

#### *F. What Was the Basis for the Proposed Standards?*

The EPA proposed standards for the HAP-emitting equipment at the two affected sources: Each asphalt processing facility (blowing stills, asphalt flux storage tanks, oxidized asphalt storage tanks, and asphalt loading racks) and each asphalt roofing manufacturing line (saturator, a wet looper, a coater, coating mixers, sealant applicators, adhesive applicators, and associated storage tanks).

The EPA determined the MACT floors for existing and new sources for each type of process equipment used in asphalt processing facilities and in asphalt roofing manufacturing lines. For each equipment type, the equipment pieces were ranked in order of level of control. Combustion devices were ranked over PM control devices because combustion devices reduce both gaseous HAP and condensed HAP.

At proposal, a combustion device operating at or above 1200 °F was the basis for the MACT floor for blowing stills, asphalt storage tanks with a capacity of 1.93 megagrams or greater, and loading racks at existing, new, and reconstructed affected sources. Blowing stills that use a chlorinated catalyst produce a vent stream that contains chlorinated organic compounds. When this vent stream is sent to a combustion device, the chlorinated organic compounds are oxidized to HCl which is a HAP. Because requiring facilities to use non-chlorinated catalysts is not feasible due to the need to produce oxidized asphalt of a given quality (see generally 66 FR 58618), and because no facilities control HCl emissions, the proposed MACT floor for HCl emissions from blowing stills using catalyst was based on no control of those emissions.

With the exception of asphalt storage tanks, the MACT floor for equipment at existing asphalt roofing manufacturing lines (coaters, saturators, wet loopers, coating mixers and sealant and adhesive applicators) was based on a PM control device complying with the new source performance standards (NSPS) for asphalt processing and roofing manufacture (asphalt NSPS) (40 CFR part 60, subpart UU) PM emission limits. The floor for saturators, coaters, and coating mixers at new and reconstructed affected sources was based on a combustion device operating at or above 1200 °F. For wet loopers at existing, new, and reconstructed affected sources, the MACT floor was based on a PM control device that achieves the asphalt NSPS PM emission limits. For storage tanks with capacity of 1.93 megagrams or greater at existing,

new, and reconstructed asphalt roofing manufacturing lines, the MACT floor was based on a combustion device operating at or above 1200 °F.

The EPA evaluated potential options for achieving emission reductions more stringent than the floor (beyond-the-floor options) for three groups of equipment: (1) Saturators, wet loopers, coaters, coating mixers, and sealant and adhesive applicators at existing sources; (2) blowing stills that use a chlorinated catalyst at existing, new, and reconstructed sources; and (3) wet loopers at new and reconstructed sources. For all other equipment (blowing stills, loading racks, and storage tanks at existing, new, and reconstructed sources; and for saturators, coaters, coating mixers, and sealant and adhesive applicators at new and reconstructed sources), there are no known technologies in use at asphalt processing or roofing manufacturing facilities or similar sources that would be capable of achieving a greater emission reduction than a combustion device operating with a minimum operating temperature of 1200 °F. Thus, EPA did not consider beyond-the-floor options for these types of equipment.

For saturators, wet loopers, coating mixers, coaters, and sealant and adhesive applicators at existing affected sources, the level of control achieved by a combustion device with a minimum operating temperature of 1200 °F was identified as the only beyond-the-floor option. However, due to the cost per megagram of HAP reduction (\$616,000) and the increase in criteria pollutant emissions, requiring the level of control achieved by a combustion device for saturators, wet loopers, coaters, coating mixers, and sealant and adhesive applicators at existing sources was not a justifiable option.

For blowing stills that use chlorinated catalysts, emissions of HCl can be reduced by a gas scrubber using caustic scrubbing media. However, since gas scrubbing has not been demonstrated as an effective technology for controlling HCl emissions from asphalt processing and due to the potentially high cost per megagram of HCl reduced (\$23,900), the additional cost of going beyond-the-floor was not warranted. Nor is process substitution a viable option for controlling HCl emissions, as noted above. Therefore, the MACT for HCl emissions from blowing stills using catalyst was based on no emission reduction. For wet loopers, EPA considered the level of control of a combustion device operating at a minimum of 1200 °F as a beyond-the-floor option. Because controlling wet loopers at new affected sources was

expected to add minimal if any cost to the total control cost, the MACT for wet loopers at new or reconstructed affected sources was based on a combustion device operating at a minimum of 1200 °F. See generally 66 FR 58618–621 and the memorandum “Documentation of Existing and New Source Maximum Achievable Control Technology (MACT) Floors for the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Asphalt Processing and Asphalt Roofing Manufacturing” (Docket No. OAR–2002–0035).

With the exception of standards for certain tanks and loading racks, EPA is adopting all of these standards (and analysis) in the final rule.

## **II. Summary of the Final Standards**

### *A. Does the Final NESHAP Apply to Me?*

The final rule applies to you if you process asphalt (at stand-alone facilities or collocated with asphalt roofing manufacturing facilities or petroleum refineries) or manufacture asphalt roofing products at a facility that is a major source of HAP emissions. Major sources of HAP are those that emit or have the potential to emit at least 10 tpy of any one HAP or 25 tpy of any combination of HAP. All HAP emission sources at a facility, not just those related to asphalt processing or roofing manufacture, must be considered in determining major source status. Put another way, the final rule may apply to you even if the HAP emissions from your asphalt roofing products manufacturing and asphalt processing operations do not themselves exceed the major source threshold levels given above. If your facility is determined to be an area source (*i.e.*, not a major source), you would not be subject to the final rule.

For the storage tanks at asphalt processing and asphalt roofing manufacturing facilities regulated by the final NESHAP, the potential exists for these tanks to already be subject to an existing emission standard: The petroleum refinery NESHAP (40 CFR part 63, subpart CC), or standards of performance for volatile organic liquid storage vessels (40 CFR part 60, subparts K, Ka, and Kb). Storage tanks that are subject to those standards are not subject to the requirements of the asphalt rule since the control requirements specified by those standards for fixed roof storage tanks (used in the asphalt processing and asphalt roofing manufacturing industry) are as stringent as the standards specified in the asphalt rule, and so regulation of these tanks under the