



Air Toxics Updates

Connie Turner

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South Carolina Department of Health and Environmental Control

Healthy People. **Healthy Communities.**

Overview

- What we do in Air Toxics
- NESHAP Applicability
- Once in Always In
- RTR
- Reporting
- RMP
- Wrap Up

Meet Our Team

- Connie Turner, Manager
- Angel Thompson (RMP and NESHAP)
- Bryan Nichols (RMP and NESHAP)
- Eric Smith (RMP and NESHAP)
- Laura Fredrickson (NESHAP)
- Neshia Wright (NESHAP)
- Zachary Carfley (RMP and NESHAP)



| Bryan Nichols (803) 898- 1781 | Angel Thompson (803) 898-4058 | Vacant (803) 898-3204 | Eric Smith (803) 898-2230 |
|---|---|--|--|
| <p><u>Chemical Manufacturing B</u> -Pesticide Production – -Pharmaceutical Production – -Polyether Polyols Production – PPP -Polymer & Resins Group IV – JJJ <u>Energy & Bulk Storage</u> -Organic Liquids Distribution – -Engine Test Facilities – PPPPP -Marine Vessel Loading– Y -Combustion Turbines – YYYY <u>Miscellaneous</u> -Brick & Structural Clay – JJJJ -Clay Ceramic – KKKKK <u>Metals</u> -Primary Aluminum – LL -Secondary Aluminum – RRR <u>Part 61 NESHAPs</u> -Radionuclides – H and I</p> | <p><u>Permitted/Unpermitted Sources</u> -Paint Stripping – HHHHHH -Miscellaneous Surface Coating (Metal/Plastic Parts and Autobody Refinishing Shops) – HHHHHH -Dry Cleaning – M <u>Gasoline</u> -Gasoline Distribution: Dispensing Facilities – CCCCCC <u>Miscellaneous</u> -Halogenated Solvents – T -Chromium Electroplating – N -Plating & Polishing– WWWWWW -Wood Preserving – QQQQQQ -Tire Manufacturing – XXXX -Printing & Publishing – KK -Commercial Sterilizers – O</p> | <p><u>Foundries</u> -Iron & Steel Foundries – ZZZZ -Aluminum, Copper, and Other Nonferrous Foundries – ZZZZZZ -Iron & Steel Foundries – EEEEE -Steel Pickling & HCl Process – CCC <u>Miscellaneous</u> -Metal Fabrication & Finishing – XXXXXX -Hospital Sterilizers – WWWW -Electric Arc Furnaces – YYYY <u>Gasoline</u> -Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities – BBBB -Gasoline Distribution – R</p> | <p><u>Waste Treatment</u> -Hazardous Waste Combustion -Portland Cement – LLL -Site Remediation – GGGGG <u>Electric Utility Steam Generating Units</u> Utility – UUUUU <u>Surface Coating</u> -Metal Coils – SSSS -Aerospace – GG -Auto & Light Duty Trucks – III <u>Miscellaneous</u> - Generic MACT – YY - Acrylic & Modacrylic Fibers Production - LLLLLL -Chemical Preparations – BBBB -Paints and Allied Products Manufacturing – CCCCCC <u>Part 61 NESHAPs</u> -Mercury – E</p> |



| Zachary Carfley (803) 898-1782 | Laura Fredrickson (803) 898- 0168 | Neshia Wright (803) 898-0844 | |
|---|---|---|--|
| <p><u>Boilers</u> - Industrial/Commercial/Institutional Boilers & Process Heaters – DDDDD -Industrial/Commercial/Institutional Boilers (Area Source) – JJJJJJ <u>Surface Coating</u> -Paper & Other Web – JJJJ -Plastic Parts – PPPP -Misc. Metal Parts & Products – MMMM - Products – QQQQ -Wood Furniture – JJ - Miscellaneous Coating– HHHHH <u>Miscellaneous</u> -Flexible Polyurethane Foam - OOOOOO</p> | <p><u>Surface Coating</u> -Fabric Printing, Coating & Dyeing (Textiles) – OOOO -Boat Manufacturing – VVVV -Shipbuilding & Ship Repair – II <u>Chemical Manufacturing A</u> -Hazardous Organic () – F,G,H,I -Misc. Organic Chemical Manufacturing (MON) – FFFF -Chemical Manufacturing Area Sources – VVVVVV <u>Miscellaneous</u> -Reinforced Plastic– WWWW -Prepared Feeds – DDDDDDD -Wet-formed Fiberglass Mat – HHHH -Gold Mine - EEEEEEE <u>Metals</u> -Secondary Lead Smelting – X</p> | <p><u>Reciprocating Internal Combustion Engines (RICE)</u> -Major and Area Sources – ZZZZ <u>Pulp & Paper</u> -Pulp & Paper – S -Pulp & Paper – MM <u>Wood Products</u> -Plywood & Wood Products– DDDD <u>Miscellaneous</u> - Landfills – AAAA -Vegetable Oil Production – GGGG <u>Waste Treatment</u> -Offsite Waste Recovery – DD, H <u>Part 61</u> -Benzene Waste Operations – FF</p> | |

Quick Poll

- How many people are subject to one or more NESHAPs?
- How many people have worked with the NESHAPs 1 year or less?
- How many people are responsible for RMP at your facility?

