

## **Technical Subcommittee Minutes from Jan 7, 2008**

Roll call: Judy Mirro – VT, Jim Coyle and Steve Mohr – NY, Richard Rasmussen – VA, Terry Polan - WV, Stacey Washington – SC, Linda Sadler and Sharon Goodwin-Walker – TN, Tony Pendola – NC, Kim Grosenheider – MN, Todd Nein – OH, Renee Bashel – WI, Barb Johnson – KS, Rebecca Hillwig – OR, Keith Barnett – EPA, Chip Goyette – PRIZM

### Agenda:

1. Responses to our comments on PSMSC (paint stripping, misc surface coating) rule.
2. dry cleaner corrections - status?
3. Agenda/format for National Conference Technical Subcommittee's sessions.

### Notes:

Renee added one topic to previously emailed agenda. Rick Carleski was able to attend the NACAA Toxics Committee monthly call and provided some notes. Rick wasn't on the call, so Renee read from his notes.

Keith mentioned that a number of lists had come out: clay, ceramics, gasoline distribution, etc. He would email them to the group. Later Keith emailed lists of affected sources for: iron and steel foundries, electric arc furnaces, secondary non-ferrous, clay, ceramics, and glass.

A short discussion about the gasoline distribution rule – expected to cover 5500 stations. Jim Coyle noted that if states have vapor recovery then didn't apply.

### 1. Responses to our comments

Renee – while some might agree that it won't level the playing field, it does allow an "out" for those who can eliminate the target HAPs. Supporting such a change in the rule is consistent with our long-term efforts to change the Once-in-Always-in policy.

Richard – challenge will be to keep this current with industry now that there's 3 years before compliance is due. Main issue is ownership turnover and the number of new shops popping up in the auto sector primarily. The cost issue for shops was largely settled by adding 4-walls of curtains to be allowed as a booth. It's still a big universe...

Terry – a small group (to remain nameless) at the planning committee meeting had the idea of holding a call to allow ALL SBEAP/SBOs to participate. The idea would be to (1) learn more about the rule (was that a part of it, or am I making that up?), and (2) brainstorm ideas for implementation of this rule. The goal: what are the next steps the SBEAP/SBOs should take to provide outreach on this rule. The idea would be for Renee to lead the discussion and we would have someone act as facilitator to keep everyone on task and on topic.

Jim - Are people ready to deal with this rule or are they still spending time on the Dry Cleaner notification submittals?

Most have only just sent out forms in their calendars, so don't really know if there's a workload issue yet.

Question to Keith – Will the petition also satisfy the initial notification or compliance notification?  
Keith will check with Warren and Kim on intent.

Another question for Keith – Why isn't the EPA Fact Sheet more forthcoming on technical details?

What it boils down to is that EPA's idea of a fact sheet is just the key details that need to be provided to media outlets. Any sort of plain-language summary, or even technical summary, is on the side of implementation tool development.

## 2. Dry cleaner corrections

On the dry cleaner rule changes – Keith checked on the status just prior to the call and it is still at the stage of internal comments. If it will be done as a direct final rule, it won't have to go to OMB.

Richard sent an email to Scott Throwe asking for a determination on the use of HC detectors. In Virginia and a few other states, inspectors are asking for proof that the detectors will catch 25 ppm of perc. The manufacturers are not willing to do tests on their own to provide that proof. A 2005 study done by CARB doesn't apply anymore since the model tested is no longer available. Other options, like EPA's EtV (technology verification), may not work either because it requires the manufacturer to submit test results first.

Shortly after our call Scott sent Richard a reply. He is looking into the issue to determine the best way to handle the issue.

## 3. National conference sessions

Stacey has helped get us 2 sessions – for a total of 3 hours – on the National Conference agenda. The larger conference call discussed earlier can help feed into this and give us an idea of how we might structure it.

Other topics?

\*\* On having a conference call with all SBEAPs – Renee suggested using our February conference call time. She will check with Angela on the capacity of the conference call line to handle a large number of callers.

\*\* Kim in MN asked about example notification forms for the Dry Cleaner rule. Renee suggested we get the Enviroweb page updated with everyone's forms. Send Audrey files or links to forms and calendars with the form.

Next Call – February 26<sup>th</sup>, 11:30 eastern/10:30 central.