

### A. EPCRA

1. Submit Tier II Report to SERC, LEPC, Local Fire Dept.  
and possibly others according to specific state requirements. Annually in February – Due March 1- Upload copy of report to e-Compliance
2. Notify LEPC & SERC of new chemicals > TPQ or any change in facility emergency contact person.  
Maintain Extremely Hazardous chemical list. As either occurs – provide SDS for new chemicals. Revise list for change in extremely hazardous chemicals, maintain current MSDS on line program..
3. Notify NRC, LEPC & SERC of any release (Ammonia, oil, diesel etc.) **exceeding the reportable quantity (RQ)**. RQ for ammonia is 100 lbs. in a 24 hour period, RQ for diesel is 25 gallons in most states but can be 1 drop. In some states. Immediately after discovery (no later than 15 minutes). Follow up with written reports as directed. NRC –1- 800-424-8802 (24 hr.)

### B. **Solid Waste Control**

1. Maintain manifests of all shipments of used oil, solvents, sludge, anti-freeze, fluorescent light bulbs, etc. Make sure waste is properly described, before signing manifest and that transporter & final disposal company is properly licensed. With each applicable waste shipment  
Note: Know where your waste is finally treated & as necessary, conduct lab test on waste to prove it is non-hazardous.
2. Recycle all possible wastes – metals, cardboard, office paper, shrink-wrap, aluminum cans, oil filters, empty drums, used oil, solvents, batteries, tires, etc. Continuously- Review land filled wastes annually & look for recycling opportunities
3. Notify State of any changes in generator status – conditionally exempt to small quantity. When volume of hazardous waste changes to 220# per month.
4. Review of chemicals on site & no longer used Annually. Properly dispose of obsolete chemicals.

### C. **Storage Tanks**

1. Records, certifications, performance standards, records associated with installation, repair of tanks, pipes sensors, alarms, etc. With installation, modifications or repairs to tank system.
2. Submit UST registration documents, pay fees, post permit certificates for tanks. Annually – Requirement & date varies by state, normally, July – September.
3. Maintain financial responsibility letter for UST Normally one time – must be submitted annually to some states.
4. Conduct tank and line tightness tests as required Lines – Annually, UST – each 5 years and after any tank/pipe repairs – or more frequently if required by the state.

### Environmental Task

### Time Frame

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| 5. Conduct written aboveground tank inspections. Inspect & clean contained rainwater, record release.  | Varies – Monthly minimum  |
| 6. Conduct inspections/test & maintain printouts, written records of all tank & piping system inspections: sensors, alarms, water content, cathodic protection, overfill protection, monthly monitoring, inventory monitoring records, spill bucket and fueling containment basin contents, etc. | Varies – Monthly minimum  |
| 7. Develop & maintain spill or SPCC plan – check & maintain spill containment inventory. Plan shall be certified by a licensed professional engineer-(P.E.) .  | Annual review & update.<br>Replenish spill materials as required.   |
| 8. Conduct employee spill response training  | Annually – Initial training provided in SIU   |
| 9. Notify of suspected tank or line leaks and of any spills which might contact the environment. Develop & maintain written reports of regulators responses.   | Immediately upon determination of leak .<br>Immediately upon spill reaching environment - including a sheen on water – (some states have a 25gal. notification trigger for non-water spills). |
| 10. Maintain records on site of any removed tank systems.  | As applicable.  |
| 11. Ensure that all leak, overfill sensors and alarms are calibrated and maintained.   | Per manufacturer PM specifications  |

### **D. Water Discharges**

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| 1. Storm Water – Locations with fueling activities, garage and truck washing would be covered by the regulations, but reduce contact with outside storage: (scrap equipment, drums, truck parts, dirty pallets, etc.) Keep dumpster lids closed. Divert storm water from flowing through the fuel island. Note: May require a NPDES | Move materials inside or cover outside storage to protect from storm water contact. Monthly inspection of yard condition.        |
| 2. Process Water Discharges – Know where all process water discharges go. Ensure <b>NO</b> process water, (cooling tower, truck/trailer wash, floor scrubber, battery wash, floor drain, etc) discharges to the environment without a proper permit. Note: May require a NPDES  | Annual review/check of process water   |
| 3. Waste Water – (a) Ensure no prohibited materials are flushed to the sewer, i.e. flammables, corrosives, pesticides chemicals, etc.   | Annual check of wastewater discharges. Notify WWTP authorities immediately of a spill reaching the sewer.                        |
| (b) Ensure discharge meets sewer limits on permits or sewer regulations – flow, mg/l and lbs per day of parameters such as: Oil & grease, ammonia, plus and PH & temperature limits. Submit timely reports promptly in writing to why variance occurred, how it will be fixed and then it must be fixed.                            | Varies depending on WWTP authorities & permit – if applicable. Flow is normally recorded daily. Testing is monthly or quarterly. |

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| (c) If WWTP authorities do not test your discharge, conduct a (24) hour composite test & test as noted in (b) above. | Minimum of one time test                |
| (d) Inspect oil/water separators, traps and clean as required.   | At least quarterly.                     |
| 4. Water Supply – (a) If backflow devices protect incoming water supply  | Annual test by qualified inspector      |
| (b) If the facility has on-site wells – have the water tested If consumed & properly identified if non-potable.      | Annual test                             |
| (c) Test drinking water for copper & lead or get test results from the WTP company                                   | Each 5 years or after a major expansion |

