

KRMCA/KAPA Environmental Management Newsletter

Volume 1, Issue 2

June 2007

Environmental Topics

Midwest Training and Consulting Services (MTCS) to help provide information on reviewing your environmental programs we have provided some additional information for your self review.

If you have any questions relating to these areas feel free to call Rick Smith or Jerry Taylor at 913-432-4022.

Asbestos Programs

Although there have been no significant changes, many organizations do not realize what management practices they should be doing for the program. There is a self-audit checklist included in this mailing.

Several less known changes to EPA programs include the vacation of the total ban on asbestos products and the addition of several provisions of the Asbestos Schools rules to public and commercial buildings.

Spill Prevention Plan (SPCC) Program

We have attached a self-audit checklist to help you remember the required actions that should be evaluated on at least an annual basis.

December 26, 2006 Federal Register was published that allowed locations that qualify to have their owner/operator of the facility to self certify their SPCC Plans.

To Qualify:

- Less than 10,000 gallons of total oil storage (Containers greater than 55 gallons must be included).
- No reportable spills in the past three years.
- Not need a statement of environmental equivalency for exceptions to engineering and other regulatory requirements of EPA. This is must be signed by a Professional Engineer (PE) with board certification from a State.

This plan must still meet all the EPA standards required by 40 CFR 112 less the professional engineer signature. The owner will take the responsibility and liability for the plan.

HAVE OIL BUT NOT ENOUGH TO QUALIFY FOR SPCC PLAN

If you have less than 1,320 gallons above ground and 42,000 gallons underground storage tanks volumes, what should you do.

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- 1 Asbestos Program, and Spill Prevention Plans
- 2 Continuation of Asbestos and Spill Prevention Plans.

Asbestos Program (Continuation)

The term asbestos may have most building owners assume only a few products are asbestos containing including sprayed on materials and pipe insulation and the other item may mean that buildings older than 1980's have asbestos in them. Since the revocation of the asbestos ban many products are returning to the inventory, for instance floor and ceiling tiles. No building can be considered asbestos-free any longer.

Each building owner should consider implementing the following activities as required by OSHA and EPA:

Inventorying and labeling locations where asbestos may be (29 CFR 1910.1001j).

Maintain the inventory through inspections. (29 CFR 1910.1001j).

Training of employees including housekeeping staff that may work in areas of asbestos. (29 CFR 1910.1001k).

Information program for contractors and vendors (29 CFR 1910.1001j)

Develop an operations and maintenance manual on how you will maintain asbestos materials.

Other Federal Requirements

NESHAPS: EPA/State Notification and permits
ASHERA and ASHARA: Management of Asbestos Materials for schools and commercial buildings.

HAZCOM: Hazard Communication

Asbestos: Construction – Removal practices

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SPILL PREVENTION PLANS (CONTINUATION)

You should develop a document that is similar to the SPCC Plan, but what most environmental professionals call a Best Management Plan.

You should prepare this abbreviated SPCC Plan because accidents are still possible and you may have the reportable quantity for oil releases at this facility.

In addition, the stormwater plans may include some of these items, but should be compared carefully to make sure all essential elements are evaluated and observed.

Other Environmental Topics:

If you have questions or concerns about other topics, feel free to contact me at my office or email me at Rick@midwest-training.com.



