

Air Toxics Workgroup
“TAC List” Discussion Paper — DRAFT
April 9, 2013

ORR (2011) Report Recommendation A-1(6):

R 336.1225 should be amended and specifically include the following:
Limit the number of air toxics to the federal HAPs list.

ATW discussion

Discussion of the "TAC list" issue at the 3/5/13 ATW meeting indicated that the "status quo" is characterized by some ATW members as burdensome and more extensive than other Region 5 state's programs. However, there are also reservations about the sufficiency of the HAPs list. And, if the DEQ were to adopt a defined list of TACs for R225 applicability, then staff asked about a mechanism to ensure public health protection if health concerns are posed by the proposed emission of an unlisted compound. ATW members voted, using the "gradient of agreement" tool, on three options: 1. HAPs only; 2. HAPs plus, including a caveat to add other compounds; and, 3. maintaining the status quo. Although there were varied levels of acceptability for each option, the voting was relatively polarized for options 1 and 3, and option 2 was relatively closer to consensus. While the discussion and the voting thus far should not be mistaken for a final recommendation or decision, the feedback was sufficient to prompt DEQ to explore further the potential ways that a regulatory system based on a defined TAC list could be developed.

Proposed Goal Statement and Guiding Concepts

The following **goal statement** is proposed, for purposes of consideration and discussion:

The TAC list includes the federal HAPs list and other air toxics that may be reasonably anticipated to occur in NSR permitted air emissions, and which warrant the evaluation of ambient air impacts in PTI applications in order to help ensure public health and environmental protection while promoting regulatory certainty and efficiency.

The following proposed set of "**guiding concepts**" for developing an "option 2" approach is provided for discussion purposes:

1. The TAC list should include the HAPs list, and should additionally include the air toxics that may be reasonably anticipated to occur in emissions from facilities requiring a Permit to Install (PTI), minus those substances that have relatively low toxicity. The regulated community would prefer an approach that is focused on the more relevant substances, that is less burdensome and provides greater certainty.

2. The DEQ would have the authority to add to the list or remove substances from the list through the rulemaking process.

3. Rule 203(1)(c) should continue to require PTI applicants to describe the “quantity of **all air contaminants** that are reasonably anticipated due to the operation of the proposed process equipment.” However, for unlisted air toxics (i.e., non-TACs), the current language in Rule 203(1)(h) would not be interpreted to be applicable; i.e., the applicant would not be required to provide in the PTI application, “Data demonstrating that the emissions from the process will not have an unacceptable air quality impact in relation to all federal, state, and local air quality standards.” So, for non-TACs, the permit applicant would need to identify the emission rates but would not be required to model the ambient air impacts or compare the impacts to screening levels or other health protective benchmarks.

4. The DEQ rules should provide the DEQ authority to evaluate the ambient air impacts and potential health concerns of non-TACs in a PTI application, and to impose restrictions on their emissions as necessary to ensure public health protection. Section 324.5512 of NREPA authorizes the department to promulgate rules for controlling or prohibiting air pollution, and to deny or revoke a permit to operate a source, process, or process equipment that **would adversely affect human health** or other conditions important to the life of the community. [The Natural Resources and Environmental Protection Act (NREPA) Act 451 of the Public Acts of 1994, Part 55 Air Pollution Control].

5. For non-TACs, a modeled maximum ambient air impact exceeding a health-protective benchmark, such as a screening level (SL) as currently derived by the DEQ, may or may not in itself provide sufficient weight of evidence to support DEQ action to ensure public health protection under #4 above. The DEQ may additionally consider relevant scientific and case-by-case information (as done currently under Rule 226(d) and Rule 228).

Potential Approaches to List Development

In 2010, AQD conducted a survey of State’s air toxics programs to gather basic information on the scope of their programs, including the list of air toxics regulated. The survey found that 30 of the 50 states regulate air toxics in permit reviews, based on ambient air impact estimates and public health protective benchmarks. Of the 20 states that do not routinely perform air toxics risk assessment in NSR, many (if not all) have a “backstop” or “safety net” provision for case-specific risk assessment. Of the six states in EPA Region 5, five states evaluate air toxics ambient air impacts for public health acceptability; only Illinois generally did not (but could in exceptional cases). Additionally, Indiana performs such evaluations only in a limited number of cases, not “routinely”. Complete information was not collected on what list of air toxics are included for all states, but the gathered information did indicate that program scope varied widely. The state’s approach for establishing the regulated air toxics may be generally grouped into five categories, as listed in **Table 1** below.

