

# Environmental Compliance Requirements

Topic	Requirements	How we can help	Additional Services
<p><b>Waste Management</b> (40 CFR 259-279)</p>	<ol style="list-style-type: none"> <li>1. Evaluate and identify waste streams generated</li> <li>2. Submit hazardous waste reports, as required</li> <li>3. Manage and retain paperwork related to waste collection and disposal</li> <li>4. Employees must be trained in job duties and responsibilities related to proper handling and disposal of hazardous waste</li> </ol>	<ol style="list-style-type: none"> <li>1. Identify and classify all types of waste produced</li> <li>2. Determine generator size and obtain generator ID numbers (EPA and/or state)</li> <li>3. Review site waste storage practices</li> <li>4. Review recordkeeping, including manifests and Land Disposal Restrictions</li> <li>5. Contingency plan development and update</li> <li>6. Hazardous waste compliance inspection support</li> <li>7. Preparation of Large Quantity Generator (LQG) biennial reports</li> <li>8. Compile data for and draft annual generator reports</li> <li>9. Complete other waste reports, such as solid waste, used oil, universal waste and annual hazardous waste generator reports</li> <li>10. Develop and deliver hazardous waste (RCRA) training</li> </ol>	<p>Interpret results of Toxicity Characteristic Leaching Procedure (TCLP) sampling</p>
<p><b>Waste Minimization Plans</b> (40 CFR 259-282)</p>	<p>Large Quantity Generators (LQGs) must develop and implement hazardous waste minimization plans</p>	<ol style="list-style-type: none"> <li>1. Write and assist with implementing waste minimization plan</li> <li>2. Evaluate waste streams for reduction potential</li> <li>3. Calculate chemical usage and cost</li> <li>4. Recommend improvement opportunities</li> <li>5. Compare costs of current and new technologies</li> <li>6. Conduct required plan reviews (semi-annual or annual)</li> </ol>	

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<p><b>Underground Storage Tank (UST) Program</b> (40 CFR 280-282)</p>	<p>Facilities with underground storage tank (UST) systems must meet federal and state requirements for USTs and piping which handle petroleum products or certain chemical substances</p>	<ol style="list-style-type: none"> <li>1. Evaluate UST systems for requirement applicability</li> <li>2. Complete notifications for federal or state authorities</li> <li>3. Conduct assessment to ensure all applicable requirements are met</li> <li>4. Annually re-assess UST systems for changes and updates</li> </ol>	<p>Assist with Time Weighted Average (TWA) noise testing</p>
<p><b>Aboveground Storage Tank (AST) Program</b></p>	<p>Operations with aboveground storage tanks (ASTs) and associated piping which handle regulated chemicals and materials must meet state requirements</p>	<ol style="list-style-type: none"> <li>1. Evaluate AST systems for requirement applicability</li> <li>2. Complete notifications to state authorities</li> <li>3. Conduct assessment to ensure all applicable requirements are met</li> <li>4. Annually re-assess AST systems for changes and updates</li> </ol>	
<p><b>Superfund Amendments &amp; Reauthorization Act (SARA)</b> (40 FR 300-374)</p>	<ol style="list-style-type: none"> <li>1. When on-site chemical storage thresholds are exceeded, prepare and submit Tier II report to local and state agencies by March 1 annually</li> <li>2. Prepare and submit toxic release inventory (TRI) reports annually by July 1, as required</li> <li>3. Notify federal, state, and local agencies when accidental releases of a CERCLA/EHS listed chemical occur at a facility</li> </ol>	<ol style="list-style-type: none"> <li>1. Review chemicals and storage thresholds to determine Tier II reporting applicability</li> <li>2. Prepare Tier II forms</li> <li>3. Provide final Tier II report for review and submission</li> <li>4. Compare operational data to reporting thresholds to determine TRI applicability</li> <li>5. Calculate release (to waste, air &amp; water), recycling, and recovery quantities</li> <li>6. Prepare TRI Form R or Form A reports for review and submission</li> <li>7. Complete spill assessments</li> <li>8. Submit release report for filing</li> <li>9. Provide required follow-up release notification to applicable agencies</li> </ol>	

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<p><b>Air Quality — Applicability and permitting</b> (40 CFR 49-95)</p>	<ol style="list-style-type: none"> <li>1. Assess facilities and to determine air permitting applicability</li> <li>2. Assure that your facility adheres to air quality standards</li> <li>3. Amend existing air permits to support operational changes</li> <li>4. Recordkeeping and reporting as mandated by your permits</li> </ol>	<ol style="list-style-type: none"> <li>1. Calculate Potential to Emit (PTE) and determine permit requirements based on PTE</li> <li>2. Quantify source specific emissions and significance for criteria and hazardous air pollutants</li> <li>3. Identify ambient air quality attainment status of facility location</li> <li>4. Determine state/local permit applicability</li> <li>5. Apply for construction and operating permits; including new permits, renewals, modifications and amendments</li> <li>6. Prepare comments on draft permits and negotiate air permit conditions</li> <li>7. Conduct air emission modeling</li> <li>8. Support permitting process</li> <li>9. Assist in understanding compliance requirements in permits</li> <li>10. Provide guidance on routine monitoring, recordkeeping, and reporting requirements</li> <li>11. Prepare deviation reports and annual compliance certifications</li> <li>12. Prepare annual emissions reports (emission inventory)</li> <li>13. Assist with enforcement, including regulatory inspections, warning letters, and violations</li> </ol>	<p>Assist with source specific performance testing</p>
<p><b>Air Quality — National Emission Standards for Hazardous Air Pollutants (NESHAPS)</b> (40 CFR 61, 63)</p>	<p>Meet the established standards for hazardous air pollutants (HAPs) from “major” and “area” sources</p>	<ol style="list-style-type: none"> <li>1. Determine NESHAP applicability</li> <li>2. Support permit modification to incorporate NESHAP requirements</li> <li>3. Support area source reporting (initial notification, annual certifications, etc.)</li> <li>4. Provide recordkeeping guidance</li> <li>5. Assist with testing/monitoring requirements</li> </ol>	

