



NEMS ENVIRONMENTAL MANAGEMENT PROGRAM

PROGRAM NAME:	Air Emissions Management Program		
SIGNIFICANT ENVIRONMENTAL ASPECT(S): Air Emissions	DOCUMENT NUMBER:	EMS.EMP.01.2007.BALT	
	DATE REVISED:		
	REVISION NUMBER:		
	SUNSET DATE:		
	PROGRAM LEAD:	Scott Koehler	

SECTION 1 – PROGRAM DESCRIPTION

Section 118 of the CAA, as amended, requires all federal facilities, including Baltimore NIH to comply with the procedural and substantive requirements of applicable federal, state, and local regulations for air pollution control. Requirements encompass federal regulations promulgated pursuant to the CAA in 40 CFR Parts 50 through 82, Code of Maryland Regulations (COMAR) Title 24 for the protection of air quality, and local requirements applicable to the maintenance and improvement of Baltimore County’s CAA attainment status. In addition to point source regulatory provisions, NIH-Bayview is subject to the federal requirements for the servicing and management of equipment containing ozone-depleting substances (ODSs) regulated under 40 CFR Part 82.

The Air Emissions Management Program is designed to help NIH Baltimore maintain compliance with these regulations, quantify emissions, and develop plans to employ the best available technologies and management practices to reduce emissions. NIH Baltimore engages in a variety of activities that emit air pollutants including carcass incineration, operation of HVAC systems, propane tanks and emergency generators, and transportation of chemicals. Of particular concern are old boilers which emit NOx as well as emissions of ozone depleting substances which presents significant health hazards and some environmental effects. The current focus of the NIH Baltimore Air program will look to reducing these emissions through the replacement of boilers and the development of a telecommuting program.

SECTION 2 – OBJECTIVES AND TARGETS

1. Objective: Investigate the possibility for on-site incineration of carcasses	Performance Indicator(s):	Responsibility: Scott Koehler	Timeframe:
- <i>Target/Milestone:</i>	Performance Indicator(s):	Responsibility:	Timeframe:
- <i>Target/Milestone:</i>	Performance Indicator(s):	Responsibility:	Timeframe:
2. Objective: Replace existing boilers with low-NOx burning boilers when current boilers reach end of life cycle	Performance Indicator(s):	Responsibility: Scott Koehler	Timeframe:

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- <i>Target/Milestone:</i>	Performance Indicator(s):	Responsibility:	Timeframe:
- <i>Target/Milestone:</i>	Performance Indicator(s):	Responsibility:	Timeframe:
- <i>Target/Milestone:</i>	Performance Indicator(s):	Responsibility:	Timeframe:
3. Objective: Pursue the development of a telecommuting option policy justified, in part, on ozone alert days.	Performance Indicator(s):	Responsibility: Jane Clarke	Timeframe:
- <i>Target/Milestone:</i>	Performance Indicator(s):	Responsibility:	Timeframe:
- <i>Target/Milestone:</i>	Performance Indicator(s):	Responsibility:	Timeframe:
- <i>Target/Milestone:</i>	Performance Indicator(s):	Responsibility:	Timeframe:

SECTION 3 – PROGRAM DESCRIPTION, SIGNIFICANCE, IMPACTS AND REQUIREMENTS

REASON(S) FOR SIGNIFICANCE:	<ul style="list-style-type: none"> ▪ This aspect is governed by Executive Order 13423: Strengthening Federal Environmental, Energy and Transportation Management ▪ This aspect has the potential to significantly impact the environment through air emissions ▪ This aspect is important to NIH’s relationship to the local community and the public at large
POTENTIAL ENVIRONMENTAL/ ORGANIZATIONAL IMPACTS:	<ul style="list-style-type: none"> ▪ Health of NIH Baltimore and surrounding community (respiratory illness) due to air pollution (ground level ozone). ▪ Public image/community relations ▪ Greenhouse gas contribution ▪ Air pollution (smog, acid rain, dust, visual impairment)
LEGAL AND OTHER REQUIREMENTS:	<ul style="list-style-type: none"> ▪ NIH Mission Statement ▪ Clean Air Act (CAA) ▪ Energy Policy Act (EPACT) ▪ Executive Order 13423: Strengthening Federal Environmental, Energy and Transportation Management ▪ 40 CFR 82 (ODS phase out)

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- CAA-COMAR 26.11.03
- 40 CFR Parts 50 – 82
- 40 CFR 60, Subpart Ec
- COMAR 26.11.09

SECTION 4 – OPERATIONAL CONTROLS

ACTIVITY(IES) THAT GIVES RISE TO ASPECT	CONTROL(S)	RESPONSIBLE PERSON	MONITORING	RECORDS	ACTION TAKEN IF CONTROL FAILS
Animal Incineration	<ul style="list-style-type: none"> ▪ Incinerator Handling Certification/ Refresher Training Courses ▪ CMS SOP Book 	▪	<ul style="list-style-type: none"> ▪ EPA monitors air emissions 	<ul style="list-style-type: none"> ▪ Yearly report to EPA 	▪
Fume Hood Use	▪	▪	▪	▪	▪
Operation and Maintenance of HVAC Systems	▪	▪	▪	▪	▪
Operation and maintenance of propane tanks	<ul style="list-style-type: none"> ▪ Baltimore fork lift operational training 	▪	▪	▪	▪
Operation of Central Utility Plant (Chillers, Boiler, Cooling Towers)	<ul style="list-style-type: none"> ▪ O&M Manual 	▪	▪	▪	▪
Transportation to facility	▪	▪	▪	▪	▪
Use of emergency generators	<ul style="list-style-type: none"> ▪ Routine operational testing of generators ▪ O&M Manual 	▪	▪	▪	<ul style="list-style-type: none"> ▪ Maintenance and retesting

SECTION 5 – RELEVANT DOCUMENT(S)

DOCUMENT NAME	LOCATION	RESPONSIBLE PERSON
NIH Policy on HVAC systems		
Yearly Incinerator Air Emissions Report to EPA		

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NIH Baltimore Ozone Reduction Plan	
Facility file information on boilers	
Facility file information on generator	
Manufacturer's operating emissions rates	
NIH Master Plan (Future Power Plant Requirements)	
NIH Master Utilities Plan	
Waste Disposal Guide	http://orf.od.nih.gov/Environmental+Protection/Waste+Disposal/

SECTION 6 – COMPETENCY OF RESPONSIBLE PERSONS

NAME/TITLE	BASIS FOR COMPETENCE
Scott Koehler	Senior facility manager; Mechanical engineer; 15 years experience at NIH Baltimore.

SECTION 7 – AUTHORIZATION

NAME:	
SIGNATURE:	
DATE:	

DRAFT

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