COMPLIANCE MATTERS
Spring 2019

AIR EMISSION INVENTORY DUE END OF JUNE

The Emission Inventory for Georgia facilities is due to the Georgia Environmental Protection Division (GAEPD) by **June 30, 2019**. This is for the mandatory reporting of facility emissions that occurred in calendar year 2018. This is part of the US Environmental Protection Agency's (USEPA) National Emissions Inventory (NEI). The NEI is developed during three-year cycle reporting periods, where all Title V (or Part 70) permitted sources will be required to report at least every third year. The other two years only comprise larger sources with greater emission potentials. The 2017 emission inventory required **all** Title V sources to report. The 2018 inventory due this year, and the 2019 inventory that will be due in 2020, is for the larger Title V sources **only**.

The NEI is a comprehensive and detailed estimate of air emissions released by the USEPA every three years, compiled from data submitted by the State, Local, and Tribal air agencies. This data is used by the agencies for rule development, attainment/nonattainment designations, and State Implementation Plans (SIPs) for attainment and maintenance of the National Ambient Air Quality Standards (NAAQS). This data is also used for Prevention of Significant Deterioration (PSD) permit reviews. As part of the PSD Review, the source must show that the proposed project does not cause significant deterioration to the NAAQS. As part of this review, air modeling is often required which will utilize the emission inventory for a 50 km radius around the subject property.

The State, Local, and Tribal air agencies are required to submit the emission inventory data to the USEPA for a given calendar year, by the end of the following calendar year. For example, the 2018 data is due by the end of 2019. When an inventory is due to the State (or, where applicable, Local) air agency is left up to that agency. Therefore, due dates for a given facility are dependent on the location of the facility. The GAEPD sets the due dates for all applicable GA facilities as June 30th every year. Most other states set a due date somewhere during the 1st or 2nd quarter of a calendar year.

For the GAEPD Emission Inventory due this year, the reporting threshold is based on potential emission thresholds as identified in the Table 1.

To determine if your facility is required to report this year, you must know the facility's Potential to Emit (PTE). PTE is the maximum capacity of a source to emit any regulated air pollutant under its physical and operational design. This is calculated as if the source were to operate for 24 hours/day, 365 days/yr (a total of 8,760 hours/yr). If you are not sure of the potential to emit for your facility, a good place to check would be a review of your facility's most recent Title V Application. Another source would be the Permit Narrative issued by the GAEPD with your facility's current permit. Air permits and narratives for Georgia facilities can be searched for on the GAEPD's Georgia Air Permit Search Engine: http://permitsearch.gaepd.org/.

TABLE 1: Calendar Year 2018 Potential Emission Thresholds for all facilities in Georgia

Pollutant	Thresholds (tons per year)	Atlanta Nonattainment (tons per year)
SO_x	2500	2500
VOC	250	250
NO_x	2500	2500
CO	2500	2500
PM_{10}	250	250
$PM_{2.5}$	250	250
NH_3	250	250

Source: https://epd.georgia.gov/air/submit-emissions-or-facility-inventory

The emission inventory for GA is entered and submitted through the Georgia Environmental Connections Online (GECO) website: https://geco.gaepd.org/. Through this system, you will enter your applicability for the emission inventory. If it is determined that you are required to submit an emission inventory, you will be required to enter in the process and emission points and associated annual emissions into the system.

Conversion Technology Inc. (CTI) has decades of experience in completing emission inventories for many State and Local air agencies. If you need help in determining if your facility is subject to the Emission Inventory or in completing the emission inventory, please contact us at (770) 263-6330 or cti@conversiontechnology.com.

HAZWOPER REQUIREMENTS FOR SMALL QUANTITY GENERATORS

In order to keep employees safe while handling hazardous waste, the Occupational Health and Safety Administration (OSHA) has developed the Hazardous Waste Operations and Emergency Response Standard (HAZWOPER), written in 29 CFR 1910.120. These regulations identify information and training requirements that facilities must comply with to keep employees safe during emergency response involving hazardous chemicals.

