What is GACT and Why Should I Care?

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Background

- CAA Amendments of 1990
- HAP List
- Major Source vs. Area Source:
  - 10 tpy of any HAP
  - 25 tpy of total HAPs
Urban Area HAPs

- EPA directed to identify at least 30 HAP that pose the greatest health threat in urban areas
- EPA identified 33
- EPA then required to identify the source categories that account for 90% of the area source emissions in urban areas
Urban HAPs

- arsenic compounds
- benzene
- beryllium compounds
- 1,3-butadiene
- cadmium compounds
- carbon tetrachloride
- chloroform
- chromium compounds
- coke oven emissions
- 1,2-dibromomethane
- 1,2-dichloropropane
Urban HAPs cont.

- 1,3-dichloropropene
- ethylene dichloride
- ethylene oxide
- formaldehyde
- hexachlorobenzene
- hydrazine
- lead compounds
- manganese compounds
- mercury compounds
- dichloromethane
- nickel compounds
- polychlorinated biphenyls (PCBs)
Urban HAPs cont.

- polycyclic organic matter (POM)
- quinoline
- 2,3,7,8-tetrachlorodibenzo-p-dioxin
- 1,1,2,2-tetrachloroethane

- tetrachloroethylene
- trichloroethylene
- vinyl chloride
Area Sources

- EPA identified 70 area sources
- Sources required to meet GACT - Generally Available Control Technology
- Sources not required to have Title V just because GACT applies (unless the specific standard requires it)
GACT vs. MACT

- Must be generally available – can be same as MACT
- May be a management practice
- Less performance testing than MACT
- Recordkeeping and reporting less onerous than MACT
Standards

- Generally focused on surrogate pollutants – PM for metals, TOC for organic HAPs
- Requirements vary by size of source – larger sources have more stringent limits, more testing, more reporting
- List of all standards on handout
Applies to any gasoline dispensing facility – even if you only have one tank and dispense into on-site vehicles

Standard depends on monthly throughput

If less than 10,000 gal/mo, meet good management practices, keep records
If throughput greater than 10,000 gal/mo, use submerged fill, keep records, submit notifications

If throughput greater than 100,000 gal/mo, reduce emissions by 90% (several options), keep records, performance test, submit notifications and reports
JJJJJJ - Boilers

- MACT stayed but not GACT
- Applies to industrial, commercial, and institutional Boilers
- Gas fired boilers are exempt
- Standards for boilers burning liquid or solid fuels
New after June 4, 2010

New liquid boilers >10 MMBtu/hr have a PM standard and must test

All liquid boilers must have a tune up every 2 years

Existing liquid boilers >10 MMBtu/hr must conduct a one time energy assessment
JJJJJJ Reporting

- Submit Initial Notification
- Submit Notification of Compliance Status
- Prepare Annual Compliance Report
- Submit report if there are deviations
Summary

- Keep up with GACT standards
- When permitting a minor source, check list of standards
- Recordkeeping very important since size of source is determining factor
Why Should You Care?

- Very easy to miss
- Enforcement potential
- You’d rather look like....
Questions???

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