**NSC Technical Subcommittee Conference Call Minutes – February 17, 2015**

**Attending:**

Reg 1: Sara Johnson – NH

Reg 2: Ed Bakos –NJ, Harry Ching -NY

Reg 3: Jeremy Hancher, Susan Foster – PA

Reg 4: Teresa Shiflett - GA; Tony Pendola – NC; Emily Ohde - KY

Reg 5: Mark Stoddard – IN; Lisa Ashenbrenner, Jennifer Hamill – WI; Rick Carleski, Todd Nein – OH; Christine Grossman - MI

Reg 6: Sandy Spon – NM; Sarah Walls –Cantey Hanger (NCAP); Patty Avery – TX; Dianne Wilkins - OK

Reg 7: Jennifer Trent – IA; Barb Goode - KS

Reg 8: Kaitlin Stabrava - CO

Reg 9: Jenna Latt – CA

Reg 10: Bryan Smith - OR

EPA: Lillian Harris

**Temporary Tech-Subcommittee folder:**

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

**1.** No changes to minutes from January 20, 2015 call. Jeremy will post.

**2. Annual 507 Training, Raleigh, NC from June 24-26 with** [**A&WMA conference**](http://ace2015.awma.org/).

* Session 1: Jeremy (PA) trying to get clarification from AWMA on session length. Tony (NC) thought planner said abstract is two 90-minute sessions worth and will follow up. Tony will try to involve EPA/RTP outreach staff or manager so they hear from us and possibly give details on EPA future outreach mechanisms. Susan (PA) –suggested Promotional Committee might want to present for longer sessions and to talk to LaRhonda (CA). Current understanding =Thursday 90 minute technical + second 90 min promotional; Friday 1-hr technical session. Jeremy left abstract open for flexibility to accommodate industry focus and targeted outreach. Tony – promo 90 minute may be on different day, not Thursday.
* Food waste topic – focus on air issues as well as waste. Barb G (KS) – Dan Nickey (IA) and Nancy Larson (KS) could be speakers on state efforts.
* Other thoughts & suggestions: Use time to plan tech subcommittee rule tracking and future speakers.
* Session 2: Speaker on printing industry – Rick (OH) coordinating.

**3. Definition of Solid Waste:** Jeremy confirmed EPA guest speakers (Tracy Atagi, Amanda Kohler) for March 17th call to provide overview, Q&A focused on small business impacts. Mark (IN) rule is quite involved and hard to understand impact of hazardous secondary materials implications. Jeremy attended EPA’s Feb 3 webinar and found hard to understand small business impacts, which could be more recordkeeping if secondary materials being recycled and for legitimate recycling documentation. See EPA 30-slide presentation already posted at <http://www.epa.gov/waste/hazard/dsw/dsw_fnl_rul_brfng_012215.pdf>

Jeremy - only 4 states accepted delegation of rule, could have impacts about cross-state transport. Christine (MI) state has own set of rules and will need to adopt federal rule to implement, think most other states have automatic adoption; probably need training for state staff to understand; concerns over waste being sufficiently clean to be reused; goal of rule was to use existing resources to encourage use of materials. Jeremy – EPA made point to mention solvent recycling and coating operations; unclear if business now has to keep own solvent recycling records. Two great examples were in presentation: foundry sand legitimate reuse (remixed for foundry molds) vs. sham recycling (use as play sand children’s sand boxes). Christine– can’t have secondary hazardous material if need to use twice as much over virgin material; situations come from case law on specific hazardous wastes and main industry affected is manufacturers. Mark (IN) – metal finishing (F006) and/or smelter wastes could be good examples to discuss because of past efforts at recycling and interpretations of solid waste exclusions. For example, IN facility had to get TSDF permit to comply. Metal finishers’ waste had more metal content in past, now less and phosphates are contaminant, so companies would need to segregate wastes for recycling and solid waste determinations. IN and PA have beneficial use rules for solids wastes

Jeremy – suggest asking EPA to write summary or Q&A about how this ruling affects small businesses.

**All: e-mail waste examples and questions to Jeremy or Rick to prep EPA speakers.**

**4. Webinar Opportunities:**

* **Overview of 2015 DSW Final Rule** – Thurs, Feb 19 2015 at 2:00 – 3:00PM Eastern. [Webinar link](https://epa.connectsolutions.com/dswfinalrule/).
* **“Moving Toward Sustainability” Water Utility Webinar** – Mon, Feb 23 2015 at 1:00PM Eastern - [Registration link](https://attendee.gotowebinar.com/register/255088160360016129)
* Microplastics webinar [recording](https://www.youtube.com/watch?v=ozgqZ1MCf0A&feature=youtu.be) (need YouTube access) – discussed on last month’s call.

**5. Federal Register Notices:** Any new ones worth noting?

Mark (IN)– Feb 6 petition to add n-propyl bromide to HAP list. Susan (PA) methyl bromide used as fumigant and chlorinated solvent mfg. industry petitioned it be added to HAP. Tony (NC)– n-propyl bromide tried for dry cleaning, but not a good perc replacement since it eats machine gaskets and forms bromine gas that corrodes plant equipment. EPA’s SNAP assessment of n-propyl bromide detailed one good use in specialized military cleaning but didn’t address dry cleaning use.

Jeremy - Earth Justice suing EPA for missing about 30 RTR reviews on MACT stds. Mark (IN)- t-butyl acetate has been delisted as VOC, and EPA deleting any associated recordkeeping.

Tony (NC) – EPA’s Once in Always In (OIAI) policy; heard EPA considering changes again; had copies of three EPA determinations that were contrary to policy because EPA allowed company the P2 option to avoid MACT after compliance date had passed. Christine (MI)– boiler 5D MACT had provisions to get out before final deadline, but not after final comp date. Tony- need EPA HQ speaker for OIAI discussion, not one from RTP.

Christine (MI) – Michigan boiler MACT assistance tool being tested internally by MI DEQ and will share feedback to date.

**Next Call:** March 17, 2015 – Topic: **Definition of Solid Waste Rule**, overview and Q&A with guest speakers Tracy Atagi and Amanda Kohler of EPA

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

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