

MINUTES
AIR QUALITY ADVISORY COUNCIL
June 20, 2018
TulsaTech – Owasso Campus
Owasso, Oklahoma

Official AQAC Approved
at October 10, 2018 meeting

Notice of Public Meeting – The Air Quality Advisory Council (AQAC) convened for its Regular Meeting at 9:00 a.m. on June 20, 2018, at the TulsaTech, 10800 North 140th East Avenue, Owasso, Oklahoma. Notice of the meeting was forwarded to the Office of Secretary of State on October 18, 2017. The agenda was posted at the facility and at the DEQ twenty-four hours prior to the meeting. Also, Ms. Beverly Botchlet-Smith acted as Protocol Officer and convened the hearings by the AQAC in compliance with the Oklahoma Administrative Procedures Act and Title 40 CFR Part 51 and Title 27A, Oklahoma Statutes, Sections 2-2-201 and 2-5-101 through 2-5-117. She entered the agenda and the Oklahoma Register Notice into the record and announced that forms were available at the registration table for anyone wishing to comment on any of the rules. Ms. Laura Lodes, Chair, called the meeting to order. Ms. Quiana Fields called roll and confirmed that a quorum was present.

MEMBERS PRESENT

Gerald Butcher
Montelle Clark
Gary Collins
Robert Delano
Gregory Elliott
Jim Haught
Steve Landers
Jeffrey Taylor
Laura Lodes

MEMBERS ABSENT

None

DEQ STAFF PRESENT

Eddie Terrill
Beverly Botchlet-Smith
Cheryl Bradley
Laura Finley
Madison Miller
Tad Alford
Jonathan Truong
Nancy O'Brien
Quiana Fields
Dawson Lasseter
Diana Scholtz

Cooper Garbe
Melanie Foster
Rick Groshong
Phillip Fielder
Morgan McGrath

OTHERS PRESENT

Angelica Reynolds, Court Reporter

Approval of Minutes – Ms. Lodes called for a motion to approve the Minutes of the October 18, 2018 Regular Meeting. Mr. Butcher moved to approve and Mr. Taylor made the second.

See transcript pages 4 - 5

Gerald Butcher	Yes	Jim Haught	Yes
Montelle Clark	Abstain	Steve Landers	Yes
Gary Collins	Abstain	Jeffrey Taylor	Yes
Robert Delano	Yes	Laura Lodes	Yes
Gregory Elliott	Yes		

Election of Officers – Mr. Butcher made a motion to re-elect Ms. Lodes as Chair and Mr. Collins as Vice-Chair. Mr. Taylor made the second.

See transcript pages 5 - 6

Gerald Butcher	Yes	Jim Haught	Yes
Montelle Clark	Yes	Steve Landers	Yes
Gary Collins	Yes	Jeffrey Taylor	Yes
Robert Delano	Yes	Laura Lodes	Yes
Gregory Elliott	Yes		

Before the rulemaking hearing, Mr. Eddie Terrill, Division Director of the Air Quality Division (AQD), introduced new councilmember, Gregory Elliott to the Council.

See transcript pages 6 - 7

Chapter 100. Air Pollution Control

OAC 252:100-37. Control of Emission of Volatile Organic Compounds (VOCs)

OAC 252:100-39. Emission of Volatile Organic Compounds (VOCs) in Nonattainment Areas and Former Nonattainment Areas

Appendix N. Specialty Coatings VOC Content Limits [REVOKED]

Appendix N. Specialty Coatings VOC Content Limits [NEW]

Mr. Cooper Garbe, Environmental Programs Specialist of the AQD, stated the Department is proposing to add a new section 252:100-37-27, Control of emission of VOCs from aerospace industries coatings operations, for existing or new aerospace vehicle and component coating operations at aerospace manufacturing, rework, or repair facilities. Additionally, the Department is proposing to amend 252:100-39-47 to correct minor typographical errors, incorporate the latest changes to the aerospace NESHAP, and ensure regulatory consistency with proposed section 252:100-37-27. Lastly, the Department is proposing to revoke Appendix N and replace it with a new Appendix N. Following discussion by the Council and a comment by the public, Ms. Lodes stated that the staff has recommended continuing this rule to the next meeting in Oklahoma City. Mr. Haught moved to approve and Mr. Collins made the second.

