

Sierra Club Great Lakes Program
Toxic Air Pollution Education Series

Using the Clean Air Act's
Prevention of Significant Deterioration Requirements
to Control Toxic Air Pollution

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Forward

This document is one in a series produced for the Sierra Club Great Lakes Program in order to facilitate and increase public understanding of toxic substance issues and the connection between toxic air pollution, Great Lakes water pollution and effects on human health and the environment.

In this document, we brief the reader on how prevention of significant deterioration provisions of the Federal Clean Air Act and EPA federal regulations can be used to address toxic air pollution from new and modified major stationary sources of air pollution.

The Sierra Club Great Lakes Program hopes that these educational and advocacy materials will assist citizens in their understanding of state and federal toxic air pollution regulations and stimulate discussion about potential changes in regulatory policy to more fully protect public health and the environment. Other documents in this series describe state toxic air pollution regulations in detail and discuss policy agendas for proposed changes in these regulatory programs.

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1 Introduction

This briefing paper is intended show the reader how to use certain requirements of the Clean Air Act on the Prevention of Significant Deterioration (PSD) of air quality to get a handle on certain types of toxic air pollution.

This paper will address the PSD provisions of the Federal Clean Air Act from a toxic pollution viewpoint, acquaint the reader with how PSD sources are defined, mention the nationwide problem of sources cheating on PSD requirements and show the reader opportunities to use PSD requirements to gain controls on toxic air pollution.

2 Why is there a “Prevention of Significant Deterioration (PSD)” Clean Air Act Requirement?

The Federal Clean Air Act amendments of 1977 established a new clean air protection program, the Prevention of Significant Deterioration (PSD) requirement.¹ In 1990, some parts of the PSD program were modified when Congress passed the 1990 amendments to the Clean Air Act.

Congress had a number of purposes in establishing the Clean Air Act PSD provisions. Congress wanted to protect public health from pollution threats by not letting air quality get as dirty as would be allowed by the National Ambient Air Quality Standards. In the absence of the PSD requirements, sources would be able to pollute right up to the level of these health standards and Congress wanted to head off such pollution brinkmanship.

Congress also sought to protect national parks, wilderness areas and other national interest lands from air pollution, to harmonize economic growth with the need to protect air resources, to ensure that one state did not interfere to cause air quality degradation in another state, to ensure protection of regional visibility and to ensure that the public had adequate procedural opportunities for informed public participation concerning new pollution sources.

3 Brief Summary of Prevention of Significant Deterioration Requirements of the Clean Air Act

The Clean Air Act PSD requirements established specific requirements to control degradation of air quality, primarily for the common “criteria pollutants.” Under the

¹ See Federal Clean Air Act provisions at Part C – Prevention of Significant Deterioration of Air Quality, 42 USC § 7470 through 7492.

CAA PSD requirements, the nation was divided into three types of air quality degradation zones:

Class I zones where very little degradation would be allowed

Class II zones in which some degradation would allowed (Class II zones initially covered most of the US), and

Class III zones where state and local governments could decide that a moderate amount of degradation would be allowed.

Each of these zones had specific requirements for the maximum air quality degradation that would be allowed for sulfur dioxide and particulate matter emissions.

Other requirements were established to protect visibility from degradation associated with air pollution and long range transport of air contaminants.

Under PSD, new and modified major stationary emission sources of PSD pollutants are required to have federal PSD permits which are only granted after pre-construction reviews by the states and EPA and after a public hearing. The preconstruction reviews ensured that the ambient impact for common pollutants would not exceed certain threshold levels of air quality degradation. And new and modified PSD emissions sources had to show they employed “Best Available Control Technology” (BACT) before they could receive a PSD permit.

EPA has published two sets of regulations applicable to PSD requirements. Under the Clean Air Act, states can enact regulations to provide a PSD program under state authority which is approvable if it complies with the requirements listed in the Code of Federal Regulations at 40 CFR §51.166. A state may then become *authorized* by EPA to run its own prevention of significant deterioration program. In this case, close attention must be paid to the actual content of the state’s regulations, since sometimes these state requirements may be more stringent than the underlying federal requirements.

