

*If you use coatings, adhesives, or inks, new EPA reporting requirements may apply to you.*

# Tracking and Reporting TBAC\* in Air Emission Permits

\*t-butyl acetate (CAS #540-88-5)

Air Quality #7.01, April 2005

The U. S. Environmental Protection Agency (EPA) has changed the classification and reporting requirements for t-Butyl Acetate (tertiary butyl acetate, or TBAC). On November 18, 2004, EPA revised the definition of volatile organic compounds (VOCs) to exclude TBAC as being considered a VOC for purposes of attaining the National Ambient Air Quality Standard (NAAQS) for ozone (40 CFR 51.100(s)(5)).

This means that TBAC will not be considered a VOC for purposes of permit emission limits or for the VOC content in material so it won't count toward these limits. However, TBAC remains a VOC for the purpose of recordkeeping, emissions reporting, and inventory requirements. This change is effective as of December 29, 2004.

Because Minnesota rules incorporate the federal definition of VOCs by reference, this change also became effective in Minnesota on December 29, 2004.

## Where is TBAC used?

TBAC is a chemical that is currently used to make pharmaceuticals, pesticides, and other products. The properties of TBAC appear to make it suitable as a substitute for toluene and xylene, thus EPA and states are expecting TBAC to become more prevalent in industrial coatings, adhesives, contact cement, and solvent-based inks as the manufacture of TBAC becomes more economical. To confirm whether your product contains TBAC,

check the ingredients found on the product Material Safety Data Sheet (MSDS).

EPA believes that expanded use of this chemical will help areas of the country reduce the levels of VOCs in the air, which will lessen the amount of ground-level ozone. However, there remain questions about its long-term toxicity, hence the interest in tracking its use.

## What This Means

### When determining if an air quality permit is needed:

TBAC is not included in a facility's calculation of total VOC emissions when determining the facility's VOC potential to emit (PTE).

### When preparing a Title V permit application:

TBAC is not included in a facility's calculation of total VOC emissions when determining the facility's VOC potential to emit (PTE).

### Recordkeeping and Reporting Requirements:

State and federal Title V permits will contain a general condition identifying which chemicals are subject to this exemption as a VOC, but must still be tracked for emissions inventory purposes.

For Registration Permits, Option A and B permit holders will not be required to track TBAC emissions. For facilities holding Option C and D Registration



Permits, recordkeeping and reporting for TBAC will be done at the same frequency that the facility must track and report their VOC emissions.

**When preparing inventories of criteria emissions:**

TBAC *is* subject to the same requirements as VOCs when reporting annual VOC emissions, except TBAC must be reported separately from other VOCs.

This means that whenever a facility is required to track and report their VOC emissions, they should also be separately tracking and reporting their TBAC emissions. The MPCA will start requesting TBAC emissions from all facilities in their 2005 air emissions inventory report, except for to Option A and Option B Registration permits.

**When paying fees:**

The MPCA does not charge fees on emissions of VOCs that are determined by EPA to be negligibly reactive. (Minn. R. 7002.0015, subp. 2a. (A), Minn. R. 7005.0100 subp. 45 (TT)). Because TBAC has been determined to be “negligibly reactive”, **no fee is collected on emissions of TBAC.**

**More Information**

EPA’s announcement of this change to the definition of VOCs can be found at:

[http://www.epa.gov/ttncaaa1/t1/fr\\_notices/tbac.pdf](http://www.epa.gov/ttncaaa1/t1/fr_notices/tbac.pdf)

If you have a business with fewer than 100 employees, you can contact the MPCA’s Small Business Assistance Program at (651) 282-6143 or (800) 657-3938 for additional assistance.

Others can contact the MPCA’s Customer Assistance Center at 1-(800)-646-6247.

Because TBAC is currently found in products that are not commonly used in industries in Minnesota, the MPCA suggests that facilities begin checking for the presence of TBAC when a new Material Safety Data Sheet (MSDS) is received after April 2005, rather than checking past or current MSDSs.

Pharmaceutical manufacturers should check the MSDS of all materials used in 2005.