Spring/Summer 2020

COMPLIANCE ASSISTANCE PROGRAM
SPOKANE REGIONAL CLEAN AIR AGENCY
UPDATE
An Informative Newsletter Helping Businesses Reduce Air Pollution in Spokane County

Is your company EnviroCertified?

Receive the recognition you deserve for protecting the environment

What is EnviroCertified?

EnviroCertified is a voluntary program offered to local small businesses under a partnership between local agencies and non-profits. The goal of the program is to recognize businesses that have practices and policies in place to properly manage hazardous wastes and conserve resources and in doing so, to encourage others to follow suit. There are currently 80 EnviroCertified businesses in Spokane County encompassing auto body and repair shops, dentists, dry cleaners, print services, and small manufacturers.

Benefits of Becoming a Certified Business

There are many benefits to earning your certification, including:

- Attract customers by being green. Survey results indicate that 80% of consumers want the businesses they patronize to reduce their use of hazardous materials.
- Gain access to technical assistance resources.
- Create a safer, healthier work environment.
- Reduce regulatory burden.
- Strengthen supplier and agency relationships.
- Increase efficiency, save on disposal and material costs.
- Attract eco-smart customers.
- Use of the EnviroCertified logo in your marketing.
- Promotion on EnviroCertified.org.
- An EnviroCertified window decal.
- A framed certificate of recognition.

EnviroCertified Program Requirements

- Generate only small quantities of hazardous waste. Typical businesses include auto body and repair shops, dentists, dry cleaners, print services, and small manufacturers.
- Participate in a voluntary, no-cost site visit with an EnviroCertified program representative to verify that you meet qualification standards.
- Set a goal to improve business practices, reduce waste, conserve resources.
- Renew certification every three years.

How to Apply

1. Contact one of these program specialists from the Spokane Regional Health District to schedule a technical assistance visit: Call Vikki Barthels or Bruce Williams at (509) 324-1560, or email pollutionprevention@srhd.org

2. After the site visit, you may be provided some voluntary recommendations. Once those are implemented, or if your business was found to already be implementing the minimum measures for recogntion, you then complete the application form for the EnviroCertified status and recognition. Applications are at www.envirocertified.org/application-forms

3. Call Tonilee Hanson, 509-847-4337, to schedule a time to complete the application together. Or, fill out the application form either electronically or manually.

a. Electronically: Type your responses into the fillable PDF form.

b. Manually: Print a paper copy of the application and fill it out with pen.

4. Send the completed application using one of these delivery methods:

Email: tonilee@spokaneriver.net

Mail: EnviroCertified, 2206 S. Sherman St., Spokane, WA 99203

5. When your application is received and confirmed, you will be contacted to schedule a certification visit to deliver your framed certificate and promotional materials.

EnviroCertified EnviroCertified.org

Program administration and public recognition activities are conducted by the Spokane River Forum. The Spokane Regional Health District provides the pollution prevention technical assistance and certification visits. Funding support and oversight are provided by the Spokane Aquifer Joint Board, City of Spokane Solid Waste Management Department, and Washington Department of Ecology. ■

Enviro Certified℠

Surface Coating Tools: Save money, reduce emissions

Solvents and paint thinners are commonly used in the surface coating process to clean surfaces and tools and to thin coatings. There can be significant environmental and health concerns related to their use. Exposure to toxic air pollutants, such as those in solvents and coatings, may increase chances of cancer or other serious health effects, including reproductive problems, birth defects and asthma.

Safeguard the health of your employees and customers by using materials, processes and practices that reduce or eliminate air pollution at the source. Pollution prevention practices also save money on waste disposal, paint and solvent usage, and the cost of air pollution controls.

Consider these three pollution prevention strategies:

1. Enclosed Paint Gun Washers

Use of an enclosed gun washer can minimize solvent evaporation loss and reduce worker exposure. An enclosed system flushes solvent through the paint equipment to remove paint residue without the need for manual cleaning, saving time and labor costs.

2. Disposable Paint Cup Liners

The amount of solvent needed to clean equipment can be greatly reduced by using disposable paint gun liners. Most of the solvent used for spray equipment cleaning is used to remove residual coating from the paint pot. If paint cup liners are used, the residual coating cures in the liner, eliminating the need to clean the paint pot.

3. Solvent Recycling

Although spent solvents are often designated as hazardous wastes, many contaminated solvents can be reclaimed and then re-used. Distilling solvents at a facility is a common way to extend their useful life, reduce the amount of new (raw) solvents needed and decrease the amount of hazardous waste generated.

