



# COMPLIANCE & PREVENTION

## *quarterly*

Spring 2009

A Publication of Ohio EPA, Office of Compliance Assistance and Pollution Prevention

### New Ohio Air Regulations for Controlling VOC Emissions

The Ohio EPA Division of Air Pollution Control (DAPC) recently enacted new and amended rules to control volatile organic compounds (VOCs) emitted by certain industrial processes in the Cleveland/Akron and Dayton/Cincinnati metropolitan areas. These rules follow U.S. EPA's guidance for reasonably available control technologies (RACT) and will help reduce ground-level ozone pollution.

These rule changes became effective on April 2, 2009. In most instances, facilities with affected operations that were installed before April 2, 2009, have one year, or until April 2, 2010, to demonstrate compliance. Operations installed on or after April 2, 2009, must comply with the new rules upon startup.

In the Cleveland/Akron area (Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage and Summit counties), the regulations limit VOC emissions from the following processes:

- printing;
- commercial motor vehicle/mobile equipment refinishing;
- industrial solvent cleaning; and
- surface coating operations for paper, metal furniture, large appliances and flat wood paneling.

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### KEY POINTS FROM THIS ISSUE

- New air rules for VOCs took effect April 2**
- Nominations for environmental stewardship awards due June 19**

In the Dayton/Cincinnati area (Hamilton, Butler, Warren, Clermont, Greene, Montgomery, Clark and Miami counties), the existing rule for cold cleaners (degreasing) was amended to include additional exemptions. In addition, the existing rule for commercial motor vehicle/mobile equipment refinishing operations was amended.

The following is a brief summary, by rule, of most of the new changes:

#### **Paper coating lines - OAC rule 3745-21-09(F)**

Facilities with a potential to emit 25 tons or more of VOCs must now have add-on control systems such as thermal oxidizers or use coatings that meet VOC per-gallon limitations. In addition, specific work practices are required to reduce VOC emissions from cleanup activities.

#### **Surface coating of metal furniture - OAC rule 3745-21-09(I) and Surface coating of large appliances - OAC rule 3745-21-09(K)**

Amendments expand the types of coating categories and corresponding allowable VOC per gallon limitations for those coatings. In addition, each rule specifies allowable types of coating application equipment and requires work practice standards for handling coatings and cleanup materials.

#### **Cold cleaners (i.e., unheated solvent cleaning tanks) - OAC rule 3745-21-09(O)**

This rule, previously applicable only in the Dayton/Cincinnati area, has been expanded to include the Cleveland/Akron area. The solvent material employed in a cold cleaner must have a vapor pressure that **does not** exceed 1.0 millimeters of mercury measured at 20 degrees Celsius (68 degrees Fahrenheit). In addition, the rule contains new exemptions for cleaning metal parts subject to requirements under FDA, FAA or DoD specifications.



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### **Flexographic, packing rotogravure and publication printing lines - OAC rule 3745-21-09(Y)**

Facilities with a potential to emit 25 tons or more of VOC must now either have add-on control systems such as thermal oxidizers to reduce VOC emissions or use low VOC-content inks and coatings. The required overall VOC control efficiency varies between 65 and 80 percent, depending on the installation dates of the press and control equipment.

### **Commercial motor vehicle and mobile equipment refinishing operations - OAC rule 3745-21-18**

This rule, previously applicable only in the Dayton/Cincinnati area, has been expanded to include the Cleveland/Akron area. The rule applies to industries that refinish (non OEM) passenger cars, trucks, vans, motorcycles and other mobile equipment capable of being driven or drawn on the highway. Industries need to comply with coating VOC per gallon limits, use HVLP or equivalent spray guns, employ non-atomizing gun-cleaning techniques and follow work practices for material handling and storage.

### **Lithographic and letterpress printing facilities - OAC Rule 3745-21-22**

This new rule applies to offset lithographic printing and letterpress printing facilities that emit three or more tons of VOCs per year. Heat-set presses that have the potential to emit 25 tons or more of VOCs must now use add-on control systems such as thermal oxidizers. Lithographic presses must meet specific VOC content limits for fountain solutions and all presses must minimize emissions from cleanup operations.

