

Recent Developments

Information about Environmental Issues

July / August 2016

U.S. ENVIRONMENTAL PROTECTION AGENCY ("EPA") RECENT RULEMAKING ACTIVITIES:

Air:

1. [81 Fed. Reg. 59950](#) (August 31, 2016). *Clean Energy Incentive Program Design Details*. EPA is extending the comment period on its proposed rule titled, "Clean Energy Incentive Program Design Details," which was published in the Federal Register on [June 30, 2016](#). Comments are now due on November 1, 2016.
2. [81 Fed. Reg. 59800](#) (August 30, 2016). *Air Emission Sources*. This rule finalizes technical and editorial corrections and revisions to regulations related to source testing of air emissions, including alternatives to existing testing regulations. The revisions do not impose new substantive requirements on source owners or operators. The final rule is effective on October 31, 2016.
3. [81 Fed. Reg. 59276](#) (August 29, 2016). *Emission Guidelines and Compliance Times for Municipal Solid Waste ("MSW") Landfills*. This rule finalizes a new subpart that updates the Emission Guidelines and Compliance Times for MSW Landfills that will result in additional reductions in emissions of landfill gas and its components, including methane, by lowering the emissions threshold at which a landfill must install controls. The revised Emission Guidelines would apply to landfills that accepted waste after November 8, 1987 and that commenced construction, reconstruction, or modification on or before July 17, 2014, and associated solid waste management programs. This final rule will become effective on October 28, 2016.
4. [81 Fed. Reg. 59332](#) (August 29, 2016). *Standards of Performance for MSW Landfills*. This rule finalizes a new subpart that updates the Standards of Performance for MSW Landfills that will result in additional reductions in emissions of landfill gas and its components, including methane, by lowering the emissions threshold at which a landfill must install controls. The rule addresses MSW landfills that are new, reconstructed, or modified after July 17, 2014, and associated solid waste management programs. This final rule will become effective on October 28, 2016.
5. [81 Fed. Reg. 58009](#) (August 24, 2016). *Fine Particulate Matter ("PM_{2.5}") National Ambient Air Quality Standards ("NAAQS"): State Implementation Plan ("SIP") Requirements*. On August 24, 2016, EPA published a final rule, effective October 24, 2016, establishing SIP requirements for PM_{2.5}. This rule implements the 12 µg/m³, annual-average PM_{2.5} NAAQS promulgated by EPA in 2012. The rule covers numerous aspects of PM_{2.5} SIP planning.
6. [81 Fed. Reg. 57822](#) (August 24, 2016). *Title V Permitting Program*. This proposed rule would revise EPA's regulations to streamline and clarify processes related to submission and review of title V petitions. The proposal covers five key areas, each of which should increase stakeholder access to

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and understanding of the petition process and aid EPA's review of petitions. Comments are due on October 24, 2016.

7. [81 Fed. Reg. 54421](#) (August 15, 2016). *Greenhouse Gas ("GHG") Emissions from Aircraft*. In this final rule, EPA finds that GHG emissions from certain classes of engines used in certain aircraft contribute to air pollution that endangers public health and welfare under the federal Clean Air Act ("CAA"). These findings are effective September 14, 2016.

8. [81 Fed. Reg. 53006](#); [81 Fed. Reg. 53097](#) (August 11, 2016). *NAAQS: Particulate Matter*. This direct final rule makes a technical correction to an equation in an appendix in the NAAQS for particulate matter. Unless EPA receives adverse comment to the proposed rule, published concurrently, by September 12, 2016, this rule will become effective on October 11, 2016.

9. [81 Fed. Reg. 52778](#) (August 10, 2016). *Oil and Natural Gas Sector*. On August 10, 2016, EPA published notice of its decision to deny petitions for reconsideration of the final rule titled "Oil and Natural Gas Sector: New Source Performance Standards and National Emission Standards for Hazardous Air Pollutants Reviews." Challenges to EPA's denial of the petitions for reconsideration must be filed in the U.S. Court of Appeals for the D.C. Circuit by October 11, 2016.

