

Technical Subcommittee Minutes for June 29, 2006

Attendance: Richard Rasmussen-VA; Renee Bashel-WI; Terry Polan-WV; Mike Nelson-MN; Rick Carleski-OH; Tony Pendola-NC; Keith Barnett-EPA; Jackie Sims-IL

Guests: Greg Norris and Ryan Green – EKAT

1. EKAT

Greg provided a brief background on the EKAT and then Ryan provided some more details.

- EKAT = Environmental Knowledge and Assessment Tool
- to view a demo go to: www.ekat-tool.com
- intended user is military base environmental manager and procurement officer
- 1 or 2 times each year they expand the tool
- has been tested and expanded over the past 3 years
- marines are allowing, in fact encouraging, them to share the tool since developed using public money
- developed for the Marines by 3 entities working jointly (M2 Technologies, Inc., Kansas State University, and CABEM Technologies, Inc.)
- intent was to create a "Turbo Tax"-like system for the environmental manager with no environmental background
- 7 tools contained in EKAT- output reports based on input or research within the tools
- Of these tools, those most likely useful to non-military are: environmental screening, solvent screening, TECCA, and EmisCalc
- Solvent screening covers HW and Air issues and includes 7 states specific requirements
- TECCA will estimate indoor air pollution from spills
- EmisCalc will perform calculations based on EPA's FIRE database, similar to the WebFire tool. It uses screening questions to select the types of operations at the facility and spits out emission factors for related equipment. It can do actuals or PTE calculations.
- Environmental screening includes categories: compliance, health and safety, Hazardous Materials, explosives. Provide an MSDS or chemical name and it will bring up regulations that apply to the material. After screening, you can do detailed research on expected use of the material.
- an information resources section includes: environmental justice, green purchasing, and direct links to rules, etc.

Opportunity for SBAP

- EKAT isn't for commercial sale, it's free and available to anyone
- developers are interested in seeing it reach a wider audience
- funding for tech support not provided, but KS will pick up the phone if someone calls
- let them know what changes would make it MORE useful
- if they can find a new user community, maybe there's an opportunity for new funding for upkeep, etc.

Are regular updates implemented by KS?

- the EmisCalc tool is almost an automatic reflection of FIRE data, as it gets updated so will EmisCalc
- they have link checker tools set up to make sure they are all valid links

How can we get started using EKAT?

- go to web site and there's an automated system to set up a login and password
- may be easier right now to email Ryan (greenrm@ksu.edu) to get login and password set up, then he can track the number of calls received by SBAPs

2. Area Source Categories – Keith

(referring to first two groups of area source categories to have rules implemented by Dec 2006 and June 2007)

- first group of 4 is fairly certain-not much time to change categories before they have to go out for proposal (August)
- second 6 may change as they analyze the universe of affected sources and current controls
- looking for the easiest 10 categories to implement, with lowest small biz impact and/or already well-regulated so can just codify other regs as GACT/MACT
- asking SBAPs to make direct contact if they have (1) specific trade association contacts, (2) information they think EPA should consider when constructing rule
- of the first 4 – PVC is already well regulated under part 61 rule, and others are also well regulated sectors
- Flexible Foam production and product manufacturing (adhesive/lamination is focus) are two in second grouping – Richard is going to run numbers because they don't seem like a SMALL universe
- **Keith further explained that the concern is whether it will be a small impact – and that these categories are likely well regulated already, so an area source rule might just codify the current practices**
- EPA is looking for ways to bundle the groups into fewer rule packages, to reduce administrative burden

Richard asked Keith for update on the OAQPS reorganization:

- Keith's division may have implementation tools in the future, but that's not final decision
- they do have a voluntary programs group now
- there is a cross division team established to develop a small business strategy – in the next couple months – have/will review Karen's strategy as a reference

Plywood MACT and risk analysis:

- Keith thought EPA has been sued on this rule
- interesting that OAQPS risk division will be approving low risk determinations rather than regions, which usually do such determinations

RICE MACT questions

- talk first with Jaime Pagan, the engineer on that rule
- Rick will address his questions, talk with Jaime, and forward responses to the group – if it seems a good idea, he may arrange for a larger group call with Jaime

OIAI – Keith expects that out by the end of the year

3. Other updates from Richard

- Area Source subgroup Metal Fabrication - 11 SICs will be addressed, and will be surveying 9 sources from each SIC; with Richard's help, Dr. Donna Lee Jones made changes to the 114 letter to better explain process for those groups
- Autobody workgroup – Kim Teal is having a meeting with trade associations and those who do training for automotive technicians on July 24, and Dan Nickey is planning on attending; will try to have a workgroup call after that meeting to get an update
- Karen's Liaison meeting August 2-4 – **Is there anything Richard could work on while in DC at issue for the Tech Subcommittee? Let him know.**

4. Next Meeting – pending Rick's discussion with Jaime on RICE MACT

Keith followed up on other questions he couldn't answer at the time:

1. The STAPPA/ALAPCO amicus brief for the Industrial Boiler NESHAP. STAPPA/ALAPCO is weighing in on the same side as the environmental groups opposing the risk-based exemptions. The brief is attached. I also attached a brief that raises a small business issue for your information. In this brief municipalities are claiming EPA failed to adequately follow the requirements of the Regulatory Flexibility Act.

(See attached file: Municipal Petitioners Brief_Industrial Boiler MACT.pdf)(See attached file: STAPPA-ALAPCO Amicus Brief.pdf)

2. Richard asked how many requests we had received for the risk based exemptions for boilers.

We have received 11 requests for boilers and expect 5 more from facilities that have indicated they are doing stack monitoring. There are three for plywood. We have not issued any final decisions on these requests.