### **Industrial solvent cleaning operations - OAC Rule 3745-21-23**

This new rule applies to solvent cleaning operations at facilities in the Cleveland/Akron area. The rule specifies VOC content limitations for the solvents used in:

- product cleaning during manufacturing process;
- surface preparation for coating, adhesive or ink application;
- repair and maintenance cleaning; and
- cleaning of coating, ink or adhesive application equipment.

The rule requires the use of non-atomizing cleaning methods unless a control system is employed. The rule also contains a number of exemptions for specific types of solvent cleaning operations.

### **Flat wood paneling coatings - OAC Rule 3745-21-24**

This new rule applies to manufacturers of wood paneling, siding, hardboard and similar products. The rule contains VOC per gallon limitations for coatings, specifies the types of coating application equipment that can be used and requires work practice standards to reduce VOC emissions.

The rules and definition of terms used in the rules can be found online at [www.epa.state.oh.us/dapc/regs/regs.html](http://www.epa.state.oh.us/dapc/regs/regs.html).

## **Nominations Sought by June 19 for Ohio Environmental Stewardship Awards**

Want to be recognized as a leader in promoting sound environmental practices?

Have an environmental success story or achievement to share?

Ohio EPA is announcing the Ohio Awards for Outstanding Achievement in Environmental Stewardship to recognize companies and organizations committed to compliance and making outstanding achievements in reducing pollution. Ohio EPA is seeking applicants who show a commitment to environmental stewardship through:

- A sound track record of environmental compliance and a commitment to go above and beyond regulations to improve environmental performance;
- A mature Environmental Management System (EMS) or integration of EMS-related principles into core business functions;
- Aggressive environmental performance goals; and
- A process for communicating with the local community about program activities and progress toward performance goals.

The awards are open to any business, industry, trade association, professional organization or local government of Ohio. Nominations are requested by June 19, 2009.

In order to encourage small businesses (companies with 100 employees or less) to apply for the awards program and complete environmental stewardship activities, 10 percent will be added to the score for five of the awards criteria.

Please contact the Ohio EPA Office of Compliance Assistance and Pollution Prevention for more information by e-mail at [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us) or by phone at (800) 329-7518 or (614) 644-3469. You can visit our Web site at [www.epa.state.oh.us/ocapp/stewardship.html](http://www.epa.state.oh.us/ocapp/stewardship.html) for additional details including eligibility criteria and nomination instructions.

## **National Partnership for Environmental Priorities**

The National Partnership for Environmental Priorities (NPEP) is a voluntary U.S. EPA partnership program that encourages organizations to reduce the use or release of 31 priority chemicals. U.S. EPA provides links to technical and training assistance services and public recognition for participants' efforts. Public recognition includes:

- Enrollment plaques and ceremony at facility;
- Achievement award and national recognition ceremony;
- Information about your organization and your project goals and achievements are posted on U.S. EPA's Web site; and
- Upon request, U.S. EPA will notify your local media of your program accomplishments.



## Sustainability Implementation Groups in Northeast Ohio

Entrepreneurs for Sustainability (E4S), a nonprofit economic development organization based in Cleveland, has attracted more than 6,600 leaders from all sectors of the economy who are interested in saving money, reducing their environmental impact and ensuring prosperity for the region.



Both public and private organizations can join this initiative, including industry, businesses, municipalities, federal facilities and universities. Eligibility is determined by a U.S. EPA review of your organization's NPEP goals to ensure they result in a meaningful improvement to the environment and a review of past environmental enforcement activities. All reporting is done voluntarily. Participants must submit a success story highlighting their achievements to receive recognition for completing their goals.

The initiative has more than 220 participants that have achieved more than 9.5 million pounds of reductions. Additional information on the National Challenge Commitment for Priority Chemicals of the NPEP is at [www.epa.gov/npep](http://www.epa.gov/npep) or by contacting U.S. EPA's Janet Haff at (312) 353-7923 or [haff.janet@epa.gov](mailto:haff.janet@epa.gov). The list of the 31 priority chemicals for the NPEP is at [www.epa.gov/epawaste/hazard/wastemin/priority.htm](http://www.epa.gov/epawaste/hazard/wastemin/priority.htm).

