

**Tech Subcommittee**  
**Conference Call Minutes**  
February 9, 2006

Attendance: Tony Pendola, Linda Hayes-Gorman, Stacy Washington, Cathy Colglazier, Rick Carleski, Jim Coyle, Jackie Sims, Todd Nein, Amelia Gooding, Richard Rasmussen, Renee Bashel

**1. Area source rules update - flexibility options (Voluntary Program options)**

Richard checked in with Keith Barnett on the status of the Voluntary Programs for Area Source rules. The email response was as follows: We have not made a lot of progress. However, I hope to start moving forward on the plating and polishing source category in the next few weeks. We also are looking to move forward with a potential voluntary program for iron and steel foundries. We are looking for ways to incorporate P2 into the Automobile refinishing rule, but I am not sure to what extent we are still looking at voluntary programs.

Keith went on to mention there will be a reorganization of OAQPS, which will include a "Voluntary and Innovative Programs" group. They are still focusing on voluntary programs, but the reorganization may change who is involved. Not all the details have been worked out yet. Keith suggested the reorganization would be a good presentation for our National Conference. Richard has asked Rudy about adding the reorg to the Conference agenda.

Richard also mentioned that only one rule writer was making contacts with SBAP volunteers – Conrad Chin. We may need to start making our own contacts. We can discuss with Keith at the Conference.

**2. Discuss topics for National Conference.**

**Keith Barnett is attending – what do we want to hear about.**

The plan is to have Keith discuss Area Source rule status and the future schedule. What other issues do folks have? Kim Teal is hoping to attend, so that may also fill some time. Our subcommittee session has 1.5 hours.

Jim asked whether there could be some discussion or update on ozone (transition) issues. States with lots of RACT work, where the rules will increase applicability (geographic, smaller size) of RACT, may be affected. They are also having some issues with changing the new source review major/minor levels. He wondered whether other states are increasing major source levels with changing nonattainment status.

Rick – Is anyone else having issues with odd interpretations of the area source Title V deferral? They have sources only major because of halogenated solvent degreasing rule, but the state issued Title V permits and won't downgrade to minor.

Is the deferral final or delayed in some way? A few people were quite certain it's a final rule, with no delays in it, but we should check language to be sure. (Anyone checking the language? I haven't yet.)

Tony - Ask Keith about Once-in-Always-in? Tony would like to hear about cases of OIAI, where its application doesn't make sense. He knows a lawyer that's researching its application. But in the event the lawyer sues EPA, any specific business cited could be called to testify. (Maybe, let the businesses decide whether they'd like to share their story.)

Keith probably isn't the person to talk to, but we could see if Jeff Herrings or Ray Vogel are available to come and discuss.

NY is having problems with PTE policy – In a state audit, EPA Region 2 indicated that an autobody shop should be HPV because the state didn't calculate a PTE. Recommendation from group was to point to 1998 PTE guidance.

For the Tech Subcommittee session, Richard and Renee will look into a possible speaker for ozone, Richard will tee up with Keith the topic of GACT for the area source rules, and Tony will talk to Ray Vogel on Once-in-Always-in.

Tony will be speaking at a concurrent technical session at the Conference, so he won't be at the Tech Subcommittee meeting for the whole time. Because of that conflict, others may miss the subcommittee meeting as well.

### **3. Dry Cleaner rule.**

(I'm not sure if I captured this well...I'm not familiar with the details of the rule.)

Richard summarized his take on the controls:

- area sources, no controls unless located in residential building
- major sources, need carbon system when door opens and emptying the machine

Jim – its really hard to track down which are residential versus commercial locations. Estimate in rule seems wrong—NY can't be the only area with lots of residential locations. What about other major metro areas?

Tony – from his discussions with them, the rule writers want comments on ANYTHING, ASAP. They're not going to make the April 28 court deadline for a final rule. They will incorporate or address any comments as they get them, so that they can get out the final rule quickly. Help them define how to find residential versus commercial.

Jim – there was an issue with the way vapor barriers are applied. It's best to install vapor barriers AFTER installing 4<sup>th</sup> Gen machines. One facility installed vapor barriers, and then had to tear down in order to install the new 4<sup>th</sup> Gen machines later.

Richard – they really weaseled around banning transfer machines, but basically they are banned. Tony – rule writers said they didn't have authority to ban, but by requiring zero emissions they could effectively ban the machines.

Needs outreach: Notification requirements don't really change because EPA is just inserting this rule into the existing rule. General Provisions will require that sources notify EPA of any changes in status. (CHECK THIS—I HAVE IN MY NOTES BUT NOT SURE ABOUT IT: An existing shop is generally OK—no new requirements—if they're between 220 and 2100, except that they now have to inspect once a week.)

Tony – his new dry cleaner calendar will include new inspection/reporting requirements on it. EPA will be including a generic template of the calendar on their rule implementation page, once the rule is final. If you want a copy sooner, let him know and he can send you one.

Richard – any installation after Dec 21, 2005 has to route vapors to a control device; so not a good idea to recommend that a facility buy a used machine right now.

Jim – confusion on generation of machines:

2<sup>nd</sup> – water condenser, external carbon unit

3<sup>rd</sup> – condenser, no carbon

4<sup>th</sup> – condenser with carbon (integral to system) and drying sensor to get below 300 ppm before opening door (have found that door locks will allow opening at greater than 300)

EPA rule is incorrect that external carbon collector is on 4<sup>th</sup> Gen machines. Should get the word out that all new machines should be 4<sup>th</sup> Gen, because 3<sup>rd</sup> Gen can't be retrofit.

#### **4. Woodworking emission factors (Tony) – from December agenda**

Tony is looking for help on getting more emission factors. Here's what he's currently working with:

- NC has a spreadsheet but it's bad.
- MN has a spreadsheet, but it refers to FIRE and some of the factors there have been revoked.
- OR has factors that can't be substantiated—some of them. Mark (Fisher?) found cyclone tests, but want "target box" information.
- AP42 still has factors for sanders, but it's a very small % of the overall emissions
- there are plywood factors, but NOT the same SCC (as what? I didn't catch)

One problem is that NC uses PM100 instead of PM10, so sources can't be exempted.

Factors that would be helpful are those for: planers, saws, uncontrolled loading to silos (target box?).

Rick is visiting their NW section office where they have the largest ready-to-make furniture manufacturing plant. They are a major source. He will check for any stack test data on file while he's there.

Tony would also like to know of anyone who has factors on wood-fired gasifiers: starved air combustion; gases produced are fed to boiler as fuel. It's NOT the same as a wood burning boiler.

#### **5. Next Meeting**

Will have a call to discuss what folks missed if they couldn't get to NH. April 27<sup>th</sup> at 1 pm EASTERN.