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<b>Risk Management Planning (RMP)</b> (40 CFR 68)	Facilities storing more than a threshold quantity of regulated substances are required to develop and submit a risk management plan to EPA	<ol style="list-style-type: none"> <li>1. Complete RMP applicability determination</li> <li>2. Prepare RMP plan information</li> <li>3. Assist with offsite consequence modeling</li> <li>4. Conduct RMP triennial program audits</li> <li>5. Update hazard reviews</li> </ol>	
<b>Ozone Depleting Substances</b> (40 CFR 82)	Requirements for industrial process refrigeration systems that contain Class I or Class II Ozone Depleting Substances	<ol style="list-style-type: none"> <li>1. Conduct assessment for industrial process refrigeration equipment</li> <li>2. Review leak repair records</li> <li>3. Draft "Leak Rate Exceedance" notification letters</li> </ol>	
<b>Greenhouse Gas Reporting</b> (40 CFR 98 and various states)	<ol style="list-style-type: none"> <li>1. Report annual greenhouse gas (GHG) emissions and other relevant information from large GHG emission sources, fuel and industrial gas suppliers, and CO2 injection sites in the U.S.</li> <li>2. Submit state required GHG reports</li> </ol>	<ol style="list-style-type: none"> <li>1. Identify Scope 1, 2, and 3 GHG emission sources for an operation</li> <li>2. Determine federal and state reporting applicability</li> <li>3. Calculate GHG emissions</li> <li>4. Draft GHG reports and assist with entering report in reporting system (e-GGRT)</li> </ol>	
<b>Water Programs — Storm Water Pollution Prevention</b> (40 CFR 122)	<ol style="list-style-type: none"> <li>1. Meet the National Pollutant Discharge Elimination System (NPDES) permit or General Storm Water Permit requirements</li> <li>2. Develop and implement a Storm Water Prevention Plan (SWPPP)</li> <li>3. Revise your SWPPP as required by facility changes or at a minimum of every 5 years</li> </ol>	<ol style="list-style-type: none"> <li>1. Conduct on-site storm water assessment</li> <li>2. Evaluate discharges and identify potential storm water contamination sources</li> <li>3. Evaluate for SWPPP applicability               <ol style="list-style-type: none"> <li>1. Identify existing management practices reducing storm water pollution risk</li> <li>2. Recommend best management practices to reduce storm water pollution potential</li> <li>3. Develop and update, as needed, a facility specific SWPPP</li> </ol> </li> <li>4. Conduct site inspections, including annual comprehensive inspection and other periodic</li> <li>5. Complete annual reports</li> <li>6. Provide storm water testing assistance</li> <li>7. Provide Storm Water Pollution Prevention training</li> </ol>	

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<b>Water Programs — Industrial Wastewater Discharge</b> (40 CFR 400-471)	<ol style="list-style-type: none"> <li>1. Maintain and comply with National Pollutant Discharge Elimination System (NPDES) Industrial Discharge Permit</li> <li>2. Complete wastewater discharge reporting</li> </ol>	<ol style="list-style-type: none"> <li>1. Determine wastewater regulatory authority</li> <li>2. Complete Industrial Discharge Permit applications</li> <li>3. Complete permit renewals and amendments as necessary</li> <li>4. Collect and analyze wastewater data and documentation, including baseline monitoring reports, discharge monitoring reports (DMRs), and Categorical Compliance Reports</li> <li>5. Complete and submit regulatory reports</li> <li>6. Assist with site-specific plan development</li> </ol>	
<b>Spill Prevention Control and Countermeasures (SPCC)</b> (40 CFR 112)	<ol style="list-style-type: none"> <li>1. Develop SPCC plans</li> <li>2. Maintain secondary containment on applicable containers</li> <li>3. Train employees on SPCC plan elements</li> </ol>	<ol style="list-style-type: none"> <li>1. Inspect facility to determine applicability of SPCC regulation</li> <li>2. Assemble information and draft SPCC plan</li> <li>3. Obtain certification of SPCC plan</li> <li>4. Develop and conduct annual on-site training</li> <li>5. Assist with determining secondary containment capacity need and design</li> </ol>	

**Environmental Compliance Summary Disclaimer**

*This form is based on Federal OSHA regulations and is only a summary of the requirements. For a detailed explanation of the requirements, please refer to the actual Code of Federal Regulations (CFR) and consult with your specific state or municipality since they may have more stringent compliance requirements. Assistance may vary based upon the product and services purchased.*

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