

# COMPLIANCE ASSISTANCE PROGRAM

SPOKANE REGIONAL CLEAN AIR AGENCY

# UPDATE

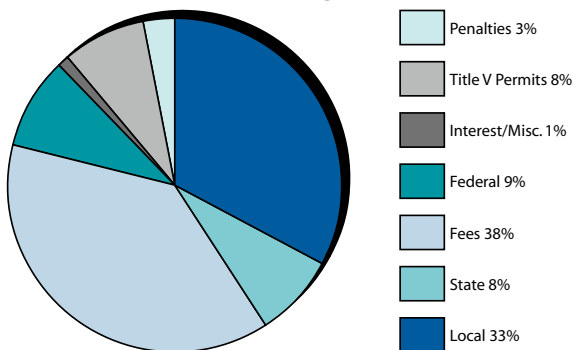
An Informative Newsletter Helping Businesses Reduce Air Pollution in Spokane County

## Spokane Clean Air

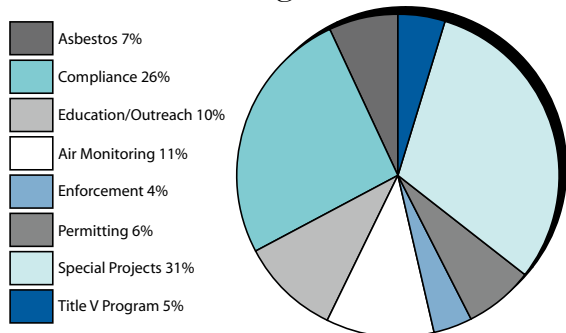
Our job at the Spokane Regional Clean Air Agency (Spokane Clean Air) is to ensure that residents of Spokane County have clean air to breathe. We do this by enforcing federal, state and local laws to control outdoor air pollution, monitoring ambient air quality and encouraging individuals to make clean air choices in their daily lives. Read more about our programs on page 2. This year brings some new and recurring challenges:

- ✓ meeting the more stringent health protective standards for ground-level ozone and fine particles that are being developed by the U.S. Environmental Protection Agency
- ✓ enacting a new odor and nuisance regulation to protect the public's right to enjoyment of life and property
- ✓ implementing new federal programs to protect the public from hazardous air pollutants
- ✓ maintaining adequate funding to meet these and other challenges

*FY 10 Funding Sources:*



*FY 09 Program Costs:*



Spokane Clean Air's budget for fiscal year 2010 is \$1.8 million. Our funding comes from a variety of sources, most of it local. Spokane County and its cities and towns contribute to the work we do on behalf of their residents through an annual assessment that is based on a formula outlined in the state's Clean Air Act. Other funding sources include permit and registration fees from businesses, and state and federal grants.

For more information about the agency and its programs, please visit our webpage at [www.spokanecleanair.org](http://www.spokanecleanair.org) or call us at 477-4727. ■

## Engineering and Compliance

Spokane Clean Air employs three air quality engineers who are responsible for evaluating facility permit applications, examining facility annual testing results, maintaining emissions inventories, and providing information to facilities related to air quality regulations. We also have five air quality specialists responsible for conducting on-site facility inspections, providing compliance assistance, enforcing air pollution regulations and responding to citizen complaints. Below is a summary of 2009 activities:

|                                      |     |
|--------------------------------------|-----|
| Existing facilities registered ..... | 625 |
| New facilities registered .....      | 10  |
| Notices of Construction approved ... | 21  |
| Notices of Intent approved .....     | 18  |
| Facility inspections .....           | 505 |
| Asbestos inspections .....           | 84  |
| Notices of Violation issued .....    | 75  |
| Air quality complaints received ...  | 934 |

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# Spokane Clean Air—Key Program Areas

**S**pokane Clean Air has a variety of programs and services that support the Agency's mission. Below is a brief overview of key areas:

## Air Monitoring

We operate a network of ten air quality monitoring stations, including three sites in Airway Heights, Deer Park and Spokane Valley. Monitoring data assists our staff in forecasting air quality conditions and significant events (e.g. stagnations); reporting current and forecasted air quality to the public, and issuing burn bans.

## Asbestos

Asbestos, a known human carcinogen, is still being imported to the United States and used in manufacturing. To help protect the public from exposure to asbestos, we enforce rules related to commercial and residential asbestos abatement projects, including the renovation and demolition of structures.

