

Boise County Business Training

Environmental Regulation
Overview
April 2009

Air

Does your business:

- Have something with a stack, dust collector or vent?
Examples: shot blasters, grinders, storage tanks
- Have a process that uses paints, solvents, adhesives or other chemicals?
Examples: paint booths, degreasers, solvent cleaning tanks
- Have a process that burns fuel (e.g., oil, natural gas, coal)?
Examples: boilers, furnaces, process heaters
- Have a process that produces visible dust, smoke or odors?
Examples: unpaved roadways, material handling areas

Air Quality Requirements

- Permits
- Area Source Rules
- Burning
- Fugitive Dust

Air Permits

- Idaho Department of Environmental Quality
- Four categories of air quality permits
 - Permit to Construct
 - Tier II Operating Permit
 - Tier I Operating Permit
 - Permit by Rule

Area Source Rules

- U.S. Environmental Protection Agency
- National Emission Standards for Hazardous Air Pollutants (NESHAPs)
- Area Sources - hazardous air pollutants emissions less than 10 tons per year (TPY) of any one, and less than 25 TPY of all combined

Requirement Examples

- Notification of EPA
- Best Practices
- Training
- Recordkeeping
- Reporting

Burning Prohibited

- Garbage from food preparation
- Dead animals or animal waste
- Junk motor vehicles or parts
- Tires or other rubber materials
- Plastics
- Asphaltic materials
- Tar and petroleum materials
- Paints
- Preservative-treated wood
- Trade waste (commercial, industrial, or construction waste)
- Insulated wire
- Medical waste

Fugitive Dust

- Idaho Department of Environmental Quality regulates fugitive dust emissions in Idaho.
- Require all reasonable precautions be taken to prevent dust from becoming airborne.
- Reasonable precautions include:
 - Using water or chemicals
 - Applying dust suppressants
 - Using control equipment
 - Covering trucks
 - Paving
 - Removing materials

Water

- Do you discharge water to a water body?
- Do you discharge to a dry well?
- Do you have activities exposed to precipitation that may pollute stormwater runoff?

Water-Related Requirements

- Wastewater Permit
- Underground Injection Controls
- Industrial Stormwater Permit

Wastewater Permits

- U.S. Environmental Protection Agency
- Applies to industrial, municipal, and other point sources of pollution to waters of the U.S.
- Permit issued through National Pollution Discharge Elimination System (NPDES)

Injection Wells

- Idaho Department of Water Resources
- Applies to injection devices such as wells or drain fields used for injecting liquids like stormwater, agricultural water and facility heating/cooling water
- Permit required for deep wells (> 18 feet)
- Inventory information required for shallow wells (<18 feet)

Industrial Stormwater Permits

- U.S. Environmental Protection Agency
- Applies to activities such as material handling and storage, equipment maintenance and cleaning, industrial processing or other operations that occur at industrial facilities are often exposed to stormwater
- Coverage under a general permit

Applies to 29 Industrial Sectors

A: Timber Products	P: Land Transportation
B: Paper Products	Q: Water Transportation
C: Chemical Products	R: Ship/Boat Building, Repair
D: Asphalt/Roofing	S: Air Transportation
E: Glass, Clay, Cement	T: Treatment Works (WWTPs)
F: Primary Metals	U: Food Products
G: Metal Mining	V: Textile Mills
H: Coal Mines	W: Furniture and Fixtures
I: Oil and Gas	X: Printing, Publishing
J: Mineral Mining	Y: Rubber, Misc. Plastics
K: Hazardous Waste	Z: Leather Tanning/Finishing
L: Landfills	AA: Fabricated Metal Products
M: Auto Salvage Yards	AB: Transportation Equip.
N: Scrap Recycling	AC: Electronic, photo goods
O: Steam Electric Facilities	AD: Non-classified facilities

Requirements

- File Notice of Intent (NOI)
- Prepare and implement Stormwater Pollution Prevention Plan (SWPPP)
- Inspection and monitoring requirements

Waste

Do you have a process:

