has estimated uncontrolled nonmethane organic compound (NMOC) emissions ≥ 50 megagrams/year (55 tons/year), or
 - (b) Operates a bioreactor (i.e. adds any liquid other than landfill leachate to the landfill waste mass to raise the minimum moisture content of the waste to 40% or more so as to accelerate the anaerobic biodegradation of the waste).

Subpart AAAA incorporates by reference existing NMOC control requirements and recordkeeping requirements set forth in 40 CFR Part 60, Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills; and 40 CFR Part 60 Subpart Cc, Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills.

In addition to requirements incorporated by reference, Subpart AAAA will require:

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- Preparation and implementation of a written startup, shutdown, malfunction plan (SSMP). The SSMP may consist of a facility's standard operating procedures manual or an Occupational Safety and Health Administration (OSHA) or other plan provided that the plan, in accordance with 40 CFR 63.6 (e), minimizes emissions consistent with safety and good air pollution control practices and corrects malfunctions as soon as practicable.
- Maintenance of records associated with the SSMP and a semiannual SSMP report.
- For bioreactors, additional gas collection requirements.
- Records of water addition other than leachate to the landfill, unless the owner or operator complies with the bioreactor requirements.
- Prompt reporting of actions during startups, shutdowns, and malfunction that are not consistent with the SSMP.
- Filing of the reports required by 40 CFR 60.757 semiannually rather than annually as required by Subpart WWW.

Existing sources subject to new Subpart AAAA must meet the new NESHAP requirements by January 16, 2004. New sources (those commencing construction or reconstruction after November 7, 2000) must comply by January 16, 2003, or upon startup, whichever is later.

By state law, NESHAPs become state Air Toxic Control Measures (ATCM), and as such are enforceable by the District as state regulations. Since 1995, the District has followed a procedure, approved by the Air Pollution Control Board, for implementing and enforcing all new and amended federal NESHAPs and state ATCMs without formally adopting them. This procedure eliminates a time consuming and costly local rule development process for regulations, which are promulgated by EPA, accepted by the California Air Resources Board, and apply throughout the country. To implement Subpart AAAA, the District is following this procedure and will add Subpart AAAA to Appendix B of the District's Rules and Regulations.

If you would like a copy of Subpart AAAA, please access the District's Website at www.sdapcd.co.san-diego.ca.us under Rules and Regulations, Supporting Activities, Workshops; or call Luann Serbesku at (858) 650-4544. If you have any questions concerning the requirements of Subpart AAAA or its implementation, please contact Cara Bandera at (858) 650-4592 or Steven Moore at (858) 650-4598.



MICHAEL R. LAKE, Assistant Director
Air Pollution Control District

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11/26/03

FINAL RULE TO REDUCE TOXIC AIR POLLUTANTS FROM SURFACE COATING OF PLASTIC PARTS AND PRODUCTS

FACT SHEET

ACTION

- ! On August 29, 2003, the Environmental Protection Agency (EPA) issued a final rule to reduce toxic air pollutant emissions from plastic parts and products surface coating operations. Toxic air pollutants, also called air toxics, are those pollutants known or suspected to cause cancer or other serious health and environmental effects.
- ! The final rule applies to new and existing facilities that are a "major source" of air toxics or are part of a facility that is a "major source" of air toxics.. A "major source" emits 10 tons per year or more of a single toxic air pollutant listed in the Clean Air Act or 25 tons per year or more of a combination of those pollutants.
- ! The surface coating of plastic parts and products is a process of applying a protective, decorative, or functional coating to a plastic substrate. Coating materials include, but are not limited to, paints, stains, sealers, topcoats, basecoats, primers, inks, and adhesives.
- ! EPA estimates that there are approximately 202 existing major sources nationwide that will be affected by this rule. Another six new major sources are expected to be constructed within the 5-year period following publication of the final rule, and they will also be affected by the rule.
- ! The final rule will require existing facilities that are subject to the rule to limit air toxic emissions. These facilities will have up to 3 years from the date of publication of the final rule to comply with its requirements.
- ! For both new and existing sources, the emission limits can be met by pollution prevention techniques.

BENEFITS AND COST

- ! The final rule will reduce total emissions of air toxics by approximately 7,560 tons per year. This represents an 80 percent reduction from the estimated 1997 baseline.
- ! Many of these air toxics are also volatile organic compounds. These compounds contribute significantly to the formation of ground-level ozone, or smog, which has been shown to cause adverse effects on human health and can damage forests and crops.
- ! EPA estimates that the total nationwide annualized cost would be about \$10.9 million per year.

- ! After assessing the impact of the final rule on small businesses, EPA determined that it will not significantly impact a substantial number of small businesses.

BACKGROUND

- ! Under the Clean Air Act, EPA is required to regulate emissions of 188 listed toxic air pollutants. The Act also requires EPA to identify industrial or source categories that emit one or more of these pollutants. The Act further requires EPA to develop emissions standards requiring stringent air pollution reduction measures for each of the identified source categories.
- ! EPA's published list of industry groups to be regulated includes surface coating of plastic parts and products.
- ! Plastic parts and products surface coating operations emit a number of toxic air pollutants including toluene, methyl ethyl ketone, glycol ethers including ethylene glycol monobutyl ether, xylenes, and methyl isobutyl ketone. Health effects associated with these pollutants include irritation of the lung, skin, and mucous membranes; effects on the central nervous system; and damage to the liver.

FOR MORE INFORMATION

- ! To download the standard from EPA's website on the Internet, go to "Recent Actions" at the following address: <http://www.epa.gov/ttn/oarpg/ramain.html>.
- ! For general information about the standards, contact Ms. Kim Teal of EPA's Office of Air Quality Planning and Standards, Emission Standards Division, Coatings and Consumer Products Group at (919) 541-5580, or by electronic mail at: teal.kim@epa.gov. Or visit the plastic parts and products (surface coating) website at: <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>.
- ! The EPA's Office of Air and Radiation (OAR) homepage on the Internet contains a wide range of information on the air toxics program and many other air pollution programs and issues. The OAR's home page address is: <http://www.epa.gov/oar/>.
- ! This source category was assigned electronic docket number OAR-2002-0074.