### E. TSCA (Toxic Substance Control Act)

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| 1. Ensure there are no PCB's in transformers and capacitors  | One time inspection/utility certification |
| 2. Ensure there is no asbestos in pipe insulation, ceiling tiles, floor tiles, wall or ceiling in freezers or coolers. | One time asbestos survey                  |
| 3. Maintain TSCA 8c list to record health complaints caused by materials not known as hazardous                        | Maintain file                             |

### F. Pesticides

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| 1. Ensure vendor is licensed, uses currently certified applicators & EPA approved pesticides. Keep MSDS for all pesticides, records on site of when, what and the amount applied to control which pests. | Annual check |
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### G. Ammonia Refrigeration

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| 1. Develop and maintain an emergency response plan, Train responders at the appropriate level, conduct drills.  | Annual review & update training & drill.   |
| 2. Maintain PSM and 112r RMP plans at facilities with >10,000# of anhydrous ammonia (NH3). <b>Recommended companies with anhydrous ammonia in any quantity shall comply with PSM/RMP regulations.</b> | Annual review, PSM audit every 3 yr. PHA review & RMP submit every five years (5). |
| 3. Written inspections of ammonia system for leaks, etc   | Daily  |
| 4. Inspections of response equipment – SCBA, respirators etc.   | Monthly  |
| 5. Review of quantity of ammonia added to the system in order to check for slow leaks and releases.   | Annual   |
| 6. Replace pressure relief valves, (PRV's).   | Every five years.  |

### H. Air

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| 1. Ensure Freon system refrigeration technicians working with the systems are properly certified, have certification on-site and ensure that only certified recovery equipment is used. Keep copies of purchase, recycling and disposal receipts. | Annual Review |
| 2. Prior to any facility renovation or demolition, have any suspect materials inspected & tested for asbestos   | As required   |

#### Misc. Information:

Ensure that spill kits are used in all tractors & drivers are trained in their use as well as sound, pro-active spill control actions – (park on paved surfaces, not on sides of hills, away from drains & water sources, etc.)

Ensure due diligence is practiced on all new facilities, purchased or leased & when sold or leases are dropped. Phase 1 or 2 environmental audits and transaction screens must be done by an outside qualified environmental consultant.

Send all correspondence to any regulatory authorities via certified mail, return receipt.

Immediately notify the Regional Safety Manager (Corporate Office) of any visits by environmental regulators (EPA), also of any spills, leaks, citations, complaints, etc.

Track State and local environmental developments/regulations. You are responsible for knowing and complying with all federal, state and local regulations that apply to you. Keep copies of the applicable state & local regulations on site.

Regulations concerning AST (aboveground storage tanks) can be found in the **40CFR 260.10**. Some ASTs fall under the OSHA requirements **29 CFR 1910.106** if they contain flammable or combustible liquids. (Diesel fuel) The rules apply to liquids with flashpoints below 200°F. In this case, the objective of the regulation is to protect workers from fires, rather than protecting the environment from spills. The majority of regulations affecting ASTs are found at the state and local level. Check with your state and local agencies to see if there are more stringent AST requirements that you need to know about.

#### References:

Regulations concerning UST (underground storage tanks) can be found in the **40 CFR 280**

**40 CFR 68**

RMP – **40 CFR 112**

Hazardous Waste – **40 CFR 265.50 -56 & 40 CFR 171**

EPA's Oil Pollution Prevention Regulation (SPCC and Facility Response Plan Requirements) - **40 CFR part 112.7(d) and 112.20-.21;**

SARA Tier II – **40 CFR 302;355;370;372**

**Contact [www.epa.gov](http://www.epa.gov) for more information**

## Glossary

**SERC- State Emergency Response Committee**

**LEPC- Local Emergency Planning Committee**

**TQ – Threshold Quantity**

**SARA - Superfund Amendments and Reauthorization Act**

A federal fund set aside to clean up existing hazardous waste sites.

**RCRA - Resource Conservation and Recovery Act**

**RMP - Risk Management Plan**

A written program that is required by the Clean Air Act. It is designed to prevent accidental releases into the environment.

**MSDS – Safety Data Sheet**

Term used to refer to a Material Safety Data Sheet (MSDS).

**UST – Underground Storage Tank**

**AST – Aboveground Storage Tank**

**RQ – Reportable Quantity**

**SPCC – Spill prevention, control, and countermeasures**

**PE – Professional Engineer**

**NPDES – What is an NPDES permit?**

The Clean Water Act prohibits anybody from discharging "pollutants" through a "point source" into a "water of the United States" unless they have an NPDES permit. The permit will contain limits on what you can discharge, monitoring and reporting requirements, and other provisions to ensure that the discharge does not hurt water quality or people's health. In essence, the permit translates general requirements of the Clean Water Act into specific provisions tailored to the operations of each person discharging pollutants.

**PM – Preventive Maintenance**

**WWTP – Waste Water Treatment Plant**

**WTP – Waste Treatment Plant**

**TSCA- Toxic Substance Control Act**

**EPA – Environmental Protection Agency**

**PSM – Process Safety Management**

**RMP – Risk Management Plan**

**PHA – Process Hazard Analysis**

**SCBA - Self-contained breathing apparatus**

**PRV – Pressure Relief Valve**