

PWGC Fall Newsletter



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

"P.W. Grosser Consulting serves our clients, our neighborhoods and our society!"

Something's in the Air....

Proposed and New Air Regulations!

As stated in our summer newsletter, the proposed NOx RACT regulation 6NYCRR Subpart 227-2 Reasonably Available Control Technology (RACT) for Major Facilities of Oxides of Nitrogen (NOx) (Title V) became final in July 8, 2010. The NOx RACT rule was revised to lower the NOx RACT emission limits for very large boilers, large boilers, mid-size boilers, and small boilers, and by requiring a case-by-case RACT analysis for combined cycle/cogeneration combustion turbines. These revisions include new shutdown and system-wide averaging options for compliance. Subject facilities must submit, by January 11, 2011, either a complete application for a permit or a RACT analysis that explains that the control technology the facility currently employs should still be considered RACT for that source. Sources subject to the new emission limits must demonstrate compliance with the new emissions by July 1, 2014. The emission rates are provided below.



STRATEGIC ENVIRONMENTAL SOLUTIONS

<u>Fuel Type</u>	<u>Large Boiler Limit Prior to July 1,2014 (lbs/mmBTU)</u>	<u>NEW Limit</u>	<u>Medium Boiler Limit Prior to July 1,2014 (lbs/mmBTU)</u>	<u>NEW Limit (After July 1,2014)</u>
Gas only	0.2	0.06	0.10	0.05
Gas/Oil (dual)	0.3	0.15	0.12	0.08

The above listed new emission rates must be met by July 1, 2014. Contact PWGC for further assistance.

Happy Fall! PWGC's hospital newsletters are designed to assist Facilities Engineering and other departments within the hospitals to stay updated on ever changing environmental rules, regulations, and other pertinent issues related to the healthcare industry.

Proposed Greenhouse Gas Emissions Reporting for Major Facilities- 6 NYCRR Part 202

6 NYCRR 202 is currently under public comment for its revisions to make some minor language changes in 202-1 to more accurately represent the Department's ability to require stack tests for inventory purposes as part of the permitting process, and to be more consistent with the language used in 202-2. The NYSDEC is also proposing to include the reporting of greenhouse gases (GHGs) as part of the existing annual emission statement process. The GHG emissions inventory is proposed to 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 proposed to be added to the emissions statement and be 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 bill calculations for the annual operating permit program fee for affected sources.

Many facilities have already begun the process of inventorying their greenhouse gas emissions via a carbon footprint. This will assist in the efforts that will be required to submit the above referenced greenhouse gases with the annual emissions statements. Note that this requirement is for major facilities and currently does not include facilities which have an Air Registration or State Facility Permit.

PWGC will stay updated on this proposed rule and when it becomes final, contact PWGC for further assistance.



**630 Johnson Avenue Suite 7
Bohemia, NY 11716
Phone: (631) 589-5363**

**600 N. 36th Street Office 225
Seattle, WA 98103
Phone: (206) 706-5533**

**Learbury Centre Suite 406-A
N. Salina St., Syracuse, NY 13203
Phone: (336) 540-0093**

**770 Broadway, 2nd Floor
New York, NY 10003
Phone: (212)495-6002**

www.pwgrosser.com

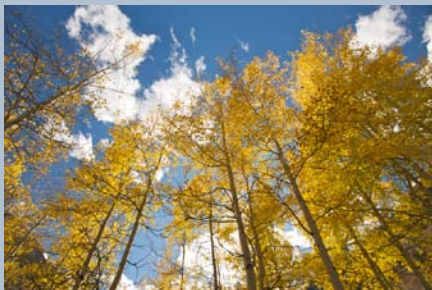
PWGC Contacts:

Theresa Colabella, P.E.
theresac@pwgrosner.com
631.589.6353

Gary Mazza, VP
garym@pwgrosner.com
631.589.6353

Paul Boyce, P.E., VP
paulb@pwgrosner.com
631.589.6353

Marie Rangel Mendes
mariem@pwgrosner.com
206.706.5533



PWGC has provided this newsletter solely for informational purposes; we make no warranties or certifications for a specific matter. If you require further information on a subject of this newsletter, would like to discuss your particular circumstances or would like to provide comments, please feel free to contact us.

Fluorescent Lamps and Mercury- Added Consumer Product Law

Fluorescent lamps, which by now most are aware contain some amount of mercury, are defined as mercury-added consumer products per Chapter 145 of Laws of NY (a.k.a. Mercury-Added Consumer Product). According to this law, these products may not be disposed of with regular municipal solid waste but must be managed by separate delivery to a solid waste management facility, recycling facility, authorized hazardous waste facility or at a municipally sponsored household hazardous waste collection program. Further, the law prohibits the incineration of mercury-added consumer products and best management for disposing mercury-added consumer products is to send them to a facility which can reclaim the mercury.

So, what should you do if you use lamps containing mercury? The first step is to obtain manufacturer information to determine if the lamps have Toxicity Leaching Characteristic Procedure (TCLP) testing data which will indicate if the lamps are considered hazardous based on the mercury levels. TCLP compliant lamps mean they contain mercury in amounts that are below hazardous waste classification thresholds (the hazardous waste level for mercury is 0.2 mg/l). Should the lamp contain mercury in amounts greater than 0.2 mg/l than the waste lamp is considered hazardous waste and must be either managed as hazardous waste or universal waste. If handling lamps as universal waste, incidentally broken

lamps must be managed as hazardous waste.

Should the lamp you use indicate they are TCLP compliant (mercury levels less than the 0.2 mg/l, the waste lamps are not considered hazardous waste; however, even if the lamps are not considered hazardous waste they must be managed in accordance with the mercury-added consumer products law.

If your facility is currently handling lamps as universal waste and purchases lamps that are TCLP compliant, it is suggested that the lamps continue to be managed and disposed of in the same manner (i.e.; recycled). If the lamps are TCLP compliant and are incidentally broken, they do not necessarily have to be managed as hazardous waste since mercury levels are below hazardous threshold and may be recycled at the same facility as intact bulbs. The broken lamps must be properly handled to prevent exposure and placed in a separate sealed container prior to being shipped offsite for recycling.

For more information on mercury visit <http://www.dec.ny.gov/chemical/285.html>. Contact PWGC for further assistance.



Shut Computers Down At Night- Lower Carbon Footprint and Save Money!

The ENERGY STAR Low Carbon IT Campaign is a nationwide effort to assist and recognize organizations for reducing the energy consumed by their computers and monitors. Saving energy reduces the impact of air pollution associated with the burning of fossil fuels to produce the electricity supplying power to computers.

The Low Carbon IT Campaign asks joiners to pledge to activate power management features to lower energy use.

Power management features include shutting computers down at night as well and placing the computers into a low-power "sleep mode" after a period of inactivity. As stated on the Energy Star website, to maximize power savings, EPA recommends setting computers to enter system standby or hibernate after 30 to 60 minutes of inactivity. To save even more, set monitors to enter sleep mode after 5 to 20 minutes of inactivity. The lower the setting, the more energy you save.

For information on this campaign and to view case studies visit the following website listed below:
http://www.energystar.gov/index.cfm?c=power_mgt.pr_power_mgt_low_carbon.