If EPA has published a disapproval of a state’s program for PSD sources² in regions where air quality is better than national ambient air quality standards, a state may still be *delegated* to run a Federal PSD permitting program under federal regulations at 40 CFR §52.21.

² EPA’s disapprovals of PSD programs are published at 40 CFR §52, Subparts F through FFF.

4 What Air Pollution Sources are Covered by the PSD Permitting and Review Requirements?

The Clean Air Act's PSD requirements are triggered for new major stationary sources of air pollution and major modifications of existing stationary sources. Major sources and major modifications are defined in EPA's regulations concerning the PSD program.

4.1 New PSD Major Stationary Sources

EPA federal regulations define three types of new major stationary sources that trigger PSD.

New PSD Major Stationary Sources
Any stationary source which emits, or has the potential to emit, more than 250 tons per year of a pollutant subject to regulation under the Clean Air Act ³
Any of the following types of stationary sources which emit, or have the potential to emit, more than 100 tons per year of a pollutant subject to regulation under the Clean Air Act: Fossil fuel-fired steam electric plants of more than 250 million BTU heat input per hour; coal cleaning plants with thermal dryers; kraft pulp mills; portland cement plants; primary zinc smelters; iron and steel mill plants; primary aluminum ore reduction plants; primary copper smelters; municipal incinerators capable of charging more than 250 tons of refuse per day; hydrofluoric, sulfuric and nitric acid plants; petroleum refineries; lime plants; phosphate rock processing plants, coke oven batteries; sulfur recovery plants, carbon black plants (furnace process); primary lead smelters; fuel conversion plants; sintering plants; secondary metal production plants; chemical process plants; fossil fuel boilers (or combinations thereof) totaling more than 250 million BTU per hour heat input; petroleum storage capacity exceeding 300,000 barrels; taconite ore processing plants; glass fiber processing plants; charcoal production plants. ⁴
Any physical change to a stationary source not otherwise qualifying in the above two categories if the physical change, by itself, would constitute a major source. ⁵

³ 40 CFR §52.21(b)(1)(i)(b)

⁴ 40 CFR §52.21(b)(1)(i)(a)

⁵ 40 CFR §52.21(b)(1)(I)(c)

4.2 Major Modifications Subject to PSD Requirements

Under EPA regulations, a “major modification” of a major stationary source can trigger PSD requirements. A major modification means:

“....any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.”⁶

However, the rules provide several exemptions which must be considered and which cause certain “physical changes” or “changes in the method of operation” to be exempted from triggering the PSD provisions.⁷

⁶ 40 CFR §52.21(b)(2)(i)

⁷ These exemptions are found at 40 CFR §52.21(b)(2)(iii)(a-k). In general, routine maintenance, repair and replacement; an increase in the hours of operation or in the production rate of a source (unless otherwise prohibited by federally enforceable conditions); use of certain types of alternative fuels; certain pollution control projects and other types of changes are specifically named as physical changes and changes in the method of operation which do not trigger PSD major modification rules.

A significant net emission increase is defined⁸ to include an emissions change that equals or exceeds any of the following pollutant and emissions rates shown in the following table:

Pollutant	Significant emission Rate (Tons/Year)
Carbon monoxide (CO)	100
Nitrogen oxides (NOX)	40
Sulfur dioxide (SO ₂)	40
Volatile organic compounds	40
Total particulate matter (PM)	25
Particulate matter – 10 microns or less	15
Elemental lead (lead compounds excluded)	0.6
Fluorides (except hydrogen fluoride which is excluded)	3
Sulfuric acid mist	7
Hydrogen sulfide (H ₂ S)	10

⁸ Federal regulations currently in effect at 40 CFR 52.21(b)(23)(I-iii) appear to also include asbestos, beryllium, mercury, vinyl chloride and potentially other toxic air pollutants in the PSD significant emission list. However, the approval of these regulations predate the passage of the Federal Clean Air Act amendments of 1990. Section 112(b)(6) (42 USC §7412(b)(6)) of the Act that was added with the 1990 amendments prohibited the PSD provisions of the Act from specifically applying to hazardous air pollutants listed pursuant to section 112(b)(1) and (2). EPA thus does not have the authority to specifically regulate such hazardous air pollutants under the PSD provisions of the Act. However, certain hazardous air pollutants, such as benzene, will continue to be regulated as a volatile organic compound that contributes to smog formation under the PSD provisions, but only under the general category of volatile organic compounds (VOCs).

