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Issue 3

Down the Pipeline

Providing Quality Service to Everyone!

Fall Inspections

October is coming upon us very soon, therefore it must be inspection time once again! I feel that it would be beneficial to all of us if a small review of the usual inspection items happened now.

First of all, you ought to go and check out the condition of your sampling point. Make sure that it does not have all kinds of solids built up in it or around it. There shouldn't be large amounts of foam blowing away from it.

You should check and make sure that your chemical containment/s are not cracking or leaking.

If you are supposed to have

safety signage deployed, please check and make sure that it still is deployed and can be easily seen by employees and visitors.

All chemical mixing/storage tanks need to be properly labeled, clearly indicating what substance is contained within them. If necessary, hazard signage must be used to warn people of danger when using these chemicals.

Check to see if any pumps and/or piping are leaking liquids onto floor areas creating slick spots. Also, note whether the leakage is going into floor drains and not out onto bare ground.

Inspect your fuel oil delivery areas for any spillage or leaks from storage vessels.

If you have cooling towers you ought to check to make sure they do not have any leakage.

Check food service areas within your facility and see if they are remaining clean and organized.

Recheck your emergency spill containment supplies to be sure there are no shortages.

Finally, visit your outdoor storm drains if they are located within the boundaries of your truck dock areas. See if

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Waste Minimization

This subject is nothing new to water pollution programs. Congress mandated this policy way back in the 1984 Hazardous and Solid Wastes Amendments to the Resource Conservation and Recovery Act (RCRA).

A basic understanding of the activities that generate waste at any business is essential to finding ways to reduce and/or eliminate that waste. Inventories should be prepared to identify the sources, quantity, types, and rates of waste generation. Preparing material balances for various activities can be useful in developing estimates of overall waste generation and emissions that may have been unaccounted for previously.

It may be useful to identify the larger and relatively predictable waste streams first and focus on them. All waste streams ought to be evaluated for potential waste minimization opportunities. However, it may be necessary to concentrate efforts in one or two specific areas.

Consideration needs to be applied to quantity of waste generated, probability

of success, hazardous properties of the waste, regulations, safety of employees, economics, and other characteristics in order to properly prioritize target waste streams.

Both source reduction and recycling options ought to be considered. Source reduction may be accomplished through:

- Good operating practices
- Reducing the scale of specific processes
- Eliminating the use of toxic compounds
- Increasing the use of instrumentation
- Eliminating the use of solvents that cause treatability issues
- Improving inventory control by utilizing computerized tracking and inventory systems

All of this, of course, must go through feasibility analysis to discover payback periods, return on investment, and net present value. Other items to consider will be cost effectiveness, benefits to society, and compliance with an existing discharge Permit's requirements.



Microsoft



Permit/Records Audits

Every December I come and conduct an audit of your files. There some normal, always asked for documents that you must keep in your records at all times.

You must keep the original Permit that you received the very first time as well as the Permit application itself. You must also keep your current Permit and application form available. You must keep your authorization letter as well as a copy of any spill/slug control Plan. If you have pH/flow meters for monitoring these parameters, then you must keep an annual record of calibration for them.

You should keep the following items in separate sections of your files: NOVs, inspections, audits, lab reports for your sampling, lab reports for my sampling, material safety data sheets, reviews of your sampling results.

Executive Director: Brian Key
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Compliance Issues

- Increase Sampling
- Informal Notice of Violation (Verbal)
- Written Notice of Violation
- Administrative Fines
- Compliance Orders
- Consent Orders
- Show Cause Hearings
- Cease and Desist Orders
- Criminal Prosecution

