



In Case You Missed It...

Season's Greetings from your friends at Associates Environmental! Before we look forward to the challenges of 2012 we thought we would remind you to take a look back at a handful of environmental regulatory requirements that may have affected your business during 2011.

March, 2011: Initial Inventory Report Due for Portable Diesel Engine Air Toxic Control Measure (ATCM)

Owners of portable diesel engines rated at 50 horsepower or greater should have submitted an initial inventory/status report to the Air Resources Board (ARB) by March 1, 2011. This was a mandatory requirement for all portable diesel engines whether the engines were registered in the statewide Portable Equipment Registration Program (PERP) or permitted with one or more local air districts. These initial reports included a requirement to calculate the weighted average particulate matter (PM) emission rate for the portable engine fleet.

September, 2011: Hazardous Waste Minimization (SB-14) Reporting

If your business generated 12,000 kilograms (26,400 pounds) or more of hazardous waste or 12 kilograms (26.4 pounds) or more of extremely hazardous waste in 2010 from ongoing operations you are subject to the SB-14 planning requirements. These requirements include developing a forward looking waste reduction plan, a historical report on the effectiveness of waste reduction measures previously implemented and a "Summary Progress Report" summarizing the results of past waste minimization efforts and any new waste minimization opportunities that will be implemented over the next four years. The report was due to the Department of Toxic Substances Control (DTSC) on September 1, 2011. During October, 2011 DTSC began sending out reminders to facilities that were required to submit a report but did not file.

November, 2011: Spill Prevention, Control and Countermeasure (SPCC) Plans & Plan Updates

A facility must have an SPCC Plan if it:

- Stores greater than 1,320 gallons of oil in aggregate (including 55 gallon drums of oil products) above ground or has greater than 42,000 gallons of underground storage capacity.
- Has a "reasonable expectation of an oil discharge" to a waterway or adjoining shoreline.

By November 10, 2011 facilities required to have an SPCC should have developed an initial plan or updated an existing plan to address amendments to the rule. Plans should include:

- Operating procedures for routine handling of products to prevent a discharge.
- Discharge or drainage control measures to prevent a discharge.
- Countermeasures to contain, clean up and mitigate an oil spill.
- Methods of disposal for recovered materials.
- Contact list and phone numbers for company, contract response personnel and the National Response Center.

If you think you may have missed one of these requirements and need a little help, or if you just have questions about the environmental regulations that impact your business, please call us at (714) 916-4953. One of our Associates will be happy to discuss these requirements or any others that might be on your mind. You can also e-mail us at info@associatesenvironmental.com and we'll respond to your inquiry promptly.