10. [81 Fed. Reg. 52348](#) (August 8, 2016). *Performance Specifications and Test Procedures*. Because adverse comments were received, EPA has withdrawn a portion of the May 19, 2016, direct final rule that made several minor technical amendments to the performance specifications and test procedures for hydrogen chloride continuous emission monitoring systems. Revisions to Procedure 6, sections 4.1.5, 4.1.5.1, 4.1.5.3, and 5.2.4.2 were withdrawn effective August 8, 2016.

11. [81 Fed. Reg. 52346](#) (August 8, 2016). *Mercury and Air Toxics Standards ("MATS") and Utility New Source Performance Standards ("NSPS")*. On August 8, 2016, EPA published notice of its final decision to deny petitions for reconsideration of the MATS and Utility NSPS for electric generating units. Challenges to EPA's denial of the petitions for reconsideration must be filed in the U.S. Court of Appeals for the D.C. Circuit by October 7, 2016.

12. [81 Fed. Reg. 51114](#); [81 Fed. Reg. 51145](#) (August 3, 2016). *National Emission Standards for Hazardous Air Pollutants ("NESHAP"): Aerospace Manufacturing and Rework Facilities*. This direct final rule amends the NESHAP for Aerospace Manufacturing and Rework Facilities by clarifying the compliance ate for the handling and storage of waste. Unless EPA received adverse written comment to the proposed rule, published concurrently, by September 2, 2016, the direct final rule will become effective on October 2, 2016.

13. [81 Fed. Reg. 51102](#) (August 3, 2016). *Regional Consistency Regulations*. This final rule, effective September 2, 2016, revises EPA's Regional Consistency regulations to address implications of adverse federal court decisions resulting from challenges to locally or regionally applicable actions by introducing a procedural exception under which EPA Regional offices no longer need to seek Headquarters concurrence to diverge from national policy in geographic areas covered by such an adverse court decision. The revisions are intended to help foster overall fairness and predictability regarding the scope and impact of judicial decisions under the CAA.

14. [81 Fed. Reg. 50330](#); [81 Fed. Reg. 50408](#) (August 1, 2016). *Air Quality: Revision to the Regulatory Definition of Volatile Organic Compounds ("VOC")*. EPA is taking direct final action to revise the regulatory definition of VOC under the CAA by adding 1,1,2,2- Tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane (also known as HFE-347pcf2; CAS number 406-78-0) to the list of compounds excluded from the regulatory definition of VOC on the basis that this compound makes a negligible contribution to tropospheric ozone (O₃) formation. Unless EPA received adverse written comment to the proposed rule, published concurrently, by August 31, 2016, the direct final rule will become effective on September 30, 2016.

15. [81 Fed. Reg. 48356](#); [81 Fed. Reg. 48372](#) (July 25, 2016). *NESHAP: Portland Cement Manufacturing Industry*. This direct final rule amends the NESHAP for the Portland Cement Manufacturing Industry by providing an additional compliance alternative, for a period of 1 year, for sources that would otherwise be required to use an HCl CEMS to demonstrate compliance with the HCl emissions limit. The rule also restores regulatory text that was inadvertently deleted. The effective date of this rule is September 8, 2016, unless adverse comments to the proposed rule, published concurrently, were received by August 24, 2016.

16. [81 Fed. Reg. 45232](#) (July 13, 2016). *NESHAP: Petroleum Refinery Sector*. This final actions amends the NESHAP for petroleum refineries in three respects: 1) it adjusts the compliance date for regulatory requirements that apply at maintenance vents during periods of startup, shutdown, maintenance or inspection for sources constructed or reconstructed on or before June 30, 2014; 2) it amends the compliance dates for the regulatory requirements that apply during startup, shutdown, or hot standby for fluid catalytic cracking units and startup and shutdown for sulfur recovery units constructed or reconstructed on or before June 30, 2014; and 3) it finalizes technical corrections and clarifications to the NESHAP and the NSPS for Petroleum Refineries. The final rule was effective on July 13, 2016.

17. [81 Fed. Reg. 45089](#) (July 12, 2016). *NESHAP: Ferroalloys Production*. EPA has received two petitions for reconsideration of certain aspects of the final residual risk and technology review final rule published on June 30, 2015, establishing the Ferroalloys Production source category NESHAP. EPA is announcing reconsideration of and requesting public comment on the following three issues raised in the petitions for reconsideration: the polycyclic aromatic hydrocarbons compliance testing frequency for furnaces that produce ferromanganese; the use of the digital camera opacity technique for determining compliance with the shop building opacity standards; and the use of bag leak detection systems on positive pressure baghouses.

