

# COMPLIANCE ASSISTANCE PROGRAM

SPOKANE REGIONAL CLEAN AIR AGENCY

# UPDATE

An Informative Newsletter Helping Businesses Reduce Air Pollution in Spokane County

## Virtual Facility Inspections

Russ Neumiller, Inspector II with Spokane Clean Air, peers into his computer. He's looking at the inside of a local auto body shop and making notes. On the other end of the video call is the owner of the shop. Neumiller asks him to move the camera to show him a specific piece of equipment and follows-up with a few questions.

This is the start of a virtual inspection of a registered source. Spokane Clean Air has five inspectors conducting a total of 10-15 inspections per week. In addition to video calls, inspectors will request records and photos for review.

"It's vital for our inspection team

to adapt and retain a sense of normalcy during the pandemic," explained Lori Rodriguez, Spokane Clean Air Compliance Manager. "Virtual inspections allow us to continue to carry out our mission during this dynamic time."

There are over 700 commercial operations in Spokane Clean Air's registration program. Currently, virtual inspections are focusing on surface coaters with auto body shops. As the process is streamlined, inspectors will begin moving to other registered sources.

Neumiller has found that the contacts with registered sources have been understanding and accommodating to this new approach.

"Many of them are doing other aspects of their job remotely as well and are familiar with some sort of virtual technology," he said. "For example, at auto body shops personnel are already working with insurance adjusters remotely."

As inspectors have become comfortable with the technology of virtual inspections, many are finding that there are more similarities than they expected between a virtual and an on site inspection.



going regulatory requirements," Neumiller said. "We also want to be available to sources to answer questions and provide guidance for changes to their equipment or operations."

Maintaining a presence during the pandemic has been challenging. Virtual inspections are helping us continue to offer personalized assistance to our registered sources.

"During these times of uncertainty, you can be certain that our team is still working to the best of their ability to uphold clean air standards and support our registered sources," Rodriguez said. ■

## Meet our Executive Director Scott Windsor



After conducting a nationwide search, the Spokane Regional Clean Air Agency's Board of Directors hired Scott K. Windsor as the agency's Executive Director.

Windsor took on the role in late September and brings to it over 23 years of experience with the City of Spokane, including 10 years as the Director of Solid Waste Management and most recently as an Environmental Analyst.

"I look forward to leading Spokane Clean Air and working to preserve such a vital resource," Windsor said. "Many challenges and opportunities lie ahead and I am confident the agency will continue to provide our community with the best service we can."

If you have any concerns or suggestions regarding our agency and our service to you, Windsor welcomes your call. He can be reached at (509) 477-4727, extension #121. ■

# New Source Review (NSR) and General Regulation Updates adopted July 2020

New Source Review and General Regulation revisions to SRCAA Regulation I, Articles I, II, IV, V, VI and X, and the Consolidated Fee Schedule became effective September 1, 2020.

## Overview of the Updates:

- Improves the consistency between SRCAA regulations and the state and federal air quality regulations.
- Adds adoption by reference (ABR) sections that specify which state and federal rules are ABR and the adoption dates.
- Streamlines source test provisions.
- Clarifies registration program requirements.
- Clarifies new source review requirements; simplifies portable source permitting process, provides for more options for public involvement notification.
- Improves clarity, readability, formatting consistency among Articles; removes obsolete regulatory language; corrects typos and spelling errors, and updates citing.
- Meets federal enforceability requirements and EPA's federal requirements for incorporation in the State Implementation Plans (SIPs).

## Article II, Section 2.09 – Source Testing:

- Clarifies test requirements and aligns test methods with state requirements in WAC 173-400-105(4).
- Adds e-mail as an allowable form of communicating about source testing may improve efficiency and timeliness.
- Removes combustion testing requirement from the regulation - if

testing is required, it will be a condition in an air quality permit. This should eliminate potential confusion and redundancy.

## Article II, Section 2.13 – State and federal regulations adoption by reference date, Section 2.14 – State regulations adopting by reference, add Sections 2.16-2.19 – Federal regulations adopting by reference:

Provides a single point of state and federal regulations that SRCAA has adopted by reference, including the adoption dates. This should help businesses clearly see, in one location, the state and federal air quality regulations that they are required to meet because SRCAA has adopted them by reference.

