# Air Compliance and Enforcement Priorities for Agriculture

Granta Y. Nakayama, Assistant Administrator
Office of Enforcement and Compliance
Assurance
Washington, D.C.

## Air Emissions Concerns Presented by Agriculture

- Do Emissions From Ag Sources Matter?
- What Is OECA Doing To Address Ag Air Concerns?

Where Do We Go From Here?

## Do Air Emissions from Ag Sources Matter?

- Significant Emission Sources
- CAFOs: Emissions of hydrogen sulfide, ammonia, VOCs & particulate matter (PM)
- Ethanol & Sugar Beet Manufacturing: Emissions of VOCs and CO

#### **CAFO Air Emissions**

- Shift to very large farms has increased:
  - Air emissions per farm over 100 farms with over 50,000 hogs in 2005
  - Impacts on local communities
  - Increased emissions may trigger air permit or reporting requirements under CERCLA and EPCRA
- Ag sources may:
  - Significantly impact air quality
    - Dairy emissions responsible for 12% of total reactive VOCs in San Joaquin Valley, and are the 3<sup>nd</sup> largest source
  - Raise potential public health issues (NH<sub>3</sub>, H<sub>2</sub>S, PM, and VOCs)

# Emissions from Ethanol & Sugar Beet Manufacturing

- Ethanol production has tripled in last 7 years
  - VOCs, which contribute to ozone, are the primary pollutant
- Sugar Beet Industry includes 28 uncontrolled facilities
  - VOCs and CO, which combines with hemoglobin and displaces oxygen in the blood, are the primary pollutants

## What is OECA Doing to Address CAFO Air Concerns?

- Ag Compliance Assistance Center
- Enforcement
  - Buckeye Eggs/Ohio Fresh Eggs
  - Premium Standard Farms/Continental Grain
  - Seaboard Foods, LP
- Air Compliance Agreement

### Ohio Fresh Eggs – Formerly Buckeye Egg



### Visible PM Emissions from Ohio Fresh Eggs



## What is OECA Doing to Address Ethanol Industry Emissions?

- Settlements with 28 companies
  - Require installation of thermal oxidizers
  - VOC emissions reduced by 100,050 tpy. CO and SO<sub>2</sub> emissions also reduced
- Midwest Scaling Protocol was developed with industry and is less expensive, optional VOC estimation method

# What is OECA Doing to Address Sugar Beet Industry Emissions?

- Enforcement focuses on dryer emissions, the major source of VOCs and CO
- EPA has invited industry to help accurately characterize VOC emissions

### **CERCLA** and **EPCRA**

- Reporting Exemption ?
- Ag industry seeking an exemption from CERCLA/EPCRA hazardous release reporting requirements
- Fall, 2007, FR Notice will be published outlining EPA preferred option, plus discussion of alternatives

### Where Do We Go From Here?

- Continue working cooperatively with ag industry
- Air Compliance Agreement monitoring results will be posted on EPA website
- Enhance Ag Compliance Assistance Center (will be called the "Agriculture" website)
- EPA will take enforcement actions where needed
- Other ideas?