



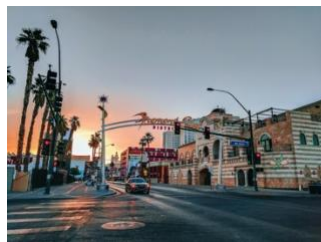
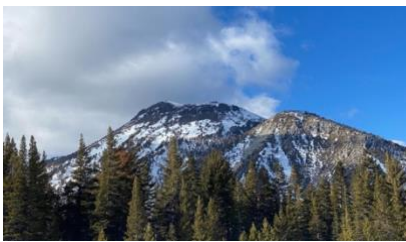
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## News & Updates

# HAZARDOUS WASTE 101

**FREE  
TRAINING**



## Learn the basics:

- Waste management
- RCRA manifests
- Waste identification
- Labeling
- Record keeping
- Reporting
- Training
- Cost saving tips

[Click or scan to register](#)

Las Vegas  
December 13th  
9AM-12PM

Business & Industry



Reno  
December 19th  
9AM-12PM

Redfield Campus



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## Registration Now Open! Hazardous Waste 101 Training

**December 13th (Las  
Vegas) & December 19th  
(Reno)**

Hazardous Waste 101 is a free training where you and your team will learn proper management of hazardous waste, RCRA manifest requirements, waste identification and labeling requirements, record-keeping and reporting requirements, and training requirements.

Throughout the training, BEP will provide tips for cost-saving approaches and resources to help you manage and minimize hazardous waste streams.

Registration is required.

Register [here](#) for the Las Vegas course, to be held from 9AM – 12PM on Wednesday, December 13<sup>th</sup> at the Department of Business and Industry building.

Register [here](#) for the Reno course, to be held from 9AM – 12PM on Tuesday, December 19<sup>th</sup> at the UNR Redfield Campus.

Please pass around the [flyer](#) for Hazardous Waste 101 to help spread the word!

## Introducing Griffin Hadlock, BEP Air Quality Specialist

Griffin Hadlock recently joined BEP as an Air Quality Specialist. He will be providing statewide assistance to Nevada's businesses for air quality permitting and compliance issues and questions.

Griffin was born and raised in Reno, Nevada, and has a passion for exploring Nevada's wild lands. He holds a Bachelor of Science degree in Ecohydrology from the University of Nevada, Reno. Griffin has prior experience with local regulatory agencies and is excited to help Nevada's start-ups and established businesses with all concerns pertaining to air quality.

[Learn More](#) about BEP staff.

## Regulatory Information

## National Enforcement and Compliance Initiatives FY 2024-2027

The EPA's Office of Enforcement and Compliance Assurance (OECA) updates its national enforcement and compliance initiatives (NECIs) every three years to address difficult environmental and public health challenges. The EPA focuses its enforcement and compliance assurance resources on the most serious environmental violations by developing and implementing NECIs, in addition to the EPA's core enforcement work. The [six NECIs for FY 2024-2027](#) are:

- Mitigating climate change (new)
- Addressing exposure to PFAS (new)
- Protecting communities from coal ash contamination (new)
- Reducing air toxics in overburdened communities (modified)
- Increasing compliance with drinking water standards (continued)
- Chemical accident risk reduction (continued)

Three NECIs have returned to the OECA's core enforcement program. Initiatives returned to the core enforcement program remain important areas for compliance even though they are no longer NECIs:

- Reducing toxic air emissions from hazardous waste facilities
- Stopping aftermarket defeat devices for vehicles and engines
- Reducing significant noncompliance with NPDES

For more detailed information on the NECIs, read the EPA's [formal memorandum](#).

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## Proposed Reclassification of Major Sources as Area Sources Under the Clean Air Act Comments due November 13, 2023

On September 27, 2023, the EPA introduced a [proposed rule](#) known as the Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act (MM2A), which sets new requirements for major sources of hazardous air pollutants ([HAPs](#)) that opt to reclassify themselves as area sources under the National Emissions Standards for Hazardous Air Pollutants (NESHAP) program. Major sources are defined as those emitting 10 tons per year (tpy) or more of a single HAP or 25 tpy or more of a combination of HAP, while area sources emit HAP below these specified thresholds. Historically, a policy known as "once in always in" required facilities that were major sources of HAP to comply permanently with that standard and this was a disincentive for major sources to reduce emissions.

