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## Engineering Guide #88: MACT and GACT Guidance

### THIS GUIDE DOES NOT HAVE THE FORCE OF LAW

#### Background:

Toxic air pollutants are pollutants that are known or suspected of causing cancer or other serious health effects. The Clean Air Act (CAA) required U.S. EPA to identify categories of industrial sources that emit one or more of 187 listed toxic air pollutants. These industrial categories include both major and area sources. For major sources within each source category, the Clean Air Act required U.S. EPA to develop standards that restrict emissions to levels consistent with the lowest emitting (also called best-performing) facilities. Major sources are those that emit 10 tons a year or more of a single toxic air pollutant or 25 tons a year or more of a combination of air toxics.

In July 1999, U.S. EPA released the Integrated Urban Air Toxics Strategy, which addresses air toxics in urban areas from stationary, indoor, and mobile sources. Under the Clean Air Act, the U.S. EPA identified a list of 30 urban hazardous air pollutants (HAPs) (Section 112 (k)(3)(B)) and also created a list of area sources that account for 90% of emissions for the listed 30 HAPs (Section 112 (c)(3)). Under CAA Section 112 (c)(3), U.S. EPA listed a total of 70 standards for area source categories, but failed to promulgate the standards within the timeframe specified by the statute. On March 31, 2006, the court ordered U.S. EPA to promulgate the standards for area source categories under CAA section 112(c)(3) after U.S. EPA was sued by The Sierra Club.

For area sources within each source category, the Clean Air Act allows U.S. EPA to develop standards or requirements which provide for the use of generally available control technologies (GACT) or management practices rather than the maximum achievable control technology (MACT) required for major sources. MACT requirements apply to major sources of HAPs or area sources, and these standards are congressionally mandated. GACT standards apply to some area sources, and they are considered to be an optional alternative approach to MACT. These standards are technologies that are considered 'generally available' to a particular source category.

Over the past decade, a significant number of new rules have been adopted that specifically apply to area sources, which, by definition, are any sources with HAP emissions that are not major sources. These new regulations affect a large number of smaller facilities and for many of these facilities the rule poses significant adjustments. Sources that have been affected by these new rules are required to make significant efforts to quantify HAP emissions, implement new control measures and/or work practices, and perform additional compliance monitoring activities. Many area sources may find the requirements to determine emission levels and to meet various technical and administrative requirements a significant new challenge since many of these smaller sources have not faced the requirements of complex federal regulations in the past.

As to DAPC guidance concerning the processing of permits for sources with an applicable major and/or area source MACT/GACT, DAPC has developed the following questions and answers.

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#### Question 1: What is the difference between GACT and MACT?

**Answer:** Area sources are required to meet MACT standards or the less stringent generally available control technology standards (GACT). MACT standards are congressionally mandated and involve the emission control level of the best controlled similar source (for new sources). For existing sources, the average emission rate of the best performing 12% of facilities establishes the emission levels. GACT is the optional approach to MACT under CAA 112 (d)(5). These technologies are considered 'generally available' to a source category. According to the Integrated Urban Air Toxics Strategy, MACT standards are developed for some area sources, but most sources are going to be subject to GACT standards developed in accordance with section 112 (d)(5).

Sometimes, the terms MACT and GACT can get confusing. A MACT typically refers to a major source and a GACT typically refers to an area source. However; area sources may be called a MACT. Due to this, and for the purposes of this guidance, using the terms "major" and "area" source may be more helpful to understand.

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### Question 2: Has Ohio EPA accepted delegation for all of the major source MACT rules?

**Answer:** Essentially, yes, Ohio EPA has formally accepted delegation for all major source MACT rules except for 40 CFR 63 Subpart L – Coke Ovens.

**\*\*NOTE: However – For all MACTs and GACTs, Ohio EPA accepts delegation only via issuance of a permit that uses the MACT/GACT reference approach. Ohio EPA does not accept the MACT/GACTs wholesale without issuing a permit. That means the MACT/GACT is only accepted on a source by source bases.**

### Question 3: Does Ohio EPA have delegation over 40 CFR 63 Subpart L (Coke Ovens)?

**Answer:** No, Ohio EPA does not have delegation over 40 CFR 63 Subpart L (Coke Ovens).

In the Memorandum of Agreement between Ohio EPA and US EPA, it states on page 2 under the Scope section:

“Ohio EPA is requesting delegation of responsibilities for implementation and enforcement of all emission standards and other requirements promulgated under Section 112 to implement the Maximum Achievable Control Technology (MACT) Standards with **the exception of the Coke Oven standard (40 CFR part 63 subpart L).**”

The full memorandum can be found at the following address: [epa.ohio.gov/dapc/mact/mactmain.aspx#164229495-permitting-and-compliance-assessment-of-major-and-area-source-mactgact-standards](http://epa.ohio.gov/dapc/mact/mactmain.aspx#164229495-permitting-and-compliance-assessment-of-major-and-area-source-mactgact-standards).

