

# COMPLIANCE ASSISTANCE UPDATE

SPOKANE COUNTY AIR POLLUTION CONTROL AUTHORITY

**PROGRAM** An Informative Newsletter Helping Businesses Reduce Air Pollution in Spokane County

## Clean Air Programs & Funding

Our job at the Spokane County Air Pollution Control Authority (SCAPCA) is to ensure that residents of Spokane County have clean air to breathe. We do this by encouraging individuals to make clean air choices and by enforcing federal, state and local laws to control outdoor air pollution.

When we began our work in 1969, businesses and industries were the primary focus for air pollution control. Over the years, new equipment and improved operations have dramatically reduced air pollution from the commercial sector. Today, most of the air pollution comes from vehicles, with indoor and outdoor burning and gas-powered yard/recreational equipment adding to the problem.

## Engineering & Compliance Activities

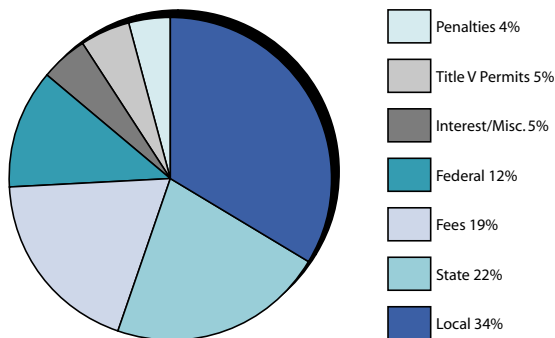
SCAPCA employs three air quality engineers who are responsible for reviewing and approving facility permit applications, reviewing facility annual testing results, maintaining emissions inventories, reviewing environmental documents and providing information related to air quality regulations.

The agency also employs four air quality specialists who are responsible for conducting on-site facility inspections and compliance assistance, enforcing air pollution regulations, and responding to citizen complaints. Below is a summary of program activity during 2006:

Existing facilities registered .....	642
New facilities registered.....	17
New source reviews—Notices of Construction (NOCs) approved.....	48
Temporary source reviews—Notices of Intent (NOI) approved.....	20
Facility inspections.....	241
Asbestos inspections .....	83
Notices of Violation (NOVs) issued....	59
Air quality complaints received .....	935

## Fiscal Year 2006

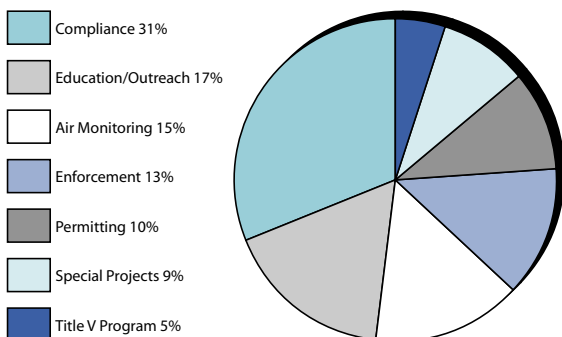
### Funding Sources:



In our work to assure clean air, SCAPCA is committed to use its resources wisely and efficiently by focusing on cost-effective programs that provide the greatest air quality benefit.

SCAPCA's budget for fiscal year 2006 is 1.8 million. Our funding comes from a variety of sources, most of it local. Spokane County and its cities and towns contribute to the work we do on behalf of their residents through an annual assessment based on a formula outlined in the state's Clean Air Act. Other funding sources include permit and registration fees from businesses, and grants from state and federal agencies.

### Program Costs:



For more information about the agency and its programs, please visit our webpage at [www.scapca.org](http://www.scapca.org) or call us at (509) 477-4727.

## Inside . . .

Source Testing Pitfalls	2
SCAPCA Board Member Changes	2
Annual Registration Program/Fees	3
Regulation & Program Update:	4
2007 Clean Air Award Recipient: Huntwood Industries	5

Preserve, enhance and protect the quality of Spokane County's air resources for the benefit of current and future generations ~SCAPCA mission

# Source Testing Pitfalls

In recent air permits issued by SCAPCA, more air contaminant sources are required to quantify their emissions or determine compliance with pollution emission limits through performance of emissions testing, otherwise referred to as source testing. These tests are performed by independent third party testing consultants who utilize United States Environmental Protection Agency reference method tests to collect, document, validate and report air emissions from facility processes.



