

## FACT SHEET

In developing the toxic guidelines it was our goal not to change the methodology and or mechanism of conducting these studies. Our goal was to make the guidance document more user-friendly and definitive.

Below are the key improvements:

- A table containing all Toxic Air Pollutants (TAP) is added, so applicant won't have to search four different databases for toxicity information. If the pollutant is not in the table then it does not need to be considered in the air toxic demonstration.
- The table contains the Acceptable Ambient Concentration (AACs) in the form of 15 minute, and 24 hour or annual averaging rate, so facility don't have to do the conversion any more.
- The table also contains a "Minimum Emission Rate (MER)". The facility can skip modeling if the facility-wide pollutant emission rate is below the MER. The MER is to be used for stack emissions only were calculated using the AAC and a conservative generic stack profile.
- Clarifies when to perform toxic impact assessment.
- Step-by step modeling procedures with a flow chart.
- Check List for Modeling.
- Modeling procedures for specific source like Lumber kilns, capped stacks and horizontal discharge.
- Facility can use AERMOD in addition to SCREEN3 and ISC3 air dispersion models.
- Provides specific guidance on how to perform a site specific risk analysis.

What is not changing in this guidance document:

- Pretty much everything else
- AAC is still based on IRIS, OSHA and NIOSH. The procedures for determining AAC are removed from the body of the document and moved to Appendix to make the document easy to read. The applicant has no need to go through these procedures since AAC is calculated and provided in the Table.
- Applicant can continue to use Screen 3 in the exact same way.
- Still requires a Toxic Impact Assessment when emissions increase from an existing facility or a new plant. The toxic impact assessment includes emissions from the entire facility.
- Agency discretion regarding synergistic and additive effects of multiple TAPs. It clarifies what to do if agency requires one.