

From the Desk of...

## Phil Billick

President  
Air Compliance Testing, Inc.

### Fall Migration

As a long time observer of waterfowl, I can't help but notice and appreciate the annual migration that ducks and geese (*and many other birds*) make each year. Heading south, they fly with a single-minded dedication and focus, and a foolproof built-in compass.

This year I am able to participate in movement south, but it is through an expansion rather than a migration. Our acquisition of the assets of FBT Testing and Environmental Services has expanded our southern range by about 200 miles.

Like the migrating birds, Air Compliance Testing is taking this step with both dedication and focus. It is perfectly in line with our mission statement to focus on growth and acquisitions:

*To be a high quality provider in the Environmental Services Industry that is focused on growth and on diversification through new products and acquisitions.*

We have continued to grow our service area from our home in Cleveland, providing testing services to clients in 18 states. Our services have expanded from stack testing to include FTIR, CEMS Maintenance Programs, OSHA Compliance Monitoring, and Dispersion Modeling.

With this expansion we're looking forward to establishing a larger presence in the Cincinnati area, and welcome our new clients in the south. Unlike the birds instincts, we move south with Mapquest and GPS... our version of a foolproof compass.



## Air Compliance Testing Acquires FBT Environmental and Testing Services

Air Compliance Testing recently announced that it acquired the assets of FBT Testing and Environmental Services' Cincinnati, Ohio stack testing division.

Founded in 1992, FBT Testing and Environmental Services maintained clients in the power production, manufacturing, construction materials, and automotive industries. The acquisition is an implementation of Air Compliance Testing's focus on growth and diversification through new products and acquisitions. Air Compliance Testing, founded in 1993, continues to be the largest air emissions testing company in Ohio.

Air Compliance Testing is looking forward to providing the clients of FBT the same superior quality testing services we provide to our current clients. It is also an opportunity to introduce them to the additional services Air Compliance Testing provides: FTIR, CEMS Maintenance Programs, Dispersion Modeling and OSHA Compliance Modeling.

## Air Compliance Testing to Become CCX Approved Verifier

Air Compliance Testing has applied to the Chicago Climate Exchange® (CCX)® to act as an Approved Verifier. The CCX is the world's first and North America's only active voluntary, legally binding integrated trading system to reduce emissions of all six greenhouse gases (GHG). Projects must obtain independent verification by a CCX approved verifier. Verifiers use information provided by the project owner or aggregator and site visits, if needed, to accurately assess a project's actual, annual GHG sequestration or destruction. An offset project is subject to initial verification, as well as annual verification for the duration of its enrollment in CCX.

Go to [www.chicagoclimatex.com](http://www.chicagoclimatex.com) for more information.



## Ohio EPA Seeks Input on BAT

Ohio EPA is developing rule-based Best Available Technology (BAT) requirements and is soliciting input from interested parties. EPA is changing their approach to establishing BAT requirements as a result of the SB 265 amendments to the Ohio Revised Code.

If you are interested in providing input, the Interested Party Request Letter, related Excel spreadsheets, and more information are available on the BAT Rulemaking Activity web page at:

[www.epa.state.oh.us/dapc/SB265/bat\\_activity.html](http://www.epa.state.oh.us/dapc/SB265/bat_activity.html)

## 2008 Vehicle Fuel Economy Ratings

EPA and the U.S. Department of Energy (DOE) released the 2008 Fuel Economy Guide in October. Hybrid vehicles continue to lead the government's fuel economy ratings.

Fuel economy estimates are displayed on the window stickers of all new cars and light trucks. They are determined by tests that manufacturers and EPA conduct according to EPA specifications. Starting with the 2008 model year, estimates will reflect the effects of faster speeds and acceleration, air conditioner use, and colder outside temperatures.

The Toyota Prius tops the list at 48 miles per gallon (mpg) city and 45 mpg highway. The Honda Civic Hybrid came in second with 40 mpg city 45 mpg highway. Third is Nissan Altima Hybrid with 35 mpg city and 33 mpg highway.

For more information on the 2008 vehicles, go to:  
<http://www.fueleconomy.gov/feg/findacar.htm>

**The Title V Emissions Fee for calendar year 2007 emissions is \$41.96/ton.**

## EPA Proposes Revised Ground-Level Ozone NAAQS

On June 20, 2007, EPA proposed to strengthen the national ambient air quality standards for ground-level ozone, the primary component of smog. EPA's proposal would revise both ozone standards: the primary standard, designed to protect human health; and the secondary standard,

designed to protect welfare (such as vegetation and crops). The existing primary and secondary standards, set in 1997, are identical: an 8-hour standard of 0.08 parts per million (ppm). (In practice, because of rounding, an area meets the standard if ozone levels are 0.084 ppm or lower.)

- EPA proposes to set the primary (health) standard to a level within the range of 0.070-0.075 ppm (70 -75 ppb). The Agency also requests comments on alternative levels of the 8-hour primary ozone standard, within a range from 0.060 ppm up to and including retention of the current standard (0.084 ppm). (EPA also proposes to specify the level of the primary standard to the third decimal place, because today's monitors can detect ozone that accurately.)
- EPA is proposing two options for the secondary standard:
  - One option would establish a new form of the standard designed specifically to protect sensitive plants from damage caused by repeated ozone exposure throughout the growing season. This cumulative standard would add daily ozone concentrations across a three-month period. EPA is proposing to set the level of the cumulative standard within the range of 7 to 21 ppm-hours.
  - The other option would follow the current practice of making the secondary standard identical to the proposed primary 8-hour standard.