Source tests are being performed more frequently within Spokane County, and SCAPCA has issued more notices of violation (NOV) this year for failed tests than ever in its history. Here are some things to be aware of if you are going to perform source testing at your facility.

First, it's very important to com-

municate regularly with your source tester during performance of the test. Staying informed on the status of the test, while it's being performed, helps you to stay on top of any problems, concerns or suspicious results, based on the testers expertise and knowledge.

If you find problems, concerns, failures or suspicious results, you are encouraged to contact SCAPCA immediately. We can discuss with you how to minimize the time you are (potentially) out of compliance.

If there are potential compliance issues, you may consider modifying your operations, such that you don't continue to have additional days of non-compliance. If the failure could be due to operation or maintenance of your emission source, check your system to determine if corrective actions (replacement of parts, modified operation, etc) can be taken to correct the problem observed during performance of the test.

It's important to remember that you must continue testing, even if you know that the results show non-compliance. Stopping a test solely because of a failure of one or more of the test runs is not allowed. SCAPCA is currently developing a rule containing source testing requirements. The draft rule will soon be available for review on SCAPCA's website at [www.scapca.org](http://www.scapca.org).

## Ahern and Mager Join the SCAPCA Board of Directors

There have been a couple of recent changes to the SCAPCA Board of Directors, and we'd like to introduce you the newest two members:

### Member-at-Large Position:

Melissa Ahern, Ph.D., MBA - was appointed by the SCAPCA Board of Directors to fill the Member-at-Large position. Ahern is an Associate Professor at Washington State University, Spokane, Dept of Health Policy and Administration.

"As a health economist, I am knowledgeable about the broad determinants of health, including air and water quality, and issues associated with toxicity in the environment," stated Ahern. "I believe that I can make a significant contribution to the SCAPCA Board in assuring the air quality of the greater Spokane area by providing information regarding the short- and long-term economic impacts of issues related to air quality."

### County Commissioner:

Bonnie Mager, Spokane County Commissioner, joined the SCAPCA Board in February 2007.

"It has been almost twenty years now that I have been involved with and an advocate for a healthy environment and clean air and water in particular," said Mager.

"In my mind there is nothing more important to our community than a healthy place to live. I look forward to working on the quality of our air by serving on the SCAPCA board!" added Mager.

# Annual Registration Fees Increase in 2007

*Fee increase moves agency a step closer to its goal of full cost-recovery for fee-based programs*

Facilities registered with SCAPCA will see an increase in annual registration fees in 2007, following final action by the SCAPCA Board of Directors at its December 7, 2006, public hearing.

For the last several years, SCAPCA's registration program has operated on an annual shortfall of about \$100,000. Although staff time spent on the program has remained relatively stable, the agency costs (salary/benefits/overhead) have increased, while program fees have remained unchanged for a decade or more.

"The agency is currently operating in a deficit mode. The registration fee increase is one of a couple of measures being taken to achieve our goal to recover operating costs of fee-based programs," according to Bill Dameworth, SCAPCA Director.

"The fact is, the shortfall we've been experiencing has been subsidized by local cities, towns, and county per capita assessments. Continued use of local assessments for fee-based program shortfalls is not a fiscally-responsible practice," added Dameworth.

The process to revise registration fees began in 2004, when SCAPCA's Board instructed staff to pursue a full cost recovery program. In 2005, preliminary information was gathered and in May 2006, a draft staff report was presented to the Board. From May through November 2006, three public comment periods were held and two mailings sent to registered facilities, seeking input on the proposed changes.

The chart below summarizes the fees. In summary:

- ◆ The more pollutants a facility emits, the higher its fees;
- ◆ The emission point fee, emissions fee, and Synthetic Minor/WEDS fee have increased;
- ◆ Gas stations are subject to all applicable fee categories; and
- ◆ A new WEDS fee of \$55/hour was added to more accurately recover costs of processing and reviewing WEDS associated with Synthetic Minor sources.

## *Next Proposed Fee Revisions- Air Quality Permits*

With the registration program fees finalized, SCAPCA is now pursuing revisions to fees collected for air quality permitting, called either a Notice of Construction (NOC) or Notice of Intent (NOI) approval.