## Article IV, Section 4.02 – Operations & Maintenance (O&M) Plan:

Requires all registered facilities to have and comply with O&M plans and establishes what should be included in O&M plans, and what record keeping is required to demonstrate compliance. O&M requirements will align with state requirements (WAC 173-400-101(4)) and mirror requirements in air quality permits issued by SRCAA.

## Article IV, 4.03 – Registration Exemption Documentation Requirements:

- Requires all facilities exempt from registration requirements to keep records documenting their exemption status and be able to produce such records upon request by SRCAA.
- Provides the steps required for an exempt business if they exceed exemption criteria; clarifies that being exempt from one Section does not exempt a business from the entirety of Regulation I.

## Article IV, Section 4.04 – List of Source Categories Required to Register:

- Renames the list from “Exhibit R” in Article IV to “Section 4.04”.
- Restructures the list by categorizing sources by similarities such as state requirements, local requirements, operation type, equipment, etc.
- Divides surface coating operations into two categories: motor vehicle and general; establishes a de minimis level for registration of general surface coating operations of: Potential to Emit (PTE) is less than 100 lbs./yr. or PTE toxic air emissions does not exceed any Small Quantity Emission Rate (SQER) listed in Chapter 173-460 WAC. *The de minimis level becomes effective after surface coating regulation updates are completed - see surface coating article on page 4.*

## Article IV, Section 4.05 – Business Closure Criteria:

- Consolidates business closure procedures. A source or emissions unit is considered closed when: the business closure form is submitted to the agency within 90 days (no change, meeting WAC 173-400-101(5)); registration fees are not paid by 120 days (change from 365 days to 120, to mirror requirements in permit conditions); the agency determines the source has gone out of business (new); the source has not operated for 2 or more years (change from 5 years to 2 years to meet federal requirements).
- Includes criteria for when an emissions unit / source is considered closed, and how to resume operation of the emissions unit / source.

*continued on top of next page*

## continued NSR/General Reg Updates

### Article V, Section 5.02 – New Source Review Exemption Requirements:

- Requires that businesses exempt from going through the new source review process to obtain an air quality permit must have records documenting their exempt status and must be able to provide documentation to SRCAA staff upon request.
- Provides steps that an exempt business must take if they exceed the exemption criteria.
- Clarifies that being exempt from new source review does not provide exemption from all of Regulation I.
- Changes the measurement unit for batch size criteria for coffee roasters that are exempt from air quality permitting from pounds per batch to kilograms per batch to be consistent with equipment manufacturers' sizing practices.
- Establishes a de minimis level for surface coating operations; all surface coaters below the de minimis level will

be exempt from new source review / air quality permitting. *Exemptions become effective after surface coating regulation updates are completed - see surface coating article on page 4.*

### Article V, Section 5.05 – Public Involvement:

- Aligns the local regulation with Washington state's public involvement requirements for air quality permitting.
- Provides more options for how a business meets noticing requirements when obtaining an air quality permit.

### Article V, Section 5.08 – Portable Source Permits:

- Changes the name, "Notice of Intent (NOI)" application to "Portable Source Permit (PSP)" application to address potential confusion with SRCAA's asbestos NOI program.
- Eliminates the requirement that a portable source operating for the first time in Spokane County go through the

NOC review process prior to obtaining an NOI.

- Increases the notification time from 10 days to 15 days to meet state noticing period requirements, WAC 173-400-036(4)(b) and 173-400-171(2).
- Updates non-road engine requirements that clearly describe how SRCAA reviews and permits non-road engines, similar to Ecology (WAC 173-400-035) and other local air agencies in Washington. This provides clarity and consistency with state and local air agencies in Washington.
- Updates exemption subsection to provide clarity on what is exempt from PSP and what exemption requirements must be met.

Visit SRCAA's website if you are interested in reviewing the regulations in their entirety: [SpokaneCleanAir.org](http://SpokaneCleanAir.org).

If you have questions about any of these regulatory updates, please call April Westby, SRCAA Engineer, (509) 477-4727, extension #105. ■

## Meet our new Board Member, Jim Simon

**T**he City of Spokane appointed Jim Simon to serve as their representative on our agency's Board of Directors.

Jim joined Gonzaga University as its first Director of Sustainability after serving Buffalo and Western New York in various professional and volunteer capacities.

At Gonzaga, Jim is working to add capacity to their missioned goal of being a climate neutral campus by 2050. He also serves as the Chair of the Washington State Ridesharing

Organization (WSRO) and is a member of the Sustainability Action Sub-Committee of the Spokane City Council.

