

Facility Permitting... *agency, public roles in the process*

The State Environmental Policy Act (SEPA) is Washington's basic environmental charter. Prior to its adoption, the public voiced concerns that government decisions didn't reflect environmental considerations. SEPA gave agencies the tools to both consider, and mitigate for, environmental impacts of proposals. SEPA provides for involvement of the public, tribes, and interested agencies in most review processes prior to a final decision and ensures environmental values are considered during decision-making by state and local agencies.

The SEPA review process is designed to work with other regulations to provide a comprehensive review of a proposal. While most regulations focus on a specific environmental aspect of a proposal (e.g., air, water, land) SEPA requires identification and evaluation of probable impacts for all elements of the environment.

Combining the review processes of SEPA with more specific environmental mandates reduces duplication and delay by combining study needs, comment periods and public notices, and allowing agencies, applicants, and the public to consider all aspects of a proposal at the same time. SEPA also gives agencies the authority to condition or deny a proposal based on the agency's adopted SEPA policies and environmental impacts identified in a SEPA document, such as an environmental checklist or environmental impact statement.

Summary of the SEPA Process

The environmental review process involves a number of steps that are briefly described below.

Pre-application conference (optional)

Although not included in the SEPA rules, several agencies offer a process for the applicant to discuss a proposal with staff prior to submitting a permit application or environmental checklist. The applicant and agency can discuss existing regulations that would affect the proposal, the steps and likely time line for project review, and other information that may help the applicant submit a complete application.

SEPA applicability determination

Determine whether environmental review is required for the proposal by (1) defining the entire proposal, (2) identifying any agency actions (e.g., issuing of licenses, permits, etc.), and (3) deciding if the proposal fits one of the categorical exemptions. If the project does not involve an agency action (e.g., issuing a permit), or there is an action but the project is exempt, environmental review is not required.

Lead agency determination

If environmental review is required, the "lead agency" is identified. This is the agency responsible for the environmental analysis and procedural steps under SEPA. Usually the agency that receives the first application for a proposal is responsible for determining who is lead agency and notifying them of the proposal.

Proposal evaluation

The lead agency must review the environmental checklist and other information available on the proposal and evaluate the proposal's likely environmental impacts. The lead agency and applicant may work together to reduce the probable impacts, either by revising the proposal or identifying mitigation measures that will be included as permit conditions.

Decision-making

The agency decision-maker must consider the environmental information, along with technical and economic information, when deciding whether to approve a proposal. Decision-makers may use information in the SEPA document and the agency's adopted SEPA policies to approve, conditionally approve, or deny a proposal.

Significance assessment, determination

After evaluating the proposal and identifying mitigation measures, the lead agency must determine whether a proposal would still have any likely significant adverse environmental impacts.

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Ask Spokane Clean Air

Q: How does Spokane Clean Air calculate the annual registration fees charged to facilities?

A: Each source is subject to annual registration fees. A flat facility fee, plus an emissions fee per ton of each criteria and toxic air pollutant emitted, plus an emissions point fee per stack/point. An additional fee applies to sources that operate at least one incinerator or burn out oven. Sources that are Synthetic Minors pay an additional fee. Sources that are required to submit WEDS (Washington Emission Data System) are subject to an hourly charge for reviewing/processing WEDS.

Each year, Spokane Clean Air reviews the fee schedule for registered sources and determines if the total projected fee revenue to be collected is sufficient to fully recover program costs. Any proposed fee revisions shall include opportunity for public review and comment. Accordingly, the agency shall account for program costs, including employee costs and overhead. If the Board determines that the total projected fee revenue is either significantly excessive or deficient for this purpose, they shall amend the fee schedule to more accurately recover program costs.

The current fee schedule is posted at spokanecleanair.org/regulations.

Regulation & Program Update

Proposed Indirect Source Rule — At the August 4 Public Hearing on the proposed rule, the Spokane Regional Clean Air Agency's Board of Directors deferred its decision for six months in order for staff to review additional public comments and gather more information. Board members also expressed support for staff to seek voluntary partnerships in lieu of adopting a rule.

Fee Schedule Approved — After a public hearing on September 1, Spokane Clean Air's Board of Directors approved a staff recommendation to reduce the Notice of Construction base fee for first time operation of temporary portable air contaminant sources. These sources are typically portable rock crushing equipment, concrete batch plants and asphalt plants. The reduced fee is based on staff review time.

Got Email? Get notices of proposed regulations sent directly to your email. Sign-up for this free listserv at www.spokanecleanair.org

Noteworthy News

Itron earns Gold

In our last issue, we recognized over 120 companies that have earned recognition as either "silver" or "gold" level achievement. Itron Inc. was erroneously left off this list. We apologize for this error. Congratulations to Itron for earning the gold-level distinction! The recognition program is open to over 640 facilities that are registered with Spokane Clean Air. For more information visit www.spokanecleanair.org.

