Answers to common questions asked of Kansas SBEAP

Will my business be affected by the new air regulations?

Several factors, including location, type(s) and amount(s) of emissions, and type of business determine whether or not you're regulated.

The Clean Air Act Amendments of 1990 regulate emissions for 189 hazardous air pollutants (HAP), ozone depleting substances (e.g., CFCs), sulfur and nitrogen oxides, small particles (diameter of 10 microns or less), and volatile organic compounds (VOC). Air permits are based on the facility's potential emissions.

A major source of air pollution is one that has potential emissions of 100 or more tons per year of SO_X, NO_X, PM10, or VOC, or 10 or tons or more per year of any single HAP or 25 tons or more per year of any combination of HAP.

Additionally, 174 industrial categories such as dry cleaners, chromium electroplaters, and degreasers are regulated under separate guidelines (National Emissions Standards for Hazardous Air Pollutants or NESHAP).

These specific industries and processes are regulated separately because they pose significant public health hazards. Since metropolitan Kansas City had poor air quality in the past, Johnson and Wyandotte Counties have stricter air regulations than the rest of the state. Kansas City, Missouri has regulations similar to the Kansas counties.

If you're currently unregulated, and not subject to a NESHAP, calculate your total emissions to see whether or not regulations affect you. Contact SBEAP for specific information on your operation.

A summary of the Clean Air Act Amendments and federal requirements, including lists of regulated materials and industries is available from SBEAP.

What is potential-to-emit?

The federal definition of potential-to-emit (PTE) is: "The maximum capacity of a stationary source to emit a pollutant under its physical and operational design...."

Since permits are based on your facility's potential emissions, they must be calculated in addition to your actual emissions.

Key assumptions that must be used when calculating PTE are:

- Each process is operated at 100 percent of capacity.
- The material you use that emits the most pollutants, is used 100 percent of the time.
- All of the equipment is operated 24 hours a day, 365 days a year (8,760 hours a year).
- No pollution control equipment is used.

If potential emissions are above the major source thresholds, you will need some type of air permit. Contact SBEAP for assistance in calculating PTE.

How do I calculate emissions?

For solvent evaporative sources (users of paints or solvents), emissions equal the amount of VOC or HAP used in the process (the amount purchased minus the amount recycled, hauled away, or still in inventory).

You can find the amount of VOC or HAP in your materials from the material safety data sheets (MSDS). If you need to calculate emissions from a boiler or other source, call SBEAP at 800-578-8898.

I'm considering changing my painting operations because of regulations. What's the best alternative?

Alternatives to conventional spray painting include high-volume low-pressure (HVLP) equipment, electro-

static systems, powder coat systems, and alternate paint formulations.

The best alternative for your operation depends on the application, type and number of parts being painted, and capital available, as well as other factors.

SBEAP has several related documents available such as a self-audit checklist, descriptions of painting technologies, and a list of equipment and paint vendors. SBEAP specialists can answer individual questions by phone or come and visit your company to help identify opportunities for preventing pollution.

We put our used paint filters in the dumpster. Is that OK?

It depends on the paint. In order to go to a sanitary landfill, dried filters (or empty cans) must pass the toxic characteristic leaching procedure (TCLP) test.

This assures that there is nothing in the paint that will escape the landfill and get into ground water.

In some cases, your vendor can tell you whether or not your paint will pass the TCLP, based on the constituents of the product. It's important to segregate wastes that will and will not pass TCLP.

Make sure that the filters are completely dry before putting them in the dumpster. Spontaneous combustion commonly occurs when paint filters are surrounded by trash in a dumpster. For further information, contact SBEAP.

What can we do with used oil and antifreeze?

Used oil can be taken by oil collecters who recycle it for energy or material recovery.

Such oil is not subject to hazardous waste regulations. Contact SBEAP for a partial list of oil collectors.

Oil generated by a facility or collected from households can be burned in the facility's space heater. However, if facility "A" does not have an oil burner, they cannot take their oil to facility "B" and let facility "B" burn it in their burner. If you burn used oil in an industrial boiler or furnace or sell it to someone who is burning it, you are required to notify KDHE.

Check with your local publicly owned treatment works (POTW) about disposal of antifreeze. Many can handle small quantities. For larger facilities, recycling is a viable option.

When do dry cleaners have to be in compliance with the NESHAP?

All facilities must have a pollution prevention (P2) program implemented right now.

The pollution prevention program covers leak inspection, storing perchloroethylene (PCE) in closed containers, filter drainage, and keeping machine doors closed.

The compliance date for existing facilities is September 22, 1996.

Whenever you get a new machine or control device for an existing machine, you have essentially changed your status from existing source to new source. You must be in compliance immediately with the pollution prevention, control, and monitoring requirements.

When you make a modification (presumably to meet requirements of the NESHAP), you must start complying with all aspects of the NESHAP.

SBEAP has a manual and pamphlet available for dry cleaners. Call 913-864-3968 for your copies.

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SBEAP's mission is to help Kansas small businesses comply with clean air regulations. SBEAP operates through a consortium of The University of Kansas, Kansas State University and Wichita State Unviersity. This fact sheet was published by KSU's Pollution Prevention Institute. For more information, call 800-578-8898 or e-mail SBEAP@ksuvm.ksu.edu. The University of Kansas, Kansas State University and Wichita State University are EEO/AA providers.