



# USTMA ADVANCES EPA REVIEW OF AIR EMISSIONS FROM TIRE MANUFACTURING FACILITIES

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## Background: Controlling Air Emissions

- The Clean Air Act outlines a two-step regulatory process for the U.S. Environmental Protection Agency (EPA) to review and control emissions of hazardous air pollutants (HAP) across a variety of industries.
- The Act's first step for regulating HAPs requires EPA to set air emission standards for covered facilities that reduce risk of exposure to HAPs and that reflect the Maximum Achievable Control Technology (MACT).
- The Act's second step requires EPA to conduct a **residual risk and technology review (RTR)** eight years after implementation of the MACT emission standards to determine whether the air emission control requirements in the original MACT standard provide an ample margin of safety, and whether any new cost-effective control technologies are available.

## Staying Current: Timing for EPA's RTR Review

- EPA is under a court-ordered deadline to complete Clean Air Act-required reviews of hazardous air pollutant emissions from over 30 industries, including the tire manufacturing industry by 2020.
- EPA plans to issue a proposed rule for tire manufacturers in 2019 and a final rule by 2020.

## USTMA and EPA Collaborate

- The National Emissions Inventory (NEI) contains mistakes and incomplete emission data that does not create an accurate picture of emissions from USTMA member facilities, and reliance on this data could lead to new emission limits or control technology requirements that are unnecessary to protect human health or the environment.
- USTMA is actively engaged with EPA, providing extensive emissions data, manufacturing plant tours and technical support to ensure EPA has accurate information to perform the residual risk and technology review.

## USTMA RTR Advocacy Positions

- USTMA supports a review of HAP air emissions and technologies to control HAP air emissions at USTMA member major source facilities that is based on the best available scientific data and information.
- We support review of technologies to control HAP air emissions that account for whether an ample margin of safety has already been achieved.
- We support broader use of EPA work practice standards to address HAP emissions from complex, large-scale, or co-located sources.