



### ***Hazardous Air Pollutants-Significant Impact Determination***

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The Environmental Protection Agency defines hazardous air pollutants (HAPs) as "... pollutants known or suspected to cause cancer or other serious health problems, or cause adverse environmental and ecological effects." According to Appendix J of 10 CSR 10-6.060, an applicant must submit an air quality analysis if the project's potential HAP emissions exceed the Screening Modeling Action Levels. In order to determine if an analysis is necessary for the entire facility, the applicant can model the project emissions to determine if a significant ambient impact will take place.

Although pollutant specific significant impact levels have not been defined for HAPs, the department's Air Pollution Control Program has adopted thresholds equal to 4% of the Risk Assessment Levels (RALs) as defined in the following table: [Air Pollution Control Program Table of Hazardous Air Pollutants, Screening Model Action Levels, and Risk Assessment Levels](#). The decision to define the significant impact as 4% of the RALs is reasonable and based upon recent decisions that the Environmental Protection Agency has made with regard to the assignment of significant impact levels for the new 1-hour nitrogen dioxide and 1-hour sulfur dioxide NAAQS, refer to the guidance documents entitled "[Guidance Concerning the Implementation of the 1-hour SO<sub>2</sub> NAAQS for the Prevention of Significant Deterioration Program](#)" and "[Guidance Concerning the Implementation of the 1-hour NO<sub>2</sub> NAAQS for the Prevention of Significant Deterioration Program](#)."

If the predicted concentration is less than the significant impact levels for each averaging period, no further analysis is necessary. However, if the predicted concentration exceeds the significant impact levels for any averaging period, a facility-wide analysis is required and must include an evaluation of the RALs.