**NSC Technical Subcommittee Call Minutes – March 20, 2018**

**Participation [by regions]**

2: Harry Ching - **NY**

3: Lee Ann Briggs & Nancy Herb - **PA**

4: Donovan Grimwood – **TN;** John Yntema – **GA;** Jack Porter – **SC**

5: Jennifer Feyerherm & Renee Bashel – **WI;** Brent Goetz, Dan Sowry & Todd Nein – **OH;** Aneka Swanson & Michael Nelson – **MN;** Mark Stoddard - **IN**

6: Lloyd Kirk & Dianne Wilkins - **OK**

7: Arthur Fink, Kevin Moluf, Barb Goode & Lynelle Ladd – **KS**; Jennifer Wittenburg - **IA**

9: LaRonda Bowen – **CA;** Eric Florio – **NV**

10: Belinda Breidenbach - **ID**

**Special guests**

**Printing Industries of America:** Gary Jones

**Non-Ferrous Founders’ Society:** Jerrod Weaver

**National Center for Manufacturing Sciences:** Lisa Stobierski

Unidentified: Lipkin

**February minutes:** approved as is

**Open forum**

**OIAI**

Brent Goetz discussed how Ohio is addressing the implications of the withdrawal of the “Once In, Always In” policy on MACT and/or Title V applicability.

How US EPA’s Withdrawal of the “Once In, Always In” MACT Policy May Affect Your Title V Air Permit, Ohio EPA, February 2018 - <http://www.epa.state.oh.us/Portals/27/mact/OIAI_FactSheet.pdf>

**PTE**

The group discussed PTE (potential to emit) which can be the basis for making an air permitting applicability determination.

***40 CFR 52.21 Prevention of significant deterioration of air quality, (b)(4)***

***“Potential to emit means the maximum capacity of a stationary source to emit a pollutant under its physical and operational design.***

***Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable.***

***Secondary emissions do not count in determining the potential to emit of a stationary source.”***

***Potential to Emit, A Guide for Small Businesses, US EPA, October 1998, For example, in a paint-spraying booth at a small autobody shop, there is a limitation on the number of cars that can be painted and dried in a given amount of time because of the time it takes to perform each task required (e.g., preparation of the surface, painting, drying, etc.).***

***In figuring out the maximum capacity of such a business, the owner does not have to assume that the paint-spraying equipment operates every hour throughout the year. Instead, he or she can assume that it operates only as much as is necessary to paint the maximum number of cars that the booth can handle if operated every hour throughout the year.***

Some states have de minimis or exemption levels which may or may not require an application to be submitted, but would require keeping material usage records on a monthly basis.

Some states adhere to a de minimis limit of 15 pounds of volatile organic compounds per day based on actual usage.

Some states will allow the process throughput to be considered of which surface coating is only one part of the process where a bottleneck (rate limiting step) hinders throughput.

As some processes are manually operated, some states allow for a batch methodology for calculating potential emissions.

RACT regulations may limit PTE based on limits on VOC content in pounds of VOC per gallon of coating material less water and/or exempt solvents.

The use of more efficient spray guns may allow for less material to be used though the process may not allow for a greater throughput of material substrate.

Some states such as Indiana allow for a permitted entity who has been active at least 12 months to terminate their permit if they are able to operate such that emissions are less than 20% of Title V thresholds. It requires the entity to produce 12 months of records within 30 days of a written request.

**Enforcement & compliance assistance delineation - confidentiality**

Multimedia compliance inspections/assistance

Compliance assistance accompanied by inspector or vice versa

Defining roles & responsibilities

Inspector referrals/training

**Future topics:**

* **April 17:** Advanced monitoring – Charmagne Ackerman, US EPA Region 5 & Radhica Kanniganti – Air Programs Branch, US EPA
* **May:** SBEAP annual training
* **June 19:** P2/compliance assistance toolkit (Mark Stoddard will be away at summer camp and would appreciate a volunteer to lead)
* **July 17:** Region 5 solvent cleaning outreach – Rae Trine, EPA
* **August 21:** Reinforced plastics (Styrene) – ongoing compliance demonstration – Donovan Grimwood, TN and Barb Goode & Lynelle Ladd – KS
* **Other topics:** Knowing the differences between safety & environmental data sheets and how to find useful information

**Next Call: April 17, 2018**

1 pm CST (2 pm EST) (3rd Tuesday of month)

Minutes prepared by Brent Goetz – OH (Brent.Goetz@epa.ohio.gov) and Mark Stoddard – IN (MSTODDAR@idem.IN.gov)