

# Recordkeeping: A Key Compliance Tool

**R**ecordkeeping is required of businesses regulated by Spokane Clean Air. The agency doesn't dictate how records are kept—you may choose any record keeping system suited to your business that clearly shows you are complying with requirements. Because of this, agency inspectors see a lot of different methods of record keeping.

## Why is recordkeeping required?

Your records verify your compliance with your permit and requirements for your industry. Spokane Clean Air has issued Notices of Violation for failure to maintain adequate records. Notices of Violation usually result in civil penalties.

## What types of records are kept?

There are a variety of records that must be kept based on the type of business you are in. Here are some examples:

### Equipment Repair/Maintenance—

Auto body shops often have booths or rooms where spray painting is conducted. Among other requirements, they may be required to track when filters are changed in their spray booth exhaust systems. Simple notations on a wall calendar work for many operations; while others have computer databases for tracking. Gas stations are required to keep records of maintenance of vapor recovery equipment. This requirement is often met by keeping a binder of invoices or work orders on site.



*A Spokane Clean Air inspector reviews facility records during an on-site visit.*

**Waste Disposal—** Many operations are required to maintain records of waste disposal and do so by maintaining waste manifests, invoices or receipts.

**Product Usage—** When an operation is required to track usage of a product such as a solvent, the purchase records are adequate as documentation of usage, as long as the business is willing to accept the purchased amount as usage. Other operations may use job tickets for tracking use. The use reported by registered sources may be part of the calculation of an operation's annual fee. Use reported may also be part of the calculation of area wide emissions inventories.

Compliance with recordkeeping requirements need not be time-consuming to the extent that it interferes with efficient operations. If record keeping requirements seem unrea-

sonable or too time-consuming, talk to one of our inspectors or engineers about your requirements and options for meeting them. Recordkeeping requirements may be changed to suit your operation's individual needs and still meet the requirements.

In summary, record keeping serves as an ongoing compliance monitoring tool. And as our motto states, Spokane Clean Air wants to work with you for clean air. Please don't hesitate to contact us regarding any aspect of your recordkeeping requirements. We can be reached at 477-4727.

*by Deanna Clarkson, Air Quality Specialist*

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# Facility Inspections Reveal Asbestos Issues

**D**uring on-site facility inspections, Air Quality Specialists will look at various aspects of the facility, including air pollution control equipment, emission points, records, etc. During these routine inspections, they may also identify asbestos compliance issues.

Keep in mind that renovations at your business are subject to asbestos regulations. Regardless of the age of the building, if you plan to alter, dismantle or move a component or structure at your business location, your project is subject to asbestos regulations.

Inspectors identified asbestos-related issues during recent routine compliance inspections at a grain handler, an autobody shop, a manufacturer, a crematorium, a remod-

eled gas station and at a corporate office. These activities were observed: carpet replacement, wall removal, re-location of exhaust stacks, dis-posal of a boiler, an oven dismantling, offices being remodeled, disposal of fallen cement asbestos board siding, and a roof collapse repair.

*At a minimum, these activities along with many others require prior inspection for asbestos. If you choose not to survey for the presence of asbestos, then you must assume that all disturbed material contains asbestos and follow the rules related to handling and disposing of asbestos-containing material.*

Asbestos can be found in more than 3,000 different construction materials and remains present in prod-

ucts sold today in the United States. To avoid costly penalties for failure to comply with asbestos regulations, always review the requirements for renovations and demolitions when planning changes at your business.

Complete asbestos regulations and compliance assistance materials are available on Spokane Clean Air's website, [www.spokanecleanair.org](http://www.spokanecleanair.org), or by calling 477-4727.

If you require professional assistance to determine if asbestos is present or in the handling of asbestos containing material, you may find a list of local asbestos service providers on the Spokane Clean Air website. You can also check listings under the asbestos heading in the yellow pages.

*by Deanna Clarkson, Air Quality Specialist*

## Regulation & Program Update

### Proposed Nuisance Rule - Regulation I, Article VI, Section 6.04 – Odors and Nuisances

Spokane Clean Air is proposing to amend its Odors and Nuisances Regulation. Some highlights of the proposed revisions are summarized below. A complete copy of the proposed revisions is available at [www.spokanecleanair.org](http://www.spokanecleanair.org), under "Hearings & Notices" or call 477-4727 to have a copy sent to you.

