

**TYPE A REGISTRATION PERMIT
REVISION SUMMARY
ROP-A03 AND RCP-A03**

The USEPA has recently promulgated another round of Generally Available Control Technology Standards for many area sources of hazardous air pollutants. These standards apply to many small facilities that are covered under or would qualify for coverage under the Type A Registration Permit. Because these standards are promulgated under s. 112 of the Clean Air Act, a facility would be disqualified for coverage under the ROP unless the standard is listed as allowed in Table H.

Also, the New Source Performance Standards (NSPS) for new compression ignition and spark ignition internal combustion engines have been added for engines meeting the qualifications listed below.

Finally, carbon adsorption is now an allowed control device listed in Table G of the Type A Registration Permits

The following new regulations under ss. 111 and 112 Clean Air Act have been added into Table H of the Type A ROP and Type A RCP. Unless otherwise noted, the regulations are contained in Part 63 of 40 CFR:

Source Category	Applicable Regulation
Plating and Polishing Operations	Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Plating and Polishing Operations
Nine Metal Fabrication and Finishing Source Categories including <ul style="list-style-type: none"> • Electrical and Electronic Equipment Finishing Operations • Fabricated Metal Products • Fabricated Plate Work (Boiler Shops) • Fabricated Structural Metal Manufacturing • Heating Equipment, except Electric • Industrial Machinery and Equipment Finishing Operations • Iron and Steel Forging • Primary Metal Products Manufacturing; and • Valves and Pipe Fittings. 	Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories
Chromium electroplating and anodizing operations which are not major sources or located at major sources <u>and</u> which are any of the following: <ul style="list-style-type: none"> • Any decorative chromium electroplating operation or chromium anodizing operation that uses fume suppressants as an emission reduction technology • Any decorative chromium electroplating operation that uses a trivalent chromium bath that incorporates a wetting agent as a bath ingredient. 	Subpart N – National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing tanks

Source Category	Applicable Regulation
Spark Ignition Internal Combustion Engines - only for the owner/operator of manufacturer-certified affected engines	Part 60 subpart JJJJ - Standards of Performance for spark ignition internal combustion engines
Compression Ignition Internal Combustion Engines - only for the owner/operator of manufacturer- certified affected engines that are 2007 model year or later with displacements less than 30 liters per cylinder	Part 60 subpart IIII - Standards of Performance for compression ignition internal combustion engines

Other changes in this revision:

The addition of carbon adsorption to the list of control devices as follows:

Control Device	Control Efficiency (Total Enclosure)	Control Efficiency (Hood)	Monitoring Requirements
	VOC and VHAP	VOC and VHAP	
Adsorber (activated carbon systems, carbon adsorption, solvent recovery)	85%	68%	Monitor pressure drop, VOC concentration at outlet

Clarified that facilities subject to standards under s. 112 of the clean air act that are regulated to a level that is considered Generally Available Control Technology (GACT) are eligible for coverage under the ROP. Previous language did not distinguish between MACT standards under s. 112 and GACT standards under s. 112.

Clarified that facilities with equipment subject to Maximum Achievable Control Technology (MACT) Standards under s. 112 are not eligible unless the standards are included in Table H. Previous language did not distinguish between MACT standards under s. 112 and GACT standards under s. 112.

Updated of hyperlinks to websites and dates.