Environmental Training

PERMITS
REPORTS AND RECORDKEEPING
BEST MANAGEMENT PRACTICES

Enviro-Sense, Inc.

Permits

- AIR QUALITY
- WASTEWATER AND STORM WATER
- HAZARDOUS WASTE
- INDUSTRIAL SOLID WASTE

Air Permits

- General Permits
  - Surface Coater and Fabrication
    - Expires 12/1/19
  - Crude Oil and Natural Gas Production
    - Expires 9/15/20
- Regulatory Permits
  - Oil and Gas Well Testing
  - Release Natural Gas from Pipelines
  - Stationary Internal Combustion Engines
  - Portable Air Curtain Incinerators
  - Concrete Man'f Facilities
  - Flaring Material other than Natural Gas
  - Storage Vessels
- Act 547 or Exemptions
  - Less than 5 tpy individual
  - Less than 15 tpy aggregate
  - Less than MER
- Small Source
  - Less than 25 tpy total emissions
- Minor Source
  - Not a small source, major source or Title V facility
- Major Source or Title V Permits
  - 10/25 tpy of TAPs
  - 100 tpy of criteria pollutants
  - Statutorily required to obtain a Title V permit

Water Permits

- General Permits
  - Sanitary wastewater
  - Light commercial facilities
  - Multi Sector Storm Water
- Individual Permits
  - Industrial facilities
  - Facilities that don't meet general permit requirements
  - Facilities with commingled discharges
  - Any facility deemed by LDEQ to require an individual permit
  - Renewal applications every 5 years
- Sewer Sludge and Biosolids General Permits
- City Pretreatment Permits

Hazardous Waste Permits

- Hazardous waste notification form
  - All generators of hazardous waste
- Transfer facilities
- Permits to Treatment, Storage and Disposal facilities

Solid Waste Permits

- Industrial solid waste notification
- Beneficial reuse permits
- Solid waste permits
  - Type I/II landfill or surface impoundment or landfarm
  - Type IA/IIA processing
  - Type III C/D and/or woodwaste landfill
  - Type III woodwaste processing and/or separation
  - Waste tire processing
  - Composting facility

Reporting and Recordkeeping

- AIR QUALITY
- WASTEWATER
- HAZARDOUS AND INDUSTRIAL SOLID WASTE
- SPILL PREVENTION
- STORM WATER
- EPCRA

Air Quality – Reporting and Recordkeeping

- See air permit for site specific requirements such as renewal application dates
- ***Renewal applications must be submitted 6 months before expiring***
- Quarterly NESHAP observations
- Monthly paint usages
- See Abrasive Blasting BMP slide for specific monitoring requirements
- Record annual hours of usage for each engine
- Record all maintenance activities on engines, baghouses, tarps, etc.
- Opacity readings as required by air permit

- Annual NESHAP reports – 1/31 (all NESHAPs)
- Semi-annual NESHAP reports – 7/31
- Annual Title V Report – 3/31
- Semi-annual Title V report – 1/31, 7/31
- Air Emission Inventory Report (ERIC) – 4/30
- Review air permit for any site specific reporting

Water Quality – Reporting and Recordkeeping

- Check sanitary units weekly to ensure aerator working and that there is chlorine in dispenser
- ***Test outfalls as specified in wastewater permit***
- Keep record of amount and types of soaps used
- Submit renewal wastewater applications as specified in wastewater permit
- Report certain deviations to LDEQ with 24 hrs (see water permit for oral notification requirements)
- Discharge monitoring reports are due 1/28, 4/28, 7/28, 10/28 dependent on sampling schedule
- Sewer sludge report due 1/28
- NetDMR
- Pretreatment Reports

Hazardous and Industrial Solid Wastes – Reporting and Recordkeeping

- Weekly inspections of hazardous waste drums and storage areas
- Dispose of hazardous waste every 90 days
- Close lids on dumpsters and waste drums
- Separate waste streams by type
- Keep all manifests and bills of lading
- Profile waste streams
- Annual training
- Annual hazardous waste report due 3/1
- Annual solid waste report due 8/1

Spill Prevention Plan – Reporting and Recordkeeping

- Monthly inspections of tanks, containment areas, oil-filled equipment
- Clean all spills
- Annual training
- Mechanical integrity testing

- Report all spills that reach water OR are over reportable quantity

Storm Water Pollution Prevention Plan – Reporting and Recordkeeping

- Quarterly routine audits of facility
- Record corrective actions taken as result of quarterly audits
- Quarterly visual monitoring of storm water
- Quarterly benchmark monitoring of storm water during 2017, 2019
- Annual compliance evaluation audit
- Record daily rainfall
- Log spills
- Annual training
- Discharge monitoring reports for benchmark sampling – 1/28, 4/28, 7/28, 10/28
- Annual comprehensive evaluation report

