

PWGC Fall Newsletter

Aviation Edition

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

Revising Underground Storage Tank Regulations (Part 280, 281) – Revision to Existing Requirements and New Requirements for Secondary Containment and Operator Training



STRATEGIC ENVIRONMENTAL SOLUTIONS

Happy Fall! PWGC's hospital newsletters are designed to assist Facilities Engineering and other departments within the hospitals to stay updated on ever changing environmental rules, regulations, and other pertinent issues related to the healthcare industry.

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Proposed federal underground storage tank (UST) regulations should be published and available for public comment this fall. The U.S. Environmental Protection Agency (EPA) sent the proposal May 13 to the executive Office of Management and Budget (OMB) for a review for new regulations that will implement the secondary containment and operator training requirements of the Energy Policy Act of 2005. The Underground Storage Tank (UST) regulations were first promulgated in 1988 primarily to prevent releases from retail petroleum marketers (gas stations) and other facilities into the environment. The EPA feels there is a need to revise the regulations to incorporate changes to the UST program from the Energy Policy Act of 2005, as well as to update outdated portions of the regulations due to changes in technology since the 1980s.

The EPA plans to develop regulations for secondary containment and operator training to apply in Indian Country and in states that choose not to obtain State Program Approval from EPA in order to achieve more consistent program results in release prevention and compliance. Both EPA and tribes recognize the importance of having requirements that can help to ensure parity in program implementation between states and in Indian Country, which is consistent with EPA's policy. Through this action, EPA will ensure federal enforceability of the EPA provisions across the country. EPA will also use our knowledge of the program gained over the last 20 years to update and revise the regulations to make targeted changes to improve implementation and prevent UST releases.

The proposed rule was initiated in 2008 and as mentioned above sent to OMB on May 13, 2011. The final rule is anticipated to be finalized this fall.

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

EPA Proposes NOx Emissions Standards for Aircraft Gas Turbine Engines – Are Greenhouse Gases Next?

The EPA is proposing to adopt emission standards and related provisions for aircraft gas turbine engines with rated thrusts greater than 26.7 kilonewtons. These engines are used primarily on commercial passenger and freight aircraft. The proposed requirements were either previously adopted by the International Civil Aviation Organization (ICAO), or agreed on at ICAO's Committee on Aviation Environmental Protection (CAEP) in 2010. Included in the proposal are two new tiers of more stringent emission standards for oxides of nitrogen (NOx). These are referred to as Tier 6 (or CAEP/6) standards and Tier 8 (or CAEP/8) standards. The proposed standards would become effective for newly-manufactured aircraft engines beginning in 2013. Regulation of greenhouse gases (GHGs) in aircrafts by the EPA may be on the horizon. Environmental groups such as Earth Justice have demanded action be taken to regulate climate pollution from ships, aircrafts and non-road emissions.

PWGC will keep you informed of future decisions for GHG regulations.

PWGC 
Strategic Environmental Engineering Solutions



Environmental & OSHA – Hand in Hand

Environmental protection which protects the environment and human health goes hand in hand with the Occupational Safety and Health Administration (OSHA). Recently, OSHA has cited facilities with large fines for putting employees at potential harm for worker exposure to chemicals. Such facilities are often delinquent in environmental regulations for chemical hazardous and wastes tracking proper labeling, handling and disposal requirements per EPA's 40 CFR 261 and more stringent state and local regulations.

Hazardous waste generators must look at requirements applicable to preparedness and prevention of potential harm to the environment and human health. Although, only large quantity generators are requirement to have a Contingency Plan and designated emergency response personnel, it is recommended that all facilities have some form of two-way communication and emergency preparedness to protection their employees for harm of chemical exposure.

Contact PWGC for further assistance with environmental and OSHA audits for your facility!

LED Lighting

LED lighting is the newest technology in energy efficient lighting systems, but how can a light source that produces the same lumens per watt as fluorescent, or HID lamps be so efficient? Fluorescent lamps are typically used indoors, and HID lamps (high pressure sodium and metal halide) typically used for roadway and parking lot lighting are omnidirectional light sources – that is they provide light all around the lamp. LED light sources are directional, and therefore their light output (measured in lumens) can be better focused at the area to be lit. Because LEDs are directional, fixtures using LEDs as light sources can be up to twice as efficient as fluorescent fixtures and five to six times as efficient as HID fixtures.

In addition to being more efficient light sources, LEDs also provide better light sources in terms of the visible light they provide. LEDs have a color rendering index (CRI) that is close to natural daylight and therefore we can perceive colors under LEDs as we would outdoors on a sunny day. LEDs have a higher CRI than metal halide lamps and a much higher CRI than high pressure sodium or fluorescent lamps. In terms of maintenance, LEDs are rated for 50,000 hours (5.7 years) of operation – about one and a half times longer than fluorescent lamps and two to eight times longer than HID lamps.

To maximize the benefits of LEDs as light sources when preparing for a new lighting project or fixture replacement project be aware that not all LED fixtures are equal! LED fixtures are only as good as their driver (the power supply that provides the correct power to the LED) and the fixture's ability to dissipate the heat generated by the driver.

PWGC now offers full lighting design services including fixture selection, layout / photometrics, and electrical engineering services. Please feel free to contact us regarding any upcoming project or to find out about any available rebates for energy efficient lighting upgrades.

Make Sure Your Fuel Storage Tanks Are In Full Environmental Compliance

The U.S. Environmental Protection Agency (EPA) does not look lightly upon facilities that are not properly up keeping their fuel storage tanks. EPA Region 2 issued a complaint and compliance order seeking \$233,000 in penalties this past May for 17 facilities in New York. The complaint alleges that the various owners and/or operators failed to: test the corrosion protection systems; perform annual tests of automatic line leak detector systems; and provide adequate overfill prevention equipment. Other allegations include failure to: report, investigate and confirm a suspected release at one facility; properly cap off and permanently close one UST; keep adequate records of release detection monitoring; and conduct an annual leak test, or monthly monitoring, of the underground pressurized pipes USTs.

Other common violations include leak detection system not working properly or does not exist, incomplete tank removals and no employee training.

Contact PWGC to evaluate your storage tanks for full environmental compliance!

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