City of Medical Lake Wastewater Treatment Plant Recognized

The City of Medical Lake was honored recently for its "Outstanding Wastewater Treatment Plant" from the Washington State Department of Ecology. The city's award is for operating its Wastewater Treatment and Reuse Facility flawlessly thereby protecting the water quality of West Medical Lake. The award was presented by the Washington State Department of Ecology.

Plant operator Steve Cooper and the plant staff were honored because the Medical Lake plant passed every environmental test, analyzed all samples according to Ecology's stringent requirements, and did not violate reclaimed water and wastewater discharge limits in 2010.

This achievement is particularly exceptional because wastewater plant processes and permit requirements for producing reclaimed water are more extensive and stringent than those for a conventional wastewater plant.

The facility produces the highest class of reclaimed water while processing an average of 570,000 gallons of wastewater each day.

Do you have noteworthy news to share about your business or organization? Email Lisa Woodard, lwoodard@spokanecleanair.org, please include contact information.

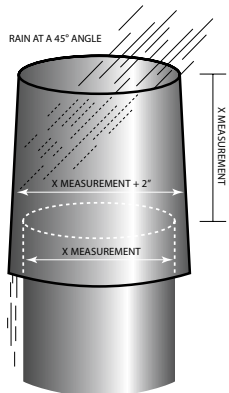
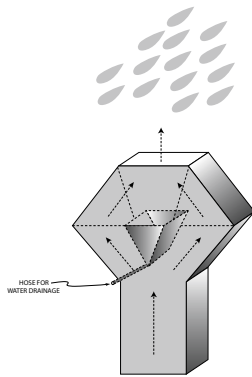
Stack & Rain Guard Requirements

Spokane Clean Air requires that emissions from many air pollution sources, including surface coating operations, exhaust through an **unobstructed, vertical stack**. The top of the stack must be **six feet above the penetration point of the roof**. The purpose of these requirements is to allow for upward dispersion of pollutants, thereby reducing air quality impacts and odors at ground level. *Stacks installed with rain guards must meet the unobstructed, vertical flow requirement.*

Approved Rain Guards — The following rain guard designs have been approved by Spokane Clean Air. Other designs may be submitted for approval prior to construction and installation.

Hexagonal Stack

This design diverts air around an internal wedge used to catch rain. A hose is connected to the bottom of the wedge which drains the collected rain water.

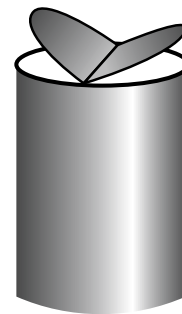
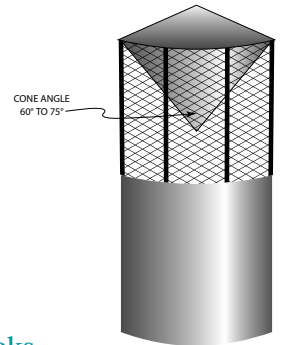


Stack-in-a-Stack

This design is based on the principle that rain falls at an angle. The inner stack is surrounded by an outer stack with space between the two. Rain runs down the inside wall of the outer stack, instead of down the inside wall of the inner stack and into the equipment being vented.

Inverted Cone Stack

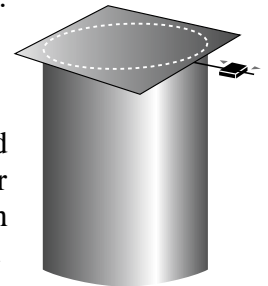
Grating or brackets support the cone which is suspended above the stack opening.



Hinged Stacks

A hinged flapper damper opens when the equipment is running, and closes when fan is turned off. A booster fan may need to be installed to help push open the flaps.

This flapper damper opens and close with the aid of a counter weight that slides back and forth on a rod for manual adjustment.



Two Examples of Unapproved Rain Guards



Unacceptable Cap

Stacks must provide for unobstructed, upward, vertical flow. This cap does not allow this to occur.



“Goose Neck” Stack Not Acceptable

Does not allow for an unobstructed, upward, vertical flow.

Where Can I Get Stack and Rain Guards?

Some companies specializing in sheet metal ducts also make stacks and rain guards. These companies can be found in the phone book, under “Sheet Metal Work.” For more information, call Spokane Clean Air, 477-4727. ■

Asbestos still Imported, Used in the U.S.;

Product Labeling not Required

Asbestos is the general term given to six natural, fibrous, silicate minerals. It is derived from a Greek word that means “inextinguishable.” For commercial use, the minerals are milled and separated into very thin fibers used in a wide variety of products. It may be surprising to know that asbestos is still being imported and used in manufacturing in the United States.

