

## Technical Subcommittee Minutes for December 8, 2005

### 1. Roll call

Rick Carleski – OH; Todd Nein – OH; Mike Nelson – MN; Cathy Colglazier – KS; Audrey Zelanko – SmallBiz-EnviroWeb; Amelia Gooding – IL; Jackie Sims – IL; Stacy ? – WA; Eric Boyd – KY; James Robinson – SC; Renee Bashel – WI.

### 2. Area Source Deferral

Calling Jeff Herring at EPA this week you get his voicemail with a message about the area source deferral status. Expecting signature Friday the 9<sup>th</sup>. Will delay the FR publication by a week or so. But EPA doesn't expect states to do anything, in terms of requiring permit applications, etc. from these sources.

NOTE: It was actually signed on Friday: It will be available in a few days at <http://www.epa.gov/ttn/oarpg/t5pfpr.html>, or under "Recent Additions" at this address.

### 3. Generic Residual Risk Rule

Renee learned about this generic residual risk rule concept at a past STAPPA/ALAPCO Toxics committee call. Something to keep in mind as they move forward with the concept – since much of the burden will be placed on the sources to do their own risk analysis and submit the results to EPA/Regulatory Agencies that take delegation. Question: What is the timing of this? Renee did not get a sense of timing on the development, but will share with the group as soon as information is available.

### 4. STAPPA – losing access.

Renee wanted to inform folks that she may not have access in future to all the STAPPA call information. STAPPA is locking down their web site and rebuilding subcommittee distribution lists from member logins on the site. Without a current Air Director at Wisconsin DNR, Renee will need to find out who can grant continued access. Hopefully other states may have access.

### 5. Air Burners EF – James Robinson

Concern in SC regarding permits on air burners, aka air curtain incinerators or trench burners:

- Permit agency only accepts AP-42 emission factors.
- This results in very high emissions and most units end up taking limits to avoid major permitting.
- Won't accept manufacturer's EF without a test protocol.
- Also have trouble passing modeling, and one had to restrict themselves to just 2 hours of operation.
- The big modeling issue is that they have no stacks.

What are other states experiencing?

- IL requires source testing if a source doesn't want to use AP-42, generally speaking.
- KY shut down all open burning/air curtain operations, but did have one test case recently so may have EF from that one.
- Others discussed that most of these types of operations are simply banned in states.

James- why are other states banning if it's better than simply open burning in a large pile?

- Eric – people don't understand the technology fully, so processors are using incorrectly, ultimately just trying to avoid using an incinerator and the related requirements.
- Mike – MN is working on a permit, but use is for deer carcass incineration b/c CWD.
- James – their units mostly used for land clearing.
- Eric – for land clearing, they just do large burn piles; some try to use large fans (?) but not true air curtain process.

- Jackie – concerns from environmental groups in IL and Gov. has problem with hospital incinerators, so all incineration techniques in IL have a bad rap; land clearing and similar uses are seen as municipal waste combustion so shouldn't be open burned; also trying to eliminate all animal incinerators too. IL has allowed waivers for land clearing in case of floods. Open burning is allowed for fire training, so many get around the requirements by scheduling as training burn.

What is allowed for land clearing if states don't allow burning?

- KY – grinding, wood waste often used for mulch, or sent to Kingsford for charcoal production.
- IL – mulching and similar reuse

## **6. Plastic Injection Molding EF – Renee**

Looking for any new sources of EF from plastics, particularly injection molding.

- AWMA has some studies on specific resins. Rick received some free copies when he called them. OH was getting permit applications citing those studies, so they needed to review. OH decided the factors in those studies were credible and allowed use.
- Eric – insignificant and exempt levels of use, based on certain EFs (? – I didn't catch all the details. Please add more...)
- Mike found some AWMA studies by using Google Scholar for 'development of emission factors'. Renee did same, and found four reports. Rick will arrange to share hard copies if he has anything in addition to what Renee found on line.
- OH has had a Permit by Rule for Injection Molding, with set thresholds, and it has been around a while.

7. **Next call** – scheduled **Feb 9<sup>th</sup> from 1 to 3 pm** eastern.