

RACT/BACT/LAER Clearinghouse (RBLC) WORKSHOPS

This year the Reasonably Available Control Technology (RACT) / Best Available Control Technology (BACT) / Lowest Achievable Emission Rate (LAER) Clearinghouse (RBLC) has received funding needed to implement major improvements and gather missing information. To effectively use these resources, the Clearinghouse needs to communicate with and consider the needs of its users and potential clients. If you use the RBLC or are involved in New Source Review (NSR) permitting activities, your views and opinions need to be considered as the RBLC begins to identify, evaluate and implement needed improvements.

BACKGROUND

What is RACT? BACT? LAER?

These terms indicate emission control and pollution prevention measures required by different provisions of the Clean Air Act. NSR requirements are case-by-case decisions or determinations based on the requirements of the applicable regulation. NSR BACT requirements apply to major new and modified sources located in attainment areas (i.e., areas attaining the National Ambient Air Quality Standards (NAAQS)) and subject to Prevention of Significant Air Quality Deterioration (PSD) permitting requirements. NSR LAER requirements apply to major new and modified sources located in nonattainment areas (i.e., areas that do not meet a NAAQS). Existing sources located in nonattainment areas are subject to RACT requirements. RACT determinations may also be made on a case-by-case basis, but typically RACT requirements have been prescribed by State and local rules and regulations.

What is the RACT/BACT/LAER Clearinghouse (RBLC)?

The RBLC is primarily a Clearinghouse for air pollution control and pollution prevention technology determinations required for major new and modified sources subject to NSR (BACT & LAER) permitting requirements. The RBLC began as the BACT/LAER Clearinghouse in 1981 as a collection and distribution service for State and local agency BACT and LAER determinations. It has progressed through paper, mainframe and personal computer/electronic bulletin board based systems. Although EPA voluntarily established the Clearinghouse as an aid to State and local permitting agencies, it became a statutory requirement in Section 108(h) of the Clean Air Act Amendments of 1990. The

Amendments also added RACT to cover requirements for existing sources located in nonattainment areas. The RBLC has now emerged as a fully functional World Wide Web site (RBLC Web) that contains over 4000 determinations made by State and local agencies throughout the U.S. The Clearinghouse is accessed more than 30,000 times a year with more than 18,000 file downloads. About 12,000 of the downloads are user-generated files from RBLC data bases. Permitting agency staff represent only about one-third of those using the RBLC. The remaining two-thirds of users represent industry, consultants and lawyers preparing NSR permit applications or searching for good technology options for their air pollution abatement problems.

How do I access the RBLC Web?

To access the RBLC Web you need a personnel computer, internet browser software, and access to the World Wide Web through an Internet provider. Access the RBLC by going to the Clean Air Technology Center (CATC) Web page and clicking on the RBLC Web logo. The CATC Web address is: < <http://www.epa.gov/ttn/catc/> >

What kind of information is available on the RBLC Web?

The RBLC contains facility, process and pollutant information that reflect RACT, BACT, and LAER determinations by permitting agencies. Agencies are required to submit LAER decisions to the RBLC (Section 173(d) of the Clean Air Act), but all other submissions to the Clearinghouse are voluntary at this time. Facility level information includes the name and location of the source, general permit and source classification information, critical dates, and other plant wide information. Process level information includes specific information on each process addressed in the permitting action. Pollutant level information includes emission limits and technology information for each regulated pollutant emitted by each process. See Attachment A, RBLC Input Form and instructions for more information about RBLC data fields and content.

NEED FOR IMPROVEMENT

What issues have been identified?

Three major problem areas have been identified:

1. Completeness and comprehensiveness: The RBLC does not contain all BACT and LAER determinations and, for those determinations that are included, the information is incomplete. Most

submissions are voluntary and it is difficult to collect missing information.

2. Compliance verification: The RBLC information usually can not confirm that a source was constructed and that compliance with the emission limits indicated in the data base has been demonstrated. Although, data fields are provided, permitting agencies rarely update the RBLC data base to indicate that compliance with the emission limits in the permit have been verified.

3. Cost Information: Although data fields are provided, virtually no cost information has been entered or provided by agencies.

In addition to these major issues, questions have been raised concerning the RBLC role in presenting new and emerging air pollution technologies and the user-friendliness of the RBLC Web.

Have any recommendations been made concerning improving the RBLC?

The RBLC Subgroup, NSR Advisory Subcommittee, Clean Air Act Advisory Committee did make specific recommendations in January 1994. A summary of their recommendations is provided in Attachment B. The actual text of the recommendations is provided in Attachment C.

Has the RBLC taken any actions to address these recommendations?

The RBLC has and continues to implement improvements based on the recommendations of the RBLC Subgroup and others, and to make better use emerging information transfer technology.

On-Going Initiatives:

Data Acquisition / quality assurance (QA)

- Improved coordination with EPA Regional Offices
- QA RBLC review of existing RBLC data base
- Regional Office visits to collect missing information from their NSR files
- Outreach Activity - Public Workshops, New Users' Manual, New Annual Report
- Data Entry - New Standalone Editor (PC based software for users to enter and format RBLC data for uploading to the RBLC data base)(NOTE: Previous RBLC Standalone Editor is no longer compatible with the with the current RBLC Web system),
- On-line data entry QA utilities

- Linkage - Provide links to related technical sites, software tools, State and local permitting agency sites/contacts

Under consideration

- Customized Retrievals / Output Reports
- Cost Data Acquisition
- More Definitive Process Identification System (process codes)
- Provide links between:
 - RBLC main (permits) data base, RBLC regulation data base, and Code of Federal Regulations;
 - RBLC main data base to permits on State and local agency Web pages
- Update Standard Industrial Classification (SIC) codes to the new North American Industrial Classification System (NAICS).
- Training - Develop on-line tutorial and/or CD based training material
- Restore Ranking Capability (ability to list most stringent to least stringent emission limit & technology for a process & pollutant)
- New Clean Air Technology Data Base (direct access to technology /venders)
- Industry Sector Technology Assessments
- Emerging Technology Technical Bulletins
- Graphic Display of RBLC Sources, Class I Areas and other GIS information.