Section 112(7) of the 1990 amendments to the Clean Air Act specifically excluded elemental lead from being listed as a hazardous air pollutant. Thus elemental lead is still considered a PSD significance pollutant. However, lead compounds (such as lead oxide and lead chloride) that are emitted from combustion sources must still be considered only as hazardous air pollutants that are not specifically subject to PSD regulation (but may be regulated under the class of particulate matter under the PSD regulation).

A March 11, 1991 guidance memo written by John Seitz, Director of the Office of Air Quality Planning and Standards, addresses these issues. The memo concerns “New Source Review Program Transitional Guidance” after the passage of the 1990 Clean Air Act Amendments.

Total reduced sulfur compounds (includes hydrogen sulfide, methyl mercaptan, dimethyl sulfide, dimethyl-disulfide and potentially others)	10
Chlorofluorocarbons (including CFC 11, 12, 113, 114, 115)	any emission
Halons (including 1211, 1301 and 2402)	any emission
Municipal waste combustor acid gases (measured as sulfur dioxide and hydrogen chloride)	40
Municipal waste combustor metals (measured as particulate matter)	15
Municipal waste combustor organics (measured as total tetra-through octa- chlorinated dibenzo(p)dioxins and dibenzofurans)	3.5×10^{-6}

Thus, if an existing major stationary source has a physical change or change in the method of operation that causes an increase in emissions equal to or exceeding any of the significance levels shown in the above table, this physical change or change in the method of operation triggers PSD requirements, including the requirement for a PSD best available control technology demonstration.

5. What Requirements Must be Met Once the PSD Process is Triggered?

Once PSD has been triggered for a new major stationary source or a major modification, a source is subject to mandatory public participation processes, federally delegated/authorized permitting, certain air quality reviews and best available control technology requirements.

5.1 Mandatory Public Participation Processes and Federal Permitting

New major stationary sources and major source modifications for which PSD is triggered must receive a federal PSD permit before construction may commence on such as source. Many states have received a *delegation* from U.S. EPA to carry out the PSD permitting program, subject to EPA oversight. States that have satisfied all federal PSD program requirements may be *authorized* to independently run a PSD program.

At this writing, none of the states in EPA Region V are presently authorized states for PSD permitting. All such states are presently operating delegated programs, although Ohio has taken recent steps to amend its regulations in an attempt to have its PSD permitting program become authorized.

Under the PSD requirements, a state must hold a public hearing on every proposed PSD permit. Notice of such a public hearing and a public comment period must be given at least 30 days prior to the public hearing and the end of the public comment period. Public hearing notices and ancillary documents must contain a statement of basis or fact sheet describing the decision to grant the permit. The permit granting authority must respond in writing to public comments made at the public hearing and during the public comment period.

The public is under an obligation to state all disputed issues during the public comment period and/or at the public hearing. For example, the public may protest that the control technology demonstration didn't comply with the PSD BACT regulations, that the emission limitation is set too high or that the BACT demonstration did not consider all PSD regulated pollutants that are emitted by the source.

