

nPB Is Now Considered a Hazardous Air Pollutant (HAP) Under NESHAP

REGULATORY DISCUSSION

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OVERVIEW

nPB is now considered a Hazardous Air Pollutant (HAP). Unexpectedly, on January 5th, 2022 n Propyl Bromide became a HAP regulated under NESHAP. The specifics of how it will be regulated will be provided by the USEPA at some time in the future. As no solvents have otherwise been added to NESHAP since it was originally enacted in the late 1990's, no one knows what the timeframe is. However, we anticipate that the use requirements will be similar to TCE, PERC and MC that were part of the earlier regulation.

NESHAP in and of itself does not preclude continued use of nPB - it is now more involved.

HERE IS HOW RELIANCE CAN HELP:

- [Free Test Part Cleaning in AeroTron-100](#)
- [Free Sample of AeroTron-100](#)
- [Free Expert Technical Consultation](#)

YOU HAVE OPTIONS:

Reliance is the manufacturer of vapor degreasing solvents & ULTRA equipment – vapor degreasing is our business and we can help with options:

1. Solvent options;
2. Equipment options;
3. Automation options.



IMPLICATIONS OF NESHAP REGULATION OF NPB

Air Permitting & State Reporting Impacts

Immediately, the main issue is air permitting. nPB was formerly only a VOC (Volatile Organic Compound), but not a HAP under NESHAP. Therefore, the type of operating permit you currently have is likely a simple air-operating permit for VOC emission. If you decide to stay with n Propyl Bromide, you will need to switch over to a HAP operating permit. Permits are issued by each state and each state's permitting rules vary.

For a HAP, there are typically *small emitter* permits and *large emitter* permits (Title V permits). The HAP permits typically are more expensive and require periodic reporting to establish compliance with the HAP requirements and report the amount of HAP's emitted. HAP permits also require more comprehensive vapor degreaser containment features and operating procedures. As mentioned earlier, specific requirements under the NESHAP regulations for nPB are not yet issued. Also, each state's DEQ/EPA will need to address the re-permitting and final reporting requirements for nPB - now that it is a HAP.

Shipping Classification Impacts

nPB is currently non-regulated for shipment. It is likely to be classified by the DOT as hazardous for shipment at some point and treated in the same manner as TCE/MC/PERC. Our understanding is that this will occur as a separate action by the DOT (Department of Transportation).

Waste Disposal Impacts

Currently nPB is not a RCRA hazardous waste for disposal. However, like the other NESHAP solvents, it is likely to be classified as a RCRA hazardous waste for disposal – at some point.

nPB Is Now Considered a Hazardous Air Pollutant (HAP) Under NESHAP – page 2

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USEPA Links Announcing HAP Regulation of nPB under NESHAP

- USEPA ANNOUNCEMENT:

<https://www.epa.gov/haps/addition-1-bp-npb-clean-air-act-list-hazardous-air-pollutants>

- USEPA QUESTION AND ANSWER BROCHURE:

<https://www.epa.gov/system/files/documents/2022-01/1bp-q-and-a-document-final.pdf>

- FEDERAL REGISTER NOTICE OF NESHAP REGULATION OF NPB:

<https://www.govinfo.gov/content/pkg/FR-2022-01-05/pdf/2021-28315.pdf>

NPB SOLVENT ALTERNATIVE: AEROTRON-100

- No Special NESHAP Reporting
- Use In Your Current Unit
- No HAP Reporting
- Excellent H&S
- Non-Flammable
- Ships Common Carrier
- Distillable

TSCA 6(a): Upcoming Additional Regulation of nPB/TCE/PERC & MC

The regulation of nPB / TCE /PERC and MC is underway under TSCA 6(a). This regulation gives the USEPA broad authority to regulate and is capable of resulting in a phase-out or ban of these solvents. A ban, if it occurs, would likely have a phase-out period. (TCE a couple of years ago was proposed banned for vapor degreasing.) The USEPA Proposal for TCE was 18 months for phase-out of manufacturing and a 36-month phase-out for use. Thus, a 3-year period.) The earlier proposal for TCE was withdrawn and is going through the process again along with nPB/PERC & MC. Proposed regulations for nPB/TCE/PERC and MC are expected to be issued this year.

You Can Still Use nPB Even Though it is NESHAP Regulated

You can continue use nPB. Companies have been using TCE /PERC and MC under NESHAP for 25 years, so NESHAP in and of itself does not preclude continued use, it is just more involved. Immediately, the main issue with nPB is your state air permitting (see above discussion). Since each state uniquely handles its own air VOC/ HAP permitting, you would need to check with your state for their immediate requirements for re-permitting of nPB & associated requirements.

TECHNICAL DATA

[AeroTron-100 comparison to nPB](#)

[AeroTron-100 Technical Brochure](#)

[AeroTron-100 Metal Compatibility](#)

[AeroTron-100 Physical Properties](#)

[AeroTron-100 SDS](#)



CONCLUSION

There is no immediate need to move out of nPB, but you may need to change permitting immediately or when your state otherwise requires it. You will need to comply with the HAP permit reporting. The TSCA 6(a) review is still in process and what the regulation of nPB will be under that regulation or if a phase-out will be proposed, is unknown.