**NSC Technical Subcommittee Conference Call Minutes – December 16, 2014 DRAFT**

**Attending:**

Reg 1: Sara Johnson – NH

Reg 2: Ed Bakos –NJ; Harry Ching - NY

Reg 3: Jeremy Hancher, Susan Foster – PA

Reg 4: Mary Talukder, John Yntema, Teresa Shiflett – GA; Tony Pendola – NC; Donovan Grimwood –TN, Melissa Collier – MS; Emily Ohde - KY

Reg 5: Erin Conley- IL; Mark Stoddard – IN; Lisa Ashenbrenner – WI; Rick Carleski, Todd Nein – OH; Hein Le - MN

Reg 6: Patty Avery – TX; Dianne Wilkins - OK

Reg 7: Barb Goode, Nancy Larson – KS; Dan Nickey, Jennifer Trent – IA; Adam Yarina - NE

Reg 8: Christine Hoefler, Kaitlin Stabrava - CO

Reg 9: Jenna Latt – CA

Reg 10: Bryan Smith - OR

EPA: Lillian Harris, Paula Hoag - SBO

**Temporary Tech-Subcommittee folder:**

<https://upenn.box.com/s/doptddztmkcv98zefar7>

**1.** No changes to minutes from October 21, 2104 call. Jeremy will post.

**2.** [**6J Boiler NESHAP reg nav tool**](http://www.epa.gov/ttn/atw/regnavboiler/quiz.html) – at <http://www.epa.gov/boilercompliance/> under “What’s New”

Jenna (CA) sent comments to Jeremy/Rick. Additional comments from subcommittee members include: 1) EPA logo obscured on some screens, maybe caused by browser, 2) can’t change answers unless you exit out and restart all over, 3) want tool to decide applicability first, then add details about ongoing compliance obligations. Tony (NC) stated Melissa Payne at EPA/RTP asked for comments and user feedback. Jeremy and Rick to combine comments and forward to Melissa for the subcommittee.

**3. Area Source Boiler -** [**6J Reconsideration**](http://www.epa.gov/airquality/combustion/actions.html)

Mark (IN) changes not easy to spot; what matters is how to demonstrate initial compliance for new or reconstructed sources and if allowed 25 months to complete tuneup. Susan (PA) fact sheet says changes don’t affect natural gas boilers, lessens coal fired sampling for mercury; removed SSM language and requires continuous compliance with emission limits. Adam (NE) – his state sent out notices to boiler sources about reconsideration.

**4. EPA Dental Effluent Guidelines outreach** **:** <http://water.epa.gov/scitech/wastetech/guide/dental/>

* What are the differences in the new proposal?
* Does the subcommittee want to keep tracking, consider comments? Deadline extended until February 21, 2015

Should we keep this on our radar? Melissa (MS)-if dental facility goes to POTW, isn’t that a local matter? Sara (NH) - in NH, must install amalgam separator regardless and must self-certify to local POTW. Most new dentists take over existing dental offices and will share certification form. Donovan (TN) – our DEP is monitoring these changes. Subcommittee decided to stop tracking this item.

**5. NPDES Electronic Reporting Rule:** new call for comments by Jan. 30, 2015

* [Supplemental notice](https://www.federalregister.gov/articles/2014/12/01/2014-27918/npdes-electronic-reporting-rule) published 12/1/14.
* Quick [analysis](https://upenn.box.com/s/r4wct27pd3w9gevgfbl7) of how new notice relates to 507 letter submitted Dec 2013.

Jeremy (PA) reiterated the major points of the subcommittee’s comment letter: 1) should have waiver provision for areas that do not have internet service, and 2) added costs of computer training for employees. Susan (PA) likes comments reflecting small biz difficulties with electronic reporting and suggested we might just review and agree/second these. Erin (IL) asked if supporting info should be anecdotal or facts with problem examples. Patty (TX) had concerns with temporary waiver and EPA’s definition of it and ability to extend upon request. Intent of rule is to move to all electronic or 90% of reporting. Patty will check with Charlie Adams (TX), who raised this initially. Melissa (MS) – MS has eDMR electronic reporting system in state, but still accept paper and decision is with state DEP. Emily (KY) -in KY all have to submit via eDMR, and DEP says all have to find a way and will not accept paper anymore. KY has seen some problems with on-time submittals, but sees improved awareness and accuracy of electronic reports. KY took a light approach with enforcement and sent warnings only; Amish and non-computer users found others that could do it, and most followed through once online.