See transcript pages 8 - 24

Gerald Butcher	Yes	Jim Haught	Yes
Montelle Clark	Yes	Steve Landers	Yes
Gary Collins	Yes	Jeffrey Taylor	Yes
Robert Delano	Yes	Laura Lodes	Yes
Gregory Elliott	Yes		

Ms. Botchlet-Smith announced the conclusion of the hearing portion of the meeting.

See transcript pages 24

Division Director's Report – Mr. Terrill provided an update on other Division activities.

New Business – None

Adjournment – The next scheduled regular meeting is on Wednesday, October 10, 2018 in Oklahoma City. Meeting adjourned at 10:35 a.m.

Transcript and attendance sheet are attached as an official part of these Minutes.

REGULAR MEETING/HEARING AGENDA
AIR QUALITY ADVISORY COUNCIL

JUNE 20, 2018, 9:00 A.M.

TULSA TECH-OWASSO CAMPUS
10800 NORTH 140TH EAST AVENUE
OWASSO, OK 74055

Reported by: ANGELICA REYNOLDS, CSR

WORD FOR WORD REPORTING, L.L.C.
111 HARRISON AVENUE
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<p style="text-align: right;">Page 2</p> <p>1 BOARD MEMBERS PRESENT: 2 Chairman Laura Lodes 3 4 Mr. Gerald Butcher 5 Mr. Montelle Clark 6 Mr. Gary Collins 7 Dr. Robert Delano 8 Mr. Gregory Elliott 9 Mr. Jim Haught 10 Mr. Steve Landers 11 Mr. Jeffrey Taylor 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 MS. LODES: Thank you. The next item on 2 today's agenda is the approval of the minutes from 3 the October 18th, 2017 regular meeting. Are there 4 any questions or comments on the minutes? 5 MR. BUTCHER: With no comments, I'd make a 6 recommendation that we accept -- (inaudible) -- 7 MS. LODES: I have a motion. Do I have a 8 second? 9 MR. TAYLOR: I'll second that. 10 MS. LODES: I have a motion and a second. 11 Quiana, would you please call roll. 12 MS. FIELDS: Mr. Butcher? 13 MR. BUTCHER: Yes. 14 MS. FIELDS: Mr. Clark? 15 MR. CLARK: Abstain. 16 MS. FIELDS: Mr. Collins? 17 MR. COLLINS: Abstain. 18 MS. FIELDS: Dr. Delano? 19 DR. DELANO: Yes. 20 MS. FIELDS: Mr. Elliott? 21 MR. ELLIOTT: Yes. 22 MS. FIELDS: Mr. Haught? 23 MR. HAUGHT: Yes. 24 MS. FIELDS: Mr. Landers? 25 MR. LANDERS: Yes.</p>
<p style="text-align: right;">Page 3</p> <p>1 CALL TO ORDER - 9:09 2 3 MS. LODES: Okay. I would like to call 4 today's meeting to order. The Air Quality Council, 5 June 20th in Owasso. Quiana, would you please call 6 roll. 7 MS. FIELDS: Mr. Butcher? 8 MR. BUTCHER: Here. 9 MS. FIELDS: Mr. Clark? 10 MR. CLARK: Present. 11 MS. FIELDS: Mr. Collins? 12 MR. COLLINS: Here. 13 MS. FIELDS: Dr. Delano? 14 DR. DELANO: Present. 15 MS. FIELDS: Mr. Elliott? 16 MR. ELLIOTT: Here. 17 MS. FIELDS: Mr. Haught? 18 MR. HAUGHT: Here. 19 MS. FIELDS: Mr. Landers? 20 MR. LANDERS: Here. 21 MS. FIELDS: Mr. Taylor? 22 MR. TAYLOR: Here. 23 MS. FIELDS: Ms. Lodes? 24 MS. LODES: Here. 25 MS. FIELDS: We have a quorum.</p>	<p style="text-align: right;">Page 5</p> <p>1 MS. LODES: Mr. Taylor? 2 MR. TAYLOR: Yes. 3 MS. FIELDS: Ms. Lodes? 4 MS. LODES: Yes. 5 MS. FIELDS: Motion passed. 6 MS. LODES: Thank you. The next item on 7 today's agenda is the election of officers. So we 8 need to elect a chair and a vice chair. Gentlemen? 9 MR. BUTCHER: I make a motion that we 10 reelect you as the chairman and Gary Collins as the 11 vice chairman. 12 MR. TAYLOR: I'll second that. 13 MS. LODES: I have a motion and a second. 14 Any questions or discussions, Gary? I have a motion 15 and second. Would you please call roll. 16 MS. FIELDS: Mr. Butcher? 17 MR. BUTCHER: Yes. 18 MS. FIELDS: Mr. Clark? 19 MR. CLARK: Yes. 20 MS. FIELDS: Mr. Collins? 21 MR. COLLINS: Yes. 22 MS. FIELDS: Dr. Delano? 23 DR. DELANO: Yes. 24 MS. FIELDS: Mr. Elliott? 25 MR. ELLIOTT: Yes.</p>