## Registration and Inspections

To achieve emissions reductions from industrial and commercial operations, Spokane Clean Air annually registers and inspects over 600 commercial and industrial operations.

## Compliance Assistance

We assist local businesses achieve emissions reductions by encouraging them to go beyond compliance. We provide resource materials and on-site visits, as well as technical workshops for source categories such as gasoline stations, drycleaners and surface coaters. We also offer free, pollution prevention consultations.

## Complaints/Enforcement

Our staff respond to hundreds of complaints from citizens concerned about smoke, dust and odors in the air. Spokane Clean Air is in the process of revising its "odor and nuisance" regulation to protect the public's right to enjoyment of life and property.



**April Westby, Environmental Engineer for Spokane Clean Air, visits a facility during their annual source testing.**

## Education and Outreach

The majority of air pollution comes from individual actions, which is why public awareness of air pollution problems and the solutions is key to achieving long term behavior change. If we all make just one air-friendly change—how we get to work, how we heat our homes, how we maintain our yards—collectively we can reduce emissions and keep our region's air healthy and clean.

## Emissions Inventory

Our agency is required to compile emissions inventories on all sources of air pollution in Spokane County. The emissions inventory identifies the location of these sources and the quantities of pollutants. The information gathered is used to evaluate the need for additional control measures.

## Outdoor Burning

Spokane Clean Air no longer administers a program for residential yard and garden debris burning. Instead, we're working with partners to promote the use of alternatives to burning such as composting, chipping and mulching, as well as hauling debris to transfer stations and other community "drop box" locations.

## Wood Heating

Our goal is to reduce fine smoke particles from wood heating by promoting cleaner burning practices and enforcing rules related to wood heating. We have provided incentives to encourage owners of old wood stoves to trade them for new, more efficient and cleaner burning devices. From January 2008 through

June 2009, our wood stove rebate program removed and destroyed 215 old, inefficient stoves and inserts. The emissions reduced from these changeouts is over 90 tons of pollutants annually. Funding for the rebate program came mainly from state and federal grants.

If you would like more information on these programs, please visit us online at [www.spokanecleanair.org](http://www.spokanecleanair.org), or call 477-4727. ■

# More Businesses Recognized

In our last issue we listed over 100 businesses recognized under our *Doing our Share for Clean Air* program. Below are 13 additional businesses that have met the recognition requirements. Congratulations!

## Gold Level:

Spokane Transit Authority

## Silver Level:

A-1 Gas & Grocery  
 Burlingame Steel Inc  
 Contract Resource Group  
 J & A Body & Fender  
 Northtown Mall  
 Riplinger Funeral Home  
 RnR RV Center  
 Roi's Furniture Refinish Repair  
 Snow Peak Forest  
 T2 Services Inc  
 Travis Pattern & Foundry  
 Western Systems & Fabrication

# Update: Odor & Nuisance Rule

Spokane Clean Air is proposing to amend its Regulation I, Article VI, Section 6.04. To obtain a summary or complete copy of the proposal, visit [www.spokanecleanair.org](http://www.spokanecleanair.org) or call 477-4727.

Written comments on the proposed revisions will be accepted through Jan. 22, 2010. Send to [cstuder@spokanecleanair.org](mailto:cstuder@spokanecleanair.org), or Spokane Clean Air, 3104 E. Augusta Ave., Spokane, WA 99207.

Next Steps—A public hearing is scheduled for 9 a.m., Mar. 4, 2010, at our office (address provided above).

# New Smog Standard Proposed

Earlier this month, the U.S. Environmental Protection Agency (EPA) announced its proposal to strengthen the National Ambient Air Quality Standard for ground-level ozone, a key ingredient in smog.

The agency is proposing to set the health standard at a level between 0.060 and 0.070 parts per million (ppm), measured over eight hours.

Ground-level ozone forms when Volatile Organic Compounds (VOCs) and Nitrogen Oxides react in the atmosphere on hot, sunny days. VOCs and NOx come from a variety of sources, including industries and gasoline vehicle refueling.

Children are at the greatest risk from ozone, because their lungs are still developing and they are most likely to be active outdoors. They are also more likely than adults to have asthma. Adults with asthma or other lung diseases, and older adults are also sensitive to ozone.

Depending on the final standard, EPA estimates that the proposal

would yield health benefits between \$13 billion and \$100 billion. This proposal could help reduce aggravated asthma, bronchitis cases, hospital and emergency room visits and premature deaths.