**6. SBA Advocacy Environmental Roundtable**:

* [Brick Production NESHAP](http://www.epa.gov/ttnatw01/brick/brickpg.html) and [Fact Sheet](http://www.epa.gov/airtoxics/brick/20141120fs-brick-proposal.pdf) on Proposed Rule 11/20/14
* EPA Regulations in 2015 and Likely Impacts on Small Business
* [Link to presentations](https://upenn.box.com/s/r7trc9nsug0kf3vdl2xs) from roundtable meeting.

Sara (NH) –roundtable call had lots of participation. Region 4 seems to have brick plants affected. Rick (OH) noted SBA reg update slides indicate drycleaners will be pulled into TRI. Next SBA call to focus on revision of ozone standards and impacts of 8-hr standard dropping to 65-70 ppb. Mark (IN) - statewide organic solvent degreasing rule taking affect January 1, 2015 as an impact example, and Susan (PA) state her state has had this for a while, and industries are used to it.

**7. Annual 507 Training** –

* Training to be held in Raleigh, NC from June 24-26 in conjunction with [A&WMA conference](http://ace2015.awma.org/).
* Abstract was submitted to A&WMA for technical subcommittee.
* Thoughts & suggestions for speakers, breakout sessions ideas, etc.

Training Committee call is Thursday, 12/18. Tech subcommittee’s abstract not confirmed but is still being evaluated. Will discuss more on Training Committee call.

**8. Recent rules & other notices:**

* **Definition of Solid Waste Rule finalized:** <http://www.epa.gov/waste/hazard/dsw/rulemaking.htm>

 Subcommittee had discussion on this back in Aug 2014, are there any specific waste examples that states have for EPA? We agreed to provide examples to discuss in a future webinar. Need to contact Jim Oleary at EPA and solicit examples from states.

* [Information Collection Request – Small Business Reporting](http://www.regulations.gov/#!documentDetail;D=EPA_FRDOC_0001-16638) – comments due Feb. 9, 2015.

 National SBEAP annual report form comment required by OMB. Will NSC handle this?

* **Proposed rulemaking for 40 CFR Parts 60 and 63 for Phosphoric Acid Manufacturing and Phosphate Fertilizer Production RTR and Standards of Performance for Phosphate Processing, FR Notice 11/17/14.** Subcommittee agreed to keep tracking.
* **NESHAP for Wool Fiberglass Area Sources** – comment period [extended](http://www.gpo.gov/fdsys/pkg/FR-2014-12-10/pdf/2014-28820.pdf) to Jan. 14, 2015. Subcommittee agreed to keep tracking.

**9. Webinar Recaps & Opportunities:**

**U.S. EPA Webinar on E-Manifest** <http://www.epa.gov/osw/hazard/transportation/manifest/e-man.htm>.

Table item for next call.

**EPA NAAQS webinar on proposal to update standards for ground-level ozone**

Website: <http://epa.gov/glo/actions.html#nov2014>

**EPA** [**online training**](http://www.epa.gov/statelocalclimate/resources/avert/training-module/index.html) **for AVERT**: a free tool designed to estimate emission benefits of energy efficiency and renewable energy policies and programs.

**Region I – Air Toxics Workshop:** Sara (NH) passed this on for further information.

[Link to presentations](https://upenn.box.com/s/dhymkpr8nmx3sqpn717f)

**Next Call:** January 20, 2014 - topics? No suggested items.

2-3pm EST (3rd Tuesday of month)

Minutes prepared by Rick Carleski, (OH), Technical Subcommittee Co-Chair