

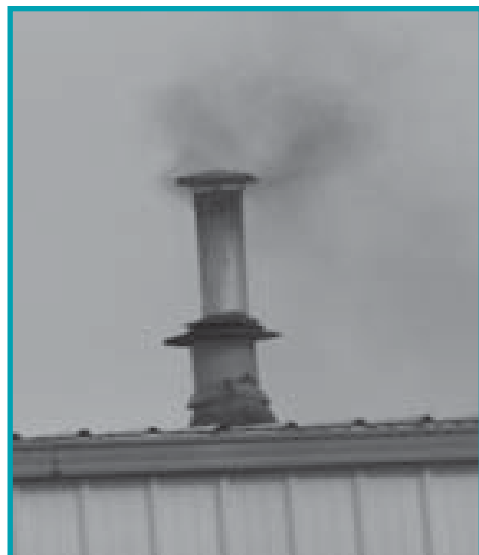
Observe Opacity...Identify Potential Problems

When a Spokane Clean Air inspector visits an industrial facility, one of the first things he or she does is look at the stack(s) to check for compliance with opacity limits. Opacity means the percentage (0-100%) at which a visible emission (i.e. dust, smoke) obscures the background. A 5% opacity reading means that a background being viewed is obscured by 5%.

Our inspectors go through rigorous testing every six months to certify as opacity readers. The testing uses a machine that produces known densities of white and black smoke.

aggregate of more than three minutes in any one hour. A different opacity limit may be enforced if a Notice of Construction has specified that a more stringent opacity limit is required. A few exceptions to the general opacity limit can be found in Regulation I, Section 6.02. A copy of Regulation I is available at www.spokanecleanair.org, or call 477-4727.

You don't have to be certified to observe for potential problems. A person doesn't have to go through the EPA certification process to be able to check for visible particulate emissions.



Combustion (e.g., boilers, engines) operations, visible emissions can indicate that the unit is not properly tuned.

Particulate generating processes (wood working equipment, etc.) that have add-on controls, such as a dust collector or baghouse, the presence of visible emissions can mean that there is a hole in the bags or other malfunctions.

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Anyone working in a process that has the potential to generate particulate matter should regularly look at their stacks to check for visible emissions.

The machine is calibrated at a number of standards prior to being used for certification purposes. In order to "certify," an opacity reader must match the machine's recorded readings, within specified ranges, for 50 continuous readings. The basis for this type of certification is in the U.S. Environmental Protection Agency's Method 9 - Visual Determination of Opacity of Emissions from Stationary Sources. Very specific criteria, such as observer-to-sun-to-source placement, must be met before a "legal reading" can be made by a certified opacity reader.

Generally, opacity from any emission point is limited to less than 20% for an

For the best accuracy, the observation should be conducted from a location(s) with a clear view of each emission source, where the sun is not directly in the observer's eyes. The inspection location(s) shall be at least 15 feet but not more than 0.25 miles from the emission source.

If visible emissions are observed, it can be a sign that the equipment or process is not being properly operated or that there is a malfunction.

Here are some examples:

Surface coating (painting) operations, visible emissions can mean that the particulate filters are not properly seated or that the filters need to be changed.

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Opacity

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Spokane Clean Air recommends that if visible emissions are observed from a stack, the source should verify that the visible emissions or PM emissions are not the result of equipment malfunction, and the equipment, if any, from which the emissions are released, is performing its normal, designed function.

In addition, if there is any air pollution control equipment, the operator should ensure that it is being operated properly in accordance with normal operating procedures.

If visible emissions are still observed and the equipment is being properly operated, the source should contact Spokane Clean Air at 477-4727.

Meet our New Board Members

Spokane Clean Air welcomes its two newest members of the Board of Directors: Steve Taylor and Ed “Chuck” Crockett.

Mr. Taylor fills the City of Spokane Valley position, previously held by Mike DeVleming. He has served on the City Council since incorporation and was recently re-elected to serve through 2011. Mr. Taylor has a Masters Degree in Public Administration and is currently the Government Affairs Director for Spokane Home Builders Association.

Mr. Crockett is the Mayor of the Town of Latah. He fills the position of Small Cities & Towns representative, previously held by Matthew Pederson.