After the state permitting agency issues its decision, it must notify all commentors of that decision. If there are unresolved adverse public comments made during the public hearing or comment period, the state permitting agency must provide for a 30 day delayed effectiveness date on the disputed PSD permit. Any person who commented at the public hearing or filed comments during the public comment period may appeal the agency's permitting decision within 30 days after a state permit agency's decision. The appeal may involve any issue raised by any commentor at the public hearing or during the public comment period.⁹ For permit agencies operating under a delegation of authority, the aggrieved commentor may appeal a permit agency's PSD permitting decision to the U.S. EPA Environmental Appeals Board in Washington, DC.¹⁰

Aggrieved commentors must submit a timely motion and brief to EAB in order to start the appeal. The brief must be substantial and completely state the grounds for an appeal. The petitioner must show that the contested issues were raised during the public comment period. EAB's standard of review requires that petitioners must show that a permitting agency's decision involved a finding of fact or conclusion of law which is clearly erroneous and/or that the permitting agency's decision represents an exercise of discretion or an important policy consideration which EAB should, in its discretion, review.

For appeals to the U.S. EPA Environmental Appeals Board, the act of filing a timely appeal by an aggrieved commentor continues the stay of effective date on the PSD permit until such time as the EAB makes at least a preliminary decision. If EAB summarily disallows the appeal, the permit immediately goes into effect and the only remedy available for an aggrieved commentor is to proceed to Federal District Court. If EAB considers the appeal meritorious, it may schedule oral argument, order submission

⁹ See 40 CFR 124.19, appeals of PSD decisions.

¹⁰ See <http://www.epa.gov/eab> for more information

of reply briefs from the applicant and the state permitting agency or conduct other proceedings. Ultimately, EAB will issue a decision granting or denying the appeal in whole or in part, assuming jurisdiction to grant the permit or otherwise remanding contested issues back to the state permitting agency with instructions.¹¹ Aggrieved members of the public must follow the EAB process in order to exhaust all administrative remedies before they may commence a citizen suit in Federal District Court under the Clean Air Act.

5.2 Best Available Control Technology

Once PSD requirements have been triggered for a new major source or major modification, the source must submit a demonstration subject to permit agency approval that it has incorporated PSD best available control technology (PSD BACT).¹² This level of control technology is defined as follows:

“Best available control technology means an emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under the Act which would be emitted from any proposed major stationary source or major modification which the Administrator, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

In no even shall application of best available control technology result in emissions of any pollutant which would exceed the emissions allowed by any applicable standard under 40 CFR parts 60 and 61.

If the Administrator determines that technological or economic limitations on the application of measurement methodology to a particulate emissions unit would make the imposition of an emissions standard infeasible, a design, equipment, work practice, operational standard, or combination thereof, may be prescribed instead to satisfy the requirement for application of best available control technology. Such standard shall, to the degree possible, set forth the emissions reduction achievable by implementation of such design, equipment, work practice

¹¹ EAB has published a Practice Manual, EPA 100-B-94-002, November 1994 which is available from EAB.

¹² 40 CFR §52.21(j)(2-4); 42 USC §7475(a)(4)

or operation, and shall provide for compliance by means which achieve equivalent results.”¹³

The most important aspect of this BACT definition to understand is that most of the time BACT will be expressed as a numerical limitation on emissions, that the setting of BACT constitutes a “maximum degree of reduction” and that the BACT determination involves a balancing of cost, energy aspects and environmental impact.

U.S. EPA has further explained the nature of BACT determinations by publishing its “top-down BACT” policy. This step by step policy is shown in the table below:

Step	Procedure
1 – Identify All Control Technologies	Listing should be comprehensive and should include Lowest Achievable Emission Rate and technology transfer
2 – Eliminate Technically Infeasible Options	A demonstration of technical infeasibility should be clearly documented and should show, based on physical, chemical, and engineering principles, that technical difficulties would preclude the successful use of the control option on the emissions unit under review
3 – Rank Remaining Control Technologies by Control Effectiveness	Should include: Control effectiveness (percent pollutant removed) Expected emission rate (tons per year) Expected emission reduction (tons per year) Energy impacts (BTU, KWH) Environmental impacts (other media and the emissions of toxic and hazardous air emissions); and Economic impacts (total cost effectiveness, incremental cost effectiveness)
4 – Evaluate Most Effective Controls and Document Results	Case-by-case consideration of energy, environmental and economic impacts If top option is not selected as BACT, evaluate next most effective control option
5 – Select BACT	Most effective option not rejected is BACT

Citizens can appeal PSD permits on the basis that a “top down” BACT review was not conducted, which is a common occurrence with proposed PSD permits.

