

NTA Environmental News

May 22, 1996

STORM WATER PLANS DUE SEPTEMBER 25, 1996

There are several steps to designing a plan, and it is important that you begin work on this process SOON.

NTA has arranged with Acheron, Inc. to hold a half-day workshop on designing a Storm Water Pollution Prevention Plan as required under the Group Storm Water Permit. The workshop will be held in **Portsmouth, NH, June 12**. The charge for attending will be about **\$300 per firm** plus the cost of the room and lunch. **If you are interested in attending this workshop, please call me at Tel: 617-542-8220 or fax: 617-542-2199.**

The Group Storm Water Permit, published in the September 29, 1995 Federal Register, contains four pages of requirements for your facility's Storm Water Pollution Prevention Plan. There follows an outline of the plan requirements:

- (1) You must form a **Pollution Prevention Team**.
 - (2) You must develop a list with a **Description of Potential Pollutant Sources**. Your plan must include detailed information on:
 - (a) **Drainage**, including:
 - (i) A **site map**.
 - (ii) A prediction of the direction of flow and an identification of the types of pollutants.
 - (b) **Inventory of Exposed Materials** handled within the past three years.
 - (c) List of **Spills and Leaks** within the past three years.
 - (d) A summary of **Sampling data**.
 - (e) A narrative description of **Risk Identification and Summary of Potential Pollutant Sources**.
 - (3) You must develop and describe your **Measures and Controls** for storm water management. The plan must, at a minimum, address:
 - (a) **Good Housekeeping**, that is the maintenance of areas which may contribute to pollutants in storm water discharges.
 - (i) **Material Storage Areas**.
 - (ii) **Materials Handling Areas**.
 - (iii) **Fueling Areas**.
 - (iv) **Above Ground Storage Tanks**.
 - (b) **Preventative Maintenance** shall involve timely inspection and maintenance of storm water management devices.
 - (c) **Spill Prevention and Response Procedures**.
 - (d) **Inspections**.
 - (e) **Employee Training**.
 - (f) **Recordkeeping and Internal Reporting Procedures**.
 - (g) **Non-storm Water Discharges** are not permitted.
 - (i) The plan shall include a certification that the discharge has been tested or evaluated for the presence of non-storm water discharges.
 - (ii) There is an exception for flows from fire fighting activities.
 - (iii) There is a provision for **Failure to Certify** due to inability to perform adequate tests; nevertheless, non-storm water discharges are unlawful.
 - (h) **Sediment and Erosion Control**.
 - (i) **Management of Runoff**.
- (4) Qualified personnel shall conduct **Comprehensive Site Compliance** including:
- (a) Evaluation by means of visual inspection of areas contributing to storm water discharges.
 - (b) The plan shall be revised based on the evaluation.
 - (c) A report summarizing the scope of the evaluation, personnel making the evaluation, the date of the evaluation, major observations and actions taken shall be made and retained.
 - (d) The evaluation may be conducted as part of a regularly scheduled inspection.

MAINE "SYNTHETIC MINOR" APPLICATIONS DUE

Any textile facility in the State of Maine seeking to establish its status as a Synthetic Minor Source in Chapter 115 in order to avoid being licensed as a Title V source in Chapter 140 has until June 1, 1996 to apply with the Department of Environmental Protection.

The new air licensing regulation, Chapter 140 is applicable to those sources that could be defined as a Part 70 major source, based on the maximum potential emissions of the facility. A license under Chapter 140 is a Title V license which requires increased public and EPA participation. In addition, most of the conditions within a Title V license are enforceable by the EPA and citizens.

Most NTA member firms operating in Maine ought to be able to qualify as Synthetic Minors, thus avoiding the costly and time-consuming Title V procedure.

EPA ANNOUNCES "Startrack" PROGRAM

On May 6 EPA Region I (New England) announced "StarTrack:" Third Party Certification of Environmental Performances. Under this program a company agrees to assess its environmental management and compliance performance and be certified by an independent third party in a public document. In return, EPA provides benefits to the company such as limited penalty amnesty, no routine inspections, simplified reporting and expedited permitting. A published certification and performance report affords the public greater information about the performance of the company. EPA will refocus resources to issues that pose greater environmental risks.

EPA selected eight companies to pilot the first phase of the StarTrack initiative under the rubric of the Environmental Leadership (ELP) Program. No textile facilities were included in this pilot project. EPA also named New England organizations to the ELP for their sustained commitment to environmental protection. ELP companies commit to a one-year project, in which the company offers its proven environmental compliance strategies and pollution prevention knowledge to industry colleagues. ELP companies represent a wide variety of New England industries, including textiles.

EPA/INDUSTRY METALS STUDY UNDERWAY

NTA President Karl Spilhaus represented Northeastern textile mills at a April 17, 1996 meeting of the ATMI Metals Oversight Committee in Washington, DC. Representatives of the EPA, the textile industry, and researchers investigating the question of metals in textile effluent reviewed the project to date and outlined the steps and timetable to complete the study.

The study, which employs ultrafiltration to investigate the proposition that metals from textile dyes are not hazardous to the environment, builds on work done about five years ago by the firm Hydrosience. The work has been split between the environmental engineering firm EarthTech and the University of Georgia. The study is funded in part by EPA, with further funding from ATMI and various textile and related associations, including NTA.

If successful, the project offers textile mills the opportunity of significant savings, and government a more effective means of regulating metals in effluent. A draft report is expected in October 1996.

MASSACHUSETTS UNVEILS "PERMIT FREE" ENVIRONMENTAL PROTECTION PLAN

Massachusetts Governor William F. Weld announced on April 30 the kick-off of a new program to improve environmental protection at less cost to both government and business.

The Environmental Results Program (ERP) will eliminate existing permits for thousands of Massachusetts companies, and replace them with a performance-based self-certification.

"For too long, government has been telling companies how to meet standards of environmental protection," said Weld. "Instead, our Dept. of Environmental Protection is going to leave it up to companies to find the most cost-effective approaches to get the job done."

It is expected that about 10,000 companies currently subject to environmental permitting will eventually be included in ERP. DEP will convert most "state-only" permits to certifications. A facility will be in ERP if it is subject to one or more of the permits listed below, and is not subject to a federally mandated permit.

A company's facility will be eligible to participate in ERP if it is subject to any of the following:

- o Plan approvals or performance specifications pursuant to 310 CMR 7.02, 7.03 and emits more than one ton per year of VOC, particulate matter, or hazardous air pollutants (HAP);
- o New source performance standards (NSPS);
- o Reasonably available control technology (RACT) requirements for VOCs and NOX;
- o Maximum achievable control technology (MACT) standards for HAPs;
- o Any Industrial Waste water (IWW) and Water Pollution (WP) Sewer Connection/extension Permits;
- o IWW and WP Holding Tanks Permits;
- o All Class A and some Class B Hazardous Waste Recycling Permits; or
- o Cross connection permits.

A company's facility is currently excluded from participating in ERP if it is subject to any of these federally mandated permits:

- o Federal Air Operating Permits;
- o NPDES Surface Water Permits;
- o Hazardous Waste Treatment Storage and Disposal Facility Licenses; or
- o EPA Single Source SIP Revisions.

Textile facilities are not included in the first industries covered by ERP, according to DEP deputy commissioner Allan Bedwell, but DEP does plan to eventually include textile facilities in the program. In a recent telephone interview with NTA staff member **David Trumbull**, Bedwell stated that the DEP hopes eventually to persuade EPA to phase out some federal permits for facilities covered by ERP. Companies would then have only one (state) regulating authority to report to, instead of two regulators with overlapping authority as now.