

Environmental Compliance News

Thompson Environmental Consulting, Inc.

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Thompson Environmental Consulting, Inc., located in West Des Moines, Iowa, is a full service environmental firm serving clients in the Midwest. We specialize in air quality, water quality and land quality issues.

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SECTION 1 MANDATORY GREENHOUSE GAS REPORTING – MONITORING PLAN

EPA released its mandatory greenhouse gas (GHG) reporting rule on September 22, 2009. For affected facilities, the first report will be due on March 31, 2011. This will cover actual GHG emissions for calendar year 2010.

Affected facilities must address a few issues before January 2010. The primary requirement is the development of a monitoring plan that will be used to collect the appropriate data. This plan will identify the level of site specific analytical data required and allow you to set up your procedures. The plan is to include:

- Identifies responsibilities (i.e., job titles) for data collection
- Explains processes and methods used for data collection
- Describes QA/QC procedures for monitors
- May rely on references to existing corporate documents (e.g., standard operating procedures)

SECTION 2 OSHA – COMBUSTIBLE DUST

OSHA has issued a guidance document titled “Hazard Communication Guidance for Combustible Dusts”. OSHA currently does not have a standard for combustible dusts.

The guidance document can be found at <http://www.osha.gov/Publications/3371combustible-dust.html>

SECTION 3 AREA SOURCE NESHAPS – SUBPART CCCCC – GASOLINE DISPENSING FACILITIES

This air quality requirement applies to facilities that are NOT classified as a major source of Hazardous Air Pollutants (HAPs) who dispense gasoline. This group includes service stations, convenience stores, car rental agencies, motor pools, etc. Requirements for this rule include:

1. Facilities with a monthly flow of under 10,000 gallons must:
 - Minimize spills, and if there is a spill, clean it up as quickly as possible
 - Cover gasoline containers and storage tank fill pipes with gasketed seal
 - Minimize gasoline sent to open collection systems
2. Facilities with a monthly flow at or above 10,000 gallons must meet all of the requirements in #1 and also:
 - Load all storage tanks at or above 250 gallons capacity using submerged fill (drop tubes)
3. Facilities with a monthly flow at or above 100,000 gallons must meet all of the requirements in #1 and #2 and either:
 - Operate a vapor balance system that meets a specified enforceable State, local, or tribal rule or permit or
 - Operate a vapor balance system during storage tank loadings, test the system periodically to make sure it works correctly, and includes specific equipment and work practices, or meets 95% control.

SECTION 4 WATER QUALITY REGULATORY CHANGES – NUTRIENT STANDARDS

IDNR is proposing to modify IAC 61.3(3) water quality standards for lakes. The proposed standards include:

- a. Transparency. The transparency of the lake as measured with a Secchi Disk shall be one meter or more in at least 75% of the measurements taken.
- b. Chlorophyll-a. The concentration of chlorophyll-a in 75% of the samples analyzed shall not exceed 25 micrograms per liter.

FOR ADDITIONAL INFORMATION – PLEASE CONTACT TEC

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