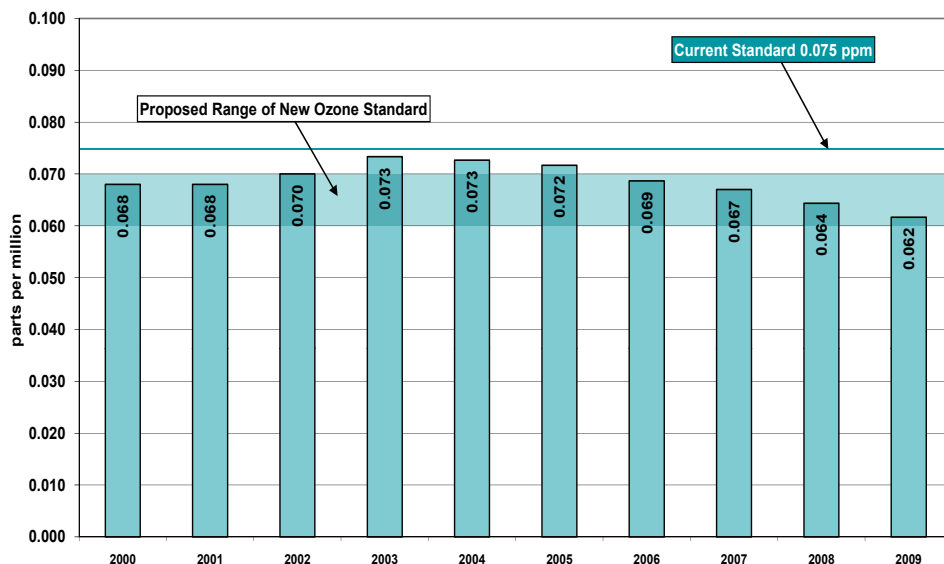
EPA is taking public comments on the proposed rule. For more information about ozone and the proposed standard, visit [www.epa.gov/ground-levelozone](http://www.epa.gov/ground-levelozone).

## How will this affect Spokane?

It all depends on where the final standard is set within the proposed range. The last three years would constitute a violation if the final standard is set at the bottom of the range, which is 0.060 ppm. If the Spokane region falls out of compliance, a likely strategy could be to require Stage II Vapor Recovery at gasoline stations throughout the county.

The bar graph below shows the proposed standard range as compared to ozone levels measured in Spokane over the last nine years. ■

Ozone 3-year averages of 4th highest



To attain the ozone standard, the 3-year average of the fourth-highest daily maximum 8-hour average ozone concentrations measured at each monitor within an area over each year must not exceed the standard.

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# New Federal Rules for Autobody Shops and Miscellaneous Surface Coating Operations

In June 2009, the U.S. Environmental Protection Agency (EPA) announced new requirements [40 CFR Part 63 Subpart HHHHHH (6H)] to reduce air pollution of metals such as chrome (Cr), lead (Pb), cadmium (Cd), nickel (Ni) and manganese (Mn) and their compounds from autobody shops and miscellaneous surface coating operations. A reduction of methylene chloride (MeCl) fumes will also be required from businesses that use more than one ton per year of MeCl for stripping operations.

The metals above are referred to as “target hazardous air pollutants” or target HAPs. These compounds, along with MeCl, pose health risks to anyone who breathes the fumes. Some coatings used in miscellaneous coating operations and autobody contain target HAPs and their compounds, while MeCl is used to strip coatings from metals and wood.

## Applicability

Businesses using more than one ton of MeCl per year and autobody shops are automatically subject to the regulation, though these sources may qualify for an exemption if they do not spray apply any target HAPs. A miscellaneous coating operation also may qualify for an exemption depending on whether they spray apply coatings that contain target HAPs. Information regarding petitioning for an exemption is provided later in this article. All existing businesses that are subject to the regulation were required to submit an

initial notification to EPA by Jan 11, 2010 and must be in compliance with the requirements of the regulation by March 11, 2011. New sources that started up after January 9, 2008, must be in compliance with the rule upon startup.

The new regulation requires autobody shops and miscellaneous coating operations to do several things to prevent the target HAPs during spray painting; and to limit the MeCl, used for stripping coatings, from getting into the air.

