FACT SHEET

Proposed Amendments to Air Toxics Standards for Cellulose Products Manufacturing:

ACTION

- On August 16, 2019, the U.S. Environmental Protection Agency (EPA) proposed amendments to the 2002 Cellulose Products Manufacturing National Emission Standards for Hazardous Air Pollutants (NESHAP).
- The Cellulose Products Manufacturing NESHAP applies to two source categories - Cellulose Ethers Production and Miscellaneous Viscose Processes, which currently include cellophane, cellulose food casings and cellulosic sponges.
- Following a residual risk and technology review conducted under the Clean Air Act (CAA), EPA is proposing to:
    - Eliminate the startup, shutdown and malfunction exemption;
    - Require periodic air emissions performance testing once every 5 years for facilities using non-recovery add-on controls to demonstrate compliance with the standards;
    - Require facilities to submit electronic copies of compliance reports, including performance tests; and
    - Provide more flexibility for monitoring requirements.
- This action applies to emissions units including process vents, storage vessels, equipment components, wastewater and liquid streams in open systems.
- EPA will accept comment on the proposed amendments for 45 days after publication in the *Federal Register*.

RESIDUAL RISK ASSESSMENT

- The CAA requires EPA to assess the risk remaining after application of the final air toxics standards. This is known as a residual risk assessment.
- Based on the completed risk assessment, available health information and associated uncertainties, EPA determined risks from cellulose products manufacturing to be acceptable and provide an ample margin of safety to protect public health.
- The maximum individual cancer risk for inhalation is estimated to be 80-in-1 million for the Cellulose Ethers Production source category and less than 1-in-1 million for the Miscellaneous Viscose Processes source category.
    - For both source categories, the chronic hazard index and acute hazard quotient are below 1.

TECHNOLOGY REVIEW

- The CAA also requires EPA to assess, review and revise the air toxics standards as necessary, taking into account developments in practices, processes and control technologies since the standards were first issued.
- The technology assessment for cellulose products manufacturing did not identify any technological developments to reduce emissions of air toxics.

BACKGROUND

- The CAA requires EPA to regulate toxic air pollutants, also known as air toxics, from categories of industrial facilities in two phases.
- The first phase is "technology-based," where EPA develops standards for controlling the emissions of air toxics from sources in an industry group (or "source category"). These maximum achievable control technology (MACT) standards are based on emissions levels that are already being achieved by the best-controlled and lower-emitting sources in an industry.
- Within 8 years of setting MACT standards, the CAA directs EPA to assess the remaining health risks from each source category to determine whether the MACT standards protect public health with an ample margin of safety and protect against adverse environmental effects. This second phase is a "risk-based" approach called residual risk. Here, EPA must determine whether more health-protective standards are necessary.
- Also, every 8 years after setting MACT standards, the CAA requires that EPA review and revise the standards, if necessary, to account for improvements in air pollution controls and/or prevention.

HOW TO COMMENT

- EPA will accept comment on the proposal for 45 days after publication in the *Federal Register*. Comments, identified by Docket ID No. EPA-HQ-OAR-2018-0415, may be submitted by one of the following methods:
    - Go to https://www.regulations.gov/ and follow the online instructions for submitting comments.
    - Send comments by email to: a-and-r-Docket@epa.gov, Attention Docket ID No. EPA-HQ-OAR-2018-0415.
    - Fax your comments to: (202) 566-9744, Attention Docket ID No. EPA-HQ-OAR-2018-0415.
    - Mail your comments to: EPA Docket Center, Environmental Protection Agency, Mail Code: 28221T, 1200 Pennsylvania Ave., NW, Washington, DC 20460, Attention Docket ID No. EPA-HQ-OAR-2018-0415.
    - Deliver comments in person to: EPA Docket Center, 1301 Constitution Ave., NW, Room 3334, Washington, DC. Note: In person deliveries (including courier deliveries) are only accepted during the Docket's normal hours of operation. Special arrangements should be made for deliveries of boxed information.

FOR MORE INFORMATION

- To download a copy of the proposed rule notice, go to EPA's website at https://www.epa.gov/stationary-sources-air-pollution/cellulose-products-manufacturing-national-emission-standards.
- Today's action and other background information are also available either electronically at https://www.regulations.gov/, EPA's electronic public docket and comment system, or in hardcopy at the EPA Docket Center's Public Reading Room.

- The Public Reading Room is located at EPA Headquarters Library, room number 3334 in the WJC West Building, 1301 Constitution Ave., NW, Washington, DC. Hours of operation are 8:30 a.m. to 4:30 p.m. Eastern Standard Time, Monday through Friday, excluding federal holidays.
- Visitors are required to show photographic identification, pass through a metal detector and sign the EPA visitor log. All visitor materials will be processed through an X-ray machine as well. Visitors will be provided a badge that must be visible at all times.
- Materials for this proposed action can be accessed using Docket ID No. EPA-HQ-OAR-2018-0415.

- For further technical information about the rule, contact Dr. Kelley Spence at the EPA's Office of Air Quality Planning and Standards, at (919) 541-3158 or at spence.kelley@epa.gov.