Before investing in a distillation unit (also called a still or solvent recycling unit), take the time to consider whether you really need one or not. If you can reduce the amount of spent solvents you generate, a still may not be necessary. Whether or not you have a still, reducing your solvent use and using less toxic solvents are good steps worth pursuing.

Things to consider before purchasing a still:

- ✔ Will the supplier distill a sample of the spent solvent with the proposed system and provide an analysis of the recycled solvent?
- ✔ Will any of the still's components deteriorate after extended use? Only stainless steel and Teflon fittings and gaskets will stand up to repeated use with some solvents.
- ✔ What are the operating costs? Costs of labor, electricity and liners should also be included (see sidebar for more information). Compare these costs with savings from reduced purchases of virgin solvent and reduced hazardous waste disposal costs.
- ✔ You should let the supplier know if you plan to distill products that contain nitrocellulose.

Special precautions must be taken when recycling solvents containing this material. Material Safety Data Sheets (MSDS) are the best source for determining whether nitrocellulose is present. It is not uncommon for a MSDS to list only the chemicals of highest concentration. If the MSDS does not report 100% of the chemicals in the product, contact the supplier to find out if it contains nitrocellulose. ■

Meet the newest member of our inspection team

Clayton Krietzman joined SRCAA in November 2018, as an Air Quality Specialist. Clayton, who grew up in Spokane, has over 10 years of experience working in the enviromental field. He began his career in the Seattle area performing industrial cleaning, spill clean up/containment, and remediation. He returned to Spokane to work for Big Horn/Montrose Environmental until their Spokane office closed.

In his free time Clayton enjoys restoring old cars, working on his small family farm and spending time with his wife and two kids. ■

More Ways to Cut Costs, Reduce VOCs

Reduce the use of solvent cleaners

Using an enclosed solvent gun washing system will help you:

- ✔ reduce evaporation when cleaning equipment
- ✔ reduce solvent use by more than 50 percent, resulting in significant cost savings
- ✔ decrease labor time by 60 percent
- ✔ decrease emissions by up to 90 percent

Reduce paint use

- ✔ Turn off the gun cleaner when not in use to reduce evaporation.
- ✔ Train technicians to use good spray application techniques to improve transfer efficiency.
- ✔ Minimize waste and spills when mixing paint.
- ✔ Reduce vapors and waste by using airtight containers. Keep containers closed unless adding or pouring liquid.

Switch to less toxic products

- ✔ Use water-based or higher solid paints.
- ✔ Choose solvents with low toxic air pollutant and VOC content. Use water-based, alkaline or microbial cleaners. ■

Thinking about investing in a Still?

Here is an example of how to calculate the payback when considering investing in a still:

A shop is considering buying a still for $6,000, which will cost $1,700 to install. The shop generates 24 drums of waste solvent per year, which cost $200 per drum to dispose. They have determined the average percent solids in their waste solvent, and estimate that they will be able to recover 1,056 gallons of solvent a year, and generate 3 drums a year of still bottoms. Because they pay $4.50 a gallon for the raw solvent, they anticipate saving $4,752 in raw solvent purchases. The bottoms will cost $350 a drum to dispose, for an annual total of $1,050.

They will distill 3 batches of solvent per week. They estimate that this will require 1 hour of staff time per batch and 0.5 hours/week in maintenance, at a salary rate of $20/hour. Electric power for the still will cost $0.061 per kWh.

Initial Capital Investment

Distillation unit	$6,000
Installation	$1,700
Total Investment	**$7,700**

Annual Operations Savings and Costs

Savings on raw solvent	$4,752
Less disposal of spent solvent	$4,800
Disposal of still bottoms	($1,050)
Labor	($3,640)
Utilities	($ 228)
Total Annual Savings	**$4,634**

Payback period $= \frac{\text{capital costs}}{\text{Annual savings}} =$ **1.66 years** ($\sim$ 20 months)

**Source: Ecology's "A Guide for Choosing and Operating an On-Site Distllation Unit, publication 94-31, rev. Jan 2003*

Ask Spokane Clean Air

Q: After my business was inspected by Spokane Clean Air, I was informed of a few Corrective Actions that need to be done. What is a Corrective Action and how does it differ from a Notice of Violation?