Facilities who are considered to be Small Quantity Generators (SQGs) generate 100 kilograms or less per month of hazardous waste. Even though these facilities handle smaller amounts of hazardous waste than Large Quantity Generators (LQGs), they must comply with some requirements listed in the HAZWOPER standard. SQGs must comply with paragraph (p)(8) of the HAZWOPER standard, which states that if the facility requires employees to engage in emergency response, the facility must prepare and implement a written emergency response plan. This emergency response plan should include procedures for handling emergency incidents involving hazardous chemicals handled on site, including:

- ❑ Pre-emergency planning and coordination with outside parties;
- ❑ Personnel roles, lines of authority, and communication;
- ❑ Emergency recognition and prevention;
- ❑ Safe distances and places of refuge;
- ❑ Site security and control;
- ❑ Evacuation routes and procedures;
- ❑ Decontamination procedures;
- ❑ Emergency medical treatment and first aid;
- ❑ Emergency alerting and response procedures;
- ❑ Critique of response and follow-up;
- ❑ PPE and emergency equipment.

Paragraph (p)(8) also states that emergency response employees are required to be trained before they are called upon to perform in real emergencies. This training should include elements of the facility's emergency response plan, standard operating procedures for emergency response, and what personal protective equipment (PPE) should be worn. The facility should certify that these employees have attended and completed this training annually.

In addition to these requirements, **ALL FACILITIES** that have employees who are engaged in emergency response, no matter where it occurs, must comply with paragraph (q) of the HAZWOPER standard. Paragraph (q) outlines the requirements for a site-specific Incident Command System (ICS). All members of a facility's ICS must receive specific training depending on their response category. These categories include:

First Responder (Awareness Level): These are the employees who are likely to witness or discover a hazardous substance release, but will only notify proper authorities of the incident. Awareness-Level First Responders must be given basic training that outlines what hazardous substances are and what risks are associated with them. Training should also ensure that these first responders understand their role and know to seek additional resources and make appropriate notifications to the communication center in the event of an emergency.

First Responder (Operations Level): These are the employees who will respond to releases of hazardous substances as part of the initial response in order to protect nearby people, property, or the environment. These first responders should be trained to respond to a release in a defensive fashion without trying to stop the release. Operations-Level First Responders must receive at least 8 hours of training that includes knowledge of basic hazard and risk assessment techniques, how to use and select proper PPE, and know how to perform basic control, containment, or confinement operations within the capabilities of the resources available to them.

Hazardous Materials Technicians: These are the employees who will respond to a release of hazardous substance with the intent of stopping the release using plugs, patches, or other methods. Hazardous Materials Technicians must receive at least 24 hours of training that includes how to use survey instruments and equipment, how to use and select specialized PPE, how to perform containment, control, and decontamination procedures, and understand basic chemical and toxicological behavior of hazardous materials.

Hazardous Materials Specialists: These are the employees who will provide support to Hazardous Materials Technicians. Specialists have similar duties to technicians, but should have more specific knowledge about the hazardous materials. Hazardous Materials Specialists are required to receive at least 24 hours of training on the same level as Hazardous Materials Technicians, along with having an understanding of additional information regarding hazardous materials and how to properly address a release.

On-Scene Incident Commander: This is the employee who will assume control of the incident scene behind the first responders. The Incident Commander should be competent in implementing the facility's ICS and ERP and should understand the risks and hazards faced by employees working with hazardous materials. The On-Scene Incident Commander must receive at least 24 hours of training.

Continued on Page 3

CHANGES TO NFPA CONBUSTIBLE DUST STANDARDS

The National Fire Protection Association (NFPA), is an organization tasked with developing and maintaining fire protection and life safety standards in the United States and worldwide. In addition to subjects such as sprinkler design, flammable liquid storage, and emergency exit requirements, NFPA has standards that deal specifically with combustible dust; a topic that CTI has been focused on for over a decade. There are several NFPA Standards that address combustible dust: NFPA 652 – *Standard on the Fundamentals of Combustible Dust*, is the overarching standard that applies to all facilities, and there are also several commodity-specific dust standards (e.g. 61 for agricultural and food, 664 for wood products, 484 for metals). CTI is a principal member of the NFPA 61 Technical Committee for Agricultural Dust and has worked with several of the other committees. All of these standards are changing, and CTI is here to help our clients understand what that will mean for them.