18. [81 Fed. Reg. 45039](#) (July 12, 2016). *2010 Sulfur Dioxide (SO₂) NAAQS*. EPA has issued a final rule establishing initial air quality designations for certain areas in the United States for the 2010 primary SO₂ NAAQS. EPA is designating the areas as either nonattainment, unclassifiable/attainment, or unclassifiable, based on whether the areas do not meet the NAAQS or contribute to a nearby area that does not meet the NAAQS; meet the NAAQS; or cannot be classified on the basis of available information as meeting or not meeting the NAAQS, respectively. The designations are based on the weight of evidence for each area, including available air quality monitoring data and air quality modeling. Areas designated nonattainment by this rule must undertake certain planning and pollution control activities to attain the SO₂ NAAQS as expeditiously as practicable. The effective date of this rule is September 12, 2016.

19. [81 Fed. Reg. 44608](#) (July 8, 2016). *Draft Guidance on Regional Haze SIPs for the Second Implementation Period*. EPA has announced the availability of a [draft guidance document](#) titled, "Draft Guidance on Progress Tracking Metrics, Long-Term Strategies, Reasonable Progress Goals and Other Requirements for Regional Haze SIPs for the Second Implementation Period," which has been posted on its Web site.

20. [81 Fed. Reg. 44212](#) (July 7, 2016). *Standards of Performance for Stationary Compression Ignition ("CI") Internal Combustion Engines*. This final rule, effective September 6, 2016, finalizes amendments to the standards of performance for stationary CI internal combustion engines to allow manufacturers to design the engines so that operators can temporarily override performance inducements related to the emission control system for stationary CI internal combustion engines. These amendments apply to engines operating during emergency situations where the operation of the engine or equipment is needed to protect human life, and to require compliance with Tier 1 emission standards during such emergencies.

[State Implementation Plan \("SIP"\): Texas:](#)

21. [81 Fed. Reg. 53284](#) (August 12, 2016). *Interstate Transport of Air Pollution for the 2008 Ozone NAAQS*. This final rule disapproves Texas' SIP revision to address interstate transport of ozone

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and its precursors for the 2008 ozone standard. The disapproval establishes a 2-year deadline for EPA to promulgate a Federal Implementation Plan for Texas to address the CAA interstate transport requirements pertaining to significant contribution to nonattainment and interference with maintenance of the 2008 ozone NAAQS in other states, unless EPA approves a SIP that meets these requirements. This rule is effective September 12, 2016.

Waste:

22. [81 Fed. Reg. 57846](#) (August 24, 2016). *Significant New Use Rule (“SNUR”) on Certain Chemical Substances*. EPA has proposed to amend SNURs under the Toxic Substances Control Act (“TSCA”) for 2 chemical substances which were the subject of premanufacture notices. This proposal would require anyone who intends to manufacture or process either of these 2 chemical substances for an activity that is designated as a significant new use to notify EPA at least 90 days before commencing that activity. Comments are due September 23, 2016.

23. [81 Fed. Reg. 51802](#); [81 Fed. Reg. 51838](#) (August 5, 2016). *Coal Combustion Residuals (“CCR”) from Electric Utilities*. This direct final rule extends the compliance deadlines for the disposal of CCR under Subtitle D of RCRA for certain inactive CCR surface impoundments. The revisions are in response to a partial vacatur ordered by the U.S. Court of Appeals for the D.C. Circuit on June 14, 2016. Unless adverse comments to the proposed rule, published concurrently, were received by August 22, 2016, this direct final rule will become effective on October 4, 2016.

24. [81 Fed. Reg. 49598](#) (July 28, 2016). *Significant New Uses of Chemical Substances*. EPA has proposed changes to the existing regulations governing significant new uses of chemical substances under TSCA to align with revisions to the Occupational Safety and Health Administration’s (“OSHA”) Hazard Communications Standard, the OSHA Respiratory Protection Standard and the National Institute for Occupational Safety and Health respirator certification requirements pertaining to respiratory protection of workers from exposure to chemicals. EPA is also proposing changes to the significant new uses of chemical substances regulations based on issues identified by EPA and raised in public comments for SNURs previously proposed and issued under these regulations. Additionally, EPA is proposing a minor change to reporting requirements for premanufacture notices and other TSCA section 5 notices.