Table 1. State’s approaches to the development of lists of regulated air toxics.

Air toxics included in NSR health risk assessment	Example states	# states
HAPs only	CT; HA; VA	3
HAPs plus additional air toxics of concern	KY (HAPs+112r list); LA; MN; NM (HAPs+OELs); NY (HAPs+112r list); NC; ND; RI; VT; WV (HAPs+OELs)	10
All air toxics with OELs	AL	1
State-specific list	OH; WI; CA; ID; MA; NH; SC	7
No discrete list; virtually any may be included	MI; MN; DE; GA; IN; MD; NJ; OK; TX	9

Conceptually, there are several potential approaches to constructing a R225 TAC list, including the following:

- 1. Adopt a list developed by another state / states.**
- 2. Develop a “list of lists”.**
- 3. List those chemicals meeting listing criteria based on health hazards, potency, persistence and bioaccumulation.**
- 4. Develop a list based on the HAPs and the current list of TACs with SLs, with exclusion criteria.**

The tendency for air toxics to pose a public health concern is generally a function of the potency, the exposure potential (which depends on the quantity and duration of the emission, the dispersion, and background exposures), and the presence and susceptibility of the public to the exposure. A list of regulated air toxics that is *unlimited* may be a relatively more reliable approach to address all potential concerns; any approach to developing a defined list of regulated air toxics may potentially be less reliable. For example, a substance with relatively low toxicity may be unlisted, however, a combination of high emissions, poor dispersion, and the presence of an exposed public, can pose public health concerns even if the toxicity is relatively low. A “backstop” plan for detecting and addressing such cases is important, and is discussed elsewhere in this paper. Having noted this general limitation of any defined list, the following is a brief description of the apparent strengths and weaknesses/limitations of the four general approaches listed above, for discussion purposes.

1. Adopt a list developed by another state / states.

The positives of this option include convenience, and consistency (with the chosen State(s), but not with others). The concern is that the available lists in Region 5 may not be regarded by the DEQ, ATW, and/or the public, as fully appropriate for Michigan. The Ohio EPA list (303 compounds or classes) is based on the HAPs list plus substances passing several inclusion and exclusion criteria. Their rationale for applying exclusion criteria contains a considerable number of professional judgments. Some of these criteria may be regarded by some as having a questionable basis; environmental groups have strongly objected and have brought a lawsuit against Ohio EPA over the list and the criteria used to develop the list. The Minnesota MPCA has an unlimited list of regulated air toxics. The Wisconsin DNR’s list was derived in 2004 based on certain

inclusion and exclusion criteria, and consists of 535 substances (26 HAPs are not included). Of course, lists from states outside of EPA R5 may also be considered. There is no consistency in the state's lists or in the approaches used to derive the lists. It would be arguable to debate whose list is more appropriate for Michigan.

2. Develop a “list of lists”.

This approach was recommended by the Michigan Air Toxics Policy Committee (1989) as a way to focus the required environmental acceptability assessments (with case-by-case assessment of other air toxics of concern at a specific site). They recommended a list of approximately 1200 substances, consisting of the substances with ACGIH or NIOSH OELs, the Michigan Critical Materials Register, the NTP and IARC lists of carcinogens, and the chemicals listed in the IJC's Great Lakes Water Quality Board 1987 Report on Great Lakes Water Quality. As noted in Table 1 above, some states have used the EPA's 112(r) chemical list for emergency preparedness (which consists of 77 acutely toxic chemicals, and 63 flammable gases and volatile flammable liquids). Another relevant list available today is the EPA's Toxics Release Inventory (TRI) list.

The strengths of this approach are the relative ease of compiling a list of lists, and, the contributing lists would presumably have some environmental relevance. The limitations of this approach are that many listed substances may be irrelevant to PTI air emissions in Michigan, and, many of the substances on lists such as the TRI may have inadequate data for SL development. Also, this approach can result in a very long list, which may be undesirable to the regulated community (guiding concept #1 above).