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1 MS. FIELDS: Mr. Haught?
2 MR. HAUGHT: Yes.
3 MS. FIELDS: Mr. Landers?
4 MR. LANDERS: Yes.
5 MS. FIELDS: Mr. Taylor?
6 MR. TAYLOR: Yes.
7 MS. FIELDS: Ms. Lodes?
8 MS. LODES: Yes.
9 MS. FIELDS: Motion passed.
10 MS. LODES: Thank you. And we now enter
11 the public rule making motion of the hearing.
12 MR. TERRILL: Before we start that, Laura.
13 MS. LODES: Yes. We need to introduce
14 Greg.
15 MR. TERRILL: We need to introduce Greg.
16 Since we last met, it seems like it's been a couple
17 of years ago, but I think it's only been five or six
18 months ago, David Gamble decided it was better for
19 him to wake up in Austin every morning and do what
20 he wants to do rather than wake up and go to Conoco
21 Phillips. So he retired and moved to Austin and --
22 so we're very fortunate that Greg Elliott, who is
23 the environmental manager for Valero in Ardmore, has
24 agreed to take his spot. That gives us a full
25 complement of council members.

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1 Greg's an East Central University of Ada
2 graduate with a Bachelor of Science, and went to
3 University of Oklahoma to get his Master's in
4 environmental science. It looks like from his resumé, he
5 started as a summer intern at the refinery back in 1989,
6 has moved his way all the way up through the ranks to
7 environmental manager. So he knows the refinery inside
8 and out, and I know he'll be a good representative for
9 Valero and for the industry. So, Greg, I'm glad to have
10 you onboard. With that, Greg, do you want to say
11 anything or --
12 MR. ELLIOTT: Me?
13 MR. TERRILL: Yes. We always like to put
14 you on the spot.
15 MR. ELLIOTT: Well, I just appreciate the
16 opportunity to be here and serve. And I look
17 forward to getting my feet wet in this.
18 MR. TERRILL: Thank you.
19 MS. LODES: Thanks for joining us, Greg.
20 MR. ELLIOTT: I will be on time from now
21 on.
22 MS. LODES: Well, we only have it in
23 Owasso, like, once a year to make you drive all the
24 way from Ardmore up to here, so -- the rest should
25 be in the city, so it's not too bad for you.

