Technical Subcommittee Conference Call
January 24, 2007
10:30 – 11:30 am Eastern

In attendance: Renee Bashel, Chair – WI, Anita Welch – MI, Judy Mirro – VT, Frances Hartwell - OR CAP, Rebecca Hillwig – OR, Larry Lashley – LA, Warren Johnson – EPA, Dan Nickey - IA, Kim Teal – EPA, James Robinson – SC, Linda Sadler - TN, Stacey Washington – SC, Todd Nein – OH

Minutes:

Renee opened the meeting and asked Warren to provide an update on the Autobody Refinishing rule and whether there would be any additional opportunities for our programs to provide input.

Warren:

- working on combining autobody refinishing with miscellaneous plastic parts and paint stripping into one rule package
- goal is December 2007 promulgation, so that means proposal to OMB in March, publication in June, and comment into July
- there is a window for participation through the end of February

Q: What does the autobody rule look like now?

Warren:

- it looks much the same as Kim's version
- now the focus is minimizing small business impact
- looking at three key control pieces (1. use of spray booth, 2. HVLP or equivalent plus training, 3. gun cleaner use), when do they become unreasonable for the industry

Q: What defines a booth?

W:

- an enclosed area to direct exhaust through a fabric filter

Q: Why combine the rules?

W:

- misc. plastic parts is similar in production style and emissions
- paint stripping is often co-located with these painting operations

Additional comments from Warren:

- It will be an option for states to substitute own programs if equivalent.
- On training – hope to define the format of training programs through comment period.

Additional comments from committee:

- gun suppliers will often provide training
- that training may not be to the extent of improving transfer efficiency
- its an OSHA requirement to have training to reduce worker exposure

Warren:

- when they go to OMB, they need to have data to support the direction of requirements in the rule, otherwise it's just opinion
- they need numbers like "X % are already trained" and "# of illegitimate businesses" (illegitimate being those who don't report the income)

- because this industry has so many illegitimate businesses, one goal is to separate the legitimate from illegitimate
- other data that would help: # of those using booths, # of those using HVLP
- having those numbers would be fastest way to set GACT for the industry, even if the data came from only one or two states

Q: The technical subcommittee understood that the rule was going to focus on the solids related HAPs. So why was a gun cleaner requirement added?

Kim Teal:

- the category was included in the listing because of the solid HAPs, but all the HAPs would be evaluated for controls in the rule

Warren:

- there are some priority HAPs in gun cleaners

Dan asked Warren about attending our National Conference to update the whole group on the autobody and dry cleaning rules. Warren received an invitation directly from Phyllis Strong and he has passed that on to management.

Warren mentioned some training program going on in California, but he had few details. We could ask our counterparts in different areas of CA to see what they know.

Warren mentioned an exemption in Texas that is based on the distance from other properties, or something like that. He wondered if any other states had similar rules. Renee mentioned that Mary Cushmac at EPA had already created a spreadsheet, with our help, about the current state rules related to autobody refinishing. This may help Warren. Renee will check on that and forward the most recent copy or contact Mary directly.

Dan asked Warren to send an email with his specific data questions, which we would then forward on to all states to try and compile as much data as is available.

We signed off at 11:25am so that we wouldn't take up time going into the Awards Subcommittee call.