3. List those chemicals meeting listing criteria based on health hazards, potency, persistence and bioaccumulation.

The strength of this approach is that the scientific defensibility may be relatively strong. The limitations of this approach are that it is a relatively labor intensive and time consuming initiative, the appropriate criteria may be difficult to establish, and the resulting list may not be the most relevant to the PTI program. Also, this approach (a version of which was implemented by Ohio EPA) may rely on multiple judgments for inclusion or exclusion that may be contested. A key element would be to establish well-reasoned, non-arbitrary inclusion and exclusion criteria, preferably derived by a consensus approach among multiple stakeholders.

4. Develop a TAC list based on the HAPs and the current MDEQ list of TACs with SLs, with exclusion criteria.

The strengths of this approach are relative efficiency of list development, the focus on air toxics that are relevant to PTI applications in Michigan, and the inclusion of those substances that have already been found to have sufficient toxicity data for SL development. As with #3 above, a key element would be to derive well-reasoned, non-arbitrary criteria, but in this case, those would be more limited since they would only be exclusion criteria (i.e., criteria for not including certain substances that currently have SLs). The limitation of this approach is that the selection of the exclusion criteria may be debatable.

Further rationale for this approach: The initial universe of substances for assessment is the current SL list of **1202 substances**. This list represents MDEQ's 21+ years of experience in evaluating air toxics in the New Source Review permitting program, under an open-ended TAC definition (excluding only a short list of exempted substances; currently 41). Over the last 21 years, screening levels have been derived for TACs (under the open-ended definition) if they appeared in proposed emission characterizations for all categories of facilities (thermal, chemical, or general manufacturing). Data-poor chemicals were addressed relatively inclusively in the MDEQ program, i.e., SL derivation methods include the use of minimal data such as subchronic animal studies, LD50s, and LC50s. This list also includes 287 substances with inadequate toxicity data for SL derivation, which were assigned the default ITSL of 0.1 ug/m³ (annual AT). Rather than propose the inclusion of all 1202 substances on the future TACs list, some exclusion criteria may be reasonable in the interest of developing a shorter list that is more focused on the more relevant substances and is less burdensome on the regulated community (guiding concept #1).

Initial Proposal for Discussion Purposes

A. The TAC list

It is proposed for discussion purposes that MDEQ follow approach #4 above, to develop a defined TAC list including the following:

1. Most (if not all) EPA HAPs should be included, including all individual chemicals that EPA includes as members of HAP listed groups (e.g., metal compounds, polycyclic organic matter (POM), glycol ethers). The HAPs list includes many air toxics with well documented toxicity and with the potential for public exposure, based on air emissions data and/or ambient air monitoring data. The HAPs list is the focus of EPA's air toxics data collection and regulatory actions under the Clean Air Act. Ohio EPA adopted all HAPs into their Toxic Air Pollutant list. However, it may be noted that some of the HAPs have relatively limited toxicity datasets, and some of the HAPs have not been identified and addressed in Permit to Install applications. For some HAPs, it may not be reasonable to anticipate that they would appear in future PTI applications. Reasons to include all HAPs in a TAC list are: for simplicity; for consistency with EPA; and, for better clarity in communicating the basis for the list with the regulated community and other groups. Reasons to not include some HAPs in the TAC list are: to better focus on the air toxics most relevant to PTI applications; and, many HAPs do not have SLs and therefore may never have been identified in a PTI application. In some cases, DEQ has evaluated air toxics in PTI applications and not established a SL, but rather notified permits staff that the predicted ambient air impact is acceptable, in cases where the impact was very low and the toxicologist did not feel it was appropriate to establish a data-derived or default SL. Therefore, for the **Table 2** list of HAPs without SLs, the Toxics Unit files should be reviewed to determine if the substance had been evaluated for a PTI application (**Table 2** has a column for "File Review Comments", which has not been completed). It is tentatively proposed that the potential TAC list exclude HAPs that do not have a SL and have not been encountered in a PTI application.

