

## **EPA Adds New Hazardous Air Pollutant**

For the first time since the original hazardous air pollutant (HAP) list was finalized by Congress in the 1990 Clean Air Act Amendments, EPA has added a HAP to the list through the petition and rulemaking process. The new HAP, 1-bromopropane (1-BP), also known as n-propyl bromide (nPB), is “reasonably anticipated to be a human carcinogen” per the National Toxicology Program Report on Carcinogens.

1-BP was previously added to the list of TRI reportable chemicals for the 2016 reporting year under the Emergency Planning and Community Right-to-Know Act. The chemical 1-BP is primarily used as a cleaning solvent in both solvent cleaning machines and as an applied solvent, as well as in both the manufacturing process and final cleaning of metal and plastic tubes and rods. It may also be used in adhesives, furniture foam fabrication, and other applications, including the aerospace industry.

1-BP became a listed HAP effective on February 4, 2022. Therefore, facilities should evaluate the chemicals used in their processes to determine the amount of 1-BP (if any) they may use and subsequently emit to the atmosphere. Facilities must account for potential emissions of 1-BP to determine if they exceed the Title V major source thresholds for HAPs (i.e., 10 tons per year of an individual HAP and 25 tons per year of total HAP). Facilities must also account for 1-BP when determining actual emissions to demonstrate compliance with HAP limits taken to avoid being a major source of HAP, as well as determining actual emissions for purposes of Title V fee calculations. However, currently 1-BP should not be included when determining compliance under other federal air regulations governing HAPs, such as the National Emission Standard for Hazardous Air Pollutants (NESHAP) addressing total HAPs or volatile organic HAPs.

Because there are unanswered and possibly unanticipated issues with the addition of a new HAP, EPA is also in the process of developing a rule to address impacts, implications, and requirements associated with adding a new HAP to the HAP list. This rule is expected to be proposed in 2022 and finalized in early 2023. In the meantime, for questions regarding the addition of this HAP and how it affects permitting or compliance requirements, please contact [Carla Brown](#) of MDEQ’s Permitting Division. For Title V facilities questions regarding reporting 1-BP for Title V fee purposes, contact [Laura James](#) of the Air Division, and for questions regarding air emissions reporting requirements please contact [Elliott Bickerstaff](#).