The individual dust standards do not always align, and the presence of numerous, competing standards can create confusion and increase risk at facilities that handle combustible dust. NFPA 652 was the first step in creating a single, unified combustible dust standard that would apply to all facilities that handle potentially combustible dusts. The most recent edition of NFPA 652 was issued in May 2018. Officially, it is the 2019 edition, as NFPA standards are much like cars in that the next year's model comes' out the year before. There were several specific changes to the standard: the deadline for facilities to complete Dust Hazard Analyses (DHA) was moved to **September 7, 2020**; DHAs are now required to be reviewed and updated **every 5 years**; and a much greater detail has been added to housekeeping requirements. However, the most important change to NFPA 652 was the reorganization of the chapters to prepare for the consolidation of the multiple dust standards into a single standard. A simple take-away on the changes to the NFPA 652 standard is as follows:

The commodity specific standards (with the exception of NFPA 484) are all nearing the end of their current revision cycle, and the 2020 editions should be coming out later in 2019. The primary change to the commodity standards is that they are all being realigned to match the new layout of NFPA 652. The ultimate goal is for Chapters 1 – 8 of the each of the dust standards to be identical, and Chapter 9 will be where the industry and commodity specific details are addressed. It is still somewhat uncertain, but the methods of aligning the chapters of most of the commodity standards is to accomplish NFPA's goal of having one single combustible dust standard that covers the basics in the first eight chapters, and then has individual chapters that address each of the diverse industries currently covered by their own standard.

CTI has decades of experience in identifying and reducing hazards from combustible dust. We offer the following, and many more, consulting services for dust:

- ❑ Dust Hazard Analysis
- ❑ Hazardous (Classified) Location Determination
- ❑ NFPA and OSHA Compliance Review
- ❑ Explosion Protection Design and Selection
- ❑ Dust Sampling Plan and Execution

Please feel free and contact us to discuss the above-mentioned services or if you have any questions regarding the dust hazard present at your facility.

CONTINUED FROM PAGE 2: HAZWOPER REQUIREMENTS FOR SMALL QUANTITY GENERATORS

Refresher training for all categories of emergency responders must be given on an **annual basis**.

In addition to these specific categories, support personnel who are skilled in the operation of certain equipment and may be needed to perform immediate emergency support or may be exposed to hazards at an emergency response scene should be given an initial briefing prior to their participation in any emergency action. This briefing should include instruction in how to wear appropriate PPE, what chemical hazards are involved, and what duties are to be performed. Also, specialist employees who work with and are trained in the hazards of specific hazardous substances who are likely to be called to provide technical advice or assistance in event of a release of hazardous substances must receive training or demonstrate competency in the area of their specialization annually.

If you have any questions about what HAZWOPER requirements your facility is required to comply with, please feel free to contact us at (770) 263-6330, or by email at cti@conversiontechnology.com.

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In This Issue:

- ❑ Air Emission Inventory Due End of June
- ❑ HAZWOPER Requirements for Small Quantity Generators
- ❑ Changes to NFPA Combustible Dust Standards
- ❑ News You Can Use/Upcoming Events

News You Can Use

Facilities that are looking to increase your workforce with robots, but need some help identifying what your responsibilities are for ensuring the safety of the surrounding employees, be on the lookout for Technical Report RIA TR.706-2019 coming out by the end of the year. This technical report will specify user guidance information as required by ANSI/RIA R15.06-2012. CTI's Adam Haroz is an associate member on the R15.06 rulemaking committee and has had input on the preparation of this technical report.

Upcoming Events: (For More Information Check our Website)

- ❑ **June 11th** — NFPA Combustible Dust Standards Webinar @ 12PM EST.
- ❑ **June 18th** — Combustible Dust Seminar in San Antonio, TX. Brian Edwards will be speaking on Combustible Dust Hazard Analysis and NFPA Standards.
- ❑ **June 19th** — Come say hello to Adam Haroz, one of CTI's Engineering Managers, as he will be speaking at this years Region IV VPPPA Conference in Chattanooga, TN