NOC or NOI permits are required prior to installing new air pollution control equipment or modifying existing equipment. This permit program has been operating at an annual deficit of over \$95,000. This shortfall has been subsidized, in part, by local cities, towns, and county per capita assessments collected by SCAPCA. Some grant funds have been applied to the program in recent years. Continued use of local assessments and grant funds for fee-based programs is expected to cause an overall agency shortfall in the future. To avoid this, fees need to be adopted that achieve full cost recovery so that local assessments and grants can be applied to non-fee-based programs (e.g. air monitoring, complaint response, public education, etc.) See page 4 under "Regulation & Program" update. ■

Registration Fee Categories	Fees last revised	Former Fees	New Fees
1. Facility Fee (per facility)	1997	\$160-215	\$165
2. Emissions Fee (per ton of emissions)	1997	\$20	\$45
3. Emission Stack Fee (per stack/point)	1991/1995	\$30	\$50
4. Burn Out Oven Fee (per facility)	1995	\$150	\$200
5. Synthetic Minor Fee (per facility)	N/A	\$150	\$250
6. WEDS Fee* (per hour)	1997	N/A	\$55

*\*WEDS is Washington Emission Data System; Synthetic Minor sources must submit WEDS data.*

# Regulation & Program Update

## Proposed Changes to Air Quality Permit Fees

In December, SCAPCA staff proposed options for revising air quality permit fees (referred to as Notice of Construction and Notice of Intent approval) in order to achieve a full cost-recovery permit program. This is not to be confused with the recently adjusted fees for the Annual Registration program. Staff was directed to move forward in obtaining initial input prior to beginning the formal rulemaking process, which includes public comment period and public hearing.

Staff time spent on the program has remained relatively stable, but costs have climbed while program fees have remained unchanged for up to 15 years.

### *Tasks integral to the permit process:*

- ◆ Pre-application inquiries
- ◆ Informational site visits
- ◆ Application completeness review
- ◆ Emission calculations and modeling

- ◆ Best Available Control Technology (BACT) Determination
- ◆ Formal Review memo
- ◆ SEPA-Some projects require a review under the State Environmental Policy Act.

For more information, a detailed staff report is available online or by calling SCAPCA. Visit [www.scapca.org](http://www.scapca.org) and see listing under "Public Notices/Hearings." ■

## Ask SCAPCA

**A:** Over 600 commercial and industrial businesses, located throughout Spokane County, are registered with SCAPCA. SCAPCA Regulation I, Article IV lists sources that have been identified as having potentially significant air emissions. Businesses that fall into these categories are required to register with SCAPCA.

### **Why does SCAPCA register businesses?**

Registration ensures that facilities which generate air emissions comply with applicable regulations. It also allows SCAPCA to maintain an accurate inventory of air contaminants released into Spokane's air, since registrants must report annual emissions to SCAPCA and agree to be inspected. SCAPCA uses this information to evaluate the effectiveness of air pollution control strategies.

## Q: What types of business operations are regulated by SCAPCA and why?

### **What businesses need to register?**

Existing and new sources of air contaminants must register with SCAPCA. Each piece of air pollution control equipment used will be given specific requirements for its operation and maintenance in order to minimize emissions.

✓ **Existing Facilities** need to fill out registration forms, itemizing the processes within the facility and the vents/exhaust points to the outdoor air. Before processes or emission points are added or modified, the facility should contact SCAPCA. A Notice of Construction (NOC) and Application for Approval may be required.

✓ **New facilities** must contact SCAPCA and follow the NOC process, which also serves as the registration form for the facility. {Additional permits may need to be obtained from other agencies, including city and county planning/zoning departments.

SCAPCA will gladly assist facilities with the registration and Notice of Construction process.}

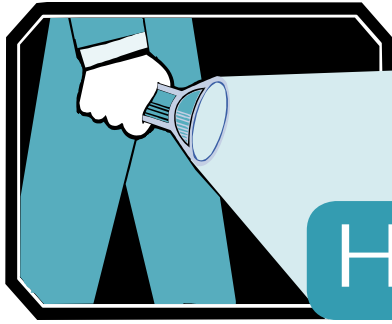
### **What does a business need to report?**

Businesses are required to report annually and provide information about the source's location, size, operating hours, kinds of processes, throughputs, air contaminant emissions and other information relevant to air pollution.

