

**SBEAP Technical Subcommittee
Conference Call - January 27th
11:30 am Eastern**

Attendance: Joan Rogers, Sharon Nizich, Steve Shedd - USEPA; Sara Johnson - NH; Jim Coyle - NY; Susan Foster - PA; James Robinson - SC; Leslie Churilla - GA; Linda Sadler, Donovan Grimwood - TN; Tony Pendola - NC; Jackie Sims, Erin Conley - IL; Rick Carleski - OH; Mark Stoddard - IN; Aneka Swanson - MN; Anita Singh - MI; Tom Coogan, Renee Bashel - WI; Mandy Ellifritz - TX; Dan Nickey, Christine Paulson (DNR) - IA; Barb Johnson, David Carter - KS; Christine Hoefler - CO; Joan Meitl - ID; Lucy Thompson - MO; Audrey Zelanko - Enviroweb

Minutes:

1. Discussion of 6C Gas Dispensing Facility NESHAP

Steve Shedd from OAOQS joined the call to respond to questions and talk about plans for clarifications/amendments to the rule.

Current efforts:

- received two petitions (auto alliance and API) and number of other requests for clarifications
- formulating responses in a EPA workgroup
- will propose changes in a couple months, but waiting on Air Assistant Administrator to be assigned - require signature for rule actions at that level
- common questions relate to monthly throughput: when to start calculations (new or existing), how to calculate monthly, changing between thresholds and control requirements
- questions related to multiple dispensing operations on same site (military, etc.)
- defining dispensing facility - clarify between public and private, how affecting spots like dispensing for lawn mowers/landscaping, marinas, generators, etc.

Open questions:

Q = In GA state rules, include CARB standards for Stage 1&2. If take delegation, considering applying CARB across state - slightly more stringent. Will it be acceptable?
A = Stage 1 CARB and NESHAP very close, may not mean much change really. Need to coordinate with regional air toxic person (Lee Page in Region 4).

Q = KS just conducted a webcast on the rule. Common questions related to monthly throughput so good to hear those will be addressed. Another question - will EPA provide list of testing companies?

A = No. May want to check with Stage 1 regulatory folks in states. Also these periodic tests are simple and handled by the installer (or subcontractor) during installation, and in principal, they are similar to the pressure tests used by installers test for proper connections and installation of piping.

Q = Also looking for sources to conduct testing. Testing not requirement in MI. Have asked equipment suppliers, but so far none have done testing. Anyone know about costs to conduct the periodic tests?

A = Doesn't recall costs, but will look back to see what came up with in rule development on the periodic testing. [FR only highlights costs for install, which would include initial testing. The rule refers to \$2,000 in labor cost, and \$2,500 in capital costs, the cost of vapor balance testing is incorporated in the above \$4,500 cost. Also, remember the cost of testing occurs every three years.]

Side note: Now if existing source is meeting state criteria in rule or permit under 63.11118(b)(2)(i)(A), then periodic testing in Table 1 is not required.

Q = When complying with vapor connections, source find using swivel adaptors will add height to connection and may require breaking concrete to fix area where tanker connects to tank. Any other options?

A = Swivel adaptors are not required by the rule. It should be possible that with careful operation to avoid kinks and poor connections that it can be met with existing equipment.

Q = Going by the definition that the entire dispensing operation is the "source" or "facility". So if existing operation adds a new tank they are not NEW source. Table 1 is misleading in way item 2 says "and new tank".

A = Rule text is clear the affected source is the entire GDF not each component. It would take a lot of changes (new tanks) to meet the reconstruction definition and make it a new source, not just one new tank.

Q = Do existing sources have to install PV with vapor balance?

A = If installed before 1/10/08 and required to meet under permit or rule an efficiency of 90%, then don't have to meet the PV requirement of Table 1. But if can't meet 90%, then have to meet Table 1 which includes installing PV.

Q = Much of state covered by stage 1 and at least 25% by CARB stage 2. What is the mechanism to show state regulations can meet the rule? Region 2 is not responding and even asking the SBEAP (not at regulatory agency) for answers on rule criteria.

A = Regional offices are delegated until they delegate to another entity - like states. If Umesh in Region 2 is not responding, try sending email and cc Steve. Steve can talk to him. Other regions could look to Region 1 for an example. They're working with individual states to figure out gaps between state regs and NESHAP.

Q = Why can't EPA just compare state rules to NESHAP?

A = Guidance paper in '77 and CARB standards were all applied to varying degrees across states. No common applications, so have to do individually. States using some rules done in the mid-90's might be closer to the NESHAP than older rules.

Q = Going back to existing installations that don't need to do more to comply. If before 1/10/08 and 90% control, also have to meet state rules?

A = Yes, also need to comply with either state permit or enforceable rule.

Q = So what about OH situation where shops in 64 counties in attainment areas have permit exemption if have vapor balance installed?

A = Bill Juris (?) in OH Air program seems to have worked that out. He believes they won't have to do more under the NESHAP. Check with him.

Steve can attend February call to answer more questions or we can build a list and email him. Let Renee know if you have a question, and if we have enough we can invite Steve in February.

2. Collision Repair DVD and posters! Get your copies.

Leslie in GA has spoken with Paul Wagner, the Region 4 contact and lead on the DVD project for EPA CRC. They are ready to go into production and states can place "orders" for copies. Region 5 has been asked by their CRC contact. Regions 2, 3, and 7 don't appear to have asked SBEAPs - not sure if other programs have heard. Let Leslie know if you haven't been contacted. Texas has asked for 100 and will ask for more if needed later; just don't have mailing funds to send out enough to reach all 5000 shops.

3. Use of the Message Board - Web Forum - Renee and Audrey

Renee would really like to use the Message Board and the Technical Subcommittee section to post items for conference call discussions that don't necessarily need to be posted on the web site. Also, it would be a good place to document the occasional lengthy email discussions.

Be sure and sign up and then set the feature to get email notices when there's a new post to our section.

4. EPA Updates - Sharon

- Foundry rule update - because it got caught in the transition they can't publish until reviewed and signed by new administration
- Misc Chemical Mfg rule - did get extension and will be final in May; working on comments now.
- Last Bin - getting close on a number of the rules, to OMB soon, but will likely wait to publish until March
- Boiler rules and Sewage Sludge Incineration - will be proposed in July 2009 and final 2010; new court approved extension

5. National Conference Sessions - Renee

- Area Source work by states - let Renee know if you want to speak on your efforts; will likely include Region 5 project info for one - **do need a few states!**
- Technical Subcommittee time slot - will work on content soon
- Be sure and complete the attendance Survey from Kenya, forwarded by Annette and hopefully your regional reps. Maybe being a speaker will help your chances.
- Will we want Sharon to present at National Conference? Renee wasn't sure if Technical Subcommittee was supposed to coordinate with Sharon, but would assume she is to be included. Audrey recalled that it was discussed at planning committee. So Renee will check with Kenya to find out if there were plans for coordinating that, but Sharon should put it on her calendar and we'll work out the content soon.

Next call in February - 24th at 11:30 am Eastern.