What do we do in Air Toxics?

- Work with Federal Regulations covering both NESHAPs and RMP
- Provide regulatory assistance with regulation requirements and interpretations
- Review reports and documentation associated with NESHAP and RMP
- Assist with NESHAP inspections
- Provide oversight and inspections for RMP for the State

NESHAP

- NESHAP is the National Emission Standards for Hazardous Air Pollutants
- It is a Federal program and SCDHEC has delegated authority for implementing them in SC
- Commonly referred to as “MACT” standards

Applicability

- One of the main things we do in the Section is assist with applicability questions
- These can range from whether or not a facility is subject to the regulation to how does this apply to my facility or what compliance options are available to my facility.
- Many times we assist with what is considered the affected source at the facility.

Once In Always In

- Major sources only (>10/25 TPY HAP)
- What if a source is no longer major?
- If you have questions or believe you qualify, contact myself or your permit writer
- Important that we all agree on the dates

Residual Risk and Technology Review (RTR)

- EPA is required to review the NESHAPs once every 8 years
- Currently under court deadline to review and propose any changes to 9 regulations by 2020
- Subpart MM was recently promulgated and has several changes to it...please contact Neshia Wright for questions regarding Subpart MM changes



- EPA has been ordered to promulgate final rules by March 17, 2020 for 20 other source categories, including:
 - Boat Manufacturing Subpart VVVV
 - Surface Coating of Metals Coils Subpart SSSS
 - Paper and Other Web Coating Subpart JJJJ
 - Municipal Solid Waste Landfills Subpart AAAA
 - Reinforced Plastic Composites Subpart WWWW
 - Solvent Extraction for Vegetable Oil Subpart GGGG
 - Engine Test Facilities Subpart PPPP
 - Site Remediation Subpart GGGGG
 - Miscellaneous Organic Chemical Manufacturing Subpart FFFF

What are we seeing in the RTRs?

- Removal of SSM
- Addition of work practice standards
- Additional or repeat testing
- Lower emission standards
- And in some cases...no changes

What are we doing and what do you need to do?

- When you see a proposed rule, look at it and see what changes have been made
- There is a comment period in which EPA accepts comments on the rule. This is your opportunity to provide input on the changes the EPA is proposing to make
- We review the changes and send outreach to all of our affected facilities

NESHAP Reporting – what issues do we normally see?

- Not signed by a Responsible Official
- Late – please send them in when they are due
- Missing information
 - If there are deviations or downtime over 1% for emissions or 5% for monitor downtime, details for each event must be included

NESHAP Reporting

- Many NESHAPs refer to Subpart A for additional reporting requirements
- Why is this important?
 - When reviewing reports, we are looking for a summary of the facility's compliance
 - We need to understand what happened when there are deviations or downtime
 - The more accurate and complete the information is in the report, the better we can review it without having to contact you

NESHAP Reporting

- Incorrect or incomplete information:
 - Correct reporting period
 - Correct source operating time
 - Date of last calibration/audit of monitors
 - Breaking excess emissions and monitor downtime into the required sections from Subpart A

RMP also known as 112(r)

- The Risk Management Program
- Designed to prevent accidental releases
- Must have one of the covered chemicals above a threshold quantity
- New regulation dated January 13, 2017 is now in effect
- Proposed regulation is pending, public comment period has closed

RMP Inspections – How to Prepare

- Have your documentation readily available – have the right people in the room
- We need completed forms...we evaluate them to see if they contain the required information to demonstrate compliance with the rule
- We will tour the facility
- Prepare to be with us the entire day

Common Issues – RMP Inspections

- Cannot locate information
 - We cannot assess compliance without the information being documented
- Incomplete documentation
 - Maintenance not including the actual checks being performed, the person who performed it, or the results of the test or inspection

Common Issues – RMP Inspections

- Deficiencies noted in audit reports or maintenance records not being completed
 - When you note an item that needs to be reviewed, corrected, addressed, or discussed, you need resolution to that. This includes compliance audits, mechanical integrity audits, PHAs, etc.

Contractor Documentation - RMP

- Document they have been notified of the requirements (emergency plan, hazards of the chemical, safety)
- Evaluate their safety performance and document it
- Training record

Mechanical Integrity - RMP

- Deficiencies noted in audit reports or maintenance records not being completed
 - When you note an item that needs to be reviewed, corrected, addressed, or discussed, you need resolution to that. This includes compliance audits, mechanical integrity audits, PHAs, etc.

Mechanical Integrity - RMP

- One of the most important on-going prevention elements
- Maintenance and proper equipment are important for reducing releases
- RAGAGEP – make sure you are familiar with industry and consensus standards
- Create a schedule and written procedure and be sure you have documentation showing you followed it

Training - RMP

- Another one of the most important on-going prevention elements
- Training is required at least every three years
- We will ask for all training for an employee to show they have been properly trained in the job duties, including the SOPs

Training - RMP

- Make sure you know how the training is organized...by employee, by date, by type of training, etc
- Third party vendors for job certifications – you are responsible for providing documentation that the person working on the covered process was trained



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Questions? Thoughts?



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CONTACT US

Connie Turner
Manager, Air Toxics Section
(803) 898-0341

turnercp@dhec.sc.gov

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