

PWGC Spring Newsletter



Helping You Make Your Facility the Best for the Community and the Environment!

New NESHAPS for Reciprocating Internal Combustion Engines-Spark Ignition

In August 2010, EPA set national emission standards for hazardous air pollutants (HAPs) from existing stationary spark ignition reciprocating internal combustion engines (RICE) that either are located at area sources of HAPs or that have a site rating of less than or equal to 500 brake horsepower and are located at major sources of HAPs. A major source of HAP emissions is defined as a stationary source that emits or has the potential to emit 10 tons per year or more of any single HAP or 25 tons per year or more of any combination of HAP. An area source of HAP emissions is a stationary source that is not a major source.

The NESHAPS rule is stated under 40 CFR 63 Subpart ZZZZ and was finalized in March 2011. The rule sets forth emissions limits and operation standards. The emission limits set by the rule vary depending on the type of source (major or area), type of engine, and whether the engine is existing or new.

The operational work practice standards were developed to help reduce emissions. These engines must meet specific operational standards during engine startup. Facilities must demonstrate compliance and meet reporting and recordkeeping requirements.

Contact PWGC for further assistance.

REMINDER: Toxic Release Inventory Due By July 1st Also 16 Chemicals Added to Rule!

The Emergency Planning and Community Right to Know Act (EPCRA) gives the community the right to know about toxic chemicals being released into the environment. The law requires facilities in certain industries, which manufacture, process, or use significant amounts of toxic chemicals, to report annually on their releases of chemicals listed in Section 313. Facilities subject to Toxic Release Inventory (TRI) reporting is based on amount of employees, North American Industry Classification System (NAICS) code and exceeding any one threshold for manufacturing (including importing), processing, or otherwise using a toxic chemical listed in 40 CFR Section 372.65 and 40 CFR Section 372.65. Facilities must report annually by July 1st.

As a reminder, Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) requires that TRI reports be filed by owners and operators of facilities that have 10 or more full-time employee equivalents, exceed established chemical thresholds, and are within primary NAICS code designations that are included in the regulations pursuant to Section 313 of EPCRA, located at 40 CFR Part 372. The threshold for manufactured or processed is 25,000 lbs, otherwise use is 10,000 lbs, 100 lbs for lead and lead compounds and PACs, 10 lbs for a subset of PBT chemicals that are highly persistent and highly bioaccumulative chemicals such as mercury and mercury compounds and 0.1 for dioxins and dioxin-like compounds.

This year there are 16 new chemicals that have been added to TRI list and include:

- Furan
- Isoprene
- Glycidol
- vinyl fluoride
- Tetrafluoroethylene
- Tetranitromethane
- methyleugenol
- o-Nitroanisole
- Nitromethane
- Phenolphthalein
- Tetranitromethane
- 4-Nitropyrene
- 1,8-Dinitropyrene
- 6-Nitrochrysene
- 1-Amino-2,4-dibromoanthraquinone
- 2,2-bis(Bromomethyl)-1,3-propanediol

Contact PWGC for assistance with TRI Reporting.


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Facilities newsletters are designed to assist relevant departments stay updated on ever changing environmental rules, regulations, and other pertinent issues related to the Manufacturing, Chemical, and Production industries.

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ARE YOU A TITLE V FACILITY?

If you answered yes to the above question then you are in the midst of preparing your annual emission statement which is due annually by April 15th. This year marks the first year that greenhouse gas reporting is required per revisions to 6NYCRR 202. The GHG emissions inventory will assist with the development of a more complete and accurate inventory of GHG emissions generated in New York State. The inventory data collected will be used in the planning for and development of additional global warming reduction programs. The six (6) GHGs to be added to the emissions statement and part of 6NYCRR 202-2.3(c) include: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These GHGs are not regulated air contaminants and therefore will not be included in the calculations for the annual operating permit program fee for affected sources.

The NYSDEC has deferred to EPA protocols for greenhouse gas reporting. 40 CFR 98.33 should be used when calculating emissions for stationary combustion sources.

Note that this requirement is for major facilities and currently does not include facilities which have an Air Registration or State Facility Permit.

Contact PWGC for further assistance.

EARTH DAY 2011!



As every year, we encourage Earth Day activities in facility settings such as tree planting, park clean up, lectures, farmer's markets, fairs, departmental green competitions and more!

To assist facilities with ideas and ongoing goals for environmentally positive impact goals and sustainability there are numerous sources. <http://www.earthday.org/earth-day-2011> is a website that has many great resources and ideas as well as an opportunity for facilities to pledge to get their corporation involved. It is also a place for potential recognition of initiatives that further the goal of measurably reducing carbon emissions and supporting sustainability.

Other great resources in the EPA website, <http://www.epa.gov/earthday/>. The EPA announced a PICK 5 Plan. This plan invites you to choose at least 5 actions you'll commit to. Use less water and electricity, commute without polluting, reuse and recycle, and more.

This Earth Day, be creative, get involved, share learned experiences and most of all, have fun in doing so!



REMINDER FOR AUTO BODY SHOPS- SURFACE COATING NESHAPs Subpart HHHHHH

New sources of paint and stripping and miscellaneous surface coating operations should comply upon startup with National Emissions Standards For Hazardous Air Pollutants (NESHAP), Subpart HHHHHH. For existing sources, Initial notifications were due by January 11, 2011 and within 180 days of startup for new sources. The first notice demonstrating compliance with Subpart HHHHHH was due March 11, 2011 for existing sources and with the initial notification for new sources. Facilities must minimize their emissions of methylene chloride, train employees, and do notification and recordkeeping among other requirements. Should you have been unaware or missed the March 11, 2011 deadline, contact PWGC for assistance to get in compliance.

Televisions- Energy Labeling Requirements on the Way

Most of us when we think of manufacturers, facilities, etc. we don't think televisions; however, some industries may have many televisions for various purposes (teaching, training, etc). As of the January 6, 2011 The Federal Trade and Commission (FTC) set forth a final rule which now requires that all televisions manufactured after May 11, 2011 bear an energy label that discloses the annual energy cost in dollars, annual energy use is kilowatt hours and an energy cost comparison with televisions with similar screen size. The final rule requires a black on yellow color scheme label.

Having such using energy information affixed to the television can assist with lowering energy costs for the facility.