2. All carcinogens would be included (i.e., all compounds with a current IRSL, or, meeting the current rules' definition of a carcinogen (e.g., asphalt fumes)).
3. All substances with ITSLs below a cutoff value would be included; substances with only ITSLs that are above the cutoff values would be excluded (see discussion below).
4. It may be considered to exclude all substances with an ITSL of 0.1 ug/m³ (annual averaging time) based on the default value and a lack of chemical-specific data sufficient for SL development. That would include 287 chemicals currently on the SL list. This approach is consistent with Guiding Concepts #1 described earlier. This approach would also be consistent with the other EPA R5 State air toxics programs. It may be noted that Texas TCEQ utilizes a default effect screening level (ESL) of 2 ug/m³ (1 hour averaging time) when data are lacking for ESL derivation. That default ESL is similar to the AQD default ITSL, using the EPA's Screen3 averaging time (AT) conversion factor of 0.08 for converting from 1 hour AT to annual AT (2 ug/m³ (1 hr AT) X 0.08 = 0.16 ug/m³ (annual AT)).
5. Consistent with the Guiding Concepts described earlier, substances not on the TAC list would be identified in PTI applications, including information on the quantity of emissions (R203(1)(c)), but the applicant would not be required to include further information demonstrating the acceptability of the air quality impacts. MDEQ may still address those substances, with justification, by way of emission limits to protect the public health and/or adding substances to the TAC list via rulemaking.

Criterion #3 above mentions a cutoff ITSL value. The selection of an appropriate and reasonable cutoff should not be arbitrarily selected. The selection of a cutoff may also take into consideration available and appropriate criteria utilized in other air quality protection activities. For example, for substances that may be anticipated to exist as particulates in air emissions and in ambient air, consider the primary NAAQS for particulate matter (150 ug/m³ (24 hour) for PM₁₀, and 12 ug/m³ (annual) and 35 ug/m³ (24 hour) for PM_{2.5}); also consider that the ACGIH (2012 handbook; Appendix B) recommends TLVs of 3 mg/m³ (respirable particles) and 10 mg/m³ (inhalable particles) for Particles Not Otherwise Specified (PNOS).

The Wisconsin air toxics regulatory list is based on several qualifying criteria, including exclusion criteria of having an OEL (TLV) of greater than or equal to 100 ppm or 10 mg/m³. A TLV of 10 mg/m³ would be associated with an AQD ITSL of 100 ug/m³ (8 hr AT) (utilizing an uncertainty factor of 100, as per the air toxics rules).

It may be considered that EPA has de-listed some HAPs based upon a finding that there are adequate data on the health and environmental effects of these substances to determine that emissions may not reasonably be anticipated to cause adverse human health or environmental effects (**Table 3**).

The establishment of a cutoff may also consider the range of ITSL values thus far derived by DEQ. An assessment of the current SL values, and the selection of a reasonable percentile of the distribution of the current ITSLs, may help distinguish the relatively more toxic substances (in the majority of the distribution) from the relatively lower toxicity substances (in the minority of the distribution). Setting that cutoff may be guided by consideration of the range of current ITSL values. Rather than setting an *a priori* percentile of the distribution as the cutoff point, it was considered informative to describe the distribution (e.g., the 50th, 75th, 90th, 95th and 99th percentiles). The distributions were determined after excluding from the dataset those substances with an ITSL of 0.1 ug/m³ (annual AT) based on the default value. These percentiles were first determined for all current ITSLs, without distinction as to HAP or non-HAP status, and without regard to the various averaging times (ATs) associated with the screening levels. For substances with two ITSLs (acute and chronic), only the chronic (lower) ITSL was included in the assessment. The ITSL distributions were also determined for the following subsets: HAPs only; non-HAPs only; annual AT only; 24 AT only; 8 hr AT only; and, 1 hr AT only. The resulting summary statistics for the ITSL group datasets are presented in **Table 4**.

For discussion purposes, staff pursued the potential content of a TAC list that includes the current ITSLs except for those exceeding the 75th percentile cutoff point for each specific averaging time (in bold in **Table 4**). This approach and proposed cutoff point may be reasonably inclusive, while providing a significant reduction in the current SL list (Guiding Concept #1).

The size of the potential TAC list following the above approach is 639. This count is the result of including all HAPs if they currently have a SL (regardless of what the SL value is; this tentatively excluded 43 HAPs listed in **Table 2** pending completion of file review); excluding chemicals with only an ITSL based on the default (n=287); including all chemicals with an IRSL; excluding all non-HAP chemicals with only ITSLs that are above the 75th percentile ITSL cutoff values; and, including the **Table 5** substances (n=22). This count can be expected to change somewhat with further analysis, but it is a useful estimate for discussion purposes.

