

COMPLIANCE & PREVENTION

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U.S. EPA Clarification for Dry Cleaning Equipment

U.S. EPA Region 5 released a letter clarifying when perchlorethylene (PERC) dry cleaners may need to retrofit old "third-generation" machines to comply with the new machine requirements under 40 CFR part 63, Subpart M. (Note: third-generation machines typically have a refrigerated condenser, but not a secondary carbon adsorber like the "fourth-generation" machines required after Dec. 21, 2005.)



U.S. EPA's letter states an older PERC dry cleaning machine triggers the new regulations if all of the following occur:

- the old machine is sold to a new owner; and
- the new owner moves the machine to a new location; and
- the new owner installed the machine after December 21, 2005.

As long as they retain ownership, original owners may move the old machine to other locations without having to retrofit it with a secondary carbon adsorber. All new PERC machines installed after December 21, 2005 need to have a secondary carbon adsorber.

KEY POINTS FROM THIS ISSUE

- Newsletter is going electronic
- Dry cleaning equipment clarification
- Annual hazardous waste report due March 1

Just a Reminder...

OCAPP is transitioning delivery of this newsletter to electronic format for as many readers as possible by next summer.

To make sure you stay on our distribution list, please send your e-mail address to Dave Foulkes at dave.foulkes@epa.state.oh.us or call him at (614) 644-3118 or (800) 329-7518.

* When replying through e-mail, please include '**Compliance & Prevention Quarterly**' in the subject line.

You can view the letter at www.smallbiz-enviroweb.org/Compliance/newrulesfiles/MNChemicalletter_perc_042809.pdf. Please contact the Office of Compliance Assistance and Pollution Prevention (OCAPP) at (800) 329-7518 or www.epa.ohio.gov/ocapp if you have any questions.

In This Issue

Compliance Assistance

U.S. EPA Clarification for Dry Cleaning Equipment 1
EPA Finalizes Greenhouse Gas Reporting Rule 1
Annual Hazardous Waste Report Due for Large Quantity Generators 2
Ohio EPA Web Site Undergoes Major Facelift 2

Pollution Prevention

National Partnership for Environmental Priorities Ohio Activities 2
Michigan Green Chemistry Governor's Awards 3

EPA Finalizes Greenhouse Gas Reporting Rule

In October 2009, U.S. EPA finalized a rule requiring companies that release 25,000 metric tons or more of greenhouse gases (GHG)* annually to begin collecting GHG data in 2010 and report to U.S EPA starting in 2011.

Wondering what 25,000 metric tons of GHG means? This amount is approximately equivalent to the annual emissions of 2,300 homes or 4,600 passenger vehicles.



Although many large emitters, such as power plants, refineries and chemical plants will be required to report, some small businesses may emit enough GHG to trigger reporting. The majority of GHG emissions result from the burning of fossil fuels in equipment such as boilers, ovens, furnaces and heaters. GHG emissions are typically calculated using emission factors. A simple way to check if your small business could emit enough GHG to trigger reporting is to add up the maximum Btu per hour ratings of all of your fuel-burning equipment. For example, if you operate two natural gas boilers rated at 10 Million Btu/hr each, and two hot water heaters rated at 1 million Btu/hr each, your facility total would be 22 million Btu/hr.

The table below gives the fuel type and approximate Btu/hr total that might result in annual emissions of 25,000 metric tons or more of GHG. Remember, the rule is based on an emissions threshold, and your company's annual emissions could fluctuate and require you to report for some years only.

Fuel Type	Total Max. Rated Heat Input that might trigger reporting
1. Only Coal	30 million Btu/hr
2. Only Natural Gas	50 million Btu/hr
3. Only Fuel Oil	35 million Btu/hr

The U.S. EPA says, "The purpose of this rule is to collect accurate and timely data on GHG emissions that can be used to inform future policy decisions".

More information about the GHG reporting rule and an online Applicability Tool to help you determine if the rule applies to your company can be found at www.epa.gov/climatechange/emissions/resources-tools.html.

**technically this is CO₂ equivalent not GHG total*

Annual Hazardous Waste Report Due for Large Quantity Generators

In Ohio, a Hazardous Waste Annual Report (AR) is required to be submitted no later than March 1 of each year. The report covers the activities conducted in the previous calendar year. Large quantity hazardous waste generators (LQG) and facilities with a permit to treat, store or dispose of hazardous waste are required to file an AR. A LQG is defined as a site that generates 1,000 kg (2,200 lbs) or more of non-acutely hazardous waste or 1 kg (2.2 lb) or more of acute hazardous waste in one calendar month. There is no exemption from reporting for one-time or short-term LQG activities.

For more information, instructions and to get the AR forms, visit the Division of Hazardous Waste Management's Web site at www.epa.ohio.gov/dhwm/ann_report.aspx.

Ohio EPA Web Site Undergoes Major Facelift

If you've recently visited Ohio EPA's Web site, you will notice that it has a very different look and feel. In September 2009 our Web site was launched under a new format and layout to match other Ohio agency Web sites.



To help you navigate the new site, Ohio EPA has posted a help page at www.epa.ohio.gov/WebRedesign.aspx. In addition, there are now different addresses for some of the other compliance assistance resources you may have accessed in the past:

- You can get to OCAPP and other compliance/permitting assistance resources through our new Permit and Compliance Assistance Page at www.epa.ohio.gov/dir/permit_assistance.aspx.
- You can get directly to OCAPP's Web Page at www.epa.ohio.gov/ocapp
- The Permit Wizard is at <http://epawebapps.epa.state.oh.us/PermitWizard/jsp/index.jsp>
- Ohio EPA's Publications Catalog is at www.epa.ohio.gov/pic/facts/fslist.aspx
- Ohio EPA's Answer Place is <http://ohioepa.custhelp.com>

We encourage you to bookmark the above locations in your browser so you can find them easily. However, also feel free to call OCAPP at (800) 329-7518 if you are having problems finding resources on the new Web site. We'll do our best to help you find what you're looking for.

