**NSC Technical Subcommittee Call Minutes – July 18, 2017**

**Participation [by regions]:**

1: Julie Churchill – ME, Jane Gilbert & Eric Kennedy (Main air program)

3: Lee Ann Briggs – PA

4: Tony Pendola – NC, Donovan Grimwood – TN, John Yntema – GA, Trayce Thomas & Melissa Collier – MS and Mareesa Singleton - SC

5: Michelle Habestroh – IL, Lisa Ashenbrenner – WI, Brent Goetz – OH; Thomas Jablonski – MN and Jim Dodson & Mark Stoddard – IN

6: Sandy Spon & Steve Dubyk – NM

7: Lynelle Ladd – KS

8: John Podolinsky – MT

9: Jenna Latt – CA

10: Laura Mathews - ID

**June minutes:** approved as is

**Roundtable/Open Discussion: Calculating potential to emit**

**Challenge:** PTE (potential to emit) is generally the basis for many air permitting decisions. Calculating it is often a best guess especially with surface coating. Surface coating is not so much a continuous process as it is a batch process which can be slow, cumbersome and logistically inefficient.

US EPA is concerned with entities that operate under Title V air permits and entities they believe should be operating under a Title V air permit. They are not as concerned with state issued minor permits including those with limitations avoiding Title V. However, many state programs have permitting requirements as minor sources and look at PTE from these operations.

**Ohio**

Basis: 24 hours per day and 365 days per year

Examples include the batch coating process of truck scales and airplanes. In the case of the former, a permit was issued limiting paint consumption to 3,600 gallons annually which allowed that entity to avoid the obligation of modeling requirements. Actual usage has typically been 500 gallons annually.

De Minimis level of 10 pounds of VOC per day of which there is a requirement to demonstrate. An excel spreadsheet can be used to track with coating material with the highest VOC and HAP content.

Emissions associated with solvent cleaning can be tracked over time based on solvent waste subtracted from solvent purchases. Some solvent would not need to be tracked as it is considered VOC exempt under the Clean Air Act.

**Indiana**

Defined in the Indiana Administrative Code, 326 IAC 1-2-55 as ***“Emissions of any one pollutant which would be emitted from a facility if that facility were operated with the use of pollution control equipment unless such control equipment is (aside from air pollution control requirements) necessary for the facility to produce its normal product or is integral to the normal operation of the facility. . . .”***

In lieu of an air permit, some entities can operate under a source specific operating agreement keeping records to demonstrate adherence to a volumetric threshold. Others, after having operated under an air permit for at least 12 months can terminate their air permit as long as records show that actual emissions are less than twenty percent of Title V thresholds.

Like many states, Indiana has RACT rules to cause emissions of volatile organic compounds to be reduced to the extent that counties can maintain or achieve attainment with national ambient air quality standards. EPA has recognized that an entity with a specific surface coating operation with actual emissions of VOC less than 15 pounds per day should be exempt from these RACT rules.

**Maine**

There are many [very] small boat builders – styrene based composites, steel and wood, coating operations. Some of these entities also make repairs to boats.

EPA Region 1 has conducted some inspections making some allegations that potential emissions were improperly calculated and that calculations should have included all spray guns on the premises, indoor and outdoor space and the transport of materials on and off the property. EPA seemed unable to give due consideration to inefficiencies of a process line which might include surface preparation and curing time.

EPA Region 1 seemed particularly focused on hazardous air pollutants from the boat building industry.

The consensus seemed to be that the rules were being improperly applied to the small boat builders, however, some states had established general permits or permits by rule for these operations to actually “protect” them from this.

**Tennessee**

For an existing entity, purchase records are used to ascertain an average rate of usage. 150 percent of this value is considered adequate for making a potential to emit determination. An entity may be required to keep records based on a weighted average.

The state will issue insignificant source determination letters for those who wish it and qualify.

**North Carolina**

One permitting option includes permit by rule.

Many entities engaged in surface coating make use of their suppliers to provide VOC reports (purchase records) on a monthly basis. This is also a great resource for CA providers to utilize to assist with calculations.

Making a determination of the maximum production rate. If you claim ‘n’ production parts per day and are operating at a rate of ‘n’ and a potential customer asks you to produce ‘n+1’ parts, would you be capable of doing so without modifying your existing equipment or adding new equipment? OR if someone gave you $1 million how many parts could you produce?

Under their state implementation plan, ***“Potential emissions for a coating operation, solvent cleaning operation, or graphic arts operation shall be determined using actual emissions without accounting for any air pollution control devices to reduce emissions of volatile organic compounds or hazardous air pollutants including perochloroethylene, methyl chloroform, and methyl chloride, from the coating operation, solvent cleaning operation or graphic arts operation.”***

***Guidance on Limiting Potential to Emit in New Source Permitting, Terrell Hunt, OECA & John Seitz, OAQPS, June 13, 1989 -*** <https://www3.epa.gov/ttn/atw/pte/june13_89.pdf> - page 2 of 27

***“Finally, we learned through the comments that in two specific circumstances, short term emission limits are the most useful and reasonable way to restrict and verify limits on potential to emit.***

***These circumstances are:***

***1) when control equipment is installed but control equipment operating parameters are difficult to measure during enforcement inspections; and***

***2) in surface coating operations with numerous and unpredictable use of coatings containing varying VOC content, where add-on control equipment is not employed.***

***Therefore, we have made a narrow exception to the flat prohibition on use of emission limits to restrict potential to emit for these specific circumstances, and only when certain additional conditions have been met.”***

**California**

Coating material De Minimis usage of 66 pounds of VOC monthly.

**Future topics:**

* North American Sustainable Refrigeration Council (NASRC) presentation – **August 15, 2017**
* Considering future industry sector partnerships with EPA
  + Multimedia outreach comparable to AutoBody ERP
  + Solvent cleaning
  + Plating & polishing – NESHAP Subpart 6W
  + Hospital sterilizers
  + Metal fabrication – flame/plasma cutting
  + Surface coating
* Coating manufacturers: information sharing
* How different states calculate potential to emit
* Electronic hazardous waste manifests user fees
* Startup/shutdown final rule: Tony Pendola - NC & Melissa Collier – MS

Region 5 Plating & Polishing NESHAP (6W) outreach effort – current progress

**Next Technical Subcommittee Call: August 15, 2017**

1 pm CST (2 pm EST) (3rd Tuesday of month)- North America Sustainable Refrigerant Council

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