EPCRA – Reporting and Recordkeeping

- Tier II reporting required for facilities that keep more than 500 pounds of a material onsite at any time during the year. Common materials include paints, diesel, compressed gases, oils
- TRI (Form R) Reports are required for *manufacturing* facilities that manufacture, process, or use more than threshold quantity of specific chemicals during the year.
  - Examples of common TRI chemicals include:
    - Xylene, Toluene, Methanol
    - Manganese, Nickel, Chromium
    - Ethylene glycol
    - Propylene
  - Tier II reports are due 3/1
    - Mail copies to LEPC
  - TRI reports are due 7/1

Report Deadline Summary

- January 28th
  - Discharge Monitoring Report (DMR)
  - Sewer Sludge Report
- January 31st
  - Annual NESHAP Reports
- March 1st
  - Hazardous Waste & Annual Waste Summary Reports
  - Tier II Report
- March 31st
  - Texas Emission Inventories
  - Title V Annual Reports
  - Title V Semi-annual reports
- April 28th
  - DMR
- April 30th
  - ERIC Reports
- July 1st
  - Toxic Release Inventory
  - Minor Source Air Toxic Report
- July 28th
  - DMR
- July 31st
  - Semi-annual NESHAP Reports
- August 1st
  - Solid waste annual reports
- September 30th
  - Title V Semi-annual reports
- October 28th
  - DMR

Records Retention

- Electronic records are allowed
- Depending on program, records should be kept at facility 3-7 years
- Recommend hazardous waste manifests (or electronic copies) be kept indefinitely

Best Management Practices

- HOUSEKEEPING
- INSPECTIONS
- RESPONSIBILITIES
- SPILL PREVENTION
- STORM WATER POLLUTION PREVENTION
- WASTE MANAGEMENT

Best Management Practices – Housekeeping

Good housekeeping is the most important factor in minimizing storm water contamination and maintaining environmental compliance

- Regular pickup and disposal of garbage and wastes
- Routine inspections for leaks and conditions of containers
- Routine inspections of yard
- Clean up of all spills
- Keep lids on containers, including dumpsters

Best Management Practices – Inspections

Continuous improvement in protecting the environment requires frequent inspections.

LA DEQ requires inspections to demonstrate compliance with permits.

We all play a part in protecting the environment.

Areas Commonly Inspected:

- Equipment and Material Storage Areas
- All Storage Tanks
- General Yard Area
- Warehouse
- Loading/Unloading Area
- Drum, Bagged, and Tote Storage Areas
- Waste Processing and Storage areas
- Drains/Oil Water Separators/Ditches
- Weekly, Quarterly, and Annual Audits

Best Management Practices – Employers

Employer's Responsibility

- Provide training to employees.
- Provide proper storage of chemicals
- Provide tools needed for spill clean up
- Ensure proper DOT drums for waste
- Test all waste streams and storm water
- Ensure waste is disposed of properly at an approved facility
- Reporting all reportable spills to the proper agency

Best Management Practices – Employees

Employee's Responsibility

- Keeping work areas clean and orderly
- Label all drums
- Ensure lids are sealed on drums before transporting drums. This includes within the facility
- Reporting all spills to supervisor
- Correcting and cleaning spills
- Replenishing spill absorbent materials
- Properly disposing of spill clean up materials
- Store materials properly in flammable cabinets
- Do not accumulate waste in work area

Best Management Practices – Spill Prevention and Countermeasure

- Clean up all spills
- Store drums and tanks in secondary containment
- Regularly monitor and drain water (if clean) trapped inside containment areas
- Closely monitor fuel and liquid loading/unloading
- Do not transfer fluids near a storm drain
- Stock absorbent materials in areas where spills are likely to occur
  - Fueling areas
  - Storage areas
  - Transfer areas
  - Tool break down areas/maintenance shops
- Perform monthly inspections of tanks, drums, oil filled equipment
- Report all spills to supervisor

Best Management Practices – Storm Water Pollution Prevention

- Good housekeeping
  - Clean up all spills
  - Store drums and tanks in secondary containment
  - Keep lid on dumpsters closed where possible.
  - Sweep work areas regularly and throw dust/debris in proper bins
- Monitor loading/unloading closely of chemicals
- Clean and drain equipment before storing outdoors
- Store waste with secured lids to prevent overflow or spills
- Keep spill kits full and readily available

Best Management Practices – Waste Management

- **DO NOT MIX WASTES!** - Keep waste streams separated
  - Paint waste can not be mixed with sludge
  - If new chemical used in a process, a potentially new waste stream will be created and will need to be tested
  - Not all waste is hazardous - do not create additional hazardous waste by mixing
- Clearly label and date all waste containers
- Only 1 drum in satellite accumulation area (aerosol puncture stations, waste paint)

Best Management Practices – Waste Management

- Keep drums of liquid wastes in secondary containment
- Seal all waste containers before transporting and while in storage
- Ensure that containers are compatible with wastes
- Recycle oils, metals, antifreeze, batteries, lamp bulbs, and electronics
- Regularly inspect waste containers

Best Management Practices – Waste Management

DO NOT TRANSPORT WASTES!

Generator is ultimately responsible for the disposal of wastes.

KNOW WHERE YOUR WASTES ARE GOING!