

Proposed MassDEP Air Pollution Control
Regulation Amendments:
Adhesives and Sealants, and other VOC-
related provisions

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MassDEP

Hearing next week:

- Proposed Regulation Amendments to 310 CMR 7.00: Adhesives and Sealants; RACT for VOC and NOx; Emission Banking, Trading, and Averaging; Miscellaneous Metal Parts and Products and VOC Definitions
- Thursday, November 17, 1:00 PM
MassDEP Headquarters
One Winter Street, Boston
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Proposed Regulation Amendments to 310 CMR 7.00

- Adhesives and Sealants
- RACT for VOC and NO_x
- Emission Banking, Trading, and Averaging
- Miscellaneous Metal Parts and Products
Definition
- VOC Definition

Adhesives and Sealants

- new regulation: 310 CMR 7.18(30)
- includes product-type-based VOC content limits
- allows emissions capture and control as alternative to VOC content – NEED AN E.C.P.
- includes work practice standards
- satisfies VOC RACT CTG for higher-emitting facilities
- based on EPA, CA and OTC work

RACT for VOC and NOx

- current provisions exempt facilities with BACT determination from obligation to comply with VOC RACT (310 CMR 7.18) or NOx RACT (310 CMR 7.19)
- proposed revisions clarify this is limited to RACT provisions in effect at time of BACT determination
- subsequent RACT revisions should apply at facilities with past BACT determinations

Emission Banking, Trading, and Averaging

- 310 CMR Appendix B provisions apply at facilities that choose “bubble” compliance strategy for RACT
- a facility with existing VOC “bubble” might need to amend the “bubble” to encompass new Adhesive & Sealant requirements
- such facility would need to amend existing Emission Control Plan

Miscellaneous Metal Parts and Products Definition

- MMPP subject to existing emissions standards for VOC emissions from coatings, 310 CMR 7.18(11)
- MMPP definition in 310 CMR 7.00 revised in past to encompass entire ships and aircraft, contradicts EPA sector description
- Result: conflict with Shipbuilding and Aerospace RACT CTGs and MACT standards
- Proposed change removes conflict

VOC Definition

- EPA approved exemption of dimethyl carbonate (DMC) and propylene carbonate from VOC classification: insufficient photochemical reactivity to affect ozone formation
- Proposed change aligns MassDEP definition of VOC with federal definition

Other VOC changes in the works

Control Technique Guidelines (CTG)
commitment to EPA, including

- Printing and Web coating
- Industrial Cleaning Solvents (non-degreaser)
- Misc metal and plastic parts and products

Ozone Transport Commission, including

- Degreasing
- Automotive refinishing

Resources

Public Hearing Notice:

<http://www.mass.gov/dep/public/hearings/aq1011.htm>

Regulations:

<http://www.mass.gov/dep/air/laws/regulati.htm>

OTC:

<http://www.otcair.org/>

New application, guidance and approval pages

<http://www.mass.gov/dep/air/permitsa.htm>

Questions?

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