In 2005, E4S launched a new learning program for business and organizational leaders who desired an integrated strategic plan for sustainability. The program, Sustainability Implementation (SI) Groups, is an action-focused, peer-based learning process that results in a peer-reviewed strategic plan for implementing sustainable business practices. SI Group participants follow an implementation process and project framework that focuses on opportunities in buildings, operations, products and services, markets, company culture and community. The program spans eight sessions with participants meeting monthly to explore opportunities in areas such as waste elimination, energy efficiency, green building and sustainable procurement. Each group consists of 3-5 leaders from 7-10 businesses. To date, more than 40 organizations have participated in seven SI Groups.

Most importantly, SI Group participants are setting the example for other businesses in the region. Mark Schwerdtfeger, a 2008 SI group member, achieved outstanding waste reductions and cost savings at GOJO Industries in Akron and is now directing sustainability implementation at Heinz Frozen Foods in Massillon. According to Mark, GOJO Industries was able to reduce its overall solid waste generation 50 percent by utilizing innovative approaches such as arranging by-product synergy. For example, GOJO works with The Little Tikes Company, which uses GOJO mixed plastic waste to produce playground equipment.

GOJO also saved \$170,000 by donating previously landfilled waste soap to the Akron-Canton Regional Foodbank. The annual cost of waste soap disposal had been \$300,000. Toiletries such as soap and shampoo cannot be purchased with food stamps. By collaborating with the Foodbank, the product is repackaged and provided to Ohioans in need.

To learn more and to register for an upcoming E4S SI Group, please visit [www.e4s.org](http://www.e4s.org).

OCAPP intends to do more in-depth reporting of sustainable business practice success stories by Ohio businesses in the near future. If your company would like to be highlighted for leadership in achieving waste reductions and cost savings through sustainability implementation, please contact Ron Smith at [ron.smith@epa.state.oh.us](mailto:ron.smith@epa.state.oh.us) or (614) 644-2813.

## OCAPP Releases Tox-Minus Activities Report

Ohio EPA started the Tox-Minus initiative in October 2007 as a proactive and cooperative way to work with Ohio business and industry to reduce toxic chemical releases. As a first step, Director Chris Korleski asked 100 of the top Toxic Release Inventory (TRI) reporters for 2005 to identify, evaluate and implement strategies to reduce waste, air and water-related TRI emissions. The initiative's name reflects a long-term goal of moving Ohio down in the TRI listings, which will help enhance our image as an environmentally proactive, yet economically competitive state.



Participation is voluntary. There are no penalties or enforcement associated with the program. Companies participating in Tox-Minus establish their own goals for reducing TRI chemical releases and other wastes.

Ohio EPA's Office of Compliance Assistance and Pollution Prevention coordinates the Tox-Minus initiative. Companies participating in the program submitted their first updates on their activities related to Tox-Minus during 2008. A new report compiling that information is now available at [www.epa.state.oh.us/ocapp/tox-minus.html](http://www.epa.state.oh.us/ocapp/tox-minus.html).

## Interested in a Statewide Sustainability Resource Network?

The growth in interest of implementing sustainable operating/development principles has many Ohio businesses and other organizations scrambling for information, resources and partners. Would your organization be interested in learning and sharing as part of a larger regional or statewide sustainability network? If so, please contact Ron Smith at [ron.smith@epa.state.oh.us](mailto:ron.smith@epa.state.oh.us) or (614) 644-2813.

### Need Help?

Ohio EPA's Office of Compliance Assistance and Pollution Prevention is a non-regulatory program and one-stop location for information about environmental requirements, compliance concerns and pollution prevention. Services are free. Contact us at (800) 329-7518 or (614) 644-3469.

### How You Can Make a Difference

You can make the publication of *Compliance and Prevention Quarterly* more environmentally friendly. E-mail the Office of Compliance Assistance and Pollution Prevention at [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us) to request that we send you an electronic copy, an Adobe Acrobat PDF file or a message that indicates the newest version is now available on the Web. It's that easy to make a difference.

#### Compliance and Prevention Quarterly

Published by Ohio EPA's  
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