#### Summary of Proposed Revisions

- ✓ Revoke present regulation.
- ✓ Add a reference to Regulation I, Article I, Section 1.04 for the applicable definitions.
- ✓ Add a notification that Spokane Clean Air implements and enforces WAC 173-400-040 as well as Regulation I, Article VI, Section 6.04. The more stringent of the two regulations supersedes the lesser.
- ✓ Adopt by reference RCW 70.94-640 (Odors or fugitive dust caused by agricultural activities consistent with good agricultural practices exempt from chapter)

- ✓ Incorporate, with some minor additions, the requirements from Puget Sound Clean Air Agency's Section 911 (nuisance regulation), which establishes odor standards that are clear to the regulated community and the public, into Spokane Clean Air's regulation.

**Public Comments Requested** — Written comments on the proposed revisions will be accepted through November 15, 2009. Please send your comments to [custuder@spokanecleanair.org](mailto:custuder@spokanecleanair.org) or to Spokane Clean Air, Attn: Chuck Studer, 3104 E. Augusta Avenue, Spokane, WA 99207.

**Next Steps** — A public hearing on the proposal has tentatively been scheduled for December 3, 2009, 9 a.m. at 3104 E. Augusta Ave. At the public hearing, after comments are considered, Spokane Clean Air's Board of Directors may decide whether or not to adopt the proposed rule.

# Surface Coating Rules

## *air quality, fire department inspections*

**R**ecently, inspectors from the Spokane Valley Fire Department and Spokane Clean Air got together to discuss each agency's regulations for surface coating operations. Since both agencies conduct inspections at these types of facilities, it was an opportunity to learn what each agency looks at during their inspections. This knowledge will enable inspectors from each agency to provide referrals when appropriate.

When **Spokane Clean Air** inspectors arrive at a surface coating operation some of the key areas they look at are outlined below.

### **Particulate Control**

- Are fugitive emissions from prep work controlled? (i.e. performed inside a closed shop, inside a booth, etc.)
- Is surface coating occurring in a booth capable of capturing all visible overspray?
- Do filters completely cover the openings to the exhaust duct?
- Are the filters designed for capturing overspray (90% control efficiency)
- What types of spray guns are used? (e.g., HPLV, LVLV, brush coat, aerosol can, etc.)
- Does the booth have a vertical stack at least six feet above the penetration point of the roof?
- Are rags, waste and other solvent containing materials stored in closed containers?
- Is spray-gun cleaning totally enclosed during clean-up or is the solvent flushed through the spraygun into a closed container?

### **Records**

- Are purchase or usage records kept on-site for the previous 24 months and available for inspection?
- Are waste records kept on-site for the previous 24 months and available for inspection?
- Are the Material Safety Data Sheets (MSDS) kept on-site for products used at the facility?

**Spokane Valley Fire Department** inspectors look at these areas when inspecting surface coating operations:

### **Fire Extinguishers**

- Fire Extinguishers. Portable fire extinguisher(s) must be serviced annually, then tagged and dated.
- Fire extinguishers shall not be obstructed or obscured from view.

### **Sprinkler System**

- Spray-booth fixed fire extinguishing systems must be inspected and serviced at least semi-annually, and then tagged and dated.
- Remove all items that block access to sprinkler risers, pipes, control valves and heads.
- Remove storage on or above the sprinkler piping.

### **Flammable Finishing**

- Materials susceptible to spontaneous ignition such as oily rags must be stored in a disposal container with a self-closing lid. Contents shall be removed and disposed of daily.

- Remove all flammable and combustible storage within three feet of the spray booth.
- Metal parts of spray booths, exhaust ducts and piping systems conveying Class I or II liquids shall be electrically grounded in accordance with the ICC Electrical Code.
- Discontinue any spray finishing operation exceeding nine square feet until an approved spray booth or room has been constructed.

Although their inspections vary in focus, fire department and clean air inspectors can make important referrals to each other when appropriate. By doing so, each agency can be more successful in serving the regulated community and the public.