Regulation & Program Update

Federal Level: Recently the U.S. Environmental Protection Agency (EPA) passed a number of area source rules for the control of Hazardous Air Pollutants (HAPs). These rules are all part of 40 CFR Part 63. An area source is defined as a facility that emits less than 10 tons per year of a single HAP and/or less than 25 tons per year of combined HAPs. The most recent rules under 40 CFR Part 63, are:

Subpart YYYYYY—National Emission Standards for Hazardous Air Pollutants for Area Sources: **Electric Arc Furnace Steelmaking Facilities**

Subpart SSSSSS—National Emission Standards for Hazardous Air Pollutants for **Glass Manufacturing Area Sources**.

Subpart TTTTTT—National Emission Standards for Hazardous Air Pollutants for **Secondary Nonferrous Metals Processing Area Sources**

The following area source rules affect known facilities that exist in Spokane County.

Subpart ZZZZZZ—National Emission Standards for Hazardous Air Pollutants for **Iron and Steel Foundries Area Sources**

Subpart BBBBBB—National Emission Standards for Hazardous Air Pollutants for Source Category: **Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities**

Subpart CCCCCC—National Emission Standards for Hazardous Air Pollutants for Source Category: **Gasoline Dispensing Facilities**

Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: **Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**

Subpart RRRRRR—National Emission Standards for Hazardous Air Pollutants for **Clay Ceramics Manufacturing Area Sources**

Subpart WWWW—National Emission Standards for **Hospital Ethylene Oxide Sterilizers**

Spokane Regional Clean Air Agency will be contacting the affected facilities in Spokane County in the near future with the requirements of each rule. A list of area source rules under development can be accessed over the internet at: <http://www.epa.gov/ttn/atw/area/arearuledev.html>. You may also access the area source rules that have been released as final at: <http://www.epa.gov/ttn/atw/area/arearules.html#current>

State Level: Washington State Department of Ecology is revising chapter 173-460 WAC and is expected to have it finalized by the end of 2008.

Local Level: Spokane Regional Clean Air Agency is presently involved with revising its own Regulation I. These revisions are mostly administrative as well as bringing the regulation up-to-date with the state and federal regulation changes. In addition, the agency is proposing fee adjustments to reach full cost recovery on fee-based programs—see page 4 “Fee Increases” for details.

Beyond Compliance: Transportation

Editor's Note: This is the first in a series of articles featuring ways in which businesses can go "beyond compliance" and implement voluntary measures. The series is written by Margee Chambers, P2 Specialist. She can be reached at 477-4727, ext. # 114.

Motor vehicles are the largest source of hazardous air pollution in our state. This is an amazing statistic when you consider that the gasoline-powered engine is about as clean as it can get. Strides in engine technology have been somewhat outstripped by the ever-increasing number of vehicles on our roads. According to a National Household Travel Survey, between 1969 and 2001 population increased 41% while vehicle trips increased 169% and vehicle miles of travel increased 194%!

When businesses look at ways to reduce costs, protect the environment, and recruit and retain employees, transportation policies should be examined. Here are three programs you should consider for your workplace. If you're already implementing all or some of these, congratulations!

Commute Trip Reduction

Encourage employees to use alternatives to driving alone to work, such as the bus, carpool, walk and bicycle. There are plenty of resources available, including Spokane County Commute Trip Reduction Office at 477-7650 or www.mycommute.org. Find out about the Employer-Sponsored Bus Pass Program and the Guaranteed Ride Home Program for starters. According to the WA State Department of Transportation, studies show that reducing solo commuting can have numerous benefits to an organization:

Parking. Fewer cars in the parking areas means more spaces for customers and/or less parking area needed to develop and/or maintain.

Productivity. Employers with commute trip reduction programs have reported a decrease in employee tardiness and absenteeism. Employees who don't drive alone have reported less stress, tension and fatigue.

Tax incentives. Employer/Commuter Tax Benefits are like money in the bank. Employers save on payroll related taxes.

Environment/Traffic. Fewer cars on the roads mean less pollution and congestion, which benefits our health and the economy.

Mobility. When solo driving is reduced everyone can get around more easily, including bicyclists.