### Question 4: Has Ohio EPA accepted delegation for the area source MACT/GACT rules?

**Answer:** No, Ohio EPA has not formally accepted delegation of the area source MACT/GACT rules. The implementation of the delegation of section 112 (d) standards is discussed in the Memorandum of Agreement between U.S. EPA and the Ohio EPA finalized on April 10, 2002. The main reason Ohio EPA has not accepted delegation is because our workload as an agency would increase significantly if we accepted delegation of authority and U.S. EPA has not provided any additional funding for us to perform the additional work.

The full memorandum can be found at the following address: [epa.ohio.gov/dapc/mact/mactmain.aspx#164229495-permitting-and-compliance-assessment-of-major-and-area-source-mactgact-standards](http://epa.ohio.gov/dapc/mact/mactmain.aspx#164229495-permitting-and-compliance-assessment-of-major-and-area-source-mactgact-standards).

### Question 5: Since Ohio EPA has not accepted delegation for the area source MACT/GACT rules, should we include them in permits?

**Answer:** The Division of Air Pollution Control has decided to include language concerning area source MACT/GACT rules in permits on a very limited basis for non-Title V and synthetic minor sources. In this case, we will only be including a term and condition that identifies that an area source MACT/GACT rule may apply, and informs the permittee that U.S. EPA, not Ohio EPA, is responsible for enforcement of this rule. The purpose of this term is to inform the permittee of the rule. An example of a term to use is as follows:

**Select from one of the following terms:**

**XX fill in the Subpart**

**XXX fill in the name of the GACT or MACT**

#### **For a GACT**

1. The permittee is advised that this facility may be subject to the “Generally Available Control Technology” (GACT) requirements under Title 40 of the Code of Regulations, Part 63, Subpart **XX**, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for **XXX**. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

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## For an Area Source MACT

2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart **XX**, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for **XXX**. At this time, the Ohio EPA is not accepting delegation for area sources subject to the Maximum Achievable Control Technology NESHAP (MACT) rules. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

## GACT or MACT generic term:

3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart **XX**, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for **XXX**. At this time the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

**\*\*NOTE: the full document for the above paragraphs in red and blue can be found on the Ohio EPA Permit Terms and Conditions Library which is located at the following address: [epa.ohio.gov/dapc/terms/termsintro.aspx](http://epa.ohio.gov/dapc/terms/termsintro.aspx).**

This term should be included in the Facility-Wide Terms and Conditions section (Section B) of the permit.

When using this term for non-Title V and synthetic minor sources in Section B, Facility-Wide Terms and Conditions, permit writers should not incorporate the area source rule references into the permit. The above term paragraph should stand alone as is.

Permits for Title V facilities must incorporate these rules by reference (IBR) according to Engineering Guide # 76.

You may access Engineering Guide #76 at the following address:

[epa.ohio.gov/Portals/27/engineer/eguides/guide76.pdf](http://epa.ohio.gov/Portals/27/engineer/eguides/guide76.pdf)

## Question 6: Should this term be included in installation permits, operating permits or both?

**Answer:** This term should be included in both installation and operating permits once it is determined that an area source MACT/GACT applies. For the MACT standards that Ohio EPA has the delegation of authority to implement, these standards are required to be Incorporated by Reference (IBR) in accordance to Engineering Guide #76 for Title V facilities. For the area source MACT/GACT standards that Ohio EPA does not have the delegation of authority to implement, these standards should be included as a brief term and condition as demonstrated in question 5 for Non-Title V permits and Synthetic Minor permits, along with installation and/or operating permits. Title V facilities that may be subject to an area source MACT/GACT that Ohio EPA does not have the delegated authority to implement still need to have the area source MACT/GACT standard incorporated by reference (IBR) in the Title V permit.

## Question 7: How can a facility avoid being subject to a major MACT standard?

**Answer:** A facility can avoid being subject to a major MACT standard by obtaining an issued synthetic minor permit before the first compliance date of the MACT.

