

AIRlines

Helping small businesses comply with the Air Quality Act

Spring 2007

Class II emission inventories due April 1 - no fooling

April 1 is the due date for Class II emission inventories. This new due date was implemented in 2006, so let this article serve as a reminder that you only have until April 1 to submit these emission inventories if you have a Class II operating permit. Since April 1 falls on a Sunday this year, the inventories will be need to be postmarked by Monday, April 2. Class I emission inventories are due June 1 of each year. Also, if you operate under the Class II 50% rule, your emission information should have been submitted to KDHE by Feb. 15.

Hard copies of reporting forms were sent out in January, but if additional or new forms are needed, find them electronically in PDF or Excel format at <http://www.kdheks.gov/emission/forms.html>. To use the Excel document on the Web, simply open the form you wish to use and unprotect the form or worksheet by going to "Tools, Protection,

Unprotect Workbook." As usual, each facility must include the facility form plus the form that specifically applies to its process equipment.

Common questions about emission inventories

These questions and answers come from a comprehensive list of frequently asked questions that can be found at www.kdheks.gov/emission/websiteFAQ.htm.

My Class II facility maintains records on actual emissions. Can I submit our records in lieu of the Class II inventory form?

If your Class II facility maintains records of actual emissions, we encourage you to submit the information, but it is not required. Send us the inventory form with the report of your actual emissions attached. You don't have to fill out the worksheets in the inventory form, but

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we do ask that you send them back to us marked with "see attachment."

If my facility doesn't operate all four quarters, why do the seasonal throughput percentages have to sum to 100% (on worksheet 1)?

The sum of the seasonal throughput percentages represents the total amount of time you operated during the calendar year, not the percentage of your capacity that you operated. The sum of the percentages should always equal 100%. For example, if you burned 90 million cubic feet of natural gas from June–August, 10 million

cubic feet of natural gas from September–November, and no natural gas during the other quarters, you would enter 0% for December–February, 0% for March–May, 90% for June–August, and 10% for September–December.

Why are the months listed for Seasonal Operating Percentages Dec–Feb, Mar–May, Jun–Aug, and Sep–Nov instead of the typical quarterly segments?

December–February is to be December, January, and February of the same calendar year, which are not consecutive months. The four quarters are operating seasons and should equal 100%.

No fees are associated with the Class II emission inventory reports. If you have additional questions, contact your KDHE permit engineer or the SBEAP at 800-578-8898. ☀

What's new at BAR?

Check out What's New at BAR by going to <http://www.kdheks.gov/bar/index.html>, periodically. This site lists public notices, new initiatives, links to conference presentations, and bi-annual air quality reports.

Are certain activities exempt from emissions reporting?

Is there a de minimus level for reporting actual emissions? Check out the answers to these questions and other by going to www.kdheks.gov/emission/websiteFAQ.htm.

Cost-Saving Clean Air Strategies Workshop

May 14, 2007
Overland Park, Kansas
To register call 816-561-1087
or visit
www.bridgingthegap.org.

Abbreviations used in Kansas AIRlines

BAR	Bureau of Air and Radiation
CAA	Clean Air Act (as amended in 1990)
EMS	environmental management system
EPA	U.S. Environmental Protection Agency
HAP	hazardous air pollutant
KDHE	Kansas Department of Health and Environment
MACT	maximum achievable control technology
MSDS	material safety data sheet
NESHAP	National Emission Standard for Hazardous Air Pollutants
NO _x	nitrogen oxides
P2	pollution prevention
POTW	publicly owned treatment works
PTE	potential to emit
SBEAP	Kansas Small Business Environmental Assistance Program
SIC	standard industrial classification
VOC	volatile organic compound

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Get your MACT together

The 1990 Clean Air Act Amendments require the Environmental Protection Agency (EPA) to establish maximum achievable control technology (MACT) standards to regulate hazardous air pollutants (HAPs) from industry sources. "Major" sources emit 10 tons per year or more of any individual regulated HAP or 25 tons or more of a combination of HAPs. "Area" sources emit less than 10 tons annually of a single HAP, or less than 25 tons of a combination of HAPs, and would be unregulated for these emissions if it weren't for these MACT rules.