Although asbestos was banned in certain products and applications by the Environmental Protection Agency (EPA) in the mid 1970s and early 1990s, and is no longer mined in the U.S., there are still numerous products containing asbestos. In addition, many products containing asbestos may not be labeled as such. Building materials containing asbestos could exist in your home—even if built after the 1970s.

Roof repair, room expansions, flooring and ceiling updates are just a few of the repairs or renovations that could result in exposure to asbestos. Once airborne, microscopic asbestos fibers can remain in the air for a long time. The result is the possibility of inhaling these fine particles, potentially causing serious illness such as asbestosis, mesothelioma and/or lung cancer. There is no known safe level of asbestos exposure.

If any type of repair, renovation, remodel or demolition is planned for your workplace or home, it is the law in most situations to have a survey conducted to check for suspected asbestos-containing

materials. Failure to do so could result in a fine and potentially slow down the project, and more importantly create a health hazard.

During routine inspections, asbestos compliance issues have been observed during carpet replacement, wall removal, relocation of exhaust stacks, disposal of a boiler, dismantling of an oven, disposal of fallen cement asbestos board siding, and repair of a roof.

Asbestos fact sheets and a list of labs that provide asbestos survey and removal services are available at www.spokaneleanair.org.

In terms of products, the primary products banned by the EPA were spray-on materials that contained asbestos, such as fireproofing, pre-molded insulation, and popcorn/decorative ceilings and used in commercial buildings. Many of us are probably familiar with the term “popcorn ceiling.” It is the most recognized form of asbestos-containing materials, but what we may not know are all the other products that may contain asbestos.

The list in the shaded box on the right lists some of the products that may contain asbestos. Some may contain 90% or more asbestos.

It’s important to be aware of what to look for before making product purchases. When reviewing the product contents, you probably won’t see the term “asbestos” listed, instead you may see the asbestos minerals by name: actinolite, amosite, anthophyllite, chrysotile,

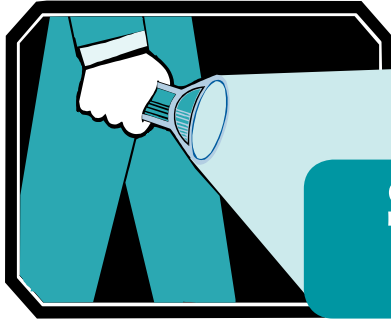
crocidolite, and/or tremolite. The most common are amosite and chrysotile. Unfortunately, in some cases there may be no mention of “asbestos” or any of the asbestos minerals by name.

If you don’t want to use products containing asbestos, look for products labeled “asbestos free” or check the ingredients for the asbestos minerals listed previously. In addition, notify your local hardware stores that you want product choices that do not contain any asbestos.

If you have questions about asbestos, please check our website or call us, 477-4727. ■

Here are some of the products not banned that may contain asbestos. Some may contain 90% or more asbestos.

- ✓ Asbestos-cement corrugated sheet
- ✓ Asbestos-cement flat sheet
- ✓ Asbestos clothing
- ✓ Pipeline wrap
- ✓ Roofing felt
- ✓ Vinyl-asbestos floor tile
- ✓ Auto transmission components
- ✓ Asbestos-cement shingle
- ✓ Millboard
- ✓ Asbestos-cement pipe
- ✓ Clutch facings
- ✓ Friction materials
- ✓ Disc brake pads
- ✓ Drum brake linings
- ✓ Brake blocks
- ✓ Gaskets
- ✓ Non-roofing and roof coatings



Technology Spotlight

Spokane Seed's Underground Dust Containment System

Spokane Seed Company is a locally-owned processor of dried peas, lentils and chickpeas. The Company has been operating in Spokane for over 100 years and employs about 40 people. In addition to their Spokane facility, they operate a processing plant in Colfax, as well as several seasonal receiving stations throughout the region.

Spokane Seed Company recently installed new underground containment systems to reduce dust emissions at their Spokane Valley facility.

The majority of dust generated at the facility occurs when trucks are unloading product. During peak harvest season, 20 to 25 trucks

could be delivering throughout the day. The dust itself is generally composed of field dirt and pea, lentil or chickpea particles.

The new dust containment systems were designed by Keigley & Co., a local agriculture system design company. The design is based on a simple mechanism – pivoting baffles.

Here's how the system works:

Trucks full of peas, lentils or chickpeas unload product through a platform grate into a receiving pit. The dust control system is installed directly beneath the receiving pit grates and consists of a series of shrouds with pivoting baffles.

The baffles close when unloading is finished, thus capturing the dust in the underground receiving pits.