25. [81 Fed. Reg. 49072](#) (July 26, 2016). *Hazardous Waste Management System*. EPA is proposing its user fee methodology applicable to electronic and paper manifests submitted to the national electronic manifest system (“e_Manifest system”). After implementation of the e-Manifest system, certain users would be required to pay a prescribed fee per submittal in order for EPA to recover its costs for developing and operating the e-Manifest system. The final rule developed in response to public comments to this proposal will include the final fee methodology, initial fee schedule, and the implementation date for the e-Manifest system. This action also proposes amendments to the regulations governing the use and completion of electronic hazardous waste manifests.

26. [81 Fed. Reg. 45416](#) (July 14, 2016). *SNURs on Certain Chemical Substances*. Because adverse comments were received, EPA is withdrawing the direct final rule SNURs promulgated under TSCA for the following three chemical substances, which were the subject of premanufacture notices: Functionalized carbon nanotubes (generic), (PMN P-15-276), Diisocyanato hexane, homopolymer, alkanolic acid-polyalkylene glycol ether with substituted alkane (3:1) reaction products-blocked (generic), (PMN P-15-378), and Modified diphenylmethane diisocyanate prepolymer with polyol (generic), (PMN P-15-559). This rule was effective July 15, 2016.

27. [81 Fed. Reg. 44797](#) (July 11, 2016). *SNURs on Certain Chemical Substances*. EPA has issued a correction to the final rule published in the Federal Register on [May 16, 2016](#), for 55 chemical substances which were the subject of premanufacture notices. EPA inadvertently omitted the *de minimus* exemption from the worker protection requirements for the chemical substance identified generically as aluminum calcium oxide salt (PMN P-15-328). This final rule/correction became effective July 15, 2016.

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Water:

28. [81 Fed. Reg. 46839](#) (July 19, 2016). *Safe Drinking Water Act; Analysis and Sampling Procedures*. EPA has announced the approval of 16 additional alternative testing methods for use in measuring the levels of contaminants in drinking water and determining compliance with national primary drinking water regulations. The Safe Drinking Water Act authorizes EPA to approve the use of alternative testing methods through publication in the Federal Register. This final rule became effective July 19, 2016.

Miscellaneous:

29. [81 Fed. Reg. 47311](#) (July 21 2016). *Hazardous Chemical Reporting: Community Right-to-Know*. EPA issued a final rule in the Federal Register on [June 13, 2016](#) amending its hazardous chemical reporting regulations. That document inadvertently omitted the hazard “serious eye damage or eye irritation” in § 370.66 under the definition of “health hazard.” This final rule corrects that definition, and became effective on July 21, 2016.

30. [81 Fed. Reg. 43091](#) (July 1, 2016). *Civil Penalty Inflation Adjustment Rule*. This interim final rule, effective August 1, 2016, adjusts the level of statutory civil monetary penalty amounts for the statutes that EPA administers. The action is mandated by the Federal Civil Penalties Inflation Adjustment Act of 1990, as amended through 2015, which prescribes a formula for adjusting statutory civil penalties to reflect inflation, maintain the deterrent effect of statutory civil penalties, and promote compliance with the law.

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ("TCEQ") RECENT RULEMAKING ACTIVITIES

Air:

1. [41 Tex. Reg. 6209](#) (August 19, 2016). *30 T.A.C. 114, Control of Air Pollution from Motor Vehicles*. TCEQ has adopted amendments to §114.680, concerning Definitions, and §114.682, concerning Eligible Vehicle Models. The amendments include non-road cargo handling equipment as eligible for replacement under the program and remove the requirement that the drayage truck being purchased must have a day cab only. In addition, language is added to the definition of a seaport to include publically or privately owned property within a ship channel security district established under Texas Water Code, Chapter 68. The effective date of the amendments is August 25, 2016.

