



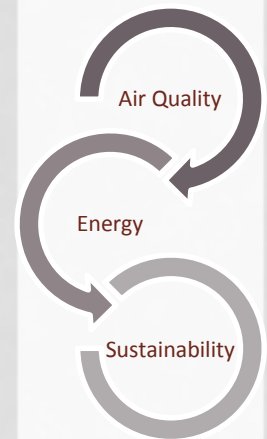
STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION



DIVISION OF AIR QUALITY
AIR QUALITY, ENERGY, AND SUSTAINABILITY

POTENTIAL AIR QUALITY RULE REVISIONS

REPEAL OF TBAC RULES 7:27-34



TBAC RULES REPEAL N.J.A.C. 7:27-34

- The Department is initiating a rule effort that affects manufacturers of t-butyl acetate (TBAC), or a product containing TBAC, subject to N.J.A.C. 7:27-34
 - TBAC is used in coating operations and may be found in products such as paints, inks and adhesives
- The Division of Air Quality (DAQ) intends to repeal Subchapter 34, TBAC Emissions Reporting
 - The next annual emissions report would be due April 30, 2017
- As of April 25, 2016, EPA concluded that recordkeeping and reporting of TBAC are unnecessary and burdensome to stakeholders and states.

TBAC RULES BACKGROUND

- Until 2004, EPA regulated t-butyl acetate (TBAC) as a volatile organic compound (VOC) contributing to the formation of ozone.
- EPA defines VOC at 40 CFR 51.100(s) – as a defined term used in the regulations governing the procedural requirements for states submitting State Implementation Plans (SIPs).
- VOCs do not include those compounds listed at 40 CFR 51.100(s)1, which EPA determined have negligible photochemical reactivity (leading to ozone formation)
- In 2004, EPA found TBAC to be negligibly reactive and exempted it from compliance requirements (such as the total VOC content in paints and adhesives)
- EPA did not add TBAC to the list of existing exempt compounds out of concern that high use volume could warrant additional regulation. Instead, in its definition of VOC, EPA adopted recordkeeping and reporting requirements for TBAC.
- DEP promulgated rules requiring TBAC use reporting in response to EPA's rulemaking