



**Presentation to the Environmental
Review Commission**

22 March 2012

Preston Howard

THANK YOU!

- **Representative Gillespie**
- **DENR Staff**
- **Legislative Staff**

The State Program Affects Our Competitiveness

- In the global market our companies need flexibility to change quickly in order to remain competitive
- Modeling every change increases costs and time from concept to production – often with little or no environmental benefit
- Dual regulation of individual sources by both State and Federal programs results in unnecessary and costly permit delays and duplicative reporting requirements that are not experienced in our neighboring states
- Startup in other SE states – quicker & less costly
- Project costs and time lines matter in today's competitive marketplace!

Air Toxics Reform

- Its about more than just a reduction in paperwork and administrative costs for regulated sources
- Recognition of an effective Federal program that was nonexistent when the State program was adopted
- Eliminating duplicative regulation of individual sources
- Preserving important health protections of the current program
- **Its about improving our competitiveness!**

Eliminate State

air toxics

Program



PLEASE SUPPORT
the
common sense reforms
called for in
Representative Gillespie's
Draft Bill

Preston Howard

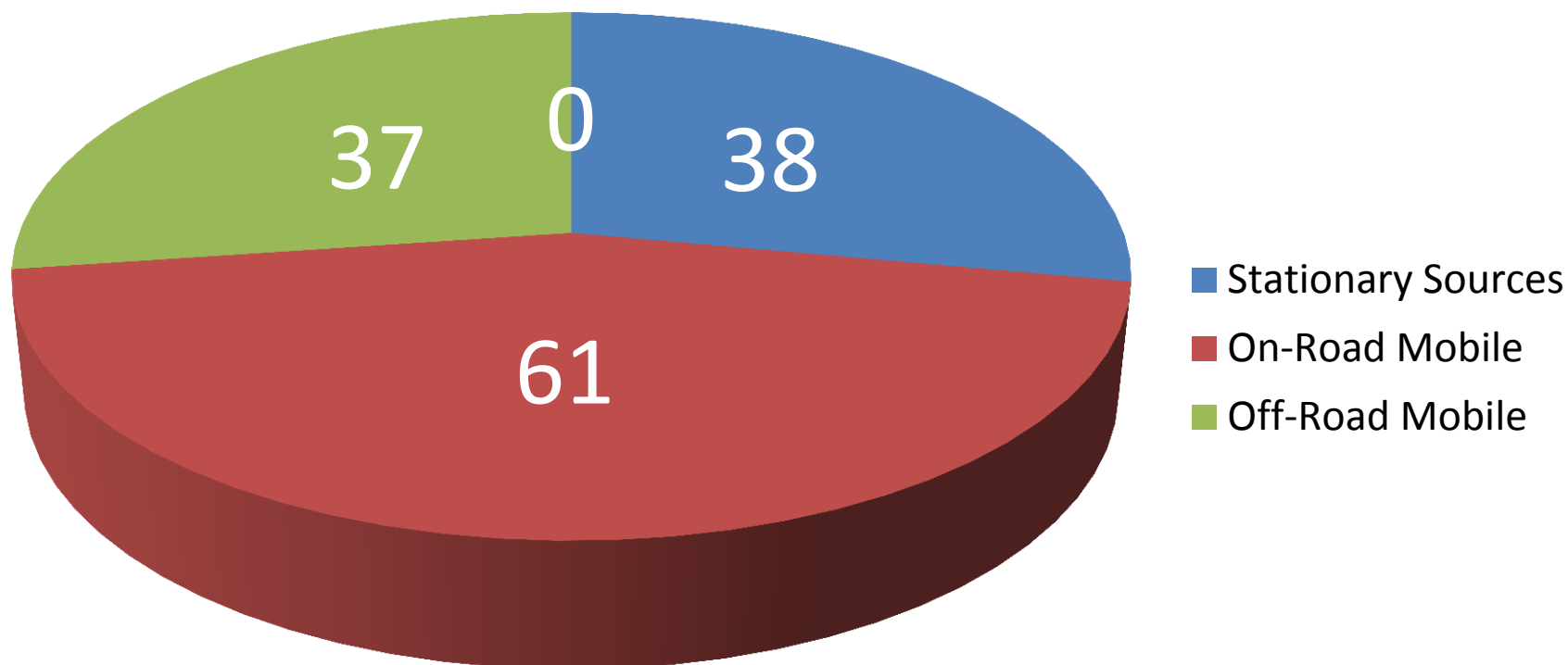


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NC Air Toxics Emissions

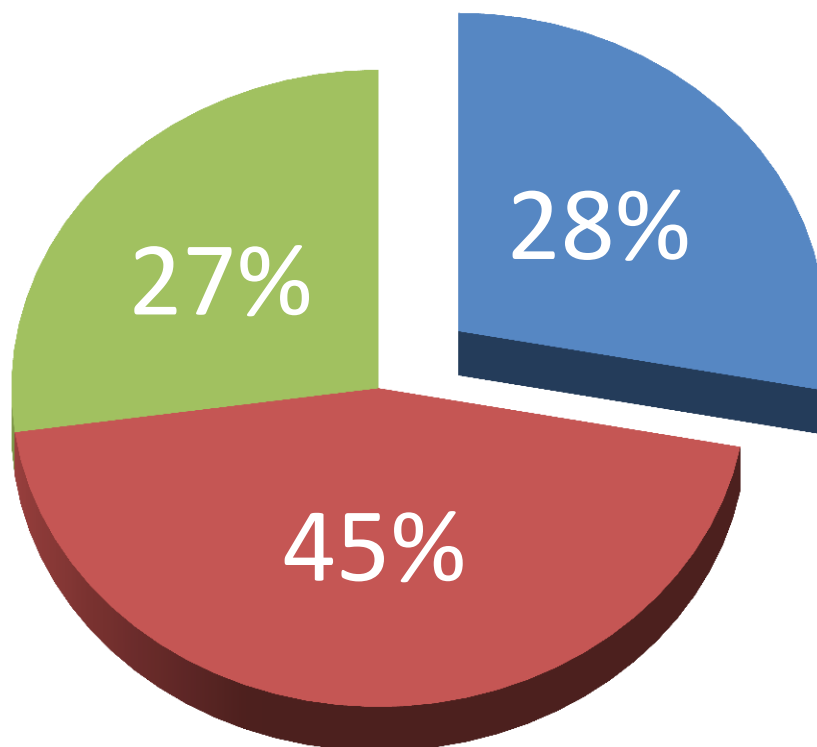
Emissions in Million Pounds



NC Air Toxics Emissions Summary

Emissions by Percent

■ NC Stationary Source ■ NC On-Road Mobile ■ NC Off-Road Mobile



Comparison between the State and Federal Programs

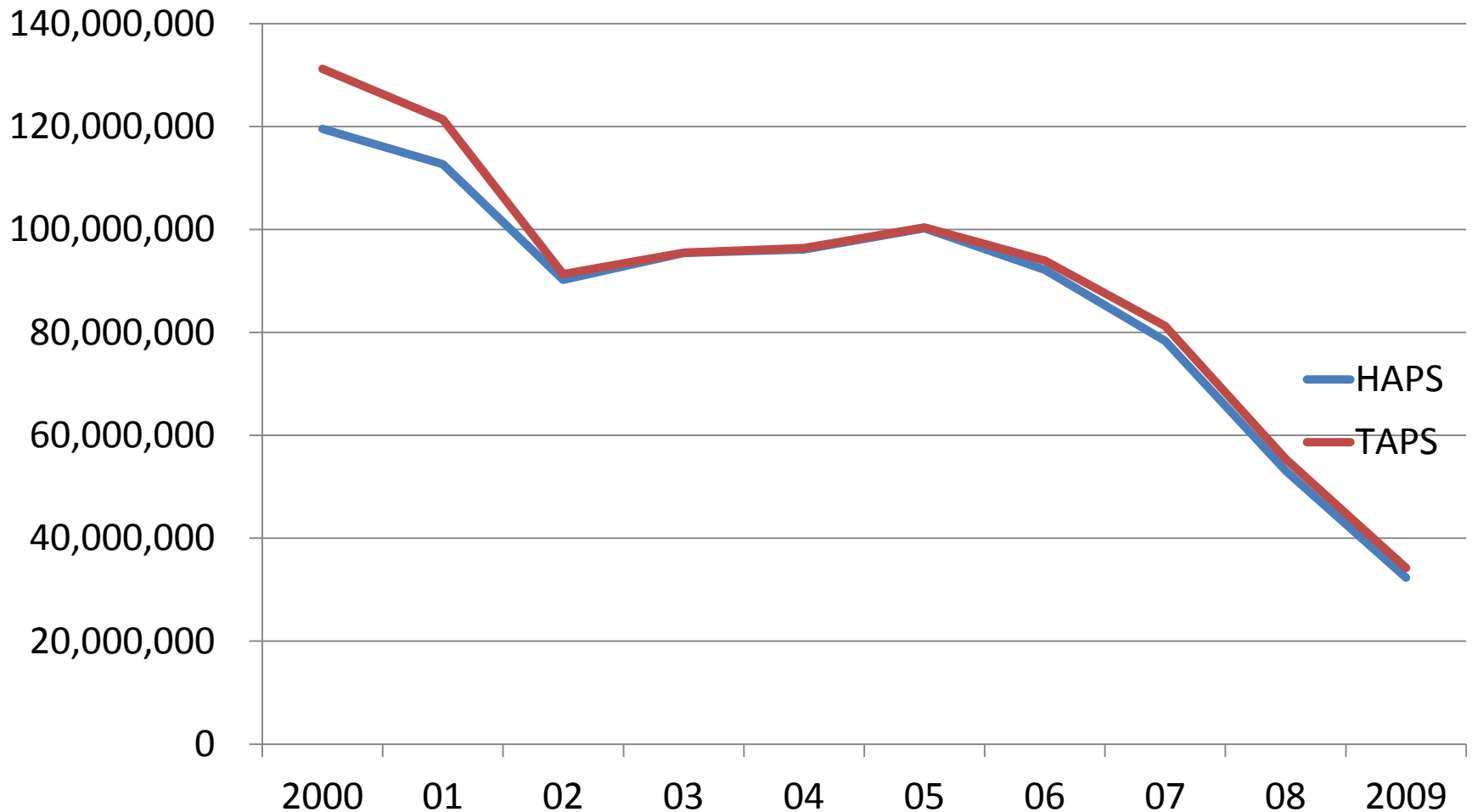
NC Air Toxics Program

- 97 regulated chemicals
- Focus is on property line concentration
- No reduction in emissions is necessarily required
- No reduction target specified

EPA MACT Program

- 187 regulated chemicals
- 2 Step Compliance Focus
- 1st – Reduce emissions at the stack (existing = average of top 12%; new = most stringent in operation)
- 2nd – Evaluate / reduce property line concentration (“residual risk”) **same as NC AT**
- Established reduction target of 2 Billion pounds in US

MACT is Working in NC!



Federal Program

- 1990 Amendments to the Clean Air Act created an effective federal program
- Congress directed EPA to establish Maximum Achievable Control Technology (MACT) for wide range of industries
- In establishing MACT for existing sources, EPA must set the “floor” of control at the average level of control achieved by the top 12% of all existing sources in a particular industry category)
- New sources must install the most stringent controls achieved by any MACT source in operation anywhere
- Thus far EPA has adopted >100 MACTs (larger sources) and Standards for 40 of 70 identified Area Sources (small sources)

EXAMPLES

- MACT Sources

Chemical Plants – Paper Mills - Brick Plants – Utility Boilers – Furniture Plants – Certain Hospitals – Adhesive Tape Plants – University Boilers – Boat Builders – Military Facilities – Food Processors – Pharmaceutical Plants – Fiberglass Plants – Plastics Plants – Truck Plants – Textile Plants – Glass Plants – Lumber and OSB Mills

- Area Sources

Auto Body Shops – Dry Cleaners – Metal Fabricators – Hospital Sterilizers – Institutional & Commercial Boilers – Municipal and County Landfills – Feed Mills – Wastewater Treatment Plants – Stationary Internal Combustion Engines (e.g. generators)