

# Issues Discussion



# Questions on T-BACT/LAER

- How is T-BACT determined/defined?
  - Is T-BACT pre-determined or case-by-case? Do you use EPA's RBL Clearinghouse?
  - Is T-BACT requirement in rule?
  - How is the cost analysis done? What is the \$/ton threshold?
- Is Lowest Achievable Emission Rate (LAER) control technology ever required for air toxics?

# Questions on level of allowable risk

Does your program determine level of allowable risk based on size of population exposed?

- If so, could you explain how?
- What are the pros and cons of this?



# Questions on changes to pollutant list

How does your program:

- implement changes in significant emission rates?
- implement changes in RBCs?
- add chemicals to the list?



# Questions on fugitive emissions

- How does your program address fugitive emissions?
- What are the pros and cons of these approaches?