## Petition for Exemption

According to 40 CFR Part 63.11170(a)(2), an owner or operator of a stationary or mobile autobody spray coating operation may petition EPA for an exemption from the regulatory requirements of 40 CFR Part 63 Subpart 6H, as they apply to those operations, if the owner or operator can demonstrate that the spray-applied coatings used by the facility do not contain the target HAPs. In determining whether you spray apply target HAP containing coatings, do not include coatings applied using hand-held aerosol cans, or spray guns with a cup capacity of 3 fluid ounces or less.)

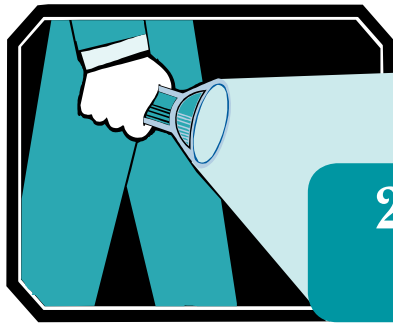
Target HAP containing coatings are defined in 40 CFR 63.11180 as those coatings that contain total Cr, Pb, Cd and Ni (which have been linked to health risks associated with cancer) at concentrations greater than 0.1% by mass, and total Mn (which has been linked to a health risk that is non cancerous) at concentrations greater than 1.0% by mass.

The owner or operator can determine whether or not the coating or solvent being used contains target HAP components by reviewing the list of components in the Material Safety Data Sheet (MSDS) provided by the manufacturer or supplier. The amount of target HAPs in each of the coating or solvent is determined by adding them all together. For example, if the coating in question contains target HAPs that are only Cr compounds, and compound #1 and compound #2 contain 0.05% and 0.6% respectively by mass of the coating, then this coating would be a target HAP containing coating since  $0.05\% + 0.06\% = 0.11\%$ , which is greater than 0.1%. However, if the mass content of Cr in compound #1 and compound #2 were 0.05% and 0.05% respectively by mass, then the coating would not be a target HAP containing coating since  $0.05\% + 0.05\% = 0.1\%$ , which is not greater than 0.1% by mass.

An exemption from the requirements of Subpart 6H is case/fact specific, so to request one, you must provide information about your operation to show why an exemption should be granted.

Various fact sheets and forms, including Initial Notification and Petition for Exemption, are online at [www.spokanecleanair.org/epa\\_rule\\_autobody\\_refinishing\\_shops.asp](http://www.spokanecleanair.org/epa_rule_autobody_refinishing_shops.asp).

If you have questions, call Spokane Clean Air, 477-4727, then dial extension #103 for Joe Southwell or extension #107 for Chuck Studer. ■



# Business Spotlight

## 2010 Clean Air Award Recipient: Fiber-Tech Industries

The recipient of the 2010 Clean Air Award is Fiber-Tech Industries located in Spokane Valley Industrial Park. The award is presented annually by the Spokane Regional Clean Air Agency to a business that has consistently demonstrated a significant commitment of resources to reduce overall air emissions. The award will be presented to the company at an event ceremony next month.

Fiber-Tech Industries is the largest supplier of fiberglass reinforced plywood panels to the transportation, construction and agricultural markets in the U.S. and Canada. The company incorporated in 1983 and operates one of its three U.S. locations at the Spokane Valley Industrial Park.

As part of the process to manufacture fiberglass-reinforced panels, plywood is bonded to a surface material generally a gel coat, using polyester resin reinforced with preformed fiberglass. Styrene, which is considered a Hazardous Air Pollutant and a Volatile Organic Compound (VOC), is contained in the resins and gel coats and emitted as part of the process. Beginning in 2000, Fiber-Tech commenced a significant project to implement several major pollution prevention technologies at their Spokane facility. Now at the end of that project, Fiber-Tech has

reduced their facility-wide emissions of styrene and other VOCs by over 55%.

In order to achieve these dramatic emission reductions, Fiber-Tech implemented pollution prevention technologies in their materials, processes and products.

**Materials**—With the help of raw material suppliers, materials were developed that would meet Fiber-

**Products**—With cooperation from their suppliers and customers, Fiber-Tech was able to replace gel coat surfaces with non-emitting surfaces on key products.