B. Authority to Address Unlisted Air Toxics in PTI Applications

If the current TAC definition were to be changed to some defined list, then a key issue would be the DEQ's authority to address air toxics concerns that may arise for unlisted air toxics that are proposed for emission in a PTI application. A review of the authority of other state's air agencies, and of other MDEQ divisions, to address unlisted substances, is summarized in **Table 6**. It is proposed for discussion purposes that AQD adopt rule language similar to that of MDEQ-WRD in **Table 6**.

Table 2. HAPs without SLs.

Chemical and CAS #	Toxics Unit File Review Comments (<i>to be completed...</i>)
Acetamide 60-35-5	
2-acetylaminofluorene 53-96-3	
4-aminobiphenyl 92-67-1	
o-anisidine 90-04-0	o-anisidine hydrochloride (134-29-2) has an IRSL. Therefore, RETAIN on TAC list.
Benzotrichloride 98-07-7	
Calcium cyanamide 156-62-7	
Captan 133-06-2	
Carbaryl 63-25-2	
Catechol 120-80-9	
Chloramben 133-90-4	
Chlordane 57-74-9	Chlordane (technical) (12789-03-6) has an ITSL and IRSL. Therefore, RETAIN on TAC list.
Chloroacetic acid 79-11-8	
Chlorobenzilate 510-15-6	
Chloromethyl methyl ether 107-30-2	
2,4-D, salts and esters 94-75-7	
DDE 3547-04-4	DDD(TDE; 72-54-8), DDE(p,p'; 72-55-9) and DDT(50-29-3) have IRSLs. Therefore, RETAIN on TAC list.
Diazomethane 334-88-3	
3,3-dimethoxybenzidine 119-90-4	
Dimethyl aminoazobenzene 60-11-7	
3,3'-dimethyl benzidine 119-93-7	
Dimethyl carbamoyl chloride 79-44-7	

1,1-dimethyl hydrazine 57-14-7	
1,2-diphenylhydrazine 122-66-7	
Ethyl carbamate (Urethane) 51-79-6	
Ethylene imine (Aziridine) 151-56-4	
Hexamethylphosphoramide 680-31-9	
Hydroquinone 123-31-9	
Lindane (all isomers) 58-89-9	
Methoxychlor 72-43-5	
Methyl iodide (Iodomethane) 74-88-4	
Methyl isocyanate 624-83-9	
4,4-methylene bis(2-chloroaniline) 101-14-4	
4,4'-methylenedianiline 101-77-9	
4-nitrobiphenyl 92-93-3	
N-Nitrosomorpholine 59-89-2	
Parathion 56-38-2	
p-Phenylenediamine 106-50-3	
Phthalic anhydride 85-44-9	
beta-Propiolactone 57-57-8	
Propoxur (Baygon) 114-26-1	
Quinone 106-51-4	
Styrene oxide 96-09-3	Styrene (also a HAP) has an IRSL. Styrene is metabolized to styrene oxide. Both are reasonably anticipated to be human carcinogens (NTP Report on Carcinogens, 12 th Ed.). Therefore, RETAIN on TAC list.
Titanium tetrachloride	

7550-45-0	
2,4-toluene diamine 95-80-7	
Trifluralin 1582-09-8	
Lead compounds	Lead is a criteria pollutant; exempted from TAC defn.
Radionuclides (including radon)	A 1994 DEQ policy determination was that there were sufficient regulations by NRC, EPA, and MDCH, such that additional AQD permitting requirements would be unnecessary and duplicative.

Table 3. De-listed HAPs.

Delisted HAP	Date of delisting	AQD ITSL (ug/m3; AT) or RfC	comments
Caprolactam	6/18/96	10 ug/m3 (8 hr AT)	
Surfactant alcohol ethoxylates and their derivatives (SAED) (in glycol ethers HAP category)	8/2/2000	Ethylene glycol ether 2-methoxy-1-propanol (a non-SAED) used as a conservative surrogate to derive an RfC-like benchmark of 200 to 2000 ug/m3 for SAEDs.	A hypothetical facility emission rate of 105 lbs total SAEDs/year was used in the petition for de-listing, and was relied upon in EPA's review.
Ethylene glycol monobutyl ether (in glycol ethers HAP category)	11/29/04	1600 ug/m3 (24 hr AT)	
Methyl ethyl ketone	12/19/05	5000 ug/m3 (24 hr AT)	

Table 4. Current ITSL value distribution. All values are in units of ug/m3. (These statistics are based on only the air toxics with data-derived final SLs, i.e., excluding chemicals with only default-based ITSLs).

