

9/28/98

FACT SHEET

PROPOSED CONSOLIDATED FEDERAL AIR RULE FOR THE SYNTHETIC ORGANIC CHEMICAL MANUFACTURING INDUSTRY

TODAY'S ACTION...

- ◆ The Environmental Protection Agency (EPA) is today proposing a rule to consolidate 16 existing Federal air rules that apply to the synthetic organic chemical manufacturing industry (SOCMI).
- ◆ The Consolidated Federal Air Rule (CAR) is a pilot rulemaking originating from President Clinton's March 16, 1995 initiative to reinvent environmental regulations. The CAR was developed with the goals of reducing the recordkeeping and reporting burden for those complying, improving compliance, and maintaining environmental protection.
- ◆ The CAR would be an optional alternative compliance mechanism. The owners and operators subject to SOCMI regulations may continue complying with the existing rules or opt to comply with the CAR.
- ◆ The EPA worked in close partnership with State and local air pollution control agencies and industry representatives over 3 years to consolidate the 16 existing rules in developing the proposed rule.

WHAT ARE THE HEALTH AND ENVIRONMENTAL BENEFITS?

- ◆ At a minimum, today's proposal would maintain the current levels of health and environmental benefits from the 16 existing Federal air rules. The optional CAR may increase the level of protection for human health and the environment if many affected owners and operators choose to use the CAR. This is because the CAR incorporates EPA's current and most effective approaches to emission control, so that a facility subject to a less stringent existing rule would have to achieve greater emission reductions if the facility chooses to meet the CAR.

WHAT FLEXIBILITY DOES THIS PROPOSAL PROVIDE TO INDUSTRY?

- ◆ Today's proposal would provide flexibility to the SOCMI by offering a choice of compliance options. A source owner or operator may decide to comply with the CAR or continue complying with existing applicable requirements.

BACKGROUND

- ◆ Over the past 25 years, EPA has issued a series of Federal air regulations, many of which affect the same plant site. As a result, many facilities are now subject to multiple Federal rules, applying to different emissions points. Each rule has its own emission control requirements as well as monitoring, recordkeeping, and reporting requirements. Although these rules were developed for different purposes, under different statutory authorities, and apply to different pollutants, they may impose many of the same or nearly the same requirements on a plant site.
- ◆ On March 16, 1995 President Clinton and Vice President Gore announced initiatives to reinvent environmental regulation, including Federal air rules. One of these initiatives was to consolidate Federal air rules so that all Federal air rules for any single industry would be incorporated into a single rule.
- ◆ The EPA selected the Federal air rules applying to the SOCFMI as the first of these “consolidated air rules” and plans to use this rulemaking as a model for consolidating other Federal air regulations in the future. The SOCFMI was selected because of the similarities in the requirements in the existing 16 Federal rules for emission points at a large number of SOCFMI facilities. This appeared to provide a good opportunity for streamlining requirements.
- ◆ The 16 existing Federal SOCFMI rules require reductions in emissions of volatile organic compounds (VOC) and air toxics. Volatile organic compounds, when emitted into the ambient air, are precursors to the formation of ground level ozone, the primary constituent of smog. A wide variety of acute and chronic respiratory health effects and welfare (e.g., agricultural, ecosystem) effects have been attributed to concentrations of ozone commonly measured in the ambient air throughout the U.S. Air toxics are pollutants which are known or suspected to cause cancer or other serious health effects such as birth defects or reproductive effects.

WHO MUST COMPLY WITH THE REGULATION?

- ◆ Since the requirements are optional, any source that is currently subject to the existing 16 Federal rules for the SOCFMI may choose to comply with the CAR or may continue complying with existing applicable requirements.

WHAT ARE THE MAJOR REQUIREMENTS OF THE PROPOSED RULE?

- ◆ There are generally no new control requirements for any source; the CAR includes provisions consolidated from the 16 existing Federal air rules. The provisions in the CAR primarily consist of design, operation, work practice, and maintenance requirements for storage vessels, process vents, transfer operations; inspection and repair requirements for equipment leaks; and performance requirements for closed vent systems and control devices.

- ◆ The CAR simplifies the regulatory language, combines similar requirements, and eliminates duplicative compliance activities while maintaining at least the current level of environmental protection.
- ◆ The proposed rule is expected to significantly reduce the monitoring, recordkeeping and reporting burden associated with compliance.

HOW MUCH WILL THE PROPOSED RULE COST?

- ◆ There would be no net costs incurred due to the CAR since it consolidates existing rules and reduces the compliance burden. Sources choosing the CAR are expected to experience a net savings.

FOR FURTHER INFORMATION...

- ◆ Interested parties can download the proposal from EPA's web site on the Internet under recent actions at the following address: (<http://www.epa.gov/ttn/oarpg/>). For further information about the proposed rule, contact Rick Colyer of EPA's Office of Air Quality Planning and Standards at (919) 541-5262.
- ◆ The EPA's Office of Air and Radiation's home page on the Internet contains a wide range of information on the air toxics program, as well as many other air pollution programs and issues. The Office of Air and Radiation's home page address is: <http://www.epa.gov>.