Infrastructure. Maintaining roads and bridges is expensive. Reducing their wear and tear can help reduce the cost and frequency of infrastructure repairs.

No Idle Zones

With gas prices at record highs, it's more critical than ever to obtain maximum fuel efficiency. Consider implementing a "No Idle Policy" for your fleet vehicles. Post "No-Idle Zone" signs near loading bays and other locations at your facility where idling commonly occurs. No Idle Zone signs are available from Spokane Clean Air for about \$25 each. Post your company's No Idle Policy and discuss it with employees. Adopting a "No Idling" policy has many benefits, such as fuel savings, extended engine life, less maintenance, improved air quality and a healthier workplace.



Vanpools are gaining in popularity. In our area, over 30 businesses have one or more vans designated to their worksite or several employees sharing a van to multiple worksites.

Fleet Vehicles

A well-maintained vehicle gets better gas mileage, emits less air pollution and has a longer life. All great reasons to set up a regular maintenance schedule for fleet vehicles.

When it's time to replace vehicles, investigate your options. New technologies allow greater gas mileage and reduced tailpipe emissions. The increased cost of these technologies is paid back by the fuel saved.

Efficient combustion engines. Many vehicles designed today are low emission vehicles (LEV) or ultra low emission vehicles (ULEV) and get great gas mileage.

Gas-electric hybrid cars and trucks. This combination allows for superior gas mileage—50+ mpg for cars, and 30+ for trucks.

Information on clean fuels and vehicle technology is available online at: www.epa.gov/greenvehicles and www.fueleconomy.gov.

These are just a few examples of how your business can go "beyond compliance" by adopting transportation-related programs. Implementing just one of these program will have a positive impact on our environment and on your bottom line! ■

Inland Empire Paper Co.

2008 Clean Air Award Recipient

Inland Empire Paper (IEP) received the 2008 Clean Air Award, presented by Spokane Clean Air at a recent ceremony. IEP was featured in the Business Spotlight in the last issue of this newsletter.

“The Clean Air Award is presented annually by Spokane Clean Air to an organization that has consistently demonstrated a commitment to reduce air emissions. The award is given to publicly express our

IEP has established itself as an industry leader in environmental management by committing significant resources to reduce air emissions, many of which have not been mandated of them. “Inland Empire Paper’s future upgrade plans will further reduce air emissions, benefiting the entire community,” added Dameworth.

Wayne Andresen, President and General Manager of Inland Empire Paper Company accepted the award.



Accepting Inland Empire Paper Company’s Clean Air Award from left: Doug Krapas, Environmental Compliance Engineer; Wayne Andresen, President/General Manager; and Kevin Rasler, Assistant GM

appreciation for innovation and to encourage others to follow suit,” stated Bill Dameworth, Spokane Clean Air Director. “Inland Empire Paper is being recognized for their multiple system upgrades that have improved efficiency of their paper manufacturing processes as well as reduced air pollution emissions. The upgrades translate to a reduction of pollutants being emitted into our air shed.”

In its fifth year, the Clean Air Award is given annually to companies that demonstrate commitment to reducing air emissions. Past recipients: 2004 - Fairchild Air Force Base, 2005 - Avista, 2006 - TransCanada, and 2007 - Huntwood Industries. ■

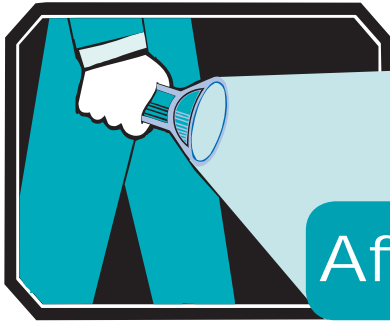
According to Andresen, “IEP will continue to abide by our core philosophies and principles of environmental stewardship to minimize our impact on the environment.”