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1 MS. BOTCHLET-SMITH: Okay. Good morning.
2 I'm Beverly Botchlet-Smith. I'm the Assistant
3 Division Director of the Air Quality Division. And,
4 as such, I'll serve as a protocol officer for
5 today's hearings.
6 The hearings will be convened by the Air
7 Quality Council in compliance with the Oklahoma
8 Administrative Procedures Act and Title 40 of the Code Of
9 Federal Regulations Part 51, as well as the authority of
10 Title 27A of the Oklahoma Statutes. Section 2-2-201 and
11 Sections 2-5-101 through 2-5-117.
12 Notice of the June 20th, 20 -- 2018 hearings
13 were advertised in the Oklahoma Register for the purpose
14 of receiving comments pertaining to the proposed OAC
15 Title 252 Chapter 100 rules as listed on the agenda and
16 will be entered into each record along with the Oklahoma
17 Register filing.
18 Notice of the meeting was filed with the
19 Secretary of State on October 18th, 2017. The agenda was
20 duly posted 24 hours prior to the meeting here at this
21 facility and, also, at the DEQ. If you wish to make a
22 statement, it's very important for you to complete the
23 form at the registration table, and then you will be
24 called upon at the appropriate time.
25 Audience members, please come to the podium to

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1 make your comment and please state your name. At this
2 time, we'll proceed with what's marked as agenda item
3 number 5A on the hearing agenda. That's OAC 252:100-37
4 Control of Emissions of Volatile Organic Compounds
5 (VOCs), OAC 252:100-39 Emission of Volatile Organic
6 Compounds (VOCs) in Nonattainment Areas and Former
7 Nonattainment Areas, Appendix N for Specialty Coatings
8 VOC Content Limits and to do -- to make the presentation
9 on this today is Mr. Cooper Garbe of our staff.
10 MR. GARBE: Good morning, Madame Chair,
11 Members of Council, Ladies and Gentlemen. I'm
12 Cooper Garbe with the rules and planning group in
13 the air quality section.
14 The department is proposing changes to our
15 aerospace coatings operations rules. Recently, we were
16 made aware of facilities in Tulsa County that were
17 finding it difficult to show compliance with overlapping
18 rules between Subchapters 37 and 39.
19 Aerospace coating operations in Tulsa County
20 are subject to Section 47 of Subchapter 39, which
21 incorporates aerospace specific standards by referencing
22 NESHAP Subpart GG. At the same time, we have statewide
23 standards for the coating of all parts and products, not
24 just aerospace, in Subchapter 37.
25 Aerospace coating operations in Tulsa County

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1 are subject to both rules, as depicted by the slide
2 above. And because the more generic standards in
3 Subchapter 37 do not incorporate aerospace specific
4 standards, some aerospace facilities and our permitting
5 section have a hard -- have difficult time matching up
6 the two sets of standards for compliance determinations.
7 While aerospace facilities in Tulsa County need
8 consistency between the rules, aerospace facilities
9 outside of Tulsa County would also benefit from the
10 flexibility that would be provided by incorporating the
11 aerospace specific standards of NESHAP GG into Subpart --
12 Subchapter 37.
13 The specialty coating VOC content limits
14 incorporated in our Appendix N are much more thorough and
15 useful to the aerospace facilities than the small generic
16 list of coatings and limits they are currently subject to
17 in Section 25 of Subchapter 37.
18 To alleviate this, the Department is proposing
19 to add a new section in Subchapter 37 for aerospace
20 coating operations throughout the state, which would
21 incorporate some of the aerospace specific standards in
22 NESHAP Subpart GG, and, therefore, more closely resemble
23 Subchapter 39's rule on aerospace coating operations in
24 Tulsa County.
25 The new proposal is depicted on the next slide