**\*\*NOTE: If a facility does not obtain an issued synthetic minor permit or take voluntary restrictions before the first compliance date of the MACT, then the Once In Always In Policy may apply.**

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**Question 8: What is the Once In Always In (OIAI) Policy and how does it apply to companies in regards to the MACT standards?**

**Answer:** Please refer to Ohio EPA Engineering Guide #67: [epa.ohio.gov/Portals/27/engineer/eguides/guide67.pdf](http://epa.ohio.gov/Portals/27/engineer/eguides/guide67.pdf)

**\*\*NOTE:** This policy applies to both area and major source MACTs/GACTs.

**Question 9: Can a facility request a 1-Year Extension to comply with the MACT?**

**Answer:** Yes, a facility can request a 1-Year Extension to comply with the MACT. For the major source MACT rules that Ohio EPA is accepting delegation for via the issuance of a permit, the MACT extension requests may be submitted to Ohio EPA via hard copy (please see question 29 for Ohio EPA's address) or via email. For area source MACT extension requests or other MACT rules that Ohio EPA is not accepting delegation for, the MACT extension requests should be sent to US EPA at the following address:

Sara Breneman  
Chief, Air Enforcement and Compliance Assurance Branch  
77 West Jackson Blvd., AE-17J  
Chicago, IL 60604

The rule reference and procedure for the 1-Year MACT extension request is 40 CFR 63.6(i).

Please contact Briana Hilton immediately via email at [briana.hilton@epa.ohio.gov](mailto:briana.hilton@epa.ohio.gov) or via phone at (614) 644-3698 if you receive a MACT Extension request. **The rule requires Ohio EPA to provide a response within 30 days of receiving the request!**

**\*\*NOTE:** Not all MACTs/GACTs may allow for a 1-Year Extension, so make sure to double check the rule!

**Question 10: Who do DO/LAAs contact for 40 CFR 63 (MACT) Subpart UUUUU (Mercury Air Toxics Standards – MATS) questions?**

**Answer:** Christopher Beekman, Central Office DAPC, is the contact for MATS at the current time. He handles all MATS questions and MATS extension requests. He may be reached via email at [christopher.beekman@epa.ohio.gov](mailto:christopher.beekman@epa.ohio.gov) and/or via phone at (614) 644-3597.

**Question 11: Does area source and major source MACT/GACT applicability affect de minimis (OAC rule 3745-15-05) determinations?**

**Answer:** Yes, sometimes as specified in OAC rule 3745-15-05(C)(1).

If an air contaminant source is subject to a major and/or area source MACT/GACT, and the applicable MACT/GACT does limit the emissions of an air pollutant from the source to less than ten pounds per day or restricts the operation of the source in a manner equivalent to an emission limit of less than ten pounds per day, then the air contaminant source cannot be considered de minimis.

However, if an air contaminant source is subject to a major and/or area source MACT/GACT, and the applicable MACT/GACT does not limit the emissions of an air pollutant from the source to less than ten pounds per day or restrict the operation of the source in a manner equivalent to an emission limit of less than ten pounds per day, then MACT/GACT applicability does not affect the de minimis determination.

**Question 12: As it relates to the area source MACTs, what additional work are staff expected to do?**

**Answer:** District Office and Local Air Agency (DO/LAA) staff are not required to determine facility applicability for the non-delegated standards.

However, if a facility is subject to an area source MACT/GACT and is obtaining a permit from Ohio EPA, then the DO/LAA staff would be required to:

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1. Put the “standard term”, (refer to question 3), in the Facility-Wide Section of the permit (Section B) for Non-Title V and Synthetic Minor sources, or
2. Incorporate the area source MACT/GACT by Reference (IBR) per Engineering Guide #76 for Title V sources.

### **Question 13: Are DOs/LAAs responsible for inspecting facilities for compliance with GACT rules?**

**Answer:** DO/LAA staff are not responsible for inspecting facilities for compliance with the non-delegated area source MACT/GACT rules.

### **Question 14: If I am on an inspection and notice a violation of an area source MACT/GACT that Ohio EPA does not have delegation of authority to implement, what should I do?**

**Answer:** Discuss the issue with the facility contact. Let them know you noticed an area source MACT/GACT violation, and Ohio EPA does not have the authority to enforce the area source MACT/GACT rules, but U.S. EPA does. Let them know that you are obligated to notify U.S. EPA of the violation. In the compliance letter, reiterate to the owners responsible that it's the facility's responsibility to identify and comply with any possible area source MACTs/GACTs that Ohio EPA does not have the delegation of authority to implement. You can notify U.S. EPA simply by copying them on your post inspection letter that includes a description of what you found concerning the area source MACT/GACT.