ITSL group	Mean	50th %ile	75th %ile	90th %ile	95th %ile	99th %ile
All ITSLs	1375	24	140	1956	5000	23800
HAPs only	626	14.5	100	1000	3088	13572
Non-HAPs only	1547	28	140	2300	5450	42850
Annual AT only	482	14	43	140	300	1363
24 hr AT only	1789	60	420	2600	6000	46600
8 hr AT only	2760	86	2850	6020	16710	30482
1 hr AT only	2741	15	290	1168	3046	44551

Table 5. Additional air toxics (n=22) that currently do not have SLs, which are proposed to be added to the potential future TAC list:

Substance	Comments on why there is no SL, but that listing as a TAC would be appropriate
Crystalline silica (7631-86-9)	Not a HAP. Some sources of crystalline silica are exempt from TAC definition. Non-exempt source impacts have been evaluated case-by-case using CalOEHHA REL of 3 ug/m ³ (annual AT). Proposed to place it on the TAC list. The fate of the current exemption would need to be addressed separately.
Asphalt fumes (8052-42-4)	Not a HAP as a mixture. The fumes contain carcinogens, but there is no IRSL for the mixture due to lack of a key study on the mixture. Based on a 1995 Scientific Advisory Panel recommendation, AQD has regulated the mixture utilizing the EPA RPFs for carcinogenic PAHs (see also below). Proposed to list this mixture as a TAC with an explanatory footnote (only) that would help clarify the regulatory approach.
Carcinogenic PAHs	The PAHs are HAPs as “POM”. EPA’s risk assessment of the carcinogenic PAH group is currently in transition. The 1993 EPA guidance for the group is currently still in use by MDEQ (there are 7 carcinogenic PAHs, including B(a)P and 6 with Relative Potency Factors (RPFs) relative to B(a)P). CalOEHHA regulates 21 carcinogenic PAHs with RPFs. EPA has drafted a new scheme, with 28 carcinogenic PAHs with RPFs (including B(a)P); they are currently addressing the SAB review comments on that draft (http://yosemite.epa.gov/sab/sabproduct.nsf/0/E65D909C98520C1D85257501005E46AE?OpenDocument). Currently, 16 do not have SLs , and one (anthracene) is on the SL list but with only a relatively high ITSL above the 75 th percentile cutoff proposed. Three additional PAHs have evidence of carcinogenicity, and are not on the current SL list. Therefore, 20 additional substances for the TAC list are proposed, for this group.

Table 6. Authority to address unlisted substances.

Agency	Description of authority
MDEQ-Water Resources Division (WRD)	NREPA Part 8 rules regulate surface water discharges of “toxic substances”, which are defined as those included in three lists of substances (several hundred) and, “Any other toxic substances that the department determines are of concern at a specific site.”
MDEQ-Remediation and Redevelopment Division (RRD)	NREPA Part 201 rules define “hazardous substance” as three lists of substances (several hundred), and, “Any substance that the department demonstrates, on a case by case basis, poses an unacceptable risk to the public health, safety, or welfare, or the environment, considering the fate of the material, dose-response, toxicity, or adverse impact on natural resources.”
Ohio EPA - Air	Ohio EPA has a list of 303 chemicals/classes of regulated air toxics. Language in administrative code and in rules gives authority for their Director to evaluate unlisted air toxics (personal communication with Paul Koval, 2/21/13).
Wisconsin DNR - Air	There are 535 listed “hazardous air contaminants” substances/groups; this was established in 2004, based on criteria specified in their code. Authority to address unlisted substances: “Code: NR 445.03 General limitations. No person may cause, allow or permit emissions into the ambient air of any hazardous substance in a quantity or concentration or for a duration that is injurious to human health, plant or animal life unless the purpose of that emission is for the control of plant or animal life. Hazardous substances include but are not limited to the hazardous air contaminants listed in Tables A to C of s. NR 445.07.”
Minnesota PCA - Air	MN does not have a defined list of regulated air toxics. Statute: “The Pollution Control Agency may issue, continue in effect or deny permits, under such conditions as it may prescribe for the prevention of pollution, for the emission of air contaminants...”