Area sources include small pollution sources like dry cleaners, certain metal-finishing shops, and in the near future autobody refinishing shops. Though emissions from individual area sources are relatively small, collectively their emissions can be of concern. In heavily populated areas like Kansas City, these small "area" sources contribute significantly to emissions that are responsible for formation of ground-level ozone.

On Jan. 3, 2007, the EPA promulgated the final rule for *National Emission Standards for Hazardous Air Pollutants for Source Categories from Oil and Natural Gas Production Facilities*. This sets forth national emission standards for HAPs to regulate HAP emissions from oil and natural

gas production facilities that are area sources, and brings to 17 the number of MACT standards for area sources.

The following list shows the 17 area source categories *already* subject to MACT standards; eight of these (in bold) are expected to affect Kansas industries. There are also three recently proposed area source category standards, two of which could be applicable to industries in Kansas.

Area source categories already subject to MACT standards¹

Chromic acid anodizing	Medical waste incinerators
Commercial sterilization facilities	Portland cement manufacturing
Decorative chromium electroplating	Secondary aluminum production
Dry-cleaning facilities	Secondary lead smelting
Halogenated solvent cleaners	Municipal landfills
Hard chromium electroplating	Mercury cell chlor-alkali plants
Publicly owned treatment works	Other solid waste incineration
Municipal waste combustors	Oil and natural gas production
Hazardous waste incineration	

The three recently proposed area source category standards are stationary internal combustion engines, hospital sterilizers, and gasoline distribution stage I. Another 52 area source standards are targeted for development and promulgation through mid-2009. See the complete list at <http://www.epa.gov/ttn/atw/area/arearuledev.html>, which includes a standard for autobody refinishing paint shops. This Web site allows you to monitor development of the standards and provides for comment during comment periods.

All of the category standards require compliance reporting in addition to recordkeeping and several other requirements. If your facility is either a major

source or area source subject to a categorical standard, you must submit your compliance reports to Mary Mahaffey, Air Compliance and Enforcement Section, Bureau of Air and Radiation, Kansas Department of Health and Environment, 1000 SW Jackson, Suite 310, Topeka, KS 66612-1366; and Richard Tripp, Air Permitting and Compliance Branch, U.S. EPA Region 7, 901 N. 5th Street, Kansas City, KS 66101.

If you have a Class I air operating permit, you can change your reporting period so your permit and MACT reports are due the same time. To change your MACT reporting date to coincide with your Class I reporting date, send a request letter to Mary Mahaffey, KDHE. Changing your Class I reporting date to coincide with your MACT reporting date (i.e. a calendar-year schedule) will require a minor permit modification. Mary Mahaffey also has the forms required to complete this process. If you have any questions, contact her at 785-296-1548 or SBEAP at 800-578-8898. ☼

¹www.epa.gov/ttn/atw/urban/arearules.html

Check your air quality IQ

The EPA has been regulating air quality since 1970. What constitutes “good” air quality? What choices have the most impact? Are we making progress? Take our little air quality quiz and see how many answers you know.

What are criteria air pollutants?

- 1) 189 pollutants identified by the EPA as being hazardous
- 2) six pollutants identified by the EPA as being health risks
- 3) the latest album from an Omaha rock band

Criteria pollutants are the first six pollutants regulated by EPA in 1970. They are ozone (O₃), particulate matter (PM), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), and lead. States still collect data on these pollutants to measure compliance with the National Ambient Air Quality Standards (NAAQS). If a state is in “attainment,” it means it meets the standard. Kansas City continues to be on the “edge” of attainment; the concern is compliance with the ozone standard. Nationwide, emissions of the criteria air pollutants decreased 25% from 1970 to 2001.

EPA listed 189 hazardous air pollutants (HAPs) which are regulated at lower levels than the criteria air pollutants (lead is also a HAP and is regulated at very low levels). The current HAP list contains 188 chemicals.

