

Texas Commission on Environmental Quality (TCEQ), Air Permits Division
Thermoset Resin Standard Air Permit
November 28, 2006
San Antonio

Minutes

I Opening Remarks **Becky Southard**

The staff introduced themselves and stated that facilities could continue to operate under a permit by rule (PBR) as long as they continue to operate under its conditions. Ms. Southard mentioned that the standard permit was expected to be completed sometime in the summer of 2007, and stressed that the standard permit document was a draft that was open to changes based on comments made.

II Background or Update Information **Eddie Mack**

Mr. Mack highlighted the distinction between a standard permit and a PBR. Mr. Mack also provided some history behind the styrene tons per year limits and effects screening levels (ESLs) and stated that the 1 hour ESL may be lowered to 70 from 110 micrograms per cubic meter in the near future. Mr. Mack stated that the 1998 United States Environmental Protection Agency (EPA) emission factors were underestimated. Mr. Mack mentioned that there would be no fugitive emissions under the new standard permit. He also stated that the filter efficiency would be changed to 98% rather than 95%, and the solvent ratio was taken from existing permits.

III Discussion Topics **Open Discussion**

A. *What is the reasoning behind lowering the short-term ESL?*

Staff from the Toxicology Section summarized the process of establishing ESLs by saying that the numbers are based on a variety of scientific methods. He stated that the proposed styrene level was based on odor studies.

B. *Concerns about meeting a short-term ESL of 70 for styrene.*

It was recommended that a case-by-case permit be considered if factors led the stakeholder to believe that the limits contained in the standard permit would be unreasonable for his facility. Staff stressed that standard permits in general are not meant to cover every situation.

Staff asked if the limit concerns were based on modeling or an actual measurement. The stakeholder answered that it was based on modeling. Staff reminded the stakeholder of the importance of an accurate emission number that is not over-predictive. He stated that there are many factors taken into consideration in modeling, such as distance to the closest residence, height of stacks, and ventilation.

Staff suggested contacting modeling staff at the Air Permits Division for more information.

C. *Is odor a legitimate reason for lowering the ESL?*

Staff from the Toxicology Section discussed olfactory fatigue, and stated that the agency is mandated to protect both the general population's health and against nuisance.

D. *How will the lowering of the ESL affect my facility?*

The stakeholder noted that his facility has been in operation for 30 years and has not received an odor complaint for over 20 years.

Staff answered that as long as the facility was operating under the conditions of its current permit, a lowered ESL would not affect it. New Source Review (NSR) permits written at this time are not including the ESL of 70. Staff also noted that facility expansions may cause the facility to fall under a different limit in the future.

E. *My facility is about to submit a revision to its NSR permit. Will the revision action cause the facility to fall under an ESL of 70?*

Staff answered that styrene's ESL was tentatively scheduled to be revised late in 2007, and that the limit in place at the time the revision application was received at the agency would be the one used.

The stakeholder also noted that the revision will involve improvements made to the site in order to comply with maximum achievable control technology standards, such as increasing the height of stacks and improving ventilation. He said that the facility has managed to reduce its styrene use, and employees have noticed a reduction in odor.

F. *Is there still a tax exemption program in place for the installation of control equipment?*

Staff suggested contacting Gary McArthur or Ron Hatlett at TCEQ concerning this issue.

IV Closing Remarks/Action Items Open Discussion

Ms. Southard thanked the stakeholder for attending the meeting and encouraged him to contact her with any specific comments regarding the draft. Ms. Southard requested that informal written comments be submitted by December 15, 2006. He was also encouraged to comment on the Toxicology Section's process for determining the ESL and the proposed number for styrene.

It was stated that notice would be published in major newspapers and the *Texas Register* to announce the 30-day formal comment period. Stakeholder meeting attendees that included their e-mail address on the sign in sheet would also be notified of the formal comment period via e-mail.

The stakeholder and staff discussed the upcoming meeting with the thermoset resin national trade association, American Composites, being held on December 12, 2006, in Austin, Texas at TCEQ, 12100 Park 35 Circle, Building C, Room 212W, at 2:00 p.m.

V Next Meeting Dates

The November 30, 2006 stakeholder meeting was canceled and no further meetings have been scheduled.

ATTENDEES