**Who this affects:** This proposed rule would apply to any source that chooses to reclassify, including those that have reclassified since January 25th, 2018.

**When does this go into effect:** Reclassification will become effective once a permit with federally enforceable conditions has been issued and the EPA has been notified. This rule also clarifies reporting requirements and submitting confidential business information.

**Federally enforceable permit conditions:** A key point of this change is that sources changing from major to area sources will need to establish federally enforceable emission limits. This will aid in preventing sources increasing emissions above the limits allowed by the major source NESHAP that the sources were subject to before reclassification.

**Small business impacts:** Small businesses should note that while the proposed rule is intended to clarify regulatory requirements, there may be additional costs associated with establishing federally enforceable permit conditions.

[CLICK HERE](#) to learn more about the [proposed rule](#). Refer to Docket ID No. EPA-HQ-OAR-2023-0330 when submitting comments. Comments are due to EPA by November 13th, 2023

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## Air Emissions Reporting Requirements Proposed Rule Comment Period Extended until November 17th

The U.S. Environmental Protection Agency (EPA) has extended the comment period for the Air Emissions Reporting Requirements (AERR) [proposed rule](#) for an additional 30 days to November 17, 2023. Written comments are being accepted [here](#).

The EPA's proposed AERR rule could impact small businesses significantly. With unique emission thresholds for Hazardous Air Pollutants, businesses might need to report even minimal emissions. This poses challenges for recordkeeping and compliance.

The [Overview Fact Sheet](#) and [Key Things to Know About the Proposed Updates](#) provide helpful summaries of the changes.

Additional information is available at the [Air Emissions Reporting Requirements](#) website.

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## NNPH Air Quality Division Seeks Public Input on Wildfire Impact Reports

The Northern Nevada Public Health Air Quality Management Division (AQMD) is seeking public input on reports that demonstrate how wildfires in 2021 and 2022 worsened air quality, especially PM10 particles. These reports request that the EPA does not consider this data when making regulations. PM10 refers to very fine particles in wildfire smoke.

If the EPA agrees to this request, it means that future local air quality plans won't be affected by PM10 from wildfires, but it won't change AQMD's responsibility for public health or air quality alerts.

The AQMD needs EPA approval for its 2nd 10-year PM10 maintenance plan, which is due next year. To gain approval, the area must meet the 24-Hour PM10 National Ambient Air Quality Standard (NAAQS) without exceeding it. Multiple wildfires in 2021 and 2022 led to 15 violations of the PM10 NAAQS in the Truckee Meadows PM10 maintenance area. Using the Exceptional Events Rule, AQMD can ask to exclude wildfire-related data when assessing compliance with the 24-Hour PM10 NAAQS.

Comments are welcome until midnight on November 26, 2023, and can be emailed to [Health-AQ-Planning@nnph.org](mailto:Health-AQ-Planning@nnph.org). Please ensure your correspondence includes your first and last name, as well as a complete mailing address.

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## Sustainability Corner

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## Latest Sustainable Nation Podcast

### Amelia DeLuca from Delta Airlines

Host Josh Prigge speaks with Amelia DeLuca, Chief Sustainability Officer at Delta Air Lines to discuss:

- Delta's decarbonization efforts and strategies
- What sustainable aviation fuel is and challenges to scale it
- How corporations can purchase sustainable aviation fueled flights from Delta
- Delta's social and environmental sustainability strategies
- Advice and recommendations for sustainability professionals



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The Sustainable Nation Podcast is made available through a [partnership](#) with the Nevada Business Environmental Program.

Be sure to also check out the full [library](#) of podcasts.

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If you have any environmental or energy questions, do not hesitate to get in touch with us. Our confidential toll-free hotline is taking calls and we are promptly answering all emails. We are staffed from 8am – 5pm, Monday through Friday.

If you are interested in having BEP visit your business for a free on-site assessment, give us a call. We are also available to communicate via calls, photos, and online video meetings.

[CLICK HERE](#) to learn more about why it makes sense to work with BEP!

*The Nevada Business Environmental Program is a partnership program funded, in part, by the Nevada Division of Environmental Protection and Northern Nevada Public Health's Air Quality Management Division.*