

# PWGC Winter Newsletter

## Aviation Edition

**“P.W. Grosser Consulting serves our clients, our neighborhoods and our society!”**

**STRATEGIC  
ENVIRONMENTAL  
SOLUTIONS**

**Happy Holidays!  
PWGC's Aviation  
newsletter is designed  
to assist Facilities and  
other relevant  
departments stay  
updated on ever  
changing environmental  
rules, regulations, and  
other pertinent issues  
related to the Aviation  
industry**

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**Helping You Make Your  
Airport the Best for the  
Community and the  
Environment!**

### EPA's Proposal for Revising Underground Storage Tank Regulations

As stated in our Fall 2011 newsletter, proposed federal underground storage tank (UST) regulations revising 40 CFR 280 and 281 are underway. The EPA is proposing revisions that will strengthen the 1988 federal underground storage tank (UST) regulations by increasing emphasis on properly operating and maintaining UST equipment. These revisions will help improve prevention and detection of UST releases, which are one of the leading sources of groundwater contamination. The revisions will also help ensure all USTs in the United States, including those in Indian country, meet the same minimum standards.

EPA's proposal revises the UST technical regulation in 40 CFR part 280 by:

- Adding secondary containment requirements for new and replaced tanks and piping
- Adding operator training requirements for UST system owners and operators
- Adding periodic operation and maintenance requirements for UST systems
- Removing certain deferrals, see below
- Adding new release prevention and detection technologies
- Updating codes of practice
- Making editorial and technical corrections

EPA is also proposing to update the state program approval (SPA) requirements in 40 CFR part 281 to incorporate the proposed changes to the UST technical regulation listed above. The EPA published a comparison chart which may be viewed at <http://www.epa.gov/oust/fedlaws/Crosswalk.pdf>.

It is important for airports to note the proposed regulation for airport hydrant systems (AHS), wastewater tanks, and field-constructed tanks (FCT). The EPA has removed the deferral and will now regulate these systems requiring monitoring and leak detection systems. Implementation of compliance will be three years for 40 CFR 280 subparts B (except notification), C, and D (except periodic bulk piping pressure testing which has a phase in over seven years) and immediate for subparts E, G, H, and notification. EPA continues to defer aboveground tanks associated with FCT and AHS.

Another important change to note that will affect many is the removal of the deferral for USTs storing fuel for emergency power generators and wastewater treatment systems. Within one year release detection must be installed.

EPA removed the option for of flow restrictors (ball float valves) in vent lines to meet the overflow protection requirement (refer to 40 CFR 280(c)(ii)).

PWGC will continue to keep you informed of when the proposed regulations may become final and what the requirements will be.



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## Don't Let Poor Housekeeping Cost You \$\$\$

Facilities storing hazardous substances and waste continued to get fined for poor housekeeping. The intent of good housekeeping practices, proper storage, record keeping and maintenance is regulated for prevention of accidents harmful to human health and the environment.

Let the New Year begin with auditing housekeeping practices for areas that may store hazardous substances and/or wastes to determine adequate prevention of spills or releases. An audit may be conducted via a third party or in house. Some tools for in house auditing include EPA checklists.

A checklist for Subtitle C requirements for generators of hazardous waste may be found at [http://www.epa.gov/compliance/resources/publications/assistance/sectors/constructmyer/myer2\\_hazardwaste.pdf](http://www.epa.gov/compliance/resources/publications/assistance/sectors/constructmyer/myer2_hazardwaste.pdf).

Contact PWGC today for assistance with proper hazardous substance and waste storage compliance.

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## Low Carbon Jet Fuels



Renewablejetfuels.org Carbon War Room has a mission: "The mission of the Carbon War Room's Aviation Operation is to significantly reduce greenhouse gas emissions from the aviation industry by accelerating the scale-up of a sustainable renewable jet fuel industry." They seek to improve access to low-carbon jet fuels for airplanes and stimulate a shift to 50% sustainable fuels in the global airline industry by 2020.

Richard Branson's airline Virgin Atlantic has pilot projects scheduled for a new low carbon jet fuel derived from industrial waste. It plans to begin commercial operation of its new jet fuel by 2014 in China.

International airways have begun this process as well. Thai Airways International will be the first airline in Asia to have a commercial passenger flight using biofuel, scheduled for December 22 flight from Bangkok to Chiang Mai.

PWGC will continue to stay abreast of biofuels in aviation and keep you informed.

## Community Right to Know Toxic Release Inventory (TRI) and TIER II Reporting


As stated in previously newsletters around the holidays we like to remind those who currently perform TIER II and TRI reporting and those that do not that it must be analyzed for the previous calendar year. Fines may be imposed by the EPA should reporting be required and not performed.

**TIER II forms are due annually by March 1<sup>st</sup>!** Facilities covered by Emergency Planning and Community Right-to-Know Act (EPCRA) requirements must submit an Emergency and Hazardous Chemical Inventory Form to the Local Emergency Planning Committee (LEPC), the State Emergency Response Commission (SERC), and the local fire department annually by March 1st.

**TRI reports are due by July 1<sup>st</sup>** annually for owners and operators of facilities that have 10 or more full-time employee equivalents, exceed established chemical thresholds, and are within primary NAICS code designations (40 CFR Part 372). The threshold for manufactured or processed is 25,000 lbs, otherwise use is 10,000 lbs, 100 lbs for lead and lead compounds and PACs, 10 lbs for a subset of PBT chemicals that are highly persistent and highly bioaccumulative chemicals such as mercury and mercury compounds and 0.1 for dioxins and dioxin-like compounds.



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