Proposed Fee Increases: Registration, NOC/NOI

The Spokane Regional Clean Air Agency’s Board of Directors periodically reviews program fees and adjusts them as necessary to reach and maintain full cost recovery for fee-based programs. A recent state audit determined that all applicable costs were not being assigned to fee-based programs, so program costs are higher than expected. As such, the registration fee schedule adopted in December 2006 and the Notice of Construction (NOC) / Notice of Intent (NOI) fee schedule adopted in June 2007 will not achieve full cost-recovery. Therefore, fee increases are being proposed. The proposed fee schedules were mailed to all known affected facilities in early April. These fee schedules are also posted on our agency’s webpage, see listing and link on homepage under “Notices/Hearings” section. Questions regarding registration and NOC/NOI program fees may be directed to Joe Southwell at 477-4727, extension # 103 or email him at jsouthwell@spokanecleanair.org.

Public Comments — Written comments are being accepted through May 16, 2008 and can be e-mailed to mholmquist@spokanecleanair.org; or mailed to Spokane Regional Clean Air Agency, Attn: Matt Holmquist, 1101 W. College Ave., Suite 403, Spokane, WA 99201

Public Hearing Scheduled — A public hearing will be held prior to adopting proposed fee amendments. The hearing is scheduled for June 5, 2008, 9 a.m., at the Spokane County Public Works Building, 1026 W. Broadway Ave., Commissioners Hearing Room.



Business Spotlight

Affordable Custom Cabinets

Affordable Custom Cabinets (ACC), is a door and cabinet manufacturing business, located at 5421 N Corrigan Rd, Otis Orchards, WA. Several tons of woodwaste (i.e., sawdust) is generated at the site as a result of the cabinet manufacturing operation. ACC was faced with the problem of storage, transfer, and disposal of the accumulated wood waste. The wood waste was stored in a collection hopper at the site, and then hauled off-site for use as a fuel in wood-fired boilers at the University of Idaho.

In 2005, ACC began investigating ways to utilize their wood waste on-site, rather than continue to incur the costs related to transporting the waste off-site. At that time, the facility's heating demands were being met by natural gas fired boilers.

ACC decided to invest in a wood-fired heating unit designed to burn wood waste for heating purposes. In January 2006, ACC installed a Talbotts Model C4 warm air combustion unit, designed to burn wood waste.

Despite some initial challenges at installation

and during start-up (primarily in regards to adjusting the unit to cleanly burn sawdust), ACC's facility manager, Mike White, continued to work on the unit to ensure it met Spokane Clean Air standards and ACC's heating requirements.

Last October, the unit was tested to demonstrate compliance with particulate emissions standards. Particulate emissions from the unit were 0.0096 gr/dscf; just below the standard of 0.01 gr/dscf.

Today, the wood waste boiler is able meet over 90% of the facility's heating demands, burning only the wood waste generated at the site, and still meeting the particulate emissions standards.

"What was once a nuisance and expensive to dispose of is now a valuable fuel source that saves our company over \$4,000 a month in heating costs during the winter months," stated Mike White, of ACC.

"In addition, we have decreased operating costs by eliminating the expense related to hauling wood waste. This also has a positive impact on the environment in that we've removed the need for truck travel," he added.

Congratulations to Affordable Custom Cabinets for your efforts to improve air quality at your facility and in our community! ■



An employee at Affordable Custom Cabinet testing the Talbott Unit



Talbot's Model C4 Warm Air Combustion Unit

Air . Quality . Calendar

UPDATE is published by the Spokane Regional Clean Air Agency (Spokane Clean Air) as part of its Compliance Assistance Program. Comments, suggestions and article ideas may be directed to Update Editor Lisa Woodard.



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- May 1 Board of Directors meeting. 9 a.m., lower level hearing room, Spokane County Public Works Bldg, 1026 W. Broadway Ave. Meeting agendas are available at www.spokanecleanair.org.
- May 16 Deadline to submit written comments on proposed Fee Increases Board meeting, see information on page 4.
- Jun. 5 Board meeting, see time/location details above. During the meeting, a Public Hearing will be held on the proposed fee increases for the Registration and Notice of Construction/Notice of Intent programs (see information on page 4.)

Spokane Regional Clean Air Agency 2008 Board of Directors:

Jeff Corkill, City of Spokane Representative, Chair
Steve Taylor, City of Spokane Valley, Vice Chair
Edward "Chuck" Crockett, Small Cities & Towns Representative
Melissa Ahern, Member-at-Large
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