### **Question 15: Can the state/DOs/LAAs pursue enforcement since the state hasn't accepted delegation for the program?**

**Answer:** No. The violation should be reported to U.S. EPA Region V for enforcement.

### **Question 16: What happens if the permittee does not want the term in their permit?**

**Answer:** If the permittee does not want the term in their permit, then remove it. Since it is just included to make the permittee aware of an additional air pollution obligation, it is considered optional. Adding a note in the workflow would be an alternative that the Division of Air Pollution Control recommends.

### **Question 17: Should the DOs/LAAs cite the applicable area and/or major source MACT/GACT subpart under the “Federal Rules” section STARS 2?**

**Answer:** Yes. When an area and/or major source MACT/GACT is cited in a facility's permit, it should be added to the “Federal Rules” section in Stars2. Not only should the “Subject to MACT” box be checked, but the applicable subpart should also be added. This information is useful for our agency if we would like to know how many permitted facilities are impacted by a particular rule. Also, this information would be important to us in case we do accept delegation of these rules in the future.

### **Question 18: Testing companies for gasoline dispensing facilities (GDFs) are starting to do the extra area source MACT/GACT required testing during the Stage II testing (which makes total sense from a tester's point of view). Should Ohio EPA staff be witnessing these extra steps?**

**Answer:** There is no obligation for Ohio EPA staff to witness the additional testing requirements for the area source MACT/GACT. However, if the additional testing coincides with another test which Ohio EPA is responsible for witnessing, inspectors are allowed to observe the testing for GDFs as well.

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**Question 19: Is there a Central Office (CO) contact for questions on the area sources standards, or should we forward the question to Region V?**

**Answer:** Questions concerning the area source standards can be addressed to Briana Hilton, MACT Coordinator. She can be reached via email at [briana.hilton@epa.ohio.gov](mailto:briana.hilton@epa.ohio.gov) or via phone at (614) 644-3698. She will be able to direct the question to the appropriate US EPA, Region V contact.

**\*\*NOTE: Briana also serves as the MACT/GACT point of contact for Ohio EPA. You may send questions regarding MACT/GACT to her at the above email address and/or phone number.**

**Question 20: Is Ohio EPA likely to accept delegation for all area sources at once, or just some of them piece-by-piece?**

**Answer:** At this time, it is not likely that Ohio EPA will accept delegation for area sources.

**Question 21: How should the limitations or control requirements established by these rules affect potential to emit for Title V, PSD, MACT, de minimis, BAT applicability?**

**Answer:** These are considered federally enforceable rules, so these rules can affect PTE for Title V, PSD, MACT, de minimis, and BAT applicability.

**Question 22: After confirming that an area source MACT/GACT rule applies to a source, how do we include the citation in a PTIO without assessing compliance (in accordance with 3745-31-05 (A)(2)(d))?**

**Answer:** We are not including any sort of citation in a PTIO. All permits should reference the area source rules in accordance to the example provided in question 5 of this document.

**Question 23: How should DO/LAAs address area source MACT/GACT rules when sending a follow-up FCE letter? Specifically, should the letter explain that compliance with area source MACT/GACT rules were not addressed during the FCE?**

**Answer:** Ohio EPA is not requiring DOs/LAAs to do any more work than what is added to the permit. When sending a follow-up FCE letter, the letter should state that these rules may be applicable to the facility, but they are not enforceable by Ohio EPA. Use the same language that is used in the permit in regards to the area source rules.

**Question 24: Do Title V sources need to certify compliance with area source MACT/GACT rules? If so, does it matter whether the area source MACT/GACT rule has been cited in a permit?**

**Answer:** If a source is subject to area source MACT/GACT rules, the area source MACT/GACT rules are an applicable requirement and meet the definition of an "Applicable requirement" in accordance with Chapter 3745-77-01(H). Therefore, yes, Title V sources need to certify compliance with area source MACT/GACT rules in accordance with Chapter 3745-77-03(C)(10)(a). Permits for Title V facilities must incorporate area source MACT/GACT rules by reference (IBR) according to Engineering Guide #76; (please see questions 5 and 6 of this guidance).

