

# 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 AREA SOURCE NESHAPS

Hazardous Air Pollutants (HAPs) regulations have been focused primarily on major facilities since the original Clean Air Act Amendments of 1990. Major facilities are those that have the potential to emit 10 or more tons of a single HAP or 25 or more tons of multiple HAPs.

Regulations have now been or are in process to regulate non-major facilities. If you are a non-major HAP facility and potentially fall under one of the following classifications, you may be impacted. Please note that this is a limited list. TEC will try to address each in more detail in future newsletters. The due date for initial notification of classifications in bold italics has already passed.

- ***Subpart ZZZZ – Stationary Internal Combustion Engines***
- ***Subpart WWWW – Hospital Ethylene Oxide Sterilizers***
- ***Subpart ZZZZ – Iron and Steel Foundries***
- ***Subpart BBBB – Bulk Gasoline Distribution***
- ***Subpart CCCCC – Gasoline Dispensing Facilities***
- Subpart HHHHH – Miscellaneous Surface Coating Operations, Autobody Refinishing
- ***Subpart WWWW – Plating and Polishing***
- Subpart XXXXX – Metal Fabrication and Finishing
- Subpart ZZZZZ – Aluminum, Copper and Other Nonferrous Foundries
- Chemical Manufacturing
- Paint and Allied Products
- Prepared Feed Manufacturing
- Pharmaceutical Production

## SECTION 2 FACILITY RESPONSE PLANS (FRP)

EPA Region VII recently mailed letters to many of the facilities in Iowa, Nebraska, Missouri, and Kansas that require SPCC Plans to remind them that the rules require the facility to determine if they can “reasonably be expected to cause substantial harm” should there be a release of a “worst case discharge planning volume of an oil”.

Many facilities with greater than 1,000,000 gallons of storage have had to review and defend their Certificate of Substantial Harm determination and in some cases proceed with the development of a facility response plan.

## SECTION 3 RISK MANAGEMENT PLANS (RMP)

The 1990 amendments to the Clean Air Act required that companies develop and submit a risk management plan that would include a worst case scenario. This requirement includes facilities that handle quantities of hazardous chemicals over an established threshold, for example 10,000 lbs for anhydrous ammonia or propane. TEC has extensive experience and can assist you in any reporting requirement, worst case and alternate scenarios, and evaluation of affected environmental receptors and population. It is the smaller, more routine accidents and spills that affect most people, and advance planning is good insurance.

These plans must be renewed and resubmitted every 5 years.

## SECTION 4 OSHA CHANGES

OSHA recently published in the Federal Register a final rule revising the personal protective equipment (PPE) sections of its general industry, shipyard employment, longshoring and marine terminals standards concerning requirements for eye- and face-protective devices, and head and foot protection.

## FOR ADDITIONAL INFORMATION – PLEASE CONTACT TEC

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