Through engaging the campus and the community in new and different ways, Jim fosters a culture of sustainability that is resilient and responsive to the dynamics of our changing world.

Keep an eye out for Jim and his son as they commute around Spokane on their cargo bicycle. ■





# Next Steps: Surface Coating Rule Updates

**A**s many of you may be aware, last summer we made amendments to some of our regulations, which are detailed on pages 2 - 3 in this issue.

For surface coating operations, last summer's regulation update was the first of a two-phase process to update rules for these operations.

The purpose of the updates to our surface coating rule (Article VI, Section 6.13) is to provide regulatory relief for smaller operations. There are no new fees and no new requirements for surface coaters in either Phase 1 or proposed in Phase 2.

Below is an overview of Phase 1, followed by our plans for Phase 2 to occur later this spring.

## PHASE 1:

In July, revisions to Article IV, Section 4.04 (Source Categories Required to Register) were made. Revisions included dividing surface coating operations into two categories **motor vehicle (auto body)** and **general** (which covers everything that is not motor vehicle), and establishing a de minimis level of: Potential to Emit (PTE) is less than 100 lbs./yr. or PTE toxic air emissions does not exceed any Small Quantity Emission Rate (SQER) listed in Chapter 173-460 WAC. *The de minimis level becomes effective after surface coating regulation updates are completed under Phase 2, described later in this article.*

The de minimis level established is to be applied as follows:

**Motor Vehicle** - ALL motor vehicle (auto body) facilities will continue to be required to register regardless of their emissions. However, facilities with emissions below the de minimis level will no longer be required to file a Notice of Construction (NOC) permit.



For existing motor vehicle (auto body) facilities with NOC permits that have emissions below the proposed threshold, we propose to void their NOC permits for their paint booths, but they still have to be registered.

**General:** For General surface coaters with emissions below the de minimis level, they will not be required to file a NOC permit and will no longer be required to register.

## PHASE 2:

The Phase 2 proposed rule making, is simply “closing the loop” on what was done under Phase 1

by updating the surface coating regulation (Article VI, Section 6.13) because it still requires all surface coating facilities to have a paint booth/room. We will propose putting the same de minimis thresholds into the surface coating regulation so that a booth is not required for sources that are below the de minimis thresholds for permitting.

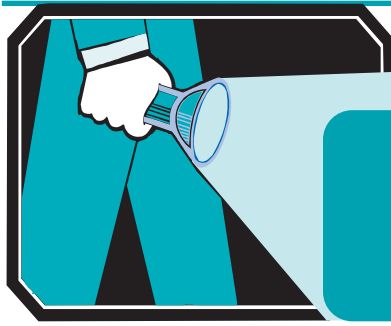
## Timeline:

Our staff will conduct work session(s) on the proposed Phase 2 updates with our Board of Directors in early 2021, then based on their input and direction, we will begin outreach on proposed updates to SRCAA Regulation I, Article VI, Section 6.13 (surface coating operations) sometime in the Spring 2021.

If you haven't signed up to receive regulatory-related updates via e-mail, please do so at [www.SpokaneCleanAir.org](http://www.SpokaneCleanAir.org), just click the "Subscribe" button.

Proposed updates will be posted on our website, including public comment/public hearing(s) dates, so be sure to visit our website in mid-March to mid-April.

If you have any questions regarding the planned rule update, please call April Westby, SRCAA Engineer, (509) 477-4727, extension #105. ■



# 2021 Clean Air Award

## AFCO Distribution & Milling

**T**he 2021 Clean Air Award goes to...*drum roll*... AFCO Distribution & Milling!

Formerly known as Aslin Finch, AFCO Distribution & Milling manufactures a variety of feed products that are shipped to eight northwest states as well as Hong Kong and Japan. Eighty percent of the grains used in production of their feeds are sourced from the productive farmland surrounding Spokane.

The company has been operating in the Spokane Valley since 1934. For locals, the company might best be recognized by its six-story concrete tower, visible from Interstate 90 near the Sprague Ave exit.

In the early 1970s, Spokane Clean Air started receiving complaints about excessive dust coming from the facility.

Lloyd Campbell is AFCO's Director of Wholesale Distribution & Milling and has worked at the company for nearly 40 years.