“The new containment system captures dust emissions by closing as soon as a delivery is made, containing the dust in the pit,” explained Ted Dehle, Maintenance Supervisor for Spokane Seed Co.

The system is working great, though Dehle points out that there is still some dust associated with receiving a load.

Minimizing dust emissions is important for air quality and can prove challenging for certain types of facilities.

Many facilities control dust emissions utilizing technologies such as baghouses and cyclones, though because each product and operation is unique, some control technologies are designed for a specific company.

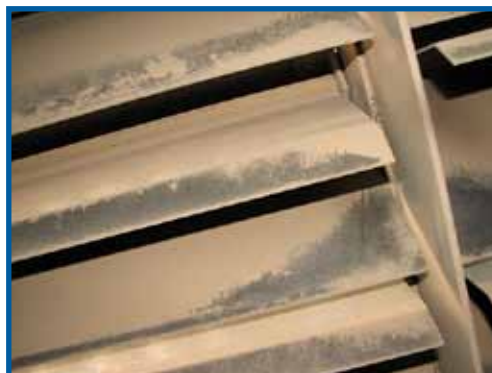
Often, in agricultural receiving, refining and shipping operations, bag houses are typically used to control dust. However, Spokane Seed Company's receiving pits were designed 50 years ago, and the traditional use of bag houses would not work. Therefore, the custom-designed pivoting baffle system is proving to work very well.

If you have an idea for a technology spotlight we'd like to hear about it! Please contact Lisa Woodard, lwoodard@spokanecleanair.org or call 477-4727, ext. # 115. ■



Pictured on the left is a receiving pit with a platform grate over the new baffle system. Product is transferred via conveyor belt to the storage silos.

The photo on the right is the baffle system from inside the receiving pit looking up. When product is not being deposited, the baffles close automatically to minimize dust emissions.



UPDATE

Spokane Regional Clean Air Agency
3104 E. Augusta Avenue
Spokane, WA 99207

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Air • Quality • Calendar

Oct. 6 Board of Directors meeting, 9:30 a.m., Spokane Clean Air conference room, 3104 E. Augusta Avenue. The meeting agenda is available at www.spokanecleanair.org or call 477-4727.

Nov. 3 Board of Directors meeting (details above).

Dec. 1 Board of Directors meeting (details above).

Spokane Regional Clean Air Agency Board of Directors:

Tom Brattebo, Chair, Member-at-Large

Jeff Corkill, City of Spokane Representative

Edward "Chuck" Crockett, Small Cities & Towns Representative

Rose Dempsey, City of Spokane Valley representative

Al French, Spokane County Commissioner

UPDATE is published by the Spokane Regional Clean Air Agency as part of its Compliance Assistance Program. Send article ideas and comments to Lisa Woodard, Editor, lwoodard@spokanecleanair.org.



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www.spokanecleanair.org

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Facility Permitting

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The lead agency will issue a Determination of Nonsignificance (DNS), which may include mitigation conditions, or if the proposal is determined to have a likely significant impact, a determination of significance/scoping notice (DS/Scoping) is issued and the Environmental Impact Statement (EIS) process is begun. The EIS will analyze alternatives and possible mitigation measures to reduce the impacts.

Public's Role

Notice to the public is provided by publishing the lead agency's determination in a newspaper of general circulation. Notices typically run for one day. The notice will request comments on the proposal and give a deadline for when comments must be received. The lead agency will review the public comment. If significant public interest is indicated, a public hearing may be held. The

intent of the public comment period and hearing is to provide opportunity for additional information relating to the proposal or to identify applicable issues/rules/information overlooked in the agency determination. Information received during the public comment period and/or public hearing is reviewed, and may be incorporated in a final decision.

Spokane Clean Air's Role

Spokane Clean Air is one of many agencies that reviews SEPA documents. Typically, Spokane Clean Air will review the SEPA to determine if air quality impacts are adequately addressed. If in the lead agency role, which is the case roughly 25-30 percent of the time, the environmental document is circulated to other agencies for comment. Spokane Clean Air will review comments received, and

if needed, require the proponent to address other agencies' concerns before making a decision. If not the lead agency, Spokane Clean Air will send a comment letter to the lead agency. If the proposal doesn't require a permit from Spokane Clean Air, then the letter will address general air pollution concerns such as dust control, open burning, or nuisance odors. If the proposed project is likely to require a permit from Spokane Clean Air, then a letter identifying the specific permit issues and permit requirements is sent to the lead agency and permit application information (forms and fact sheets) is sent to the proponent. Generally, the lead agency won't make a final decision unless the proponent has addressed the air pollution issues identified by Spokane Clean Air. For more information, call Joe Southwell at 477-4727, ext. # 103. ■