



# COMPLIANCE & PREVENTION

## quarterly

Winter 2007

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### Compliance Assistance Conference Announced

Ohio EPA will be hosting our third "Compliance Assistance Conference: Successfully Navigating Permits, Reporting and Inspections," at the Columbus Marriott on March 22, 2007.

The full-day conference is targeted to small to medium-sized businesses and others who need to know the basics about environmental compliance. Please note that if you represent a large operation looking for detailed information on more complex regulatory requirements such as Title V permits and reporting, the March conference does **not** cover these topics.

For those of you who do need the basics, we hope you will consider joining us in March. There is a registration fee of \$75.00. You can get additional information on the agenda and registration instructions through our conference Web site at [www.epa.state.oh.us/compliance\\_conference/index.html](http://www.epa.state.oh.us/compliance_conference/index.html).

This event is similar to our conferences held in 2005 and 2006, covering a variety of environmental compliance-related topics, such as:

- RCRA, EPCRA, TRI and RMP Reporting;
- Air Permitting Basics and Reporting;
- Preparing for an Ohio EPA Inspection;

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### KEY POINTS FROM THIS ISSUE

- March 22 Compliance Assistance Conference**
- Summary of Air Permit Program changes**
- House Bill passed in January establishes sales bans for certain mercury products**
- Printer reduces hazardous waste by 96 percent**

- Hazardous Waste Requirements Overview;
- Used Oil and SPCC Requirements;
- Reporting When Things Go Wrong;
- Solid Waste Basics;
- Wastewater Pretreatment Permitting and NPDES Reporting Basics;
- Pollution Prevention and Compliance Assistance Resources;
- Storm Water Permitting ... and more!

The conference has been expanded to include additional sessions. An added feature of this year's event is a demonstration of some of the Agency's new Web-based tools, such as the Permit Wizard, Answer Place and online Publications Catalog. We will also have staff from each program area available to answer questions throughout the day and during an informal "Ask the Experts" session over the lunch hour.

Space is limited, so register early! If you have questions, contact Laurie Stevenson by e-mail at [laurie.stevenson@epa.state.oh.us](mailto:laurie.stevenson@epa.state.oh.us) or by phone at (614) 644-2344.

### OCAPP's District Positions

The last district position has been filled for the Office of Compliance Assistance and Pollution Prevention (OCAPP). Now all five Ohio EPA districts have a staff person to offer compliance assistance to small businesses to help them understand and comply with environmental regulations. These services are free and available



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to businesses with fewer than 100 employees. OCAPP is an independent, non-regulatory office within Ohio EPA. This means that information obtained **will not** be shared with Ohio EPA inspection and enforcement staff.

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View Ohio EPA District Office map at  
[www.epa.state.oh.us/new/dist.html](http://www.epa.state.oh.us/new/dist.html).

## **Changes to Ohio EPA's Air Permit Program**

The Summer 2006 Compliance & Prevention Quarterly contained an article outlining upcoming changes to Ohio EPA's air permitting program. Many of these changes are now effective and significantly alter the way small air pollution sources are regulated. The following summarizes the major changes:

#### Toxic air contaminants

The new regulation clarifies the universe compounds Ohio EPA regulates as "toxic air contaminants." The list of 303 chemical compounds can be found in Ohio Administrative Code (OAC) 3745-114-01. Previously, an air toxic compound was any one of more than 700 compounds listed in the American Conference of Governmental Industrial Hygienists (ACGIH) handbook. In addition, Ohio Revised Code (ORC) 3704.03(F) now defines how Ohio EPA evaluates the potential impact of air toxics and how emission limits are established in permits.

#### Allowed construction activities before permit OAC rule 3745-31-33 lists what

construction activities, such as site clearing, utility lines, foundation work, etc., can be completed before obtaining a final air permit-to-install (PTI). Large (major) air pollution sources are limited in what activities are allowed.



Many more activities are allowed for small (minor) air pollution sources. For example, small sources may install equipment, but may not make the utility connection and begin to operate it until a complete permit application is submitted to Ohio EPA. Keep in mind, though, that installing the equipment without a permit is risky, since there is no guarantee that the installation will be approved.

#### Applicability of Best Available Technology (BAT) requirements

Small air pollution sources that emit less than 10 tons of air pollutants annually will not be required to undergo a Best Available Technology (BAT) evaluation for emission controls. By August 2009, Ohio EPA must write regulations that spell out the specific BAT requirements for many types of equipment. This will enable companies to know how the equipment should be designed and operated in advance of applying for the permit.

#### Other changes

Air permits cannot impose more stringent requirements for monitoring, record-keeping or reporting if such a requirement is already established for that type of pollution source in federal regulations or state rules unless agreed to by the owner or operator and Ohio EPA.

Watch online for upcoming changes and more information:

What's New: [www.epa.state.oh.us/dapc/page/whatsnew.html](http://www.epa.state.oh.us/dapc/page/whatsnew.html)

Regulations: [www.epa.state.oh.us/dapc/regs/regs.html](http://www.epa.state.oh.us/dapc/regs/regs.html)

## **Spill Prevention, Control, and Countermeasure (SPCC) Update**

Recently U.S. EPA amended the Spill Prevention, Control and Countermeasure (SPCC) requirements. These changes streamline the requirements for some SPCC regulated facilities.

- Provide an alternative to the general secondary containment requirement without requiring a determination of impracticability for qualified oil-filled operational equipment.
- Define and exempt particular vehicle fuel tanks and other on-board bulk oil storage containers.