¹³ 40 CFR §52.21(b)(12); See also 42 USC §7479(3)

5.3 PSD BACT Determinations and PSD Toxic Air Pollutants

Once the PSD BACT requirement is triggered for a major stationary source or a major modification by even a single pollutant, a best available control technology review must be done for each PSD regulated pollutant that is emitted in significant quantities. The same table in Section 4.2 used for PSD major modification significance thresholds is also used to define significance levels for common and toxic pollutants in doing BACT reviews.

Permits reflecting subsequent BACT review must contain numerical emission limitations reflecting BACT reviews for each applicable PSD toxic air pollutant if such emissions exceed the significance level shown in the table in Section 4.2.

Unfortunately, other toxic air pollutants not in the table cannot be regulated under the PSD provisions. The toxic pollutants listed in the table are there because they are regulated under some provision of the Clean Air Act other than provisions contained in Section 112 for Clean Air Act hazardous air pollutants. Unfortunately, Section 112(b)(6) of the Act explicitly prevents toxic pollutants listed as hazardous air pollutants under Section 112(b)(1) from being regulated as PSD pollutants.

5.4 PSD BACT Determinations, Clean Air Act Hazardous Air Pollutants and Unregulated Toxic Air Pollutants

Evolving EPA administrative case law in the PSD program has ultimately interpreted the “environmental impact” provisions in the definition of best available control technology to require consideration of unregulated pollutants in making such BACT determinations. Under this regulatory theory, emissions of unregulated pollutants, such as Clean Air Act hazardous pollutants and unregulated toxic pollutants, must be considered in the process of making best available control technology decisions, although no emission limitations can be directly set for these pollutants in the PSD process.

The first time this doctrine was clearly articulated was in a case of a municipal waste combustor in California in which citizen commentators appealed a decision of EPA Region IX on a proposed PSD permit for the North County Resource Recovery Associates.¹⁴

In a remand order back to EPA Region IX, then-EPA Administrator Lee Thomas wrote as to petitioner’s allegations:

¹⁴ EPA Administrative Decision In the Matter of North County Resource Recovery Associates, Remand Order, PSD Appeal No. 85-2, June 5, 1986.

“Among the reasons the petitioners present for granting review is Region IX’s alleged failure to establish emission limitation for all pollutants, including hazardous pollutants, that will or could possibly be emitted from the facility; the alleged inadequacy of Best Available Control Technology (BACT) determinations;..... With one exception, Region IX has addressed each of petitioners’ allegations and has provided rational explanations for not making any alterations in its permit determination.

The exception concerns Region IX’s assertion that EPA lacks the authority to “consider” pollutants not regulated by the Clean Air Act when making a PSD determination. This assertion is correct only if it is read narrowly to mean EPA lacks the authority to imposed limitations or other restrictions directly on the emission of unregulated pollutants. EPA clearly has not such authority over emissions of unregulated pollutants.

Region IX’s assertion is overly broad, however, if it is means as a limitation on EPA’s authority to evaluate, for example, the environmental impact of unregulated pollutants in the course of making a BACT determination for the regulated pollutants. EPA’s authority in that respect is clear.....

As defined in §169(3) the term BACT refers to an “emission limitation” that is set on a case-by-case basis for regulated pollutants, “taking into account energy, environmental, and economic impacts and other costs” associated with the particular emission control system that is selected to achieve the BACT emissions limitation. 42 USC §7479(3) (emphasis added) (40 CFR §52.21(b)(12).

Hence, if application of a control system results directly in the release (or removal) of pollutants that are not currently regulated under the Act, the net environmental impact of such emissions is eligible for consideration in making the BACT determination. The analysis may take the form of comparing the incremental environmental impact of alternative emission control systems with the control system proposed as BACT; however, as in any BACT determination, the exact form of the analysis and the level of detail required will depend upon the facts of the individual case. Depending upon what weight is assigned to the environmental impact of a particular control system, the control system proposed as BACT may have to be modified or rejected in favor of another system.

