

## Day 1

### U.S. EPA Office of Air Quality and Planning Standards update and learning management system

- Many cremation companies for humans and / or animals have been using the emission factors from the EPA AP-42 Refuse Combustion (5th Edition 10/96) Table 2.1-12. These do not seem to be the most appropriate EFs for pathological incineration processes. Do you have any suggestions on what EFs EPA recommends, or if any rules / guidance is forthcoming for this industry sector?
  - Answered live in recording.
- Especially for air curtain incinerators, will this group be automatically considered a major source (>100 tons/ year emissions)?
  - Answered live in recording.
- Would a burn-off oven be regulated under this rule?
  - Answered live in recording.
- So OSWI is a proposed rule now? What is the schedule for final? Will there be new assistance materials on EPA's website once the changes are final? Is there an outreach plan to promote new compliance assistance?
  - Slide 12 said public comment closes Oct 15, published rule May 2021. We will confirm if time allows.
- Wouldn't a private entity, even a commercial small business, be covered under CISWI, including businesses burning clean lumber, yard waste, paper or a mixture? I can see if a commercial small business is contracting with a municipal or institutional entity to burn their solid waste or is burning waste from the general public. But, not if the commercial small business is burning their own waste generated as a result of their business. A small business may generate paper or waste similar to municipal waste, but it is commercial waste generated through a trade. Those businesses would be CISWI affected, correct?
  - It depends on the applicability of the rules to determine whether CISWI or OSWI will apply to the unit. Taking your example, and based on the limited information provided by the comment, if a commercial unit burns more than 30% of municipal type solid waste as defined in the OSWI review proposal, the unit would most likely be subject to the OSWI rule.
- Approximately, how many small businesses (estimated #) own an OSWI unit? Are they located in certain parts of the country, or regions, versus others?
  - There are approximately 65 units and 59 facilities. Please note that these are estimated numbers of units and facilities based on a limited database. We believe these units are geographically diverse being located in 26 different states and not located to any specific region.
- Is the change to no Title V for ACIs for the less than 10 ton per day units only?
  - No, the revision to the Title V permitting requirements for ACIs burning wood waste, clean lumber, yard waste and mixture of wood, clean lumber, and yard waste are not limited to the units with capacities less than 10 TPD.
- How many sources were impacted by the 2005 rule?
  - The economic impact analysis (EIA) memo for the 2005 OSWI rule listed 248 OSWI units. We believe they would all be affected. However, we do not have any information how many of these units are still in operation.

- Are there any exemptions for air curtain incinerators used during an emergency?
  - Yes, she briefly addressed this and she did say these were an example of an exemption.
- Will you add regulation-specific training like NESHAPs vs. just permitting, compliance, and other broad-based subjects? Will we be able to submit training we develop to the Cornerstone LMS system? Will it accept Articulate Storyline HTML5?
  - Answered live in recording.