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1 above. So aerospace facilities in Tulsa County now would
2 be subject to the new rule in 37-27, as well as the old
3 rule in 39-47. The new rule in 37-27 would have a
4 statement that would exempt them from the old rules of
5 37-25, which are the more generic rules for just coating
6 of all parts and products.
7 The new section 37-27 would also refer to
8 Appendix N. For this reason, the Department is also
9 proposing a new Appendix N, Specialty Coatings VOC
10 Content Limits, with a new introductory statement
11 allowing it to be used by both 39-47 and the new section
12 37-27.
13 To sum it all up, our proposal before you today
14 includes adding new Section 27 to Subchapter 37 to be
15 applicable statewide for aerospace coating operations,
16 amending Section 47 of Subchapter 39, which is the
17 current aerospace coating rule applicable only in Tulsa
18 County, to update reference date of NESHAP Subpart GG,
19 remove outdated material, and add language consistent
20 with the most recent version of NESHAP Subpart GG.
21 Finally, to revoke Appendix N, and create new
22 Appendix N to correct typographical errors and allow the
23 new Appendix N to be used in the new section of
24 Subchapter 37.
25 Prior to publication of the proposed rule, the

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1 Department received input from aerospace industry
2 professionals in a work group conducted through email and
3 conference calls. Since the publication of the proposed
4 rule, the Department received formal comments from
5 American Airlines located in Tulsa. We are currently
6 reviewing these comments.
7 The Department is recommending that Council
8 carry this rule proposal forward to a subsequent meeting
9 to allow for further discussion and consideration among
10 industry, and so that we may present these changes in
11 Oklahoma City, as well. Thank you for your time.
12 MS. BOTCHLET-SMITH: At this time, I'd
13 like to take questions and comments from the council
14 for Mr. Garbe.
15 MR. COLLINS: I have a question. Mr.
16 Garbe, the industries that will be impacted, we've
17 looked at what -- which industries or which
18 companies that will be outside of Tulsa County. So
19 will we be pulling in additional facilities into the
20 new rule that were outside of Tulsa County?
21 MR. GARBE: We did do a review of the
22 facilities that are going to be impacted. That was
23 part of our work group outreach, as well. So
24 anybody that popped up in our database as a
25 potential aerospace coating facility that does

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1 coating operations for aerospace, we sent them an
2 email and let them know what was going on. We tried
3 to gather as much information, including whether
4 they already follow NESHAP Subpart GG, whether this
5 proposal would impact them in any particular way.
6 So the facilities that are currently regulated
7 by our rules will continue to be regulated by our rules.
8 As far as we know, there are no new facilities that will
9 be brought into regulation that aren't currently
10 regulated by our rules. They will just be moved maybe
11 from one section to another section. Does that make
12 sense, and does that answer your question?
13 MR. COLLINS: I think so. The main
14 message is that there won't be any new reporting or
15 regulatory requirements for facilities that
16 previously weren't covered; is that correct?
17 MR. GARBE: That previously weren't
18 covered by some rule, correct. They -- there are
19 facilities outside of Tulsa County that were subject
20 to the old rule 37-25, and they will now be subject
21 to a new rule 37-27, which will incorporate new
22 standards that are referenced in NESHAP GG.
23 MR. COLLINS: Okay. Thank you.
24 MR. GARBE: You're welcome.
25 MR. HAUGHT: So does that tighten the

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1 rules for those? Does imposing some new
2 restrictions tighten the rules on those?
3 MR. GARBE: It could in certain instances,
4 because it's an extensive list of coatings and VOC
5 limits for these coatings. So when you look over
6 the list of VOC coatings, and you look at our old
7 generic list of, I believe, six coatings, it kind of
8 varies on how they compare.
9 There are some that are going to be -- some of
10 these coatings have lower limits than what were listed in
11 the old list, and then there are some that are a little
12 bit more higher limits than what were the six generic
13 coating list in the old list.
14 So, while it could tighten up in some
15 instances, it also allows these aerospace facilities a
16 lot of flexibility to better classify these coatings that
17 they are using as opposed to have to fit them into it
18 just a six part list.
19 MR. HAUGHT: Okay. So -- but the list --
20 the expanded list is consistent with the federal?
21 MR. GARBE: Yes.
22 MR. HAUGHT: And -- so this is going to
23 pull in both major sources and area sources?
24 MR. GARBE: The new rule?
25 MR. HAUGHT: Yes.

