

The logo features a circular emblem on the left containing a stylized landscape with mountains, a sun, and water. To the right of the emblem, the words "Environmental Investigations" are written in a smaller, teal, sans-serif font. Below this, the word "ALERT" is written in a very large, bold, teal, serif font.

Environmental Investigations ALERT

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Virginia's Environmental Compliance Calendar

Is your facility in compliance with all of the environmental standards, guidelines and regulations which have been promulgated over the past few years? With the help of the Virginia Department of Environmental Quality (DEQ) Office of Pollution Prevention (<http://www.deq.state.va.us/opp/opp.html>), Environmental Investigations, Inc. (EI) is providing a summary of the major compliance requirements and deadlines which may affect industry throughout the Commonwealth of Virginia. Please note, the summary is meant to highlight major issues and does not claim to be exhaustive. For additional sources of Virginia-specific compliance assessment and self-auditing tools, please contact either Melanie Carrow or Kevin Bald of EI at (800) 717-3472.

Air Quality Issues

Dry Cleaners

All dry cleaners using perchloroethylene in their dry cleaning machines were required to submit an Initial Notification Report Form for the MACT Standard by July 18, 1994.

Chromium Electroplating

All facilities doing hard or decorative chromium electroplating or performing chromium anodizing were required to submit Initial Notification Report Forms for the Chromium Electroplating MACT by July 24, 1995.

Solvent Degreasing

All facilities using either a batch vapor, in-line vapor, or cold batch degreasing process that utilizes either methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane (TCA), carbon tetrachloride, or chloroform as the cleaner must complete an Initial Notification Report Form for the Halogenated Solvent MACT by August 29, 1995.

Bulk Gasoline Terminals

All bulk gasoline terminals and breakout stations emitting 10 tpy of a single HAP or 25 tpy of multiple HAPs must complete an Initial Notification Report Form for the Gasoline Distribution MACT by December 14, 1995.

Aerospace Industry

All facilities engaged in the manufacturing and/or rework of aerospace components and assemblies and emitting 10 tpy of a single HAP or 25 tpy of multiple HAPs must complete an Initial Notification Report Form for the Aerospace Manufacturing and Rework MACT by December 30, 1995.

Chromium Electroplating

All owners of decorative chromium electroplating operations must be in compliance with the January 25, 1995 MACT Standard for Chromium Electroplating by January 25, 1996.

Printing Operations

Compliance with the State Air Pollution Control Board Regulation for Flexographic, Packaging Rotogravure, and Publication Rotogravure Printing Lines must be achieved by April 1, 1996. This applies to all flexographic, packaging rotogravure, or publication rotogravure printing lines that use a substrate other than textile and emit more than 25 tpy of VOCs in the Northern Virginia VOC Emissions Control Area or more than 100 tpy of VOCs in the Richmond or Hampton Roads VOC Emission Control Areas, and were subject to this rule prior to April 1, 1996 amendment.

Industrial Cooling Towers

All owners of industrial process cooling towers must be in compliance with the September 8, 1994 MACT standard for Industrial Cooling Towers under the 1990 CAA by April 8, 1996.

Sources in Nonattainment Areas

All stationary point sources emitting 25 tpy or more of VOCs or oxides of nitrogen (NO_x) in ozone nonattainment areas must be in compliance with the Emission Statement Program under the CAA by April 15, 1996.



Fleet Vehicles

All fleet vehicles operated by federal, state, and local government agencies as specified in the regulation must comply with the State Air Pollution Control Regulations for the Control of Emissions from Fleet Vehicles by June 1, 1996.

Ship Building and Ship Repairs

All shipbuilding and ship repair facilities that emit 10 tpy of a single HAP or 25 tpy of multiple HAPs must complete the Initial Notification Report Form and Written Implementation Plan under the Shipbuilding and Ship Repair MACT by June 12, 1996.

Wood Furniture Manufacturing

All wood furniture manufacturing facilities that emit 10 tpy of a single HAP or 25 tpy of multiple HAPs were required to complete an Initial Notification Report Form for the Wood Furniture Manufacturing Operations MACT by September 2, 1996.

Marine Tank Loading Operations

All marine tank loading operations that emit 10 tpy of a single HAP or 25 tpy of multiple HAPs must complete an Initial Notification Reporting Form by September 19, 1996. Refueling operations are exempted from the calculations of total emissions.

Dry Cleaners

All dry cleaners using perchloroethylene must be in compliance with the September 22, 1993 MACT standard by September 22, 1996.

Bulk Gasoline Terminals

All bulk gasoline terminals and break out stations that emit 10 tpy of a single HAP or 25 tpy of multiple HAPs must complete an Initial Notification Reporting Form for the Gasoline Distribution MACT by December 14, 1996.