EPA anticipates issuing final standards in spring 2008. Details can be found at: <http://epa.gov/groundlevelozone/>

## NOx Budget Trading Program (NBP) Annual Report Released

Smog-forming emissions of nitrogen oxides (NOx) from power plants and industry have declined significantly in 19 eastern states and the District of Columbia. The NOx Budget Trading Program (NBP) annual report indicates that summertime NOx emissions were seven percent lower than in 2005, 60 percent lower than in 2000 and 74 percent lower than in 1990.

The reduction of NOx – a precursor to ground-level ozone, or "smog" – has helped reduce ground-level ozone concentrations an average of 5-8 percent in the eastern United States in the last three years. Four out of five

eastern ozone non-attainment areas now meet the current standard.

The EPA report tracked summertime emission reductions from 1990 to 2006 and assessed the impact of these reductions on ozone air quality in the eastern region. The largest NO<sub>x</sub> reductions occurred in the mid-central area of the eastern United States including Illinois, Indiana, Kentucky, Ohio, and West Virginia.

The 2006 NO<sub>x</sub> Budget report is online at:  
<http://www.epa.gov/airmarkets/progress/nbp06.html>

## Ethanol Plant Issues

As the ethanol industry expands, so do the issues associated with accurately identifying and quantifying the emission from ethanol plants. State agencies are facing a learning curve in association with air permitting and compliance for these plants.

The main processes that need to be controlled include the dried distillers grain solids (DDGS) dryers, fermentation units, DDGS cooling, ethanol loadout and boilers. The primary pollutants emitted from those processes are Volatile Organic Compounds (VOC's) (including Hazardous Air Pollutants (HAPS), nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO).

The control equipment options available to reduce these pollutants have typically been scrubbers on the fermentation units, cyclones for the DDGS cooling systems, a flare for the loadout and low NO<sub>x</sub> burners on the boilers to reduce emissions below major source levels. Unfortunately, according to sources in Nebraska and other states, testing since 2002 indicates that the DDGS dryer and fermentation scrubber emissions are not adequately reducing the VOC and HAP emissions to required levels.

The Minnesota Pollution Control Agency (MPCA) revealed also in 2002 that emissions from ethanol plant DDGS dryers emit several pollutants in larger quantities than originally thought. Until then, it was believed that methanol and ethanol were the only significant VOC's emitted from the dryers. However VOC testing conducted by the MCPA at various ethanol plants in Minnesota showed some disturbing results. Not only was there ethanol and methanol in larger quantities than previously suspected, but other pollutants emitted included: acetaldehyde, acrolien, formaldehyde, 2-furaldehyde, acetic acid and lactic acid. Tests conducted in Illinois

indicate carbon monoxide emissions from the dryers may have also been significantly underestimated.

If your facility is a new ethanol plant or an ethanol plant modifying existing technology, consider performing informational testing to allow you to identify these issues prior to a compliance test. Having confidence that your emissions are within permitted limits, or time and data to use to make process changes, could help you avoid multiple, expensive, full-scale compliance tests.

## Region 5 Air Priorities

EPA Region 5 has established priorities for air, land, water, multi-media, and human capital. Their air priorities are as follows:

- Expand the use of biofuels and reduce diesel emissions through retrofit and other technologies
- Use assistance agreements and partnerships to promote reductions in diesel emissions
- Address NAAQS non-attainment for ozone and PM 2.5
- Help states meet Clean Air Act requirements and develop approvable attainment plans
- Redesignate eligible areas to attainment
- Ensure timely and streamlined permitting for domestic energy projects
- Work with states to expedite energy permit review and issuance
- Protect communities from hazardous air pollutants
- Develop regional / state capacity to address impacts
- Reduce risk through collaborative and regulatory approaches

To view the rest of Region 5's priorities, go to:  
<http://www.epa.gov/region5/aboutr5/r5priorities.htm>

## Onsite Mercury Testing

Did you know that Air Compliance Testing offers EPA Method 30B Mercury emission measurement services onsite? Method 30B is a procedure for measuring total vapor phase mercury (Hg) emissions from coal-fired combustion sources using sorbent trap sampling and an extractive or thermal analytical technique. This method is offered as a reference method for Relative Accuracy Test Audits (RATAs) of vapor phase Hg CEMS and sorbent trap monitoring systems installed at coal-fired boilers and is also appropriate for Hg emissions testing at these boilers.

Air Compliance Testing can provide on or off-site Hg analysis. Contact us for more information.



# Air Compliance News™

## Our Mission Statement:

To be a high quality provider in the Environmental Services Industry that is focused on growth and on diversification through new products and acquisitions.

## Our Core Values:

Customer Satisfaction  
Rigorous Attention to Detail  
Continuous Improvement  
Employee Empowerment and Accountability  
Flexibility

## Upcoming Events...

- **Manufacturer's Education Council's 17th Annual Business & Industry's Environmental, Health and Safety Symposium** Wednesday & Thursday, March 26-27, 2008, Duke Energy Center, Cincinnati. Go to [www.mecseminars.com](http://www.mecseminars.com) for more information. Please stop by our booth to say hello!

**Air Compliance**  
  
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## Excellence in Emission Testing

- ⇒ Source (Stack) Testing
- ⇒ FTIR Services
- ⇒ CEMS Testing and Maintenance
- ⇒ OSHA Compliance Monitoring
- ⇒ Dispersion Modeling
- ⇒ Ambient Air Monitoring

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