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1 MR. GARBE: The new rule will apply to any
2 facility that requires a permit that does coating
3 operations -- aerospace coating operations, both
4 major and minor, synthetic minor.
5 MR. HAUGHT: I guess I'm trying to
6 understand as I was working through this this
7 weekend, I kept thinking this seemed complicated. I
8 mean, if there's NESHAP GG's out there, why is --
9 why are we doing this two-part thing, and is this
10 really -- I mean, I understand the need from the
11 industry standpoint to want to understand which set
12 of rules -- you know, you don't want to be trying to
13 decide which set of rules do I comply with. So I
14 understand that. But is -- it just seems like a
15 little complicated way to do that to me. I don't
16 know. Is there not just some way to reference the
17 GG requirements and not have these two separate
18 sections?
19 MR. GARBE: Well, --
20 MR. HAUGHT: You know, to have to add a
21 new section for this one --
22 MR. GARBE: We didn't feel -- I mean, we
23 have a Section 39-47 that references GG, right?
24 That's applicable only in Tulsa County. And that's
25 because it was a nonattainment, former

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1 nonattainment area. Subchapter 39 covers
2 nonattainment, former nonattainment areas.
3 We didn't feel it was necessary or necessarily
4 correct to reference Subchapter 39 in Subchapter 37.
5 That would be pulling facilities into a nonattainment,
6 former nonattainment area rule. This somewhat keeps them
7 separated, so that way you kind of know which subchapters
8 you are subject to and which ones you don't have to worry
9 about.
10 MR. HAUGHT: But the provisions in those
11 two are the same?
12 MR. GARBE: Basically.
13 MR. HAUGHT: Someone doesn't want to go
14 under a heading -- nonattainment heading, they're
15 not in a nonattainment area to look up their rule.
16 MR. GARBE: I'm sorry?
17 MR. HAUGHT: So we're just -- we're doing
18 this so that somebody -- we're not sending somebody
19 who's not in the nonattainment area, we're not
20 pointing them to the nonattainment rules?
21 MR. GARBE: That's -- yes.
22 MR. HAUGHT: But it's going to be
23 consistent --
24 MR. GARBE: It will be consistent.
25 MR. HAUGHT: -- with the nonattainment --

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1 MR. GARBE: There's -- yes. Which will be
2 consistent with NESHAP GG --
3 MR. HAUGHT: So it is a little bit
4 duplicative?
5 MR. GARBE: Yes.
6 MR. HAUGHT: That's just what it seems
7 like to me. But okay.
8 MR. GARBE: Yes.
9 MR. HAUGHT: Okay. Thank you.
10 MR. GARBE: You're welcome.
11 MS. BOTCHLET-SMITH: Any other questions
12 from the council?
13 MR. ELLIOTT: So in any of the comments
14 you received, have you gotten any feedback from the
15 industry about any impact this is going to have on
16 cost? Have you gotten any feedback from them on
17 that?
18 MR. GARBE: We received input from
19 industry. We didn't receive any input on cost. My
20 main question to industry that is regulated was are
21 you following NESHAP GG already. If you are not,
22 have you reviewed NESHAP GG, and do you feel you are
23 able to follow NESHAP GG. Because those are the
24 rules that we will be referencing throughout and so
25 as I went through and tried to find that out from

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1 facilities, most facilities said they are already
2 following NESHAP GG. Some said they would have no
3 problem being able to meet the limits listed in GG,
4 but nobody mentioned anything about cost.
5 MR. ELLIOTT: Thank you.
6 MR. GARBE: You're welcome.
7 MS. BOTCHLET-SMITH: We've received notice
8 of one commenter from the public. Thelma
9 Latimer-Davis from American Airlines. If you'd like
10 to present your comments, and then, Council, we'll
11 give you another chance after we hear from the
12 public.
13 MS. LATIMER-DAVIS: Good morning. I am
14 Thelma Latimer-Davis with American Airlines. I
15 appreciate the opportunity to give comments. Also,
16 I want to, on behalf of American Airlines and myself
17 as a citizen, thank everyone involved in this rule
18 making and the council for all of your hard work.
19 American performs maintenance and repairs on
20 more than 250,000 different mechanical and avionics parts
21 and components per year. Most of these parts are removed
22 from the aircraft, sent to various shops within the base
23 for maintenance and repair. So tracking individual
24 components, the type of maintenance repair conducted, as
25 well as the amount of coating applied can be somewhat of

