

2009 SBO/SBEAP NSC Technical Subcommittee

**November 24, 2009
11:30 PM Eastern**

**Conference Call:
866-299-3188
Access Code:
202-566-2827 #**

Minutes

Roll Call, by region:

I – Sara Johnson (NH)

II – Jim Coyle (NY)

III – Susan Foster (PA)

IV – Linda Sadler (TN), James Robinson (SC)

V – Renee Bashel (WI), Erin Conley (IL), Mark Stoddard (IN), Rick Carleski (OH), Aneka Swanson (MN)

VII – Dan Nickey (IA), Jeremy Duis and Barb Johnson (KS)

EPA – Deanna Jackson and Paula Zampieri

Other – Audrey Zelanko (AGZ)

Draft Area Source Implementation Guide: Some states represented on the call sent comments directly, others did not. Thanks to subcommittee members who provided comments and to Renee for incorporating and sending them to EPA. They are posted on the TSC message board.

Rule Updates: There was discussion on Chemical Preparation, 7B (to be out mid-Dec) vs. Chemical Manufacturing, 6V (out Oct, 2009). Finalized on Nov. 16 were Asphalt Processing and Asphalt Roofing Manufacturing, 7A, and Paints and Allied Products Manufacturing, 7C. Dan asked for volunteers to provide summaries of these for the next TSC meeting in January.

Susan was on the NACAA enforcement call and shared the concern that several States aren't taking delegation. Everyone is overwhelmed.

TSC members added

- Rules are written poorly (e.g. combining paint stripping with coatings)
- Autobody rule is bogus
- Plating and polishing and several other NESHAPs state, "there are no additional air emission reductions as a result of this final rule..."
- Time is needed for implementation
- Funding is not available
- Need compliance assistance for small businesses prior to enforcement
- EPA says they won't enforce area source rules; however, compliance assistance is expected
- Small businesses haven't been represented

Dan encouraged the Ombudsman office to comment.

If anyone is working with the 6B rule, let Dan know. Dan offered to send 6B compliance calendars. This rule will affect COOPs in agricultural states.

Upcoming Rules: Renee asked if anyone has figured out how to track regulations on www.regulations.gov? Other links to area source rules are www.epa.gov/ttn/oarpg/t3pfpr.html and www.epa.gov/ttn/atw/area/arearules.html.

Regional/State updates: Dan asked states to comment on their outreach for area source NESHAPs.

Region I: NH is conducting auto body workshops; attendees are vocal and upset. Workshops include waste management.

Region II: NY is doing outreach to crematories. Operators must be certified. ERP for autobody shops—created a voice over PowerPoint presentation, saved to CD and sending it to shops. Multimedia fact sheets for 6H (incl. used oil, hazardous waste). Mandatory to file ERP form. For gasoline dispensers, created fact sheets and notification forms, includes list of testers, est. >10,000 affected sources in NY. Also conducting dry cleaner outreach.

Region III: PA is working on their dry cleaner perc compliance calendars. Printed calendars in Korean.

Region IV: SC held autobody workshops and experienced upset attendees.

Region V: WI coordinating SIG-funded Region 5 autobody ERP, conducting training on compliance, sent in initial notifications; working on requirements of litho RACT. MN autobody ERP. IN autobody ERP, will send initial notifications. OH working on dry cleaner calendars and litho RACT rule.

Region VII: IA has been conducting autobody workshops, have online presentation; developing compliance calendars for bulk terminals 6B, and continue to provide dry cleaner calendars. KS sent letters to autobody shops enclosing the initial notification form and EPA summary brochure. Finalizing dry cleaner compliance calendars and updating dry cleaner manual.

Open discussion:

- Small-Biz@EPA newsletter – Renee thanked Paula for the opportunity to submit articles; maybe this can be done annually; good to forward to top level management; propose one annual issue to State success stories

Next TSC call: Tuesday, January 26, 2010 11:30 EST.