



Small Business Advisor - April 2018

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Changes in EPA's "Once-In-Always-In" policy

The U.S. EPA issued a guidance memo in 1995, referred to as the "Once-In-Always-In" policy, which offers guidance on MACT standard applicability. This guidance was recently reversed in a new [EPA guidance memo dated January 25, 2018](#).

The following fact sheet provides more information on EPA's "Once-In-Always-In" policy and EPA's recent guidance memo.

- DNR Fact Sheet: [EPA's Once-In-Always-In Policy \(AM-562\) \[PDF\]](#)

Business panel at the FET South Central Chapter Water Issues seminar

Attendees of FET Inc.'s (<http://fetinc.org>) South Central Chapter Water Issues Seminar on May 3 will hear from the Department of Natural Resources' (DNR) Small Business Environmental Council (SBEC) and learn about the Council's activities. There will be an opportunity to ask the Council members questions and provide comments they can take back for further discussion with DNR staff.

The SBEC is a key component of the DNR's Small Business Environmental Assistance Program (SBEAP). The seven SBEC members are appointed according to state statute, by the Governor and majority and minority leadership in the legislature. DNR also appoints a staff representative to the council. The purpose of the SBEC is to review and comment on how the DNR disseminates information to small businesses, whether the information provided is readable by someone with no technical training, whether new regulations meet the paperwork reduction act, and any difficulties encountered by small businesses trying to comply with the environmental regulations.

The SBEC has worked with DNR on efforts such as: development of the Green Tier and Compliance Audit programs, transitioning the SBEAP from air-only to all environmental assistance, streamlining air permits (Registration Permits), and creating a streamlined "incidental emitters" category in the state hazardous air pollutant rule (NR 445), among others. In addition, the SBEC submitted comments to the U.S. EPA on the impact of the proposed Boiler MACT Rule on Wisconsin small businesses.

The Council asks that attendees come prepared with questions or comments. They prefer to focus on water quality issues, but will take comments on other state environmental regulations back for discussion at a future meeting. Types of issues to consider include:

1. What action(s) would you advise the DNR to take to help existing small businesses and stimulate growth (e.g., streamline regulatory requirements that impact growth, provide financial assistance opportunities, etc.)?
2. Where do you think the DNR could further streamline processes to help small businesses quickly get the permits they need and quickly come into compliance once a permit has been issued?

3. How might the DNR help small businesses comply through development of assistance materials: checklists, guidance documents, training videos, descriptions of best management practices used by certain categories of business, etc.?

The seminar agenda is here: <http://fetinc.org/website/wp-content/uploads/2018/03/5-3-18-WI-Water-Issues.pdf>. Register for the seminar at: <http://fetinc.org/website/online-registration/>. Learn more about the SBEC at <http://dnr.wi.gov/topic/SmallBusiness/Council.html>.

DNR's Air Program is the first federally authorized program in Wisconsin to accept e-signatures for official reports

The Department of Natural Resources (DNR) began accepting electronic signatures for the Air Program's monitoring reports and compliance certifications on April 9, 2018. Facilities now have the option to submit signed Air compliance reports via either paper copy with ink signature or electronically with e-signature. An e-signature is a secure electronic signature that guarantees information about the signatory and the document.

Approval of DNR's e-signature solution by the U.S. Environmental Protection Agency (EPA) was finalized in the Federal Register in August 2017. The DNR developed its "Digital Signature Service" to manage e-signature for the agency. The Air Program is the first program at DNR to use the new service and is the first federally authorized program to accept electronic signatures for official reports. The Air Program plans to offer e-signature for additional reports in the future.

For more information on e-signature, visit the Switchboard e-signature services webpage: <http://dnr.wi.gov/topic/Switchboard/esignature.html>. Contact DNRSwitchboard@wisconsin.gov with general questions about e-signature.

For questions related to using e-signature for the Air Program's monitoring reports and compliance certifications, contact Emily Houtler, Air Program, 608-267-0803, Emily.Houtler@wisconsin.gov.

US EPA Region 5 Outreach on Solvent Reduction Options

The U.S. Environmental Protection Agency's (EPA) Region 5 office has initiated a voluntary air toxic reduction effort with regulated industry sectors in the states of Illinois, Indiana, Michigan, Minnesota, Ohio and Wisconsin. Companies affected by the Halogenated Solvent Cleaning Machine standard (40 CFR Part 63, Subpart T) may receive a letter from EPA Region 5 indicating their interest in partnering with businesses to help reduce or eliminate the use of the regulated solvents. Halogenated solvents include:

- Trichloroethylene (TCE)
- Methyl chloroform (TCA, 111- trichloroethane)
- Dichloromethane (DCM, methylene chloride)
- Perchloroethylene (PERC)
- Carbon Tetrachloride (CTC)

There are alternative solvents available that are safer and as effective as halogenated solvents. Solvent substitution may allow the facility to reduce or eliminate permit or other compliance requirements under the federal standard, protect worker health and reduce costs. More information on alternative solvents can be found on EPA's website: <https://www.epa.gov/p2/case-studies-safer-alternatives-solvent-degreasing-applications>.

Learn more about this initiative in EPA Region 5's fact sheet, found on the Great Lakes Pollution Prevention Roundtable's website at: <http://www.glrppr.org/docs/RegSummaryRegion5April18.pdf>. For questions on how to participate, contact Rae Trine at EPA Region 5, (312) 353-9228, trine.rae@epa.gov.

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