**Question 25: Do applicants need to include a reference to the area source MACT/GACT rule for each significant and insignificant EU as an applicable requirement per 3745-77-03 (C)(4)(a)?**

**Answer:** If a source is subject to area source MACT/GACT rules, the area source MACT/GACT rules are an applicable requirement and meet the definition of an "Applicable requirement" in accordance with Chapter 3745-77-01(H). Therefore, yes, applicants need to include a reference to the area source MACT/GACT rules for each significant and insignificant EU as an applicable requirement per Chapter 3745-77-03(C)(4)(a). This referencing should follow Engineering Guide #76.

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### Question 26: How are insignificant emissions units subject to an area source MACT/GACT to be incorporated into a Title V permit?

**Answer:** This guidance does not result in any change to the current procedure of listing insignificant emissions units (IEUs) in Section B (Facility-Wide section) of a Title V permit. Any source subject to an area source MACT/GACT should continue to be listed in State and federally-enforceable list of IEUs. The standard permit language following the list of State and federally-enforceable IEUs reads: "Each insignificant emissions unit at this facility must comply with all State and federal regulations..." It is the responsibility of the Title V permit holder to know which area source MACT/GACT applies to individual IEUs at the facility and ensure that those emissions units comply with the area source MACT/GACT requirements. See Engineering Guide #76.

### Question 27: If the area MACT/GACT standard requires periodic compliance demonstrations or emissions testing, are we obligated to attend the test, review the report, or enter the results into CETA if they are submitted to us?

**Answer:** Ohio EPA staff are not required to attend the test, review the report, or enter results into CETA for tests demonstrating compliance with area source rules.

### Question 28: Does area source MACT/GACT applicability affect the exemption determinations from OAC rule 3745-31-03 (A)(1) and the Permit by Rule determinations from 31-03 (A)(4)?

**Answer:** No, area source MACT/GACT applicability does not affect exemption determinations. It is the obligation of the company to comply with the area source rules.

### Question 29: Where should facilities send their Initial Notification forms and other compliance reports for the major source standards?

**Answer:** Facilities subject to major MACT standards via an issued Ohio EPA permit should send their Initial Notifications and other compliance reports via hard copy or electronically via Air Services to Ohio EPA. If facilities send their Initial Notification forms and other compliance reports hard copy, they may send it to their permit writer at their District Office or Local Air Agency or to Briana Hilton at Central Office.

The address for Central Office is:

50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, OH 43216-1049

Once Ohio EPA accepts delegation for a MACT via issuing a permit, Ohio EPA becomes the Administrator for the rule for that company. However, facilities may also choose to send a copy of their Initial Notifications and other compliance reports to US EPA, Region 5 – (please see question 30 for US EPA, Region 5 address).

### Question 30: Where should facilities send their Initial Notification forms for the area source standards?

**Answer:** Facilities should send their Initial Notification forms for area source MACT/GACT rules that Ohio EPA does not have the delegated authority to implement to U.S EPA Region V at the following address:

Compliance Tracker – Air Enforcement and Compliance Assurance Branch  
US EPA – Region 5  
AE-17J  
77 West Jackson Blvd.  
Chicago, IL 60604

As a courtesy, Ohio EPA may ask for a copy of the Initial Notification; however, it is not required for the company to send Ohio EPA a copy of these reports.

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**Question 31: Where should facilities send their other compliance forms for these standards (reports, notification of compliance, etc.)?**

**Answer:** Facilities should send their compliance forms and reports for area source MACT/GACT rules that Ohio EPA does not have the delegated authority to implement to U.S. EPA Region V at the following address:

Compliance Tracker – Air Enforcement and Compliance Assurance Branch  
US EPA – Region 5  
AE-17J  
77 West Jackson Blvd.  
Chicago, IL 60604

As a courtesy, Ohio EPA may ask for a copy of the other compliance reports and forms; however, it is not required for the company to send Ohio EPA a copy of these reports.

**Question 32: It has come to CO's attention that there are some major source MACT rules that have area source language written within the rule. Is Ohio EPA accepting delegation over both major and area source portions of the rule or is Ohio EPA accepting delegation over the major source portion of the rule only?**

**Answer:** When there are both major source and area source language built into a MACT rule, Ohio EPA is only accepting delegation for the major source portion of the rule.

For example, 40 CFR 63 Subpart ZZZZ (RICE) has both major source and area source language within the rule. For this rule, if the facility is applicable to the major source portion of the rule, then Ohio EPA accepts delegation. If the facility is applicable to the area source portion of the rule, then Ohio EPA is not accepting delegation and, therefore, the delegation resides with US EPA.