The latest album from the Omaha band, Criteria, is *When We Break*. Whether or not it constitutes NOISE pollution is subjective.

Which pollutants are associated with respiratory-related effects, including asthma?

- 1) ozone
- 2) NO₂
- 3) SO₂
- 4) CO
- 5) lead
- 6) particulate matter
- 7) cockroaches

Ozone, NO₂, and SO₂ are the pollutants primarily associated with these effects, which include respiratory diseases and irritation of the lung, plus symptoms such as cough, chest pain, and difficulty breathing. Short-term exposure to ozone has been linked to lung inflammation. Repeated short-term exposure to high ozone may cause increased asthma in children engaged in outdoor sports.

Carbon monoxide primarily affects people with cardiovascular disease, reducing the amount of oxygen in the blood and aggravating angina. Elevated blood lead levels are associated with behavioral problems, neurological effects, and lowered IQ. Largely as a result of reducing lead content in gasoline, the average level of lead in children’s blood decreased by 93 percent from 1982 to 2001.

Airborne particulate matter is associated with a broader range of health problems, including respiratory-related and cardiovascular effects. Cockroaches are not exactly air pollution; however, many people with asthma are allergic to the dried droppings and remains of cockroaches. ✨

Reference: EPA Report on the Environment: Cleaner Air, www.epa.gov/indicators/roe/html/tsd/tsdAir.htm#11

— Save the date —

***Don't sit idle, attend the
Idling-Reduction Workshop***

May 15, 2007

11811 S. Sunset Drive, Olathe, Kansas

To register, call the Small Business Environmental Assistance Program at 1-800-578-8898. Watch our Web site at www.sbeap.org for more information.

Don't idle away your profits

Learn about the latest technologies and resources that will help you save on fuel expenses and engine maintenance and wear, enhance vehicle safety, and improve air quality. The Kansas Small Business and Environmental Assistance Program and the Kansas Department of Health and Environment are hosting an Idling-Reduction Workshop that will introduce these technologies and explain how you can take advantage of the cost savings and health benefits. The workshop will include presentations from fleet managers with experience using idling-reduction technologies, idling-reduction technology manufacturers, and representatives from federal and state government programs that provide financial resources for idling reduction.

Idling-reduction technologies include automatic start/stop controls, energy recovery systems, auxiliary power units or generator sets, and electrification of parking spaces. Several alternative fuels are available such as natural gas and biodiesel. According to the American Transportation Research Institute (ATRI), idling costs on average \$3.00 per hour based on 2005 diesel fuel prices¹.

Corporations like Coca-Cola and United Parcel Services have incorporated idling-reduction technologies in their fleets to help curb unnecessary fuel use and to ensure health and safety.

Approximately 15 states and dozens of local counties have laws that restrict the amount of time that a vehicle can idle its main engine². For the states, reducing idling translates into substantial reductions of air pollutants. For the trucking industry, reducing idling can result in considerable fuel savings. So don't sit idle. Attend this exciting workshop so you too can take advantage of this opportunity to save your organization money. Save the date—*May 15, 2007, from 12:30 to 5:00 p.m.* The Idling-Reduction Workshop will be held at the new Johnson County Sunset Building located at 11811 S. Sunset Drive, Olathe, Kan. For more information or to register, please contact SBEAP at 1-800-578-8898, or visit our Web site at www.sbeap.org. ☼

¹ www.atri-online.org/research/results/Idle%20Survey%20One%20Page%20Summary.pdf

² www.epa.gov/smartway/documents/420b06004.pdf

Hot weather, clean air travel tips

BAR has posted a short new video at www.kdheks.gov/bar/index.html. It promotes three simple ozone pollution prevention (P2) tips to remember as you travel on your daily commute or on that family vacation:

1. **Refuel when it is cool.** This prevents gas fumes from heating up and creating ozone in the presence of the hot summer or fall sun.
2. **Don't top off the tank.** Stop at the click or just short of a full tank to prevent the escape of gas fumes.
3. **Use less gas.** Don't idle. Maintain your vehicle. Keep tires properly inflated and when renting a vehicle, request a fuel-efficient car.