- That uses paints, solvents, adhesives or other chemicals?
Examples: metal fabrication/machine shops, vehicle maintenance and repair, wood finishers, auto body shops
- That includes cleaning and degreasing?
Examples: dry cleaners, vehicle maintenance and repair, surface coating and painting operations
- That involves electroplating and/or anodizing operations?
Examples: electroplating operations, manufacturing, metal fabrication/machine shops

Waste

Do you:

- Have an above-ground or underground storage tank? *Examples: petroleum storage, hazardous material or waste storage*
- Have electric or electronic waste? *Examples: lights, ballast, computers, cell phones*

Waste-Related Requirements

- Solid Waste Disposal
- Hazardous Waste Management & Disposal
- Universal Waste Management
- Used Oil Regulations
- Storage Tank Requirements

Solid Waste

- Idaho Department of Environmental Quality and Health District
- Landfill disposal
- Burning of trade waste (commercial, industrial, or construction waste) prohibited
- If possible, reuse or recycle

Hazardous Waste

- Idaho Department of Environmental Quality
- Listed by EPA or exhibit certain characteristics (toxic, corrosive, ignitable, reactive)
- Check MSDS
- Applicable requirements based on amount of waste generated

Generator Categories

- Conditionally Exempt Small Quantity Generators (CESQG) - ≤ 220 lbs/month
- Small Quantity Generators (SQG) – 220 lbs to 2,200 lbs/month
- Large Quantity Generators (LQG) - $\geq 2,200$ lbs/month

Generator Categories: Summary

<u>Generator Category</u>	<u>Monthly Generation Rate</u>	<u>Maximum Accumulation Limit</u>	<u>Maximum Accumulation Time</u>
CESQG	<220 lbs/mo	2,200 lbs	No time limit
SQG	220 – 2,200 lbs/mo	13,200 lbs	180 days
LQG	>2,200 lbs/mo	No limit	90 days

CESQG Requirements

- Perform and document hazardous waste determinations
- Dispose of hazardous waste at:
 - Permitted hazardous waste facility
 - Permitted solid waste facility
 - Legitimate recycling facility
- Solid waste facility may refuse to accept CESQG waste

SQG Requirements

- Obtain EPA Identification Number
- Recordkeeping and reporting requirements
- Emergency requirements
- Employee Training requirements
- Treatment requirements
- Disposal requirements

SQG Requirements

- May store waste in tanks or containers for less than 180 days
 - 270 days if 200 miles from disposal facility
- Container requirements
 - closed, in good condition, managed to prevent releases
 - inspect weekly, maintain aisle space

SQG Requirements

- Container must be marked with "Hazardous Waste" and accumulation start date
- Additional requirements called "Pre-transport" requirements apply prior to shipment

Universal Waste

- Idaho Department of Environmental Quality
- Streamlined requirements for certain categories of hazardous waste, e.g. batteries, thermostats, spent lamps
- Encourage recycling and proper disposal

Universal Waste Requirements

- CESQG: Requirements do not apply
- SQG:
 - Longer storage times
 - Larger accumulation rates
 - Exemption from certain hauling requirements

Used Oil

- Idaho Department of Environmental Quality
- Used oil may **not** be applied as a dust suppressant.
- Requirements:
 - Store only in tanks and containers in good condition marked as "USED OIL"
 - Clean up spills
 - Use a transporter with an EPA ID #

Above-Ground Storage Tanks

- U.S. Environmental Protection Agency
- Spill Prevention, Control, and Countermeasure (SPCC) rule
- Applies to tanks that store petroleum products, hazardous waste, or other hazardous material with a total aboveground capacity of >1,320 gallons, where there is potential for a discharge to reach navigable water
- Certain facilities must prepare, amend, and implement SPCC Plans to address the potential for a discharge
- (Also applies to buried containers with a total capacity >42,000 gallons)

Underground Storage Tanks

- Idaho Department of Environmental Quality
- Applies to tanks that are buried at least 10% underground and store either petroleum products or certain hazardous substances
- Most often found at gas stations and other fueling facilities