*by Derek Aubrey, Air Quality Specialist*

## **Need Assistance?**

If you operate a surface coating facility and need assistance understanding air quality requirements call Spokane Clean Air. Separate from on-site compliance inspections, our agency offers a free, on-site technical assistance consultation. Just call 477-4727, extension #105 to make an appointment. For more information about our Pollution Prevention Consultation program visit: [http://www.spokanecleanair.org/pollution\\_prevention\\_consultation.asp](http://www.spokanecleanair.org/pollution_prevention_consultation.asp)

# Greenhouse Gas Emissions State Reporting To Begin in 2010

**B**y the end of October, the Washington State Department of Ecology (Ecology) will have hosted seven workshops across the state to help the largest sources of greenhouse gas emissions get ready to report their releases in 2010.

Under House Bill 2815, Gov. Chris Gregoire and the 2008 Legislature required the owners or operators of large fleets of vehicles and large stationary sources of greenhouse gases to begin reporting their emissions in 2010. Lawmakers directed Ecology to adopt a rule for developing and implementing an emissions reporting system.

Since August 2008, Ecology has worked with a stakeholder group on the proposed rule. Group members represented private and government fleets, power producers, manufacturers, pulp, paper and lumber mills; business groups; the environmental community, and other affected entities.

The proposed rule is available for public review and comment at <http://www.ecy.wa.gov/laws-rules/activity/wac173441.html>.

Public comments on the proposed rule will be accepted through November 12, 2009. Send comments to Nancy Pritchett, Air Quality Program, Washington Department of Ecology, P.O. Box 47600, Olympia, WA 98504-7600 or email comments to [npri461@ecy.wa.gov](mailto:npri461@ecy.wa.gov).

One of two public hearings on the proposed rule will be held in Spokane on November 3, 6 p.m. at Ecology's Eastern Regional Office, 4601 N. Monroe St.

Ecology anticipates adopting a final rule by early 2010. The first reporting period will be for 2009 emissions. Emitters whose 2009 emissions meet the reporting thresholds must report their emissions to Ecology by Oct. 31, 2010.

## The rule will apply to owners or operators of:

- ✓ Fleets of on-road motor vehicles that emit at least 2,500 metric tons of greenhouse gases a year in Washington. The state's largest motor vehicle fleets will meet this threshold. They include trucking and delivery fleets, rental car companies, large customer service fleets (such as phone, cable or power companies) and large government agency fleets.
- ✓ A source or combination of sources that emits at least 10,000 metric tons of greenhouse gases a year in the state. Washington's largest factories and power facilities will meet this threshold, including refineries, pulp and paper mills, cement kilns, some lumber mills, large food processors, and some entities that use fossil fuels to generate power, steam, heat or cooling. Large fleets of aircraft, marine vessels or rail equipment also must report if they emit at least 10,000 metric tons of greenhouse gases a year in the state.

## What are Greenhouse Gases (GHGs)?

Greenhouse gases are chemicals that contribute to climate change by trapping heat in the atmosphere. There are six internationally recognized greenhouse gases:

- carbon dioxide
- methane
- nitrous oxide
- hydrofluorocarbons
- perfluorocarbons
- sulfur hexafluoride

## Where do GHGs come from?

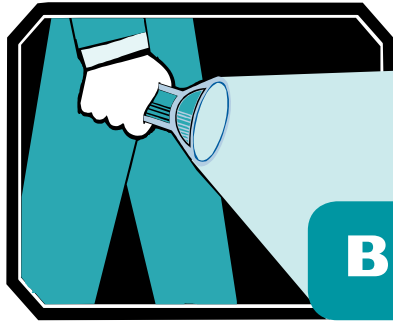
**Stationary combustion** — fuel burned to produce electricity or at manufacturing facilities (for example, using boilers.)

**Mobile combustion** — fuel burned for transportation (such as in cars, trucks, ships, trains and planes.)

**Production processes** — the manufacturing of cement, aluminum, ammonia, etc.

**Fugitive releases** — releases from the production, processing, transmission, storage, and use of fuels and other substances that don't pass through a stack, chimney, vent or exhaust pipe. Examples are the release of sulfur hexafluoride from electrical equipment or hydrofluorocarbons from air conditioning units.

**To learn more about Ecology's response to climate change, visit [www.ecy.wa.gov/climatechange/index.htm](http://www.ecy.wa.gov/climatechange/index.htm).**



# Business Spotlight

## Business Recognition Program

Every-other-year, Spokane Clean Air recognizes businesses that apply for and meet the minimum criteria for its “Doing our Share for Clean Air” recognition program. Congratulations to these facilities for their efforts!

