

PWGC Winter Newsletter

Facilities Edition

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**STRATEGIC
ENVIRONMENTAL
SOLUTIONS**

Happy Holidays! PWGC's Facilities newsletters are designed to assist relevant departments stay updated on ever changing environmental rules, regulations, and other pertinent issues related to the Manufacturing, Chemical, and Production industries.

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Helping You Make Your Facility the Best for the Community and the Environment!

EPA's Proposal for Revising Underground Storage Tank Regulations

The EPA's 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>.

An 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 overfill protection requirement (refer to 40 CFR 280(c)(ii)).



NYSDEC Air Regulations Part 231, New Source Review (NSR) for New and Modified Facilities, Part 201 Permits and Registrations, and Part 200 General Provisions Effective October 15, 2011

Revisions to above referenced NYSDEC air regulations were finalized to incorporate greenhouse gas provisions from EPA's June 3, 2010 rule, add to existing PM-2.5 provisions as a result of EPA's May 16, 2008 and October 20, 2010 rules, and correct existing typographical errors.

To view the revisions visit <http://www.dec.ny.gov/regulations/77409.html>.

PWGC 
Strategic Environmental Engineering Solutions



Environmental Justice 2014

Plan EJ 2014 aims to protect people's health in communities overburdened by pollution, empower communities to take action to improve their health and environment. Plan EJ 2014 is a roadmap that will help EPA integrate environmental justice into the Agency's programs, policies, and activities. Plan EJ 2014 identifies Cross-Agency Focus Areas, Tools Development, and Program Initiatives as three essential elements that will advance environmental justice across the EPA and the federal government. The goals of the plan are to:

- Protect health in communities over-burdened by pollution
- Empower communities to take action to improve their health and environment
- Establish partnerships with local, state, tribal and federal organizations to achieve healthy and sustainable communities.

EJ 2014 is not a regulation but a strategy to protect communities with higher than normal air pollution. In 2014, EPA will make an assessment of its progress in achieving the goals of Plan EJ 2014. Based on this assessment, EPA will produce a report on the accomplishments, lessons learned, challenges, and next steps for continuing the Agency's efforts to make environmental justice an integral part of every decision.

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

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

Food is always a great topic to bring up around the holidays! Sustainable food systems are being put into practice in many hospitals as they are realizing unhealthy and unsustainable food systems are negatively impacting human health. Hospitals are beginning to make a change in the ways in which they procure, offer, prepare and dispose of food. Creation of farmer's markets organic gardens, increased purchasing of locally grown seasonal and organic produce, efforts to purchase milk and dairy products free of hormones and programs to compost a large percentage of food waste are just a few of the strategies being integrated at major hospitals and health systems nationwide.

As stated in our Fall newsletter, many healthcare facilities are making food a priority to achieve more sustainable food practice goals. Practice Greenhealth has partnered with Health Care Without Harm and the Food Matters Project to provide a range of tools and resources, sample policies and case studies designed specifically for the healthcare sector.

Visit http://practicegreenhealth.org/topics/sustainable-food#_edn3 for more information on Healthcare without Harm's Healthy Food Systems.

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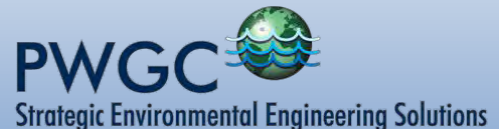
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