Some other examples of rules that this applies to are the following Subparts: AAAA, AAAAA, EE, EEE, GGGG, HHHHHH, IIII, KK, LLL, M, N, O, RRR, T, and VVV.

**\*\*NOTE: Subpart HH has both area and major source language within the same rule; however, Ohio EPA has decided to accept delegation of both area and major source portions of the rule on a source-by-source basis.**

**\*\*NOTE: For all MACTs and GACTs, Ohio EPA accepts delegation only via issuance of a permit that uses the MACT/GACT reference approach. Ohio EPA does not accept the MACT/GACTs wholesale without issuing a permit. That means the MACT/GACT is only accepted on a source by source basis.**

**Question 33: For the permits that have been issued in the past for area sources that included the MACT requirements, the delegation is accepted on a facility-specific basis. This would include continuing to retain the MACT terms on renewal of the permit – correct?**

**Answer:** Yes, unless Ohio EPA decides to remove the MACT terms from the permit and switch to the “not accept” approach. Ohio EPA would do so if the company wants us to do so.

**Question 34: Moving forward though for new permit actions where the emissions unit is being permitted for the first time, we should only include the paragraph in the Facility Section for area source MACTs/GACTs where Ohio does not have delegation of authority – correct?**

**Answer:** Yes, where Ohio EPA has chosen not to accept the delegation for that MACT/GACT. In most cases, that would be a GACT.

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### Question 35: How are area source MACT standards handled when it comes to General Permits (GPs)?

**Answer:** When it comes to General Permits, if an area source MACT/GACT is cited, unless otherwise noted in Section B, (Facility-Wide Terms and Conditions) of the permit, Ohio EPA accepts delegation for that specific area source MACT for that specific facility only.

**\*\*NOTE: It DOES NOT mean that Ohio EPA has accepted the area source MACT/GACT in its entirety!**

### Question 36: Is there a table that deciphers which MACTs/GACTs Ohio EPA has accepted delegation for?

**Answer:** Yes. Permit writers can refer to the MACT Tracker Excel Spreadsheet which is available at the following address: [epa.ohio.gov/dapc/mact/mactmain.aspx#164229495-permitting-and-compliance-assessment-of-major-and-area-source-mactgact-standards](http://epa.ohio.gov/dapc/mact/mactmain.aspx#164229495-permitting-and-compliance-assessment-of-major-and-area-source-mactgact-standards).

There are notes in the major or area source column of the MACT Tracker that notes if Ohio EPA has accepted delegation over the major source portion of the rule only and notes for area sources that are not exempt from obtaining a Title V permit.

**\*\*NOTE: Some of the MACTs/GACTs do not distinguish between major or area source. In this case, Ohio EPA only accepts delegation of the rule if the facility obtains a permit from Ohio EPA.**

### Question 37: What is the purpose of the MACT Tracker?

**Answer:** The MACT Tracker is an Excel Spreadsheet that is a “go-to” document for MACTs/GACTs. It outlines all promulgated MACTs/GACTs. Within the MACT Tracker, it has the Subpart Name, associated Subpart letter, if the Subpart is major or area source, the promulgation date, amendments, the CFR reference, the current action of the standard and date of the current action.

Within each MACT/GACT standard listed in the MACT Tracker, there are hyperlinks associated with the Subpart letter and the amendments. The hyperlink for the Subpart letter is a direct link to the eCFR rule for that specific subpart and the hyperlink for the amendments for each subpart is a direct link to the U.S. EPA (or other state) webpage for each specific subpart.

There is a second tab on the spreadsheet, “Table 2,” that contains a listed version of the information from the first tab, “Table 1”.

**\*\*NOTE: The MACT Tracker should be used as a guide. Due to the frequent changes in the rules, the Tracker will be updated periodically.**

### Question 38: How do I use the MACT Tracker?

**Answer:** There is an instructional document that explains how to use the MACT Tracker that can be found at the following address: [epa.ohio.gov/dapc/mact/mactmain.aspx#164229495-permitting-and-compliance-assessment-of-major-and-area-source-mactgact-standards](http://epa.ohio.gov/dapc/mact/mactmain.aspx#164229495-permitting-and-compliance-assessment-of-major-and-area-source-mactgact-standards).

### Question 39: Is there an Answer Place topic ID for MACT/GACT?

**Answer:** Yes. The Answer Place topic ID is #2313.