



Clean Air News

Fall 1999 Vol 2 No. 2

"...to preserve, enhance and protect
the quality of our region's air resource..."

"Hi there! I'm from the government
and I'm here to help you!" Read on
and you will see that it is
the truth!"

Well, it's time again for that inspection from the nice folks at the Southwest Air Pollution Control Authority. What should you expect from this year's inspection? Should you call your attorney, lock the door and turn out the lights, put up a sign that says "Closed Forever", turn the dogs loose, or all of these?

The correct answer is: *None of the above.*

SWAPCA's mission is to preserve, protect and enhance the quality of our region's air quality for the benefit of current and future generations in Clark, Cowlitz, Lewis, Skamania and Wahkiakum Counties, a mission which we take very seriously.

As part of the effort to accomplish this mission, SWAPCA conducts routine inspections that have several components. Some companies are inspected once per year, while some are inspected every other year. There are even some facilities which receive quarterly inspections. There are currently over 650 facilities which are inspected by SWAPCA staff.

The Inspection Process

- ✓ One of the goals of the inspection is to assist you and your company in understanding the rules governing air pollution in general, and which rules in particular that you need to follow. The inspection is a good time to ask the inspector about upcoming regulatory changes that will affect your business. The inspector will be able to advise you of pending regulatory changes. While our inspectors are trained only in the rules governing air pollution, they may also be able to provide information on who to contact at the Department of Ecology, or county agency, in regards to water, hazardous waste, or other environmental issues.
- ✓ A second component of the inspection is determining compliance with applicable SWAPCA regulations and Orders of Approval issued by the agency. Most businesses have a relatively small number of SWAPCA regulations for which to maintain compliance.
- ✓ The compliance status of the company is determined by reviewing records on file at SWAPCA, reviewing operation and maintenance (O/M) records at the facility, and a walk-through inspection. During the on-site inspection, the inspector will check the on-site equipment, processes, and air pollution control equipment with the list of approved equipment.
- ✓ Operating conditions of equipment will also be noted, such as the pressure drop on a baghouse, scrubber or spraybooth. Some equipment and processes may have limits on temperatures, pressures, feed and flow rates, and the like. It is crucial that gauges on equipment be maintained in good working condition so that there are no questions concerning the compliance status of the equipment or process.
- ✓ O/M logs and records will also be reviewed. You should periodically review the Orders of Approval for the operating information which is required to be recorded. The O/M log documents the continuing compliance of your facility during the entire year.
- ✓ The third major component of the inspection is to collect all evidence necessary to confirm compliance or non-compliance. Should the inspector find a violation of either a regulation or a condition of the Order of Approval, a Field Notice of Correction (FNOC)/Field Notice of Violation (FNOV) will be issued, usually during the inspection. The FNOC/FNOV will describe the nature of the violation.
- ✓ After the inspection, the inspector will prepare a detailed Source Inspection Report describing the facility operations, emission units, inspection observations, emission summary and a compliance summary section which will summarize applicable regulatory requirements and operating conditions. The facility will receive the Source Inspection Report when it is completed so that it is possible for the company to know all of the observations and facts associated with the inspection.

Whew! I'm glad that's over!

For some companies, the only time they think about SWAPCA and air pollution regulations is when the SWAPCA inspector shows up for the inspection. Or, when the inspector observes a violation during a routine pass by of the facility. You should consider your inspector, and SWAPCA, as a resource to aid you in maintaining compliance.

Remember, clean air is the goal. Compliance with air pollution regulations goes a long way in maintaining the quality of our air. Compliance involves you, your company, and SWAPCA working together. We are from the government and we are here to help you!

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Southwest Air Pollution Control Authority

Definition of Terms

Ambient Air:

The surrounding outside air.

Construction:

Any physical change or change in the method of operation which would result in a change in actual emissions.

Emission:

A release of air contaminants into the ambient air.

Emission Unit:

Any part of a stationary source which emits or would have the potential to emit an air pollutant.

New Source:

Means the construction or modification of a stationary source that increases the amount of any air contaminant emitted by that source or any air contaminant not previously emitted.

Pollutant:

Means the same as air contaminant, air pollutant and air pollution.

Stationary Source:

Any building, structure, facility or installation which emits or may emit any air contaminant.

Field Notices

So, you've received a Field Notice. Perhaps during the inspection, or maybe an inspector was driving by your facility and observed and documented a violation such as a smoking stack or a baghouse that was blowing dust....Now what?

In the case of a violation observed at times other than the inspection, the inspector will immediately make contact with a company representative. At this time the violation will be explained, an inspection of the equipment involved may be done, and the Field Notice issued.

In some cases the Field Notice may be treated as a Notice of Correction (NC). This would require the facility to take the necessary action to correct the deficiency which led to the issuance of a Field Notice.

In other cases, particularly when the violation is a reoccurring or repeat situation, or when the responsible party has prior knowledge of the requirements, the Field Notice will be treated as a Notice of Violation (NOV). A Notice of Violation will result in a civil penalty as well as the appropriate corrective action.

The Field Notice should never be considered as a warning. The Field Notice is a legal document describing a violation of a regulation. You will be given ample opportunity to present your case to SWAPCA prior to any enforcement action by the agency. Don't hesitate to call or write should you receive a Field Notice.

Order of Approval Conditions....Read them, know them and meet them

With the approval of a Notice of Construction (NOC) for new or modified air pollution generating or control equipment, an Order of Approval is issued. The Order of Approval details the operational requirements that must be met to maintain compliance with applicable air quality regulations.

There are two times during the NOC approval process when it is especially important to read the conditions of approval. The first is upon issuance of the Preliminary Order of Approval, which is a draft Order of Approval for your review and the public's review. Scrutinize every stipulated condition. Questions to ask yourself include:

- ✓ Do I understand how to comply with each condition?
- ✓ Can my facility meet all conditions under normal operating situations?
- ✓ Will I stay below my emission limits with planned future production increases?

If the answer to any of these is "no", you should contact SWAPCA immediately so that the condition(s) can be reviewed and possibly revised.

The second time to carefully review the operating conditions in the Order of Approval is after final approval has been made. Once the Order has become final, your facility is responsible for maintaining and documenting compliance with each and every requirement. Once the Order becomes final, any changes which you may request will cost additional review fees.

Remember, don't get caught off guard! Know the operating conditions you are required to meet!



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