National Partnership for Environmental Priorities - Ohio Activities

The National Partnership for Environmental Priorities (NPEP) is a voluntary partnership program with the U.S. EPA that encourages public and private organizations to reduce the use or release of any of 31 priority chemicals. U.S. EPA provides links to technical and training assistance services and public recognition for participants' efforts. The list of the 31 priority chemicals is at www.epa.gov/epawaste/hazard/wastemin/priority.htm.

Several Ohio companies are participating in the NPEP, completing a number of different projects that improve the environment and make sound economic sense.

Bridgestone Americas Motorsports Lead Reduction

Firestone Racing, a division of Bridgestone Americas Tire Operations, LLC, is based in Akron, Ohio. Its Firestone brand is the official tire of the IndyCar Series, Firestone Indy Lights and the Indianapolis Motor Speedway.

Firestone Racing's NPEP Goal was to replace approximately 2,240 lbs of lead per year from lead wheel weights by substituting the non-toxic 3M Wheel Weight System. During 2008, Firestone Racing met its goal in all of its IndyCar Series and Firestone Indy Lights operations.

Beginning in 2009, Firestone Racing began collecting and recycling used 3M Wheel Weight System weights from all IndyCar Series and Firestone Indy Lights race teams. Since starting the program, Firestone has recycled 524 pounds used weights.

Crown Equipment Corporation Chromium Elimination

Headquartered in New Bremen, Ohio, Crown is the largest electric lift truck company in the U.S. Crown's goal was to eliminate chromium, a rust inhibitor, from painting operations. After many hours of supplier visits and in-house and outside testing, a paint formula was designed that performed better while still meeting the required color, gloss and durability specifications.

Crown's paint reformulation project eliminated more than 300,000 pounds of hazardous waste and saved more than \$20,000. Crown also installed a powder coating line to eliminate most of the wet spray-painting operations. This change resulted in the elimination of more than 200,000 pounds (65 percent) of water and sludge and saved \$45,000 in labor, maintenance and disposal costs.

In addition, this change resulted in much improved corrosion protection for the coatings on lift trucks, improved the employee work environment and reduced air emissions of glycol ethers by more than 20,000 pounds. This project was both an air and hazardous waste pollution prevention project.

International Truck and Engine Corporation Lead Reduction

International Truck and Engine Corporation, in Springfield, Ohio, manufactures school buses, medium trucks and heavy trucks. International has won a number of state and national awards for their waste reduction efforts. During 1999, International implemented a number of initiatives to reduce lead waste.

International's pollution prevention initiatives focus primarily on process and material substitution before recycling. Teams at the Springfield operations facility

were tasked with finding new ways to reduce or eliminate lead waste. The teams consisted of representatives from engineering, management, environment, safety and members of the United Auto Workers Local 402. The teams identified opportunities to reduce lead in cab repairs at the body plant and battery cable ends at the assembly plant.

By using a new method for repairing dents on damaged cabs and replacing lead solder with a lead-free alternative, the body plant reduced the amount of lead used to repair cabs from 30 pounds a month to zero.

Overall, the Springfield operations facility has been able to reduce its use of lead and its by-products from more than 100,000 pounds to less than 200 pounds per year. The reduction of lead has saved the company approximately \$125,000 annually.

Additional information on these success stories and the efforts other companies is available at www.epa.gov/epawaste/partnerships/npep/success.htm.

Michigan Green Chemistry Governor's Awards



Winners of the first Michigan Green Chemistry Governor's Award Program were honored on September 25 in conjunction with the first Michigan Green Chemistry Conference in Detroit.

The award program recognizes advances that either incorporate the principles of green chemistry into chemical design, manufacture, or use, or that promote activities which support or implement those technologies.

Winners of the 2009 Michigan Green Chemistry Governor's Award were:

PPG Industries, Inc.

Chitosan Enhanced Paint Detackifier GREEN LOGIC™

Dow AgroSciences

Spinetoram: Enhancing a Natural Product for Insect Control

Yinlun Huang, PhD - Wayne State University

Integrated Hazardous Chemical-Metal Near-Zero Discharge Technology for Green and Profitable Design and Operation of Electroplating Processes

Phillip E. Savage, PhD, PE - University of Michigan

Terephthalic Acid Synthesis in High-Temperature LiquidWater at High Concentrations

Chemistry Department, Grand Valley State University
Green Chemistry Integration in the University Curriculum

Ecology Center - Mike Garfield, Director and Tracey Easthope, Environmental Health Director

Advocating for Green Chemistry Policy for Michigan

Nathan Craft, Chemistry Major, Grand Valley State University

Cyclic Polyols in Transfer Hydrogenation

More information about this award program and the Michigan Green Chemistry Program is available at www.michigan.gov/deqgreenchemistry.

For more information about green chemistry and its benefits for businesses, OCAPP has online green chemistry pollution prevention training available at www.epa.ohio.gov/ocapp/p2/onlinep2training/onlinep2training.aspx.

Need Help?

Ohio EPA's Office of Compliance Assistance and Pollution Prevention is a non-regulatory program and one-stop location for information about environmental requirements, compliance concerns and pollution prevention. Services are free. Contact us at (800) 329-7518 or (614) 644-3469.

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