Ship Building and Ship Repair

All shipbuilding and ship repair facilities that emit 10 tpy of a single HAP or 25 tpy of multiple HAPs must be in compliance with the associated MACT standard by December 15, 1996.

Chromium Electroplating

All owners of hard chromium electroplating operations must be in compliance with the January 25, 1995 MACT standard by January 25, 1997.

Aerospace Industry

All facilities engaged in the manufacturing and/or rework of aerospace components and assemblies and are emitting 10 tpy of a single HAP or 25 tpy of multiple HAPs must complete an Initial Notification Reporting Form for the associated MACT by September 1, 1997.

Title V Sources

Title V air quality permit applications are due to the DEQ for the first group of applicants as designated by the DEQ by January 12, 1998.

Title V Sources

Title V air quality permit applications are due to the DEQ for the second group of applicants as designated by the DEQ by March 10, 1998.

Lithographic Printers

All lithographic printers that use a substrate other than textile and emit more than 10 tpy of VOCs in the Northern Virginia VOC Emission Control Area or more than 100 tpy of VOCs in the Richmond VOC Emission Control Area must comply with the State Air Pollution Control Board Regulation for Lithographic Printing Processes by April 1, 1998.

Title V Sources

Title V air quality permit applications are due to the DEQ for the third group of applicants as designated by the DEQ by May 11, 1998.

Stationary Point Sources

All major stationary point sources emitting 100 tons per year or more of any criteria air pollutant, sources subject to the permit fee program, and other selected sources must submit Air Emissions Annual Updates on April 15th of each year.

Water Quality Issues

Waste Water Treatment Facilities

Communities that had to comply with sludge-handling standards by February 1994 but received an extension for new equipment acquisition must now comply with the sludge-handling standards under the Clean Water Act by February 19, 1995.

Water Supply Systems

Communities that operate water systems serving between 3,300 and 50,000 customers not meeting EPA's lead and copper rule must install corrosion control and water treatment equipment by January 1996 as required under the Safe Drinking Water Act. If state regulators direct local water suppliers to study treatment alternatives, this deadline is extended to January 1998.

Water Supply Systems

Cities that operate water systems serving more than 50,000 customers not meeting EPA's lead and copper rule must install corrosion control and water treatment equipment by January 1997 as required under the Safe Drinking Water Act.

Water Supply Systems

Communities that operate water systems serving fewer than 3,300 customers not meeting EPA's lead and copper rule must install corrosion control and water treatment equipment by January 1998 as required under the Safe Drinking Water Act. If state regulators direct local water suppliers to study treatment alternatives, this deadline is extended to January 1999.

Waste Management Issues

Sanitary Landfills

All old sanitary landfills less than two miles from a drinking water intake must be in compliance with groundwater final detection monitoring requirements by October 9, 1995. Note that Virginia's regulations required facilities to be in compliance with new liner, cap, and leachate standards.

Sanitary Landfills

All old sanitary landfills that were not closed on December 21, 1988 must comply with groundwater final detection monitoring requirements by October 9, 1996.

Sanitary Landfills

All sanitary landfills must meet federal financial assurance requirements under the Resource Conservation and Recovery Act (RCRA) by April 9, 1997.

Hazardous Waste Facilities

Hazardous waste treatment, storage and disposal facilities must file an update that estimates closure and post-closure costs within 30 days after the close of the firm's fiscal year (typically February 1st). For the majority of the firms, the end of the fiscal year falls on December 31, so the February due date would apply.

Community Right-to-Know

Manufacturers Using Hazardous Materials

Manufacturers that store on-site, at any time, more than 10,000 pounds of a hazardous material (or an extremely hazardous material above its threshold planning quantity) must submit a Tier II Report annually by March 1st as required under SARA Title III, Section 312.

Manufacturers Using Hazardous Materials

Manufacturers that use more than 10,000 pounds of a chemical on the Section 313/Toxic Release Inventory List of Lists must submit Form R Reports annually by July 1st as required under SARA Title III, Section 313. (The deadline for the 1996 reports had been moved to August 1, 1997).

DID YOU KNOW.....

On September 1, 1996 the DEQ adopted an Air Toxics Program Priority Implementation Policy. This policy sets priorities for the implementation of Rule 4-3 (for existing facilities) and Rule 5-3 (for new and modified facilities) which focus first on the 189 hazardous air pollutants (HAPs) as identified under Section 112 of the Clean Air Act. By initially limiting the TAP reviews from broad range of Toxic Air Pollutants (TAPs) previously identified as "any air pollutants for which no ambient air quality standards have been established" (totaling nearly 600 compounds) the DEQ hopes to more efficiently evaluate the pollutants of greatest concern: those compounds identified by Congress and EPA as hazardous. The ACGIH Handbook, which forms a key basis for establishing the Significant Ambient Air Concentration (SAAC) in Rules 4-3 and 5-3, will continue to be used until a full review of the regulations is complete.