- Exempt mobile refuelers from the sized secondary containment requirements for bulk storage containers.
- Remove SPCC requirements for animal fats and vegetable oils for certain types of facilities.
- Extend the SPCC compliance dates for farms.
- *For facilities that have an aboveground oil storage capacity of 10,000 gallons or less and meet other qualifying criteria:* provide the option to self-certify SPCC plans instead of having a Professional Engineer review and certify the plan.



## Ohio Printer Reduces Hazardous Waste

*\*Ohio EPA does not endorse any product/company*



Robin Enterprises Co. is a 40-year old family-owned lithographic printing business in Columbus, Ohio, with 127 employees. A few years ago, as waste generation and management responsibilities increased, they wondered how to improve the company's waste management.

In 2003, the company purchased a blanket wash distillation unit (approximately \$40,000). Blanket wash is a solvent, usually a combination of alcohol and water. It cleans the excess ink from the printing press and plates.

They phased it into operation gradually, carefully monitoring the quality of recycled blanket wash. Today, all blanket wash is recycled.

### Cost Savings

Robin Enterprises saves approximately \$34,000 a year in raw materials (\$13,000) and hazardous waste disposal (\$21,000) costs. They purchase less "new" blanket wash and add a "rejuvenator" to the recycled wash before using it to make sure it meets their performance expectations. The unit produces recycled blanket wash, water and "still bottoms." The still bottoms are disposed of as hazardous waste. There are two filters on the unit; one is a reusable metal screen mesh filter where solids are periodically scraped into the drum of still bottoms and the other filter screens water. Water, a by-product of the distillation process, is high quality and is re-used in the printing process. Since they must pre-treat all water used in their printing process, this also saves them money. Their water use has decreased by approximately 20 percent since they now reuse the water from the distillation process.

### Reduced Environmental Regulation

Robin Enterprises used to be a large quantity generator (LQG) of hazardous waste. This year the company will probably qualify as a conditionally exempt small quantity generator (CESQG) of hazardous waste. This eliminates many of the regulatory requirements for the company, making compliance with environmental regulations easier. In 2003 they disposed of approximately 105 55-gallon drums of hazardous waste. This year they anticipate generating only four 55-gallon drums of still bottoms for hazardous waste disposal. This is a **96 percent reduction** of hazardous waste disposed.

### Other

Robin Enterprises was surprised with the decreased amount of labor required to run the unit. The unit runs for

U.S. EPA is also proposing to extend the compliance dates to July 1, 2009, for facility owners and operators to prepare or amend and implement their SPCC Plans. The agency expects to propose further revisions to the SPCC rule this year, so the extension would allow them time to publicize those revisions before the compliance dates.

For more information on these changes visit U.S. EPA's SPCC Web page ([www.epa.gov/oilspill](http://www.epa.gov/oilspill)). For a general overview of the SPCC requirements, see OCAPP's SPCC fact sheet ([www.epa.state.oh.us/ocapp/sb/publications/spcc.pdf](http://www.epa.state.oh.us/ocapp/sb/publications/spcc.pdf)).

## New Biodiesel Guide

OCAPP has published a new guide, *Want to Start a Biodiesel Production Operation? Environmental Compliance Basics*. This guide addresses several areas related to the construction, design and operation of a biodiesel manufacturing process that could be regulated by Ohio EPA. It's available online at [www.epa.state.oh.us/ocapp/sb/publications/biodieselguide.pdf](http://www.epa.state.oh.us/ocapp/sb/publications/biodieselguide.pdf).

## New Law Bans Mercury Products

House Bill 443 was made law in January 2007, which establishes bans for certain mercury products.

- Public and private schools through high school cannot purchase mercury, mercury compounds or mercury-measuring devices for classroom use as of April 2007.
- Mercury thermometers and mercury-containing novelty items cannot be sold as of October 2007.
- Mercury thermostats cannot be sold or installed as of April 2008.

If you have any questions, feel free to contact Bill Narotski, Office of Compliance Assistance and Pollution Prevention at (614) 728-1264 or [bill.narotski@epa.state.oh.us](mailto:bill.narotski@epa.state.oh.us).

two shifts, but only one employee is needed for two hours a day to operate it. They estimate the actual payback or break-even point on the unit was about six months.

Robin Enterprises worked closely with the fire department on installation of the unit. And although additional electrical wiring was needed for the unit, the cost of the extra electricity to run the unit is negligible. They feel the money they save on water treatment covers the additional cost of electricity.

Ohio EPA would like to thank Robin Enterprises for sharing their experience with us. If you have any questions about the company featured in this article, please contact Duane Moore at [dmoore@robinent.com](mailto:dmoore@robinent.com) or (614) 891-0250. You may also visit them at [www.robinent.com/](http://www.robinent.com/).

### Need Help?

Ohio EPA's Office of Compliance Assistance and Pollution Prevention is a non-regulatory program and one-stop location for information about environmental requirements, compliance concerns and pollution prevention. Services are free. Contact us at (800) 329-7518 or (614) 644-3469.

### How You Can Make a Difference

You can make the publication of *Compliance and Prevention Quarterly* more environmentally friendly. E-mail the Office of Compliance Assistance and Pollution Prevention at [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us) to request that we send you an electronic copy, an Adobe Acrobat PDF file or a message that indicates the newest version is now available on the Web. It's that easy to make a difference.

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