

**Technical Subcommittee**  
**June 23rd, 11:30 am eastern**

**Attending:**

Leslie C - GA; Charlie A - TX; Jackie S - IL; Joni C - CO; Kim G - MN; Joan M - ID; Rick C - OH; Todd N - OH; Susan F - PA; Barb J - KS; Jeremy D - KS; Linda S - TN; Sharon G - TN; Sarah W - TX (NCAP); James R – SC; Tony P - NC; Renee B - WI; Deanna, Lester, Paula - EPA ASBO; Jan K and Melissa P - EPA OAQPS; Brad N - ECR

**Minutes:**

1. Minutes from National Conference session. No additional comments. Ready to be posted on web.

**2. Melissa Payne – EPA OAQPS, rule writer for Paint and Allied Products**

- provided a quick summary of the rule using slides emailed to group ahead of time
- NOTE – did have a public hearing so the comment deadline was extended until July 16
- described applicability as those sources who mix and blend paints from the very basic raw materials of pigments and solvents to make the paints, adhesives and inks sold at other locations
  - still many questions from group on whether Home Depot/Lowes type locations could be included, also ink cartridge refill stores
  - not intended for those point of sale places that just add colors to the white base paint that was pre-mixed elsewhere
  - ink cartridge refilling also not intended if they are using pre-packaged inks, but if they do mix up inks from basic raw materials they may be included
- asked about sources under NAICS listed, but not using HAPs in materials – what do they have to do
  - they would have to prepare a one time report to notify agencies they're not affected
- EPA is looking for information/data that could set up a tiered structure within the rule based on class, type or size of operations, if appropriate
- concern expressed about use of Method 9 visible emissions testing
  - costly and time consuming
  - margin of error for certification is larger than 5% limit in rule, at  $\pm 7.5\%$
  - asked whether Method 22 considered
    - they did, and thought M9 was less burdensome
    - group discussed burden of certifying staff to read M9
- All good comments – please submit to EPA

Discussion after Melissa signed off:

- generally not satisfied with the explanation that Home Depot, etc not “intended” to be included – need stronger language to exclude or better define operations included/NOT included
- also thought there is conflicting information in the applicability section and the definition of “paint and allied products manufacturing”
- update on any states finding examples of Method 9 used as periodic compliance demonstration?

- OH couldn't find any
- WI only found one, wood pellet manufacturing and only as biennial performance test – short term compliance demonstration by pressure drop across control device and maintenance/inspections according to manufacturers specifications
- TX does include for Air Curtain Incinerators' permits
- CO does have in some general permits for asphalt plants, incinerators
- conditions more often found are minimum control efficiencies, documented by manufacturer, and operate/maintain according to manufacturer specs with some parameter like pressure drop measured periodically
- all the extra records and reporting go above and beyond what most larger sources traditionally have in their permits, especially for such little environmental benefit – daily records of anything is going to be difficult to maintain; annual reports are also difficult to compile
- the cartridge filters Melissa described are often vented internally – those are rarely included in any visible emissions monitoring much less even permitted since they don't exhaust outside
  - does that cause problems with OSHA limits?
  - no one knew of any problems in those situations
- so we should recommend that any control devices vented internally shouldn't have any additional requirements

### **3. Other issues?**

- Has anyone seen anything about regulating crematories under the OSWI (other solid waste incinerator) rule?
  - Jan will check
- Jan provided update on other area source rule progress
  - prepared feeds going to DC this week, hope for publication first week of July
  - Asphalt and Chem Prep both expected soon – end of June
  - All need to be final by August 17<sup>th</sup>, so need to be published in early July
- Anyone read through the GHG reporting rule?
  - have heard about some small biz may end up reporting
  - comment is due July 1 so not likely we can do anything

### **4. Next call**

- May need to be ready to adjust July call to discuss last three rules
- Think about skipping August call since all the rules will be out and we'll just be reacting at that point
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