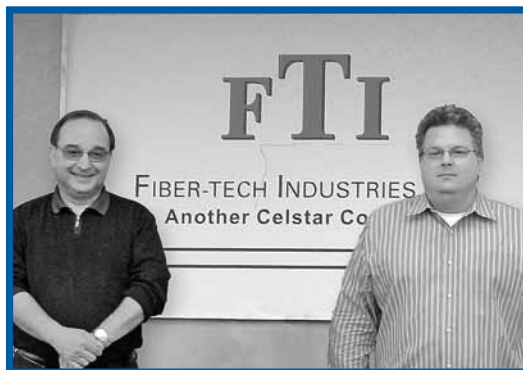
Implementation of these technologies took a significant commitment of time and resources. The company worked extensively with their suppliers to develop lower VOC materials that could be used with their current equipment.

Once the new technologies were implemented, these new panels had to be field-tested.

Fiber-Tech vendors tested the products for overall weatherability, and Washington State University tested the materials for strength and durability. Using this data, Fiber-Tech was able to get customer acceptance for all of the process changes.

With all of the pollution prevention advances in place, Fiber-Tech's VOC emissions at the facility have been reduced by 98 tons per year, which translates to a 55% reduction in emissions from the facility.

“Spokane Clean Air is proud to recognize Fiber Tech for their efforts and innovation we and appreciate their efforts to improve our air quality,” comments Bill Dameworth, Director of Spokane Clean Air. ■



**Roger Mola (left) and Rick Sherwood of  
Fiber-Tech Industries, Inc.**

Tech's requirements at the lower emissions levels. This was achieved by reducing the VOC content and suppressing the evaporation of the VOCs in the materials.

**Processes**—After several years of development, a low atomizing application used in other processes was adapted for Fiber-Tech's gel coat process. The new process creates larger droplets which reduces the emitting area during application. It also allows less material to be used for a given coating thickness.

## UPDATE

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

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# Air • Quality • Calendar

## Happy New Year!

Feb. 4 Board of Directors meeting, 9 a.m., Spokane Clean Air conference room, 3104 E. Augusta Avenue. The meeting agenda is available at [www.spokanecleanair.org](http://www.spokanecleanair.org) or call 477-4727.

Mar. 4 Board of Directors meeting (details above).

### Spokane Regional Clean Air Agency Board of Directors:

Rose Dempsey, Chair, City of Spokane Valley  
Bonnie Mager, Vice Chair, Spokane County Commissioner  
Tom Brattebo, Member-at-Large  
Jeff Corkill, City of Spokane Representative  
Edward "Chuck" Crockett, Small Cities & Towns Representative

**UPDATE** is published by the Spokane Regional Clean Air Agency as part of its Compliance Assistance Program. Send your comments to Lisa Woodard, Editor, [lwoodard@spokanecleanair.org](mailto:lwoodard@spokanecleanair.org).



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## Portable Autobody Surface Coating Operations

Winter weather and road conditions, along with current fuel prices, have tempted some operators of Portable Autobody Surface Coating Operations to choose convenience over the rules by parking their mobile painting equipment in one location and bringing vehicles to this location for painting. This action has resulted in Spokane Clean Air issuing Notices of Violation (NOVs).

All Portable Autobody Surface Coating Operations must be approved by Spokane Clean Air and are subject to annual fees and inspections. A General Order of Approval is issued by Spokane Clean Air and must be followed. Failure to comply is subject to a Notice of Violation.

A condition specifically prohibits *establishing stationary operations with mobile equipment*. Using a portable operation at your own place of busi-

ness constitutes the establishment of a stationary source. In addition, the use of a portable operation at one site for more than 52 days a year constitutes establishment of a stationary source.

The General Order of Approval allows a source to use its Portable Autobody Surface Coating Operation at indoor or outdoor locations, but the owners/operators are still responsible for complying with all other applicable federal, state, and local regulations and requirements. These include worker and fire safety requirements and local building codes.

Operators of stationary paint booths, whose permits often state that all spray painting must be conducted in an enclosed booth or room, may question why Portable Autobody Surface Coating Operations can operate outside. These portable, mobile operations must comply with conditions

beyond those for stationary operations, such as:

- ➔ They are prohibited from using full-sized guns, and instead must spray-apply any VOC-containing coating exclusively with mini-jet/mini-turbine HVLP guns or equivalent.
- ➔ They have limits on the amount of coatings and cleaners they can use and are limited to painting no more than nine square feet of surface area per vehicle, which is equivalent to a door or side panel.
- ➔ Nuisance conditions, such as depositing overspray on another's property, are prohibited.

This summary is not a substitute for the complete regulations, which are available at [www.spokanecleanair.org/pasco\\_goa.asp](http://www.spokanecleanair.org/pasco_goa.asp) or call 477-4727.