### **Does SCAPCA inspect businesses?**

Yes. Regular inspections of registered sources are conducted to verify compliance with existing air pollution regulations. In addition, facilities that are not currently registered with SCAPCA are inspected in order to determine if they need to be registered.

For more information, contact SCAPCA: 477-4727 or online at [www.scapca.org](http://www.scapca.org). ■



# 2007 Clean Air Award Recipient

## Huntwood Industries

**H**untwood Industries is the recipient of the 2007 Clean Air Award. The award is presented annually by SCAPCA to an organization that has consistently demonstrated a commitment to reduce air emissions.

Huntwood Industries is a large cabinet manufacturing facility in Liberty Lake. Their recent and significant investment in air pollution control equipment has resulted in an annual air emissions reduction of 250 tons.

In 2006, Huntwood Industries moved their operations from the Spokane Industrial Park--where they had operated for 18 years--to a new 560,000 square foot facility in Liberty Lake. The facility is the largest cabinet manufacturing plant in the western US and among the 20 largest in the country.

Huntwood's several hundred employees cut, finish, and assemble 1,000 cabinets each day. As part of the cabinet making process, a coat of stain or glaze, a topcoat, and a sealant is spray-applied to each cabinet, in enclosed booths. Herein lies the air quality concern. Stains, coatings and sealants contain volatile organic compounds (VOCs) evaporate readily to the air. VOCs contribute to the formation of ground-level ozone

pollution. Ozone pollution is a concern in the Spokane-area, with summer peak levels approaching current clean air standards.

When designing and constructing their new facility, Huntwood made a large investment in the purchase and installation of two Regenerative Thermal Oxidizers. These oxidizers control VOCs and toxic air pollutants from 17 paint booths and associated ovens at the facility.

Each thermal oxidizer contains two porous beds, filled with high temperature ceramic heat transfer media. The exhaust air from the paint booths and ovens is preheated in the first bed and then passes through a central combustion chamber where the VOCs and toxic air pollutants are heated to ~1500 F and oxidized to carbon dioxide and water vapor. The air then exits through the second bed where heat is transferred from the hot air back into the bed. The gas flow direction is changed automatically every 4 minutes to maintain an even temperature between the two beds in the thermal oxidizer.

The natural gas Thermal Oxidizers destroy over 99% of the emissions produced by the coating process.

This translates to a reduction of over 250 tons of pollutants from being emitted into our airshed.



*Tim & Resa Hunt, of Huntwood Industries, recipient of the 2007 Clean Air Award, presented by SCAPCA at a ceremony in January.*

SCAPCA recognizes Huntwood Industries for their commitment to reduce emissions, which benefits the entire community. As the 2007 Clean Air Award recipient, your hard work and dedication to improve air quality is commended. ■

# Air . Quality . Calendar

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

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**[www.scapca.org](http://www.scapca.org)**

Mar 1: SCAPCA Board of Directors Meeting, 9 a.m., Commissioners Hearing Room, Lower Level, Spokane County Public Works Building, 1026 W. Broadway Avenue. Meeting agendas and minutes are available at [www.scapca.org](http://www.scapca.org).

Mar. 21: Extended deadline to submit written comments on the proposed regulation changes to air quality permit fees (Notice of Construction/Notice of Intent) prior to the public hearing, tentatively scheduled for June 7, 2007, at the SCAPCA Board of Directors meeting. Check SCAPCA's website for future updates. Send written comments on or before March 21, 2007, to: Matt Holmquist, SCAPCA, 1101 W. College Ave., #403, Spokane, WA 99201 or email: [mgholmquist@scapca.org](mailto:mgholmquist@scapca.org).

Apr. 5: SCAPCA Board of Directors meeting, see details above.

## Spokane County Air Pollution Control Authority 2007 Board of Directors:

Jeff Corkill, City of Spokane Representative, Chair  
Mike DeVleming, City of Spokane Valley Representative, Vice Chair  
Melissa Ahern, Member-at-Large  
Bonnie Mager, Spokane County Commissioner  
Matthew Pederson, Small Cities & Towns Representative

*This newsletter is available electronically via SCAPCA's website. To add or remove names to **UPDATE** mailing list, call 477-4727, ext. 115.*

## **UPDATE**

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*working together for clean air*