

TBACT and Presumptive TBACT Updates

Cleaner Air Oregon

REFORMING OREGON'S INDUSTRIAL AIR QUALITY REGULATIONS

Inviting Oregonians to help create new regulations that protect what we all care about: the health of our people, a clean environment, and the economic vitality of our communities.

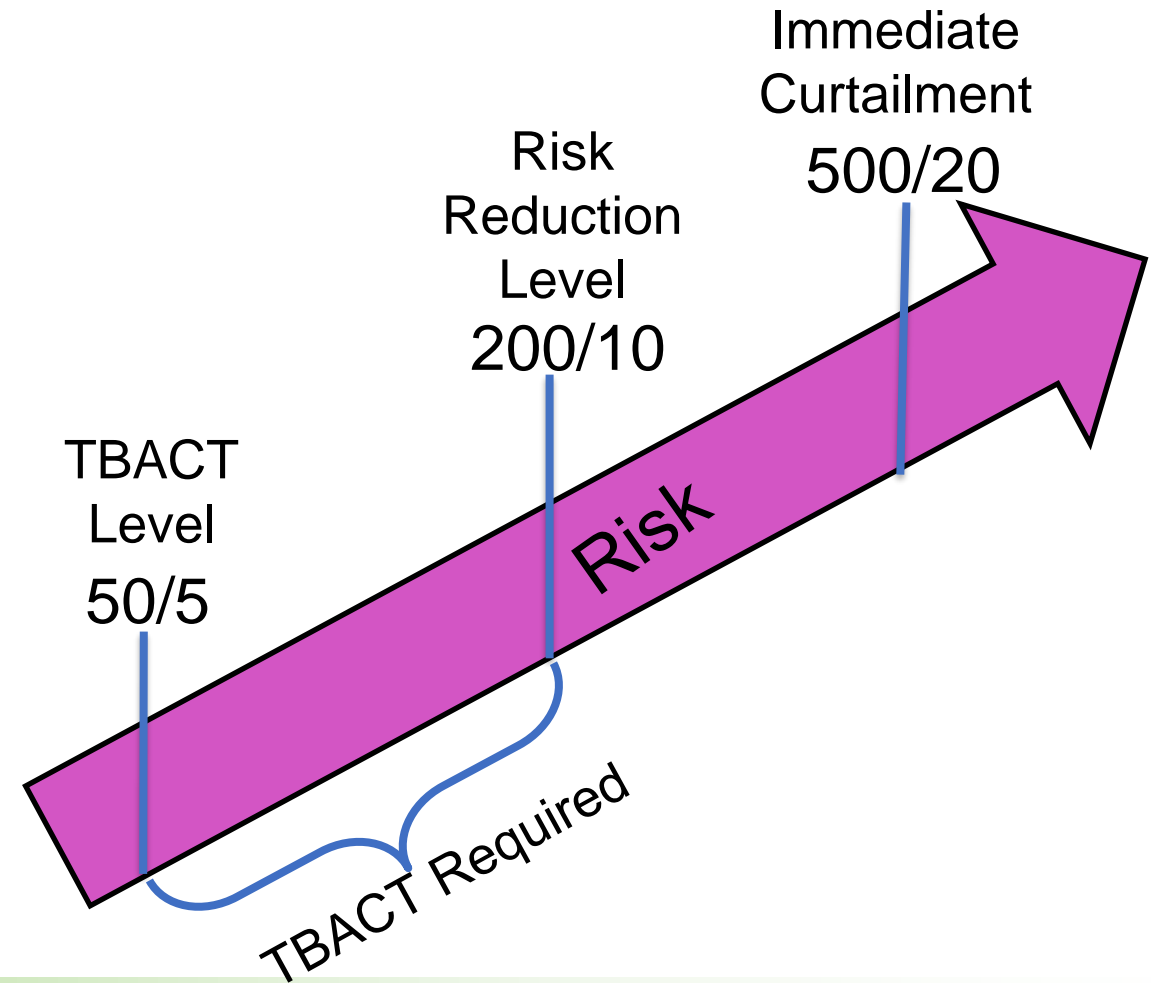
May 8, 2018

CleanerAirOregon

TBACT- Summary of Changes

Changes required by SB1541

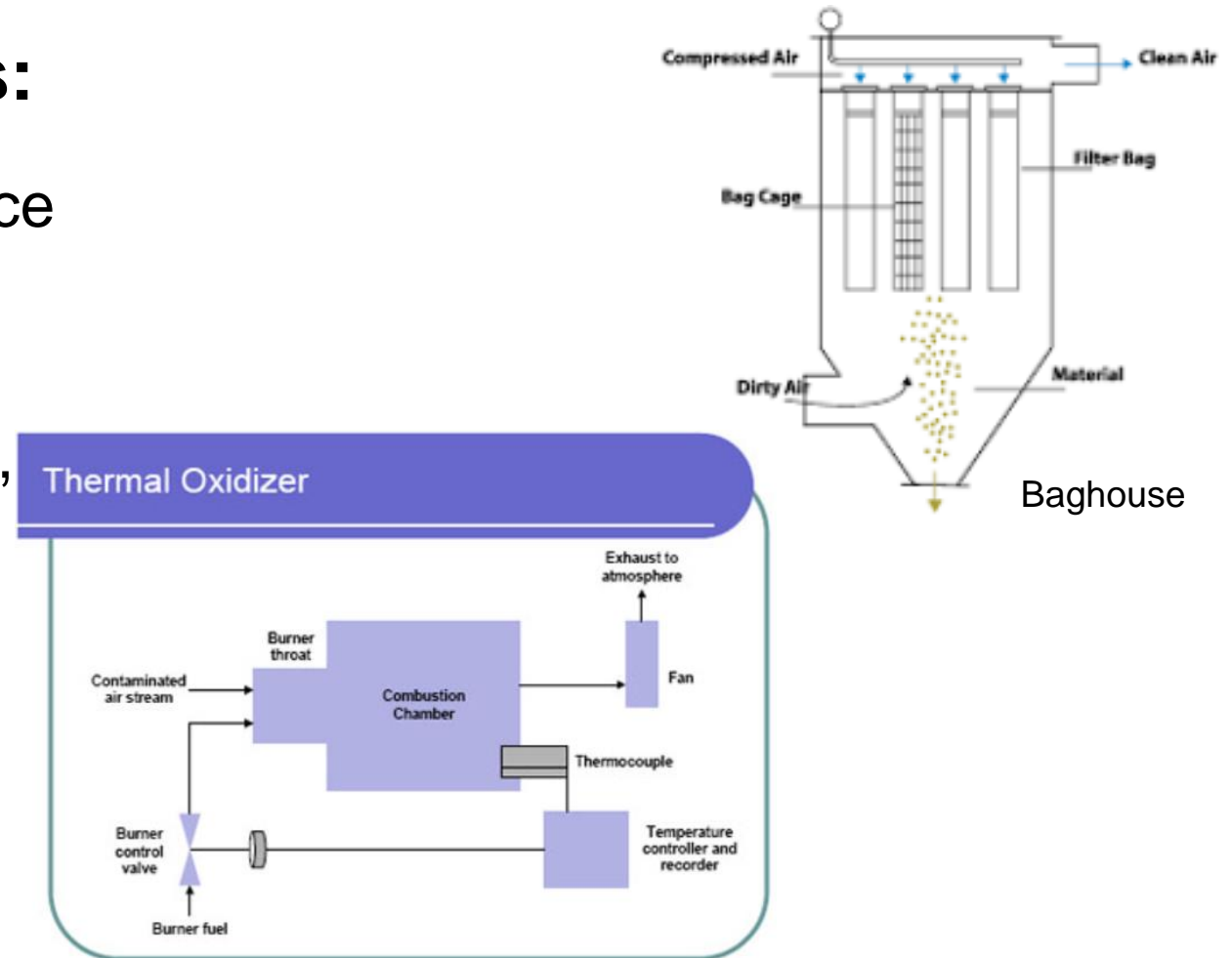
- Sources with TBACT not required to reduce unless risk > 200/10
- TBACT = NESHAP for major sources
- Cost effectiveness based on toxic air contaminants, not PM or VOCs



TBACT - Similarities

Similarities to previous draft rules:

- Required on all significant TEUs if source remains above 50/5
- Requires a case-by-case determination, subject to approval by DEQ
- Uses same factors to consider in determination



Determining if NESHAP = TBACT

Under SB1541, compliance with major source NESHAP would be considered TBACT if the NESHAPs:

- Result in actual reductions of hazardous air pollutants.
- Do not allow other toxics to pose “material” risks that aren’t controlled by the NESHAP



What is a NESHAP?

- **National Emission Standards for Hazardous Air Pollutants** set by EPA for stationary industrial/commercial sources of hazardous air pollutants
- **Maximum Achievable Control Technology** for over 100 industry categories
- **Risk and Technology Review** is a follow-up review by EPA of health risk and technology improvements may be included

TBACT and RALs

Under SB 1541, if a source employs TBACT on all significant TEUs, DEQ cannot require additional reductions or limitations unless risks exceed:

- Four times the cancer benchmark (200/million),
or
- Two times the non-cancer benchmark (HI of 10)

The multipliers are not subject to the sunset.