For more P2 tips for driving, go to www.italladdsup.gov/index.html. Remember—it all adds up to cleaner air.

Quick reads

Award season is open

KDHE wants to recognize your pollution prevention successes. Have you implemented a new procedure, policy, or technology that has reduced emissions, wastes, or conserved water or energy? Let us help you apply for a P2 award and get the recognition for your business that you deserve. Contact SBEAP for

help at 800-578-8898 or simply file an application by going to www.kdheks.gov/sbcs/p2_pollution_prevention_awards.html.

Applications are due by June 15 and awards will be presented at the Kansas Environmental Conference in August.

Attend the 2007 Kansas Environmental Conference

This conference will be held Aug. 21–23, 2007, at the Grand Prairie Hotel and Convention Center in Hutchinson.

Here is what's included—

- regulatory updates
- regulatory trainings
- new regulations
- new compliance opportunities
- pollution prevention case studies
- vendors

Watch your mailbox for registration information, or go to www.kdheks.gov/sbcs/environment_conf.html.

Pollution Prevention Interns – summer '07 program

The Pollution Prevention (P2) Intern Program links top-level engineering and environmental sciences students with business and industry. These positions are filled for the summer of 2007, so begin planning for 2008. Questions? Call 800-578-8898 and ask to speak to the P2 intern coordinator.

A summary of the 2006 program can be found at www.sbeap.org/internships.html. By implementing the 2006 interns' recommendations, Kansas industries could accomplish the following:

- save up to \$461,000
- reduce 400 tons of solid waste
- prevent 625 tons of hazardous waste
- save more than 2.1 million kWh of energy

What is the Kansas Clean Air Act Advisory Group?

The Kansas Clean Air Act Advisory Group (CAAAG) meets periodically and serves as a forum for stakeholders and the public to provide input to BAR regarding program legislation, regulations, policies, and procedures. The group last met Feb. 26, 2007, and plans to meet Aug. 21, 2007, prior to the Kansas Environmental Conference.

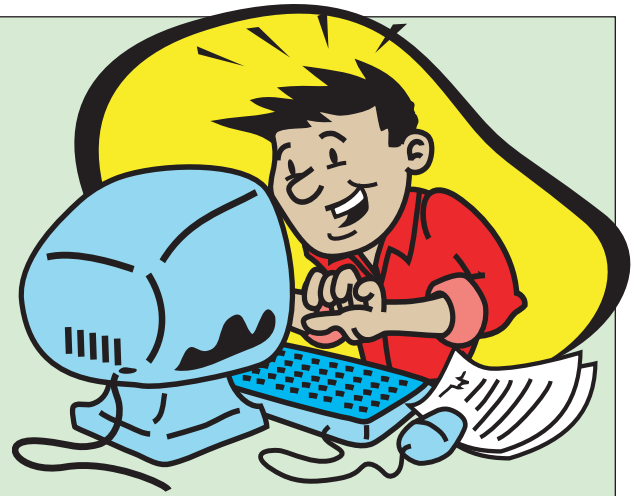
Participants include permit holders, public interest groups, trade associations, and government agencies. If you are interested in becoming a member of the CAAAG, simply contact Linda Vandevord at 785-296-6423.

Read more about the goals and purpose of CAAAG at www.kdheks.gov/bar/download/CAAAG_Information.pdf.

Dear EnviroMike:

I'm in the oil and gas industry and have an air operating permit for our operations. I understand KDHE has a flash-emission sheltered initiative and was wondering if it affects our business?

— Signed,
O.G. Industry



Dear O.G.,

Yes, this flash-emission sheltered initiative DOES affect your business, and you need to act on it by June 30 in order to take advantage of the "shelter." If you do not submit the necessary information by June 30, you may be subject to enforcement actions.

Recently KDHE, along with several Midwestern states, has begun initiatives to incorporate flash emissions with calculations for potential to emit (PTE) from volatile-material storage tanks and/or processes associated with flash emissions. Historically, emissions from these tanks were calculated using only equations for working (due to displacement of vapors within the storage tank as a tank is filled) and breathing losses (due to displacement of vapors within the storage tank due to daily/yearly changes in tank temperature and pressure). Calculating flash emissions might change your permitting status.

