

# KRMCA/KAPA Environmental Management Newsletter

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## Environmental Topics

Midwest Training and Consulting Services (MTCS) to help provide information on reviewing your environmental programs we have provided some additional information for your self review.

This newsletter topic was recommended by a member of the Safety committee and is a calendar of annual environmental reporting requirements from EPA and State Program Offices.

If you have any questions relating to these areas feel free to call Rick Smith or Jerry Taylor at 913-432-4022.

## Annual Requirements

The primary agency for environmental requirement is the US EPA, but they have delegated many programs to the State Offices.

**Clean Air Program:** The state of Kansas has primary responsibility for permitting. A Title V permit will have many specific requirements that will follow a timeline. Each permit will have times for that facility and the permit will have to renewed at a five-year time frame. All new sources such as generators for power must be registered with the state by submitting a construction permit.  
Annual requirements:

Emissions Inventories and reporting are required to be turned in by April 1. Class II or VOC permits (painting and solvent use) have to turned in by June 1.

**MACT Standards:** These are separate standards for classes and specific chemicals that different industries use. If you use have these operations there is a reporting annual requirements. Several items are Portland Cement -- LLL, Lime manufacturing -- AAAAA, and Asbestos Abatement -- M.

**Opening Burning:**

**Open Burning of Solid Waste Materials:** Must have a permit for opening burning. You should check with the State KDHE about open burning. If you have a permit it will require recordkeeping, inspections and training on an annual basis.

**EPCRA TIER II Reporting.** This is an annual report that must be submitted to be received by March 1 of each year. There are two reporting thresholds to mandate this report. The first is listed chemicals (EHS – Extremely Hazardous Substances). One chemical on this list is battery acid. The other is 10,000 lbs. of any one chemical. This could be about 1,300 gallons of diesel. There is an abbreviated method if the reportable quantity is in a registered tank.

**EPCRA Form R Reporting:** This report is due to the EPA by the 30<sup>th</sup> of June each year. The facility must use certain chemicals that in excess to 25,000 lbs.

**Emergency Planning:** You should maintain a list of chemicals with reportable quantities along with who should be called such as LEPC, SERC and EPA.

**FIFRA:**

If your employees use restricted use pesticides they must have an applicators license. There is an annual recertification for applicators.

**Resource Conservation Recovery Act (RCRA):** There is a registration requirement for all generators, transporters, and treatment storage disposal facility.

**Generator:**

Audit programs for inspection records.

Annual hazardous waste management training is conducted are maintained for five years.

Ensure all manifests are maintained for at least three years.

Ensure all land ban restrictions forms are maintained for five years.

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Contingency Planning: Review the written document on an annual timeframe.

Biennial Report (EPA Form 8700-13A) has been completed on every even number year and submitted by May 1. Annual Monitoring Fee and Report submitted by May 1 of each year.

**Stormwater Permits:** The permit requires annual recordkeeping, training, and inspection process from the approval date.

**Spill Prevention Plans:** There is an annual requirement (one year from the date of signature by the Professional Engineer) to review the plan for significant changes that must be approved by a Professional Engineer. This is a requirement for annual training that must be provided to all employees that may observe a spill or release.

**Above Ground Storage Tanks:** The Kansas Fire Marshal requires all tanks (greater than 600 gallons) to be registered and renewed on an annual basis. The registration and \$10.00 fee must be received by December 1.

**Under Ground Storage Tanks:** The annual certification and fee must be received by Apr 30 of each year.

**Used Oil:**

Disposal of used oil is limited to Oil Marketers, you should obtain their EPA Identification Number for your files.

If your facility burns oil (other than space heater) then a notification to the State/EPA must be submitted.

**Universal Waste:**

Annual Record keeping for storage and transfer of universal waste. This includes electronic items (computer monitors), lead acid batteries, pesticides, fluorescent light tubes. The State of Kansas has set yearly storage limitations

**Ground Water Wells:**

Annual testing of water if less than 25 people are served by the well. If greater than 25 different testing requirements.

**Clean Water Permits (NPDES):** If you have been given a discharge permit either by the State or City POTW then they will require specific recordkeeping or water sampling results. Any water drains or sewage discharge points that have process or other operational materials discharged at this points must have local Public Owned Treatment Works (POTW) notification and they may have additional requirements. Some have written program requirements called Organic Toxic Management Programs that must be submitted to them.

**Other Environmental Topics:**

If you have questions or concerns about other topics, feel free to contact me at my office at 913-432-4022 or email me at Rick@midwest-training.com.

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