A: At the conclusion of most routine inspections, Spokane Clean Air inspectors will issue a Compliance Status Report (CSR). Occasionally, if compliance issues are found, there may be items which need corrective action. A due date for completion is usually given for each corrective action required and a request that Spokane Clean Air be notified upon completion of each. In some cases, a CSR may not be issued in the field. The inspector may send a letter in the mail. In some instances, a NOV might still be issued after a Corrective Action. ■

Installing the wrong Stack Cap can be an *expensive* mistake

Spokane Clean Air field staff often come across newly-installed stack caps that do not meet air quality permitting requirements.

Installing an unapproved cap can be a costly mistake because it must be removed and replaced with an approved cap.

Spokane Clean Air requires that emissions from many air pollution sources, exhaust through an **unobstructed, vertical stack**.

Additionally, all surface coating operations are required to have the top of the stack rise at least **six feet above the penetration point of the roof**.

These requirements are intended to support the upward dispersion of pollutants, which reduces air quality impacts and odors at ground level.

Dispersion of air pollution is influenced by a variety of other factors, including stack height, surrounding building or rooftop features and the temperature and velocity of the exhaust. These factors are all considered during the air quality permitting process.

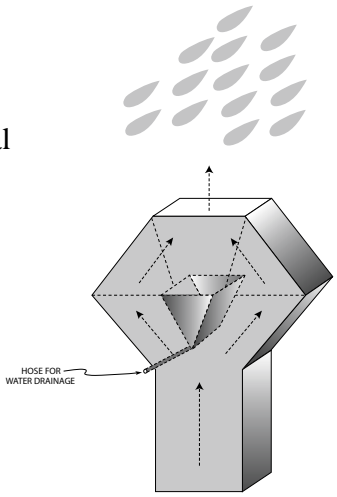
In order to allow for good vertical flow of the exhaust, there are specific requirements for caps used on stacks.

Below are examples of designs that have been approved by Spokane Clean Air. If you have any questions, please call 477-4727. ■

Approved Stack Cap Designs

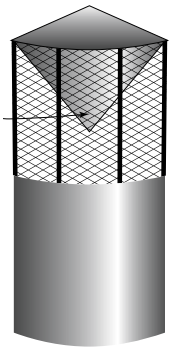
Hexagonal Stack Cap

This design diverts air around an internal wedge used to catch rain. A hose is connected to the bottom of the wedge which drains the collected rain water.



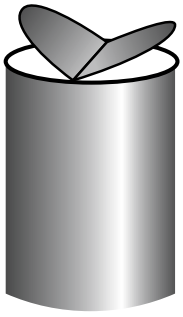
Inverted Cone Stack Cap

Grating or brackets support the cone which is suspended above the stack opening. The cone helps prevent rain from entering the stack. The angle of the cone must be 45 degrees or greater.

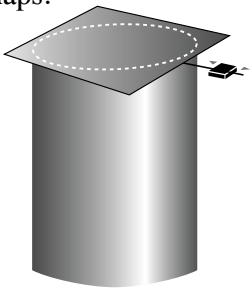


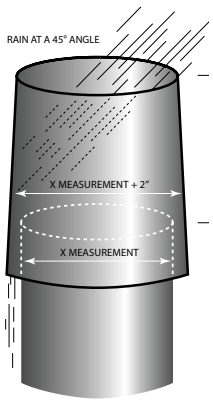
Center-hinged or Side-hinged Stack Caps

A hinged flapper damper (center or side hinge) opens to a 45 degree angle or greater when the equipment is running and closes when the fan is turned off. A booster fan may need to be installed to help push open the flaps.



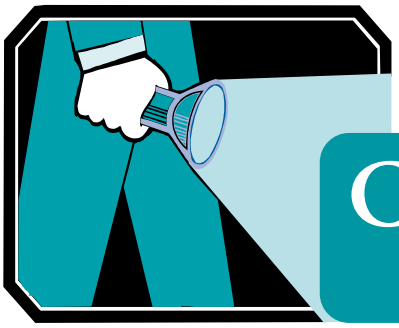
This flapper damper opens and close with the aid of a counter weight that slides back and forth on a rod for manual adjustment.





Stack-in-a-Stack

This design is based on the principle that rain falls at an angle. The inner stack is surrounded by an outer stack with space between the two. Rain runs down the inside wall of the outer stack instead of down the inside wall of the inner stack and into the equipment being vented.



2020 Clean Air Award

Costco Gasoline Station

northside location

Spokane Clean Air is thrilled to announce that the 2020 Clean Air Award goes to...drum roll please...Costco Wholesale!