2. [41 Tex. Reg. 5343](#) (July 22, 2016). *30 T.A.C. Chapter 101, General Air Quality Rules*. This proposed rulemaking would add §101.222(k) and (l) to explain that the use of the affirmative defenses in §101.222(b) - (e) are not intended to limit a federal court's jurisdiction or discretion to determine the appropriate remedy in an enforcement action. The proposed rule would include a delayed applicability date to put Texas in a position to comply with EPA's SSM SIP Call while maintaining its position in the litigation concerning the EPA's SSM SIP Call. The applicability would not be effective until the appeals of EPA's SSM SIP Call are extinguished and the affirmative defense rule is prohibited.

3. [41 Tex. Reg. 5350](#) (July 22, 2016). *30 T.A.C. Chapter 113, Standards of Performance for Hazardous Air Pollutants and for Designated Facilities and Pollutants*. Proposed amendments to Chapter 113 would incorporate by reference amendments and additions that EPA made to the NESHAP under 40 CFR Part 63 as published through December 31, 2015. EPA's changes to 40 CFR Part 63 include amendments to a number of existing NESHAPs, the addition of a new NESHAP covering Wool Fiberglass Manufacturing at area sources, and the promulgation of two NESHAPs which replaced standards previously vacated by court actions.

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4. [41 Tex. Reg. 5361](#) (July 22, 2016). *30 T.A.C. Chapter 114, Control of Air Pollution from Motor Vehicles*. TCEQ proposes amendments to §114.100 and §114.305 to require regulated entities to use the most current ASTM test method when determining compliance with the Reid vapor pressure limits in §114.301, and to make non-substantive changes to address outdated citation references as needed to provide clarity and consistency. TCEQ also proposes the repeal of Chapter 114, Subchapter F, Division 2, §§114.211 - 114.217 and §114.219, to remove the Voluntary Accelerated Vehicle Retirement (“VAVR”) program regulations. The VAVR program is an obsolete program that provides no current benefit to the state and is no longer considered viable since the adoption and implementation of the Low-Income Vehicle Repair Assistance, Retrofit, and Accelerated Vehicle Retirement Program.

5. [41 Tex. Reg. 4950](#) (July 8, 2016). *30 T.A.C. Chapter 116, Control of Air Pollution by Permits for New Construction or Modification*. TCEQ proposes the repeal of §116.130 (Applicability); §116.131 (Public Notification Requirements); §116.132 (Public Notice Format); §116.133 (Sign Posting Requirements); §116.134 (Notification of Affected Agencies); §116.36 (Public Comment Procedures); and §116.137 (Notification of Final Action by the Commission), because the rules were superseded and are obsolete. These rules apply to air permitting applications declared administratively complete before September 1, 1999, and no pending applications meet that criterion. Repealing the obsolete rules and revising the SIP by removing §§116.130 - 116.134, 116.136, and 116.137 would eliminate any possible confusion as to what the applicable public participation requirements are in the SIP.

Water:

6. [41 Tex. Reg. 5366](#); [41 Tex. Reg. 5377](#) (July 22, 2016). *30 T.A.C. Chapter 210, Use of Reclaimed Water; 30 T.A.C. Chapter 285, On-site Sewage Facilities*. The TCEQ has proposed amendments to Chapters 210 and 285 to implement House Bill 1902, (Acts of the 84th Texas Legislature, 2015), which requires TCEQ to develop standards to allow the reuse of graywater for toilet and urinal flushing and creates a new regulatory classification for "alternative onsite water" which is defined as "rainwater, air-conditioning condensate, foundation drain water, stormwater, cooling tower blowdown, swimming pool backwash and drain water, reverse osmosis reject water, or any other source of water considered appropriate by the commission." The bill directs TCEQ to develop similar standards for the reuse of this new source of water similar to graywater.

Waste:

7. [41 Tex. Reg. 6160](#) (August 19, 2016). *30 T.A.C. Chapter 336, Radioactive Substance Rules*. Proposed revisions to Subchapters A and D of Chapter 336 would revise the commission's rules concerning definitions, general requirements for surveys and monitoring, and physical protection of category 1 and 2 quantities of radioactive materials. The proposed rulemaking would ensure compatibility with federal regulations promulgated by the Nuclear Regulatory Commission in order to preserve Texas' status as an Agreement State under 10 CFR part 150 and under the "Articles of Agreement between the United States Atomic Energy Commission and the State of Texas for Discontinuance of Certain Commission Regulatory Authority and Responsibility Within the State Pursuant to Section 274 of the Atomic Energy Act of 1954, as Amended." Comments are due on September 19, 2016.