In other words, EPA may ultimately choose more stringent emission limitations for a regulated pollutant than it would otherwise have chosen if setting such limitations would have the incremental benefit of restricting a hazardous but, as yet, unregulated pollutant.” (Decision at p 3-4)

The precedent that PSD BACT determinations must consider the effects of control technology decisions on unregulated pollutants as part of the environmental impact

analysis has been extended and clarified in EPA's transitional guidance memo after the passage of the 1990 Clean Air Act Amendments.

“Toxic Effect of Unregulated Pollutants Still Considered in BACT Analysis -- Based on the remand decision on June 3, 1986 by the EPA Administrator in North County Resource Recovery Associates (PSD Appeal No. 85-2), the impact on emissions of other pollutants, including unregulated pollutants, must be taken into account in determining BACT for a regulated pollutant. When evaluating control technologies and their associated emissions limits, combustion practices, and related permit terms and conditions in a BACT proposal, the applicant must consider the environmental impacts of all pollutants not regulated by PSD. Once a project is subject to BACT due to the emission of nonexempted pollutants, the BACT analysis should therefore consider all pollutants, including Title III hazardous air pollutants previously subject to PSD, in determining which control strategy is best.”¹⁵

Under this approach to making a best available control technology decision, there is considerable opportunity to obtain emission reductions for toxic and hazardous air pollutants that are otherwise unregulated by PSD-related numerical emission limitations. For example, consideration of potential mercury and acid gas emissions from a combustion source may tip the balance in the BACT determination for using a spray dryer fabric filter combination over merely using an electrostatic precipitator for emission control. Another example would be tipping a BACT determination in favor of imposing fuel cleaning and fuel quality standards to remove lead and other heavy metals prior to combustion.

When an applicant has failed to consider the issue of unregulated pollutants by failing to name and quantify such pollutants in the application, and when a state permitting authority has subsequently approved such an application, the failure of the ensuing BACT determination to consider unregulated toxic pollutants can serve as a basis for appeal when the petitioner can show that a substantively different result might have occurred with proper consideration and that substantial error has contaminated the permit issuance proceeding in the BACT determination process.

6 Industry Cheating on PSD Permitting Requirements

U.S. EPA has recently published information (See attached Enforcement Alert newsletter) indicating widespread industry non-compliance with new source review and prevention of significant deterioration permitting requirements. As a result, citizen attention to PSD issues at neighboring industrial sites may yield several opportunities for

¹⁵ Ibid, March 11, 1991 Seitz memo at P. 3.

citizen enforcement proceedings and for injecting toxic air pollution concerns into the regulatory process.

7 Further Resources on PSD Regulation for Citizen Use

Citizens seeking further information and regulatory resources on prevention of significant deterioration may wish to consult the following information resources on the Internet:

U.S. EPA's Technology Transfer Network New Source Review Web Site:

www.epa.gov/ttn/nsr/

Government Printing Office (to find citations to the Code of Federal Regulations (CFR's))

www.access.gpo.gov

EPA Region VII's Searchable Compendium of EPA New Source Review Guidance:

<http://www.epa.gov/ttn/nsr/regionvii.html>

PDF Version of EPA's Draft October 1990 PSD Workshop Manual:

<http://www.epa.gov/ttn/nsr/gen/wkshpman.pdf>

EPA's Guidance Memo on Appropriate Injunctive Relief for Sources Violating PSD Requirements:

<http://es.epa.gov/oeca/ore/aed/comp/gcomp/g5.html>

EPA's RACT– BACT – LAER Control Technology Clearinghouse (provides BACT determinations made nationwide):

<http://mapsweb.rtpnc.epa.gov/RBLCWeb/bl02.htm>

EPA's Unified Air Toxics Website:

<http://www.epa.gov/ttn/uatw/>