Hazardous Waste LQG and TSD Facilities

All large quantity generators and treatment, storage and disposal facilities must prepare and submit a Annual Hazardous Waste Report by March 1st of each year.

Solid Waste Landfills

All solid waste landfills not closed prior to December 1998 must prepare a Groundwater Annual Report by March 1st of each year.

Hazardous Waste Transporters

All hazardous waste transporters must submit a Hazardous Waste Transporter Annual Report by April 1st of each year.

Hazardous Waste TSD Facilities

Hazardous waste treatment, storage and disposal facilities that use the Financial Test/Corporate Guarantee mechanism must file their annual financial assurance documentation within 90 days of the close of each fiscal year (typically April 1st). For the majority of the firms, the fiscal year closes on December 31, so the April 1 deadline applies. Other financial assurance mechanism updates are due annually, per the Virginia Hazardous Waste Management Regulations, but these due dates vary according to the mechanism chosen and its effective date.

Stormwater Issues

Facilities with Stormwater Permits

Holders of Virginia General Permits for Stormwater Management are required to submit a Stormwater Monitoring Report by November 1st of each year.

Underground Storage Tanks

Facilities with Underground Storage Tanks

Underground storage tanks installed before or during 1988 must be equipped with corrosion protection and spill prevention devices as required under RCRA Underground Storage Tanks Upgrades Regulations by December 22, 1998.

Getting the Most For Your Title V Dollar.....

Preparing a Title V permit application is both complicated and time consuming; however, if done correctly, it is also an outstanding means of facility auditing. During the process of preparing your Title V permit, each process in your facility will be analyzed to identify raw materials which may produce regulated air emissions. During this analysis other compliance issues, such as areas of the greatest waste generation, and worker health and safety issues (especially related to fugitive emissions of hazardous air pollutants) can be audited with little additional effort. This is a great opportunity to make note of these areas and begin to plan more pro-active approaches to maintaining overall environmental compliance.

Also, emissions from your facility will have to be re-inventoried for the permit application and annually thereafter. The permit application process is the optimum time to organize your inventory information into a database which can then be used for future emission inventories, as well as required compliance documentation. A database can be developed to correlate process data and material usage rates with appropriate emission calculations, simultaneously supporting recordkeeping and reporting requirements. Data collected on a daily or weekly basis can be entered once and then automatically included in emission calculations as required without having to find files or contact other in-house departments for purchasing records or usage rates. In addition, your emission factors will be available in one location, with appropriate references, to eliminate any confusion. Such a database ensures that annual emission inventories are consistent, providing an accurate record of the facility's manufacturing expansion rates and/or pollution reduction efforts. Most importantly, a well documented inventory database will always save time and effort for all future inventories.

Environmental Investigations, Inc. (EI) has years of experience in the development of air emission inventories and Title V permit applications. We have assisted a variety of industries in achieving air quality compliance including:

- Furniture Manufacturers
- Automobile Parts Manufacturers (fiberglass, plastic, and metal)
- Surface Coating Facilities
- Printing/Display Manufacturing
- Concrete Facilities
- Brick Manufacturing
- Semiconductor Facilities
- Electroplating Facilities
- Resin Manufacturers
- Textile Dyeing and Finishing
- Food Processing
- Wood Processing, Cutting and Finishing
- Metal Working Facilities
- Steam and Energy Generation
- Glass/Mirror Processes

EI is unique in our commitment to whole facility compliance and our attention to detail. Our professional staff of air quality scientists and engineers is complemented by RCRA specialists, wastewater/chemical engineers, and health and safety specialists. We help to make sure that facilities get the most from their Title V permit application preparation efforts. We develop practical, facility emission inventory databases, and make an effort to identify opportunities for pollution prevention or increased facility compliance. We provide competitive prices and the top quality services which your facility deserves.

Environmental Investigations (EI) is a multi-disciplinary environmental consulting firm which provides services in a wide variety of technical areas.

EI is a Registered Professional and Geological Engineering Firm possessing extensive experience in industrial permitting and compliance with RCRA/hazardous waste regulations, water pollution, air pollution, and occupational health and safety issues. EI's staff of professionals includes geologists, environmental scientists, chemists, biologists, industrial hygienists, and engineers, allowing EI to provide a variety of cost-effective services to our clients. Please don't hesitate to call our scientists or engineers with questions regarding issues in this Alert or any other regulatory questions you may have.



2327 Englert Drive, Suite 1
Durham, North Carolina 27713
(919) 544-7500

720 Moorefield Park, Suite 140
Richmond, Virginia 23236
(804) 320-9300

