

Environmental Program (Compliance Issues)

Robert J. Beyke
Milestone Contractors, L.P.

Areas Included:

- Air Management
- Community Right-to-Know
- Hazardous and Solid Waste Management
- Water Management
- Environmental Management Practices
- Emergency Planning and Spill Response
- UST Management
- Used Oil Management

Environmental Files

- Agency requires 3 & 5 years retention of paperwork for most environmental paperwork
- Some files are required to be maintained for the life of the facility, product use, or supplier used.

FESOP Requirements

- Plans
 - Preventive Maintenance Plan
 - Emergency Reduction Plan
 - Risk Management Plan
 - Fugitive Dust Plan



FESOP

- Submittals
 - Annual Compliance Certification
 - Quarterly Reports
 - Fuel Usage
 - HMA production
 - Cold Mix production
 - Slag Usage
- Other Required Files
 - Stack Test (every 5 years)
 - Analytical Certifications (Fuel, Slag, Shingles)

FESOP

- Recorded Observations
 - Visible Emissions (1-2 per day)
 - Stack
 - Conveyors, Transfer points
 - Unpaved Roads
 - Pressure Drop (daily)



FESOP

- Maintenance
 - Record of all maintenance conducted on a pollution control device
 - PMP inspections (item and frequency)
 - Spare parts list
 - Calibration of Pressure Gauge

EPCRA

- Tier II (Chemical Inventory)
 - State
 - LEPC
 - Fire Department
- Form R (Chemicals manufactured, processed or otherwise used)



RCRA

- EPA ID Number (off-spec)
- Hazardous Waste Rules
 - Non-generator status
 - Waste inventory
- Used Oil Rules
- Underground Storage Tanks
- Universal Wastes



Storm Water

- Rule 6 (Plants)
 - Applicability
 - Permit
 - Storm Water Sampling
 - SWPPP
 - Training



SPCC Plan

- Petroleum Storage
 - Management & PE Signature
 - Containment Calculations
 - Spill Response Procedures
 - Training (annual)
 - Inspections
 - OPA '90 Certification



Community Relations

- Environmental activist groups are gaining ground across the country.
- Better to be proactive.
- Establish and implement company program.
- Build community relations and trust.
- Stay cool, listen, respond appropriately.

QUOTE

- Paperwork is the embalming fluid of the bureaucracy, maintaining an appearance of life where none exists.

- Robert J. Meltzer

Questions?