8. [41 Tex. Reg. 5383](#) (July 22, 2016). *30 T.A.C. 331, Underground Injection Control*. The TCEQ has proposed amendments to Chapter 331 to implement House Bill 2230, (Acts of the 84th Texas Legislature, 2015), which provides authority for TCEQ to authorize a Class V injection well by individual permit, general permit, or by rule for disposal of nonhazardous desalination brine or nonhazardous DWTR into a Class II disposal well permitted by the Railroad Commission of Texas. This is known as dual authorization of a Class II-Class V well.

Procedural Rules:

9. [41 Tex. Reg. 6158](#) (August 19, 2016). *30 T.A.C. 11, Contracts*. TCEQ has proposed new §11.202 to implement Senate Bill 20 (Acts of the 84th Texas Legislature, 2015), which requires state agencies to establish by rule a procedure to identify each contract that requires enhanced for

performance monitoring and to submit information related to these contracts to the agencies' governing bodies. Comments are due on September 19, 2016.

10. [41 Tex. Reg. 5331](#); [41 Tex. Reg. 5339](#) (July 22, 2016). *30 T.A.C. Chapter 39, Public Notice; 30 T.A.C. Chapter 55, Requests for Reconsideration and Contested Case Hearings; Public Comment.* TCEQ has proposed amendments to Chapters 39 and 55 which would require owners or operators who register to construct and operate a concrete batch plant without enhanced controls under the Air Quality Standard Permit for Concrete Batch Plants to publish a consolidated Notice of Receipt of Application and Intent to Obtain Permit ("NORI") and Notice of Application and Preliminary Decision ("NAPD") as one consolidated NORI/NAPD notice, rather than separately as required under current rules. The amendments would also provide for a 30-day notice period during which comments and requests for public meeting or contested case hearing can be submitted in response to the consolidated NORI and NAPD.

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[ALSO OF INTEREST](#)

[Allocations of Cross-State Air Pollution Rule Allowances from New Unit Set-Asides for the 2016 Compliance Year.](#) EPA is providing [notice](#) of emission allowance allocations to certain units under the new unit set-aside provisions of the Cross-State Air Pollution Rule federal implementation plan and is responding to objections to preliminary calculations. Spreadsheets containing the calculations have been posted on EPA's [Web site](#).

[Recommended Aquatic Life Ambient Water Quality Criterion for Selenium.](#) EPA has provided [notice of availability](#) of a final updated Clean Water Act section 304(a) recommended national chronic aquatic life criterion for the pollutant selenium in fresh water, which supersedes EPA's 1999 CWA section 304(a) recommended national acute and chronic aquatic life criteria for selenium.

[Ambient Air Monitoring Reference and Equivalent Methods.](#) In accordance with 40 CFR part 53, EPA has [designated](#) one new reference method for measuring concentrations of SO₂, and four new equivalent methods for measuring concentrations of PM_{2.5}, PM₁₀ and PM_{10-2.5} in ambient air.

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[UPCOMING CONFERENCES, MEETINGS, and WORKSHOPS](#)

[TCEQ Advanced Air Permitting Seminar.](#) The TCEQ's [2016 Advanced Air Permitting Seminar](#) will be held in Austin on October 10-11, 2016.

[TCEQ Water Quality/Stormwater Seminar.](#) This TCEQ [seminar](#), to be held in Austin on October 12-13, 2016, will provide updates on permitting rules and upcoming regulations.

[TCEQ Work Session.](#) The next Commissioners' Work Session is scheduled to be held in Austin on November 3, 2016.

[TCEQ Environmental Trade Fair and Conference.](#) The next TCEQ annual [Environmental Trade Fair and Conference](#) has been scheduled for May 16-17, 2017.

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CONTACT INFORMATION

For copies of any information referenced in this newsletter, please contact Susie McKithan at 713.229.2047, or by e-mail at susie.mckithan@bakerbotts.com. Questions you may have regarding these or any other matters may be directed to any of the attorneys in our environmental section. For your convenience, their names and telephone numbers are listed below:

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