"When designing and building their new northside gasoline facility, Costco made the decision to go beyond the minimum requirements," according to Lori Rodriguez, Compliance Section Manager for Spokane Clean Air, who presented the award to company representatives at a recent awards ceremony.

"The 2020 Clean Air Award acknowledges Costco's investment in the best available air pollution control technology. Additionally, their operations are top-notch, which keeps the air pollution control equipment working as designed. This commitment is making a difference in our air quality – with the additional VOC reductions of as much as 80 tons per year," added Rodriguez.

There are 173 gasoline stations registered with Spokane Clean Air. Collectively, these stations dispensed 158.5 million gallons of gasoline in 2019.

Based on this volume of gasoline, it is estimated that 868 tons of volatile organic compounds or VOCs were released to the air during vehicle refueling and underground storage tank filling in 2019.

It's critical to minimize the release of VOCs because they contribute to the formation of ground-level ozone, a harmful air pollutant. One way is requiring gasoline stations to install and maintain equipment designed to reduce vapor loss when underground storage tanks are being refilled. This is called Stage I Vapor Recovery.

Additionally, the amount of gas dispensed by a station and its proximity to residential property may necessitate Stage II Vapor Recovery systems. These systems use specialized nozzles to capture vapors during vehicle refueling.

There are currently nine stations in Spokane County that have installed both systems—some by requirement and others voluntarily.

On behalf of Spokane Clean Air's staff and Board of Directors, we congratulate Costco! Your decisions and actions are making a difference in the air we share! ■

Above from left: SRCAA Compliance Section Manager, Lori Rodriguez; Jeffrey Rumsey, Costco Gasoline Attendant; and Bill Olmstead, Costco Supervisor.

Pictured above is the permeator which collects the gasoline vapors from the vapor recovery systems.

Each year, Spokane Clean Air recognizes a company that has consistently demonstrated a commitment to reduce air emissions. The award is to publicly express our appreciation for innovation and to encourage others to follow suit. Learn more at SpokaneCleanAir.org/business/recognition. Past recipients:

Costco #1298 (north Spokane)
Gonzaga University
Eastern Washington University
Spokane International Airport
ExxonMobil Spokane Terminal
Central Pre-Mix
Providence Sacred Heart Medical Center & Children's Hospital
Ed's Premier Auto Body
Beacon Cleaners & Laundry
CXT, Inc
Fiber-Tech Industries
Ross Printing
Inland Empire Paper Co
Huntwood Industries
TransCanada
Avista Corp
Fairchild Air Force Base

UPDATE
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Air · Quality · Calendar

Spokane Clean Air is governed by a 5-member Board of Directors who convene monthly meetings to conduct Agency business.

Board meetings are held on the first Thursday of each month unless otherwise publicized. (In 2020, the January and the July board meeting will be held on the second Thursday.) Each December, the Board sets the dates for the upcoming calendar year. The meetings begin at 9:30 a.m. at the Agency's office, 3104 E. Augusta Avenue, Spokane, WA 99207.

Meeting agendas are posted on the agency's webpage under "Hearings & Notices" a week prior to each meeting. The public is welcome and encouraged to attend. All meeting facilities are wheelchair accessible. For special accommodations, call (509) 477-4727, 48 hours in advance.

More information about our Board of Directors, including approved meeting minutes, is on our website, SpokaneCleanAir.org, under "about us."

UPDATE *is published by the Spokane Regional Clean Air Agency. Send article ideas and comments to LWoodard@SpokaneCleanAir.org.*

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UPDATE *is available online and via email subscription: just visit our website at SpokaneCleanAir.org*

Regulation & Program Update

Agency staff are in the initial stages of drafting updates to the New Source Review (NSR) program and general air quality regulations. **The proposed changes will not change fees or add new requirements for businesses.** A public comment period on the proposed amendments will be publicized and is expected to be held sometime this spring.

The proposed amendments will:

- Simplify compliance for regulated sources:
  - Add adoption by reference (ABR) sections that specify which state and federal rules are ABR and the adoption dates
  - Streamline source test provisions and improve consistency with state and federal regulations
  - Clarify registration program requirements and improve consistency with state regulations
- Clarify NSR requirements and improve consistency with state and federal regulations; simplify portable source permitting process; and update public involvement provisions to allow e-noticing
- Meet federal enforceability requirements and the EPA's federal requirements for incorporation in the State Implementation Plan.
- Remove obsolete regulatory language.
- Make general housekeeping edits (typos, spelling errors, update citing).
- Improve clarity, readability, formatting consistency among Articles.
- Improve consistency with state and federal regulations.

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