

the equipment (e.g., blowing stills, coaters) that are subject to more stringent emission standards. In other words, it is more cost effective to "over control" emissions from lower-emitting storage tanks that are nearby, using a combustion device that is selected and designed to control emissions from the entire system (e.g., blowing stills, coaters, and asphalt storage tanks), than it is to install a separate control device to reduce emissions from the storage tanks to a lesser degree.

In the absence of an integrated system configuration, we do not believe that combustion controls represent the MACT floor (or otherwise represent MACT) for tanks that store low-vapor pressure asphalt since facilities that do not use a combustion device to reduce emissions from higher-emitting process equipment are unlikely to use a combustion device to reduce emissions from tanks that store low-vapor pressure asphalt (and we in fact know of no instance when a tank storing low-vapor pressure asphalt in this industry is controlled by a combustion device when the tank is a stand-alone unit). Therefore, for tanks storing asphalt with a low vapor pressure, the MACT floor largely depends on whether or not the tank is part of an integrated system.

Based on the above discussion, it would seem logical to develop one set of standards for integrated systems (including tanks) and another for nonintegrated systems (where tanks would have different standards). However, we do not have sufficient data to characterize the control level of integrated versus nonintegrated systems or even to devise workable definitions of these systems. The significance of the existence of integrated systems, therefore, relates to calculation of floor standards for tanks.

Based on the existence of integrated systems, we do not believe that we have to include all tanks storing high- and low-vapor pressure asphalt together in making a floor determination for storage tanks. We do believe that it is reasonable to assume that facilities would use combustion devices for tanks storing high-vapor pressure asphalt because of the greater potential for emissions from these tanks and the appropriateness of controlling volatile emissions using combustion devices. We, thus, included all such tanks as a single group in determining floor standards and determined that the best-performing 12 percent of tanks used to store high-vapor pressure asphalt use combustion to control the emissions. (We did not, however, include tanks used to store low-vapor pressure asphalt in this calculus and are not compelled

to for the reasons explained above relating to integrated systems.) Therefore, for tanks storing asphalt with a high vapor pressure at existing and new sources, we believe that the MACT floor is a combustion device regardless of whether or not it is located in an integrated system.

For tanks storing low-vapor pressure asphalt, a separate determination must be made to establish the MACT floor for existing and new sources. For these storage tanks, the MACT floor depends mainly on whether or not the tank is part of an integrated system. However, as noted above, we are unable to devise a workable definition of the integrated system. Among other problems, we have no information regarding tank vapor pressure or facility configurations to determine the relative proximity of low-vapor pressure asphalt storage tanks to combustion devices. Although we are unable to develop a separate standard for integrated systems, the MACT floor for any storage tank cannot be less stringent than the opacity limits for controlling PM specified in the asphalt NSPS, since over 12 percent of existing storage tanks in the industry are already subject to those standards. In fact, approximately 27 percent of the storage tanks in the database use particulate controls (such as fiber-bed filters, mist eliminators, condensers) to meet the asphalt NSPS. This control of PM will necessarily control HAP emissions since a portion of the PM is condensed HAP. Therefore, the MACT floor for tanks storing asphalt with low vapor pressures at existing and new sources is the opacity limit specified in the asphalt NSPS.

We recognize that this floor for tanks storing low-vapor pressure asphalt actually applies to some tanks that are part of integrated systems. Nevertheless, we expect that tanks that are part of an integrated system are controlled by the same control device used to control the entire system, rather than being controlled separately. Therefore, using the opacity limit specified in the asphalt NSPS as a floor for tanks storing asphalt with low vapor pressures should not discourage facilities from using combustion devices to control emissions from storage tanks that are part of integrated systems. Nor is it likely to lead to removal of any existing controls on integrated systems since the combined system was already adopted by those facilities and removal would entail retrofit costs.

With regard to establishing the vapor pressure cutoff value that would be used to assign tanks into high- and low-vapor pressure groups (Groups 1 and 2, respectively), EPA does not have survey

data for the vapor pressure of stored asphalt that could be used to establish this value. In the absence of vapor pressure data, we based the vapor pressure cutoff value on the MACT floor for existing storage tanks at petroleum refineries. Asphalt tanks are similar because asphalt is a petroleum refinery product, and asphalt processing facilities are located at some petroleum refineries. Therefore, EPA believes that it is reasonable for the vapor pressure cutoff in the final rule to be consistent with the maximum true vapor pressure cutoff (10.4 kPa) for existing storage tanks in the petroleum refinery NESHAP. Thus, under the final rule, tanks storing asphalt with a maximum true vapor pressure of 10.4 kPa or greater are considered "high-vapor pressure" tanks (*i.e.*, Group 1 tanks) while tanks storing asphalt with a maximum true vapor pressure less than 10.4 kPa are considered "low-vapor pressure" tanks (*i.e.*, Group 2 tanks).

The petroleum refinery NESHAP also contains an annual average true vapor pressure cutoff (8.3 kPa) and an annual HAP liquid concentration cutoff (4 percent, by weight of total organic HAP) for determining storage tank applicability. Because the storage temperature of asphalt at asphalt processing and asphalt roofing manufacturing facilities is expected to be maintained over a narrow range throughout the year, providing an annual average for storage temperature in the asphalt NESHAP is unnecessary. The concentration cutoff was included in the petroleum refinery NESHAP to address the fact that some liquids at petroleum refineries have very low HAP concentrations and high vapor pressures due to the volatility of non-HAP compounds in the material. However, because asphalt processing and asphalt roofing manufacturing facilities do not typically store products other than asphalt, the EPA believes that including an annual HAP liquid concentration cutoff in the asphalt NESHAP is unnecessary.

With regard to the proposed tank capacity cutoff of 1.93 Mg, EPA believes that the analysis used to establish the proposed capacity cutoff for combustion control was flawed since the cutoff value was based on the smallest tank controlled by a combustion device. Since we now consider the seeming prevalence of combustion devices on tanks storing low-vapor pressure asphalt to actually reflect controls on integrated systems (driven by the need to control the greatest emission source of the integrated system), we do not believe that the proposed capacity cutoff value for combustion control is valid because