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1 a task.
2 At present, tracking the applicability of
3 various rules to each of these components is also
4 somewhat difficult. Compounding the difficulty is the
5 fact that there are several rules potentially applicable
6 to such coating operations as stated in the presentation
7 before.
8 We have Subchapter 37, 39, and Subpart GG that
9 are currently potentially applicable. Determining the
10 applicability of compliance with the above regulatory
11 req- requirements involve a detailed analysis of several
12 factors including the type of function and the individual
13 coating, emissions associated with individual coating,
14 emissions associated with equipment used to apply the
15 coating, and whether an individual part or component
16 coating and/or cleaning material is specifically exempted
17 from one or more of the above requirements.
18 Further, many times the rule specify different
19 limits. And although an individual coating operation may
20 be applicable to one of the above requirements, it may
21 also be subject to other requirements, and I think that
22 was pointed out earlier. I'll just present one example.
23 Specialty coatings are those which have performance
24 criteria beyond those of standard coatings, additional
25 performance criteria required for flight safety, consider

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1 the specialty category metalized epoxy coatings. The
2 aerospace MACT standard limits the VOC and HAP content to
3 6.2 pounds per gallon.
4 Subchapter 39-47 limits the VOC only to 6.2
5 pounds per gallon. However, when we transfer over to
6 37-25 epoxy coating limits are 4.8 pounds per gallon.
7 And that limit does not take into account additional
8 performance criteria associated with flight safety.
9 American believes that the addition of
10 Subchapter 37-27 will somewhat clarify the applicability
11 of these subchapters. American is seeking further
12 clarification with respect to certain GG exemptions, as
13 well. As originally promulgated, Subchapter 37 -- 39-47
14 was intended to include EPA's control technology
15 guidelines or control of VOC operations at aerospace
16 manufactory and rework operations.
17 EPA subsequently promulgated Subpart GG, which
18 represents maximum available control technology
19 applicable to aerospace manufactory and rework
20 facilities. Although, Subpart GG contains certain
21 specific exemptions, American believes these exemptions
22 associated the emissions associated with such exemptions
23 do not rise to the level of requiring control regulations
24 in the MACT standard.
25 To alleviate confusion and burden on the

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1 regulated community as well as American, we request that
2 the proposed revision specify compliance with Subpart GG
3 is deemed to be compliance with all provisions of 37-25,
4 -26, and -27, as well as Subchapter 39-47. This would
5 include both coating operations required to comply with
6 Subpart GG, as well as those which are specifically
7 exempted under Subpart GG.
8 American has submitted written comments
9 generally to seek and confirm the intent of the
10 Department's proposed revisions and to clarify certain
11 language for this purpose. Additionally, American's
12 written comment sought to incorporate specific
13 requirements and/or compliance alternative be provided in
14 Subpart GG. Thank you.
15 MS. BOTCHLET-SMITH: Thank you. Do we
16 have anyone else from the public that has an
17 interest in commenting on the rule at this time?
18 Hearing none, after hearing those comments, are
19 there some additional questions from the council?
20 MR. HAUGHT: We had a recommendation to
21 continue this. And I understand that it doesn't
22 seem like it's very real time sensitive, but is
23 there a particular reason or is there something we
24 think maybe controversial in this or some reason
25 that the staff didn't think this would go through or