"When we began operating, there were no air quality standards or dust control equipment, so we were 'grand fathered' to continue operating as long as we did not make changes to our existing equipment. But the time had come to make the needed changes," said Campbell.

That time came in 2013 when the company was acquired by Skagit Farmers, an agricultural-based cooperative with a mission to pre-



serve and enhance the agricultural viability of the local agriculture economy. When Campbell brought the long-standing air quality issues to their board of directors, they fully supported making the changes to bring the mill up to standards.

In September 2018, AFCO completed its final improvements and shortly thereafter were no longer required to register with Spokane Clean Air. There have since been no complaints to the agency about dust emissions from the facility.

According to Campbell, improvements to their filtration system made a huge difference, not only to maintain FDA standards for dust accumulation, but also to the air quality in the mill. A brief overview of other measures at the facility:

- New bag filter system for the Pelletizer & Roller exhaust. This involved capping off pellet cooler cyclone exhaust and venting it into the new bag filter system located inside the building where it exhausts.
- New bag filter system on the second floor for the roller mill cooler.

The exhaust off the roller mill cooler is ducted into the bag filter system in the building which also exhausts in the building. Two bag filter systems catch the dust in the room and allow steam to vent.

- New bag filter system inside on the third floor. The exhaust off the small cyclone is vented into the new bag filter system inside.
- New drag chain conveyor for truck unloading with variable speed allows optimal speed adjustment for reducing potential dust.

- New 30k cfm dust control system in the grain receiving area which allows for continuous negative pressure on the conveyor, drawing the dust into the collector.

According to Campbell, making equipment changes is only part of the equation.

"You've got to look at all of your standard operating procedures. We ended up changing several parts of our processes. Employees should be made aware of why the changes are needed. Educating suppliers and drivers about new policies is vital."

After seeing the dramatic results, Campbell wishes only that the changes would have come sooner.

"We are proud that we took this journey, and we will continue to monitor its success."

Congratulations to Campbell, and Kyle Morgan, Mill Manager, and everyone at AFCO Distribution & Milling! ■

## UPDATE

Spokane Regional Clean Air Agency  
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# Air • Quality • Calendar

Our Board of Directors typically meet the first Thursday of the month, at 9:30 a.m., unless otherwise publicized. Meetings are currently being held virtually. The monthly meeting agenda is posted on our website a week prior to the meeting. The agenda includes information for participating in the meeting remotely.

### Spokane Regional Clean Air Agency Board of Directors:

Al French, Chair, Spokane County representative  
Kevin Freeman, Vice Chair, Small Cities and Towns representative  
Tom Brattebo, Member-at-Large, Citizen representative  
Rod Higgins, City of Spokane Valley representative  
Jim Simon, City of Spokane representative

**UPDATE** is published by the Spokane Regional Clean Air Agency. Send article ideas and comments to [LWoodard@SpokaneCleanAir.org](mailto:LWoodard@SpokaneCleanAir.org).



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**UPDATE** is available online and via email subscription: just visit our website at [SpokaneCleanAir.org](http://SpokaneCleanAir.org)

## 2021 Annual Registration

In early January, all sources registered with Spokane Clean Air should have received both their Annual Registration form and their Annual Registration billing. Both the form and the fees are due by February 19, 2021. *{The exception is Marijuana Producers/Processors who register later in the year.}*

The 2021 registration *billing* is based on the 2019 data reported on the 2020 Annual Registration Form submitted last March. Paying registration fees allows companies to continue operating as an air pollution source under the registration program.

The 2021 registration *form* is used to report your 2020 data.

It's important that both the form and the fees are submitted to Spokane Clean Air on time.

If you need assistance with your registration, please call us at (509) 477-4727 and ask for an engineer.

Facilities are registered annually to ensure that their operations are in compliance with local, state and federal regulations, and to maintain an accurate inventory of air contaminants released into Spokane's air.

The registration program includes annual reporting, annual fees and compliance inspections. The data obtained from each facilities annual report assists Spokane Clean Air in planning

and evaluating air pollution control strategies, which are designed to help the area comply with National Ambient Air Quality Standards.

The registration program includes technical assistance, including variety of sector-specific informational materials. We also offer a business recognition program to all registered facilities.

More information is available at [SpokaneCleanAir.org](http://SpokaneCleanAir.org). ■

**REGISTRATION  
DEADLINE  
IS FEB 19!**