As mentioned above, information will need to be submitted to KDHE by June 30, 2007. Facilities with emissions above permitting thresholds are required to submit the follow-

ing information:

- Tank information worksheet
- Detailed emission calculations (volatile organic compounds and hazardous air pollutants); KDHE's Bureau of Air will accept any of several methods of calculating flashing losses/VOC emissions
- Compliance plan/schedule [include the date the construction and/or operating permit application will be submitted and how potential prevention of significant deterioration (PSD) issues will be addressed]

BAR has produced several helpful documents related to this initiative, which can be found at www.kdheks.gov/bar/flashemissions.html. The memo at <http://www.kdheks.gov/bar/download/Memo.pdf> includes a permitting flow chart.

If you need help calculating your emissions or have questions, contact SBEAP or one of the initiative BAR staff listed at the page cited above. ✨

Air Quality 101 and 102 – catch it on the Web

Did you miss the Air Quality 101 and 102 workshops SBEAP hosted in 2006 and 2007? Do you have a new employee that might benefit from some basic air quality training? You can view the agendas and presentation files at www.sbeap.org/workshops.html. As always, if you have questions, contact SBEAP at 800-578-8898 or sbeap@ksu.edu.

AIRlines events calendar

Beyond Rehab the Lab: Micro-Scale and Green Chemistry Workshop; April 13, 2007; Salina, Kan.; watch www.sbeap.org/workshops.html for more information.

Idling-Reduction Workshop; May 15, 2007; Olathe, Kan.; register at www.sbeap.org or call 800-578-8898.

2007 National Environmental Partnership Summit; May 7-10, 2007; New Orleans, La.; register at www.environmentalsummit.org/.

Pollution prevention award applications are due June 15, 2007. Contact SBEAP for assistance at 800-578-8898, or simply file an application by going to www.kdheks.gov/sbcs/p2_pollution_prevention_awards.html. Awards will be presented at the Kansas Environmental Conference in August.

National Small Business Environmental Assistance Program Conference; June 18-21, 2007; Saint Paul, Minn.; to register, go to www.sbeapconference.com/.

2007 Kansas Environmental Conference; Aug. 21-23, 2007; Hutchinson, Kan; to register, go to www.kdheks.gov/sbcs/environment_conf.html.

Monthly Environmental Health and Safety Networks meet regularly around the state; go to www.sbeap.org/ppi/calendar.asp.

Favorite places—Web sites

KDHE Bureau of Air and Radiation –
www.kdheks.gov/bar/index.html

National Small Business Environmental Assistance Program – www.smallbiz-enviroweb.org/

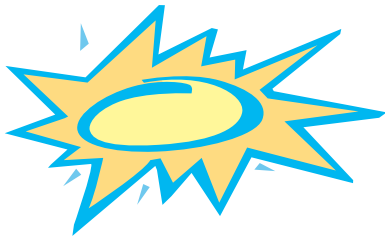
Environmental Protection Agency – www.epa.gov/

Air Toxics Web site – MACT information –
www.epa.gov/ttn/atw/mactfnlalph.html

Air Toxics – Area Source MACT rules –
www.epa.gov/ttn/atw/urban/arearules.html

Kansas Small Business Environmental Assistance Program – www.sbeap.org

Where to turn...



For regulatory assistance with general technical information, MACT standards, or air permitting, please contact the air permit writer (KDHE Bureau of Air and Radiation) assigned to your facility by calling 785-296-1570. You can also check the KDHE air permit program Web site, www.kdhe.state.ks.us/air-permit/index.html, for contact information.

For free, confidential, nonregulatory assistance with air-related questions, fact sheets, or other general information, contact the K- State Small Business Environmental Assistance Program (SBEAP) through the toll-free hotline at 800-578-8898.

If you have a question or concern, or are unsure of whom to call for help, contact the Office of the Public Advocate at 800-357-6087; or in Topeka, call 785-296-0669.



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