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1 shouldn't go through this first time?
 2 MR. GARBE: Do you want me to take that?
 3 MR. TERRILL: I'll give a stab at it. We
 4 wanted to present it in Tulsa because rules have
 5 a -- a specific Tulsa -only provision in it that we
 6 were trying to work through. So -- and we also are
 7 very sensitive that we make sure we reach out to
 8 everybody. So we wanted to hold a meeting here, and
 9 then do another one in Oklahoma City to get the
 10 folks that might not be able to come over an
 11 opportunity to attend that meeting, too. So it
 12 wasn't necessarily we didn't think we could get it
 13 done in one.
 14 But, generally, looking at the past 20 years
 15 I've been doing this, we don't. And so we always plan on
 16 doing two of them, like because this one did have a Tulsa
 17 component, and then Oklahoma City with it, we wanted to
 18 do at least two meetings, and we felt like that would be
 19 sufficient to get public input from everyone that might
 20 be effected.
 21 MS. LODES: Cooper, in a review of the
 22 American Airlines comments, some of them are -- to
 23 clarify, I see some of the substantial ones are to
 24 clarify that if you're subject to Subchapter 39,
 25 then you're exempt from the requirements of, say, 25

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1 and 26, and then, you know, make sure you're out of
 2 37, as well to clarify that. I think some of those
 3 are valid comments to look at so it doesn't look
 4 like you're crisscrossing which one are you
 5 compliant with. But I know you've got these
 6 comments as well to go through.
 7 MR. GARBE: Yes. Yes.
 8 MS. LODES: Do we have any other questions
 9 or comments from the council?
 10 MS. BOTCHLET-SMITH: Hearing none, Laura,
 11 if you want to call for a vote.
 12 MS. LODES: The staff has recommended that
 13 we continue this rule to the next meeting in
 14 Oklahoma City. Do I have a motion?
 15 MR. HAUGHT: Upon, I'll so move.
 16 MR. COLLINS: I'll second.
 17 MS. LODES: I will have a motion and a
 18 second. Quiana, would you please call roll.
 19 MS. FIELDS: Mr. Butcher?
 20 MR. BUTCHER: Yes.
 21 MS. FIELDS: Mr. Clark?
 22 MR. CLARK: Yes.
 23 MS. LODES: Mr. Collins?
 24 MR. COLLINS: Yes.
 25 MS. FIELDS: Dr. Delano?

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1 DR. DELANO: Yes.
 2 MS. FIELDS: Mr. Elliott?
 3 MR. ELLIOTT: Yes.
 4 MS. FIELDS: Mr. Haught?
 5 MR. HAUGHT: Yes.
 6 MS. FIELDS: Mr. Landers?
 7 MR. LANDERS: Yes.
 8 MS. FIELDS: Mr. Taylor?
 9 MR. TAYLOR: Yes.
 10 MS. FIELDS: And Ms. Lodes?
 11 MS. LODES: Yes.
 12 MS. FIELDS: Motion passed.
 13 MS. BOTCHLET-SMITH: That concludes the
 14 hearing portion of today's meeting.
 15 (Hearing concluded at 9:35 a.m.)
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 3 C E R T I F I C A T E
 4 STATE OF OKLAHOMA)
) SS:
 5 COUNTY OF OKLAHOMA)
 6 I, ANGELICA REYNOLDS, Certified Shorthand
 7 Reporter within and for the State of Oklahoma, do
 8 hereby certify that the above and foregoing meeting
 9 was taken by me by means of shorthand, and that the
 10 same was thereafter transcribed; that the same is
 11 true and correct; and that the same was taken on the
 12 20th day of June 2018
 13 I further certify that I am neither attorney or
 14 council for, nor related starting at 9:09 a.m. in
 15 the City of Owasso, County of Tulsa and State of
 16 Oklahoma. I am not related to nor attorney for any
 17 said parties nor otherwise interested in the event
 18 of said action.
 19 IN WITNESS WHEREOF, I have hereunto set my hand
 20 and affixed my seal this 26th day of June, 2018.
 21
 22 _____
 Angelica Reynolds, CSR
 Oklahoma CSR No. 1941
 23
 24
 25



AIR QUALITY COUNCIL

Attendance Record

June 20, 2018

Owasso, Oklahoma

NAME and/or AFFILIATION

Address and/or Phone and/or E-Mail

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