### Gold Award Level:

Central Pre-Mix Concrete Products  
Columbia Paint  
Contemporary Fiberglass  
Custom Painting  
Cylinder Head Service  
Dishman Dodge  
Ed’s Premier Auto Body  
Pathology Assoc. Medical Labs  
Inland Asphalt  
Interstate Concrete & Asphalt  
Itron  
Sonderen Packaging  
Western Concrete Products

### Silver Award Level:

A Pro Auto Body  
A Super Store  
ADM Centennial Mills  
ALSCO  
AT&T Mobility  
Agilent Technologies  
Alliance Machine  
American Way Auto Body  
Animal Clinic of Spokane  
Barton Collision Center  
BECU  
Blue Falls USA  
BMT Metal Fab  
C & C Auto Restoration  
Can Am  
Cannon Hill Industries  
Cheney Qwik Stop  
City of Cheney

City of Spokane  
City Svc Valcon – Cheney  
Clarks Cleaners  
Comcast  
Community Colleges of Spokane  
Cooperative Supply  
Corbin Park Cleaners  
Crestline Cleaners  
Doors & Millwork  
Driscoll One Stop  
Everhart Painting  
Fairchild Air Force Base  
Five Mile Wash & Dry  
Four Lakes Grocery  
Freeborn Tool  
GCR Truck & Tire  
Garco Building Systems  
Gobees Auto Body  
Grocery Boys  
Hollister-Stier Laboratories  
Homer’s Ornamental Iron  
Husky International  
Hydrostraw  
Impact Service Corporation  
Inland Empire Distribution System  
Inland Fixture  
Jinda & Brothers  
K & M Unibody Works  
Kimmel Athletic  
L & M Truck Sales  
Lafarge North America  
Litho Art Printers  
Lloyd Industries  
Lyn Tron  
Marty Fitzgerald  
Midway Stop  
Millers One Stop  
Mitchells  
MoCo Engineering  
Moon Rock Company  
Motor Works Inc  
Mr. Touch Up  
NW Industrial Services

NW Pea & Bean  
Navy Operation Support Center  
NEW Castings Div. Travis Pattern  
Nichols Bros Body Shop  
Northwest Sandblast & Paint  
Pathology Assoc. Medical Lab  
Petrocard Systems  
Proto Manufacturing  
Raja Market  
Rich’s Gas & Deli  
River Ridge Food Mart  
S & B Mart  
Schindler’s Prosthetics  
Scollards Cleaners  
Shredfast Mobile Data Destruction  
SCRAPS  
Speedi Shoppe  
Spokane Metals  
Spokane More Mile  
Spokane Transit Authority  
Spokane Dry Cleaners  
Target Media NW  
The Factory Co Int’l  
The Gas Co  
The Woodman  
Thornhill Valley  
Tire Distribution System  
Toby’s Body & Fender  
Tresko Monument Inc  
Triple Plate Chrome  
Washington Auto Carriage  
Watson Body Shop  
Westberg’s Advanced Engine  
Western States Steel & Fab  
White Block  
Wingfoot Commercial Tire



# Air Quality Calendar

**UPDATE** is published by the Spokane Regional Clean Air Agency (Spokane Clean Air) as part of its Compliance Assistance Program. Comments, suggestions and article ideas may be directed to Update Editor Lisa Woodard.



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To receive this newsletter electronically, send your request to [lwoodard@spokanecleanair.org](mailto:lwoodard@spokanecleanair.org)

To add or remove names to the **UPDATE** mailing list, call 477-4727.

Nov. 5 Board of Directors meeting. 9 a.m., Spokane Clean Air conference room, 3104 E. Augusta Avenue. The meeting agenda is available at [www.spokanecleanair.org](http://www.spokanecleanair.org) or call 477-4727.

Dec. 3 Board of Directors meeting. See details above.

## Spokane Regional Clean Air Agency Board of Directors:

Jeff Corkill, Chair, City of Spokane Representative  
Rose Dempsey, Vice Chair, City of Spokane Valley  
Tom Brattebo, Member-at-Large  
Edward "Chuck" Crockett, Small Cities & Towns Representative  
Bonnie Mager, Spokane County Commissioner

*Preserve, enhance and protect the quality of Spokane County's air resources for the benefit of current and future generations.*

Spokane Regional Clean Air Agency's Mission

## UPDATE

Spokane Regional Clean Air Agency  
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