

J. J. Keller and U. S. Compliance Corporation

Environmental Compliance Requirements

ACTION NEEDED	AREA OF SERVICE	CODE	REQUIRES THAT YOU	HOW WE CAN HELP
	Waste Management	40 CFR 259-282	Evaluate the waste streams generated by your facility	<ol style="list-style-type: none"> 1. Evaluate waste streams 2. Determine hazardous waste categories 3. Interpret Toxicity Characteristic Leaching Procedure (TCLP) sample data
	Hazardous Waste — Management	40 CFR 259-282	Evaluate on-site management of wastes	<ol style="list-style-type: none"> 1. Review site storage practices 2. Assist with Universal and Special Waste Management 3. Review manifesting, Land Disposal Restrictions (LDR) and recordkeeping 4. Review weekly inspection logs 5. Determine generator size and obtain EPA ID numbers 6. Develop contingency plans 7. Assist with Hazardous Waste Compliance Inspections
	Hazardous Waste — Reporting	40 CFR 259-282	Complete a Hazardous Waste Report, as required, if your facility ships any waste to an off-site facility	<ol style="list-style-type: none"> 1. Complete Large Quantity Generator (LQG) biennial Reports 2. Complete annual generator reports 3. Complete Solid Waste and Universal Waste Reports
	Hazardous Waste — Training	40 CFR 259-282	Train your employees on their job duties and responsibilities in the proper handling and disposal of hazardous waste	<ol style="list-style-type: none"> 1. Produce hazardous waste summaries 2. Provide hazardous waste (RCRA) training for management, existing and new employees 3. Assist with development of employee job descriptions for waste management
	Waste Minimization Plans	40 CFR 259-282	Develop a hazardous waste minimization plan for Large Quantity Generators (LQGs)	<ol style="list-style-type: none"> 1. Evaluate waste streams 2. Expose current chemical usage and costs 3. Develop areas for improvement 4. Measure current costs to new technology costs 5. Design and implement waste minimization plan 6. Re-evaluate plans semi-annually or annually
	Underground Storage Tank (UST) Program	40 CFR 280	Meet Federal and State requirements for all underground storage tanks (USTs) and pipes handling either petroleum or certain chemical substances	<ol style="list-style-type: none"> 1. Evaluate your UST chemical storage 2. Complete Federal or State notifications 3. Ensure your facility is maintaining all applicable tank requirements 4. Re-assess your facility annually for changes and updates to maintain all applicable tank requirements
	Aboveground Storage Tank (AST) Program		Meet State requirements for above ground storage tanks (ASTs) and pipes handling regulated chemicals and materials	<ol style="list-style-type: none"> 1. Evaluate your AST chemical storage 2. Complete State written notifications 3. Ensure your facility is maintaining all applicable tank requirements 4. Re-assess your facility annually for changes and updates to maintain all applicable tank requirements

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	Superfund Amendments & Reauthorization Act (SARA)	40 CFR 300-374	Assess your material storage and usages annually	<ol style="list-style-type: none"> 1. Request applicable information 2. Compile a chemical assessment spreadsheet 3. Complete threshold determinations
	SARA — Tier II Reporting	SARA Sections 302, 311 and 312	Report chemical storage data to local and state agencies annually by March 1, if on-site storage thresholds are exceeded	<ol style="list-style-type: none"> 1. Request applicable information 2. Review hazards to determine reportable chemicals 3. Evaluate storage thresholds 4. Complete Tier II forms 5. Submit final Tier II reports to client for review and submission
	SARA — Toxic Release Inventory (TRI) Reporting	SARA Section 313	Submit toxic release reports (TRI) under SARA Section 313 annually by July 1, as required	<ol style="list-style-type: none"> 1. Evaluate reporting thresholds 2. Calculate waste, air & water releases 3. Determine recycling quantities & locations 4. Determine waste recovery quantities 5. Complete Form R/A Reports 6. Submit final Form R/A Reports to client for review and submission
	SARA — Spill Reporting	SARA Section 314	Notify appropriate Federal, State, and local agencies if an emergency situation at your facility results in the spill of a CERCLA/ EHS listed chemical	<ol style="list-style-type: none"> 1. Complete spill assessment 2. Report correct spill report documentation to appropriate agencies, if required 3. Provide required follow-up to applicable agencies 4. Submit spill report to client for filing
	Air Quality — Applicability	40 CFR 49-95	Assess all facilities and equipment in your operation to determine whether an air permit is required per the amended 1990 Clean Air Act	<ol style="list-style-type: none"> 1. Prepare an emissions summary calculating Potential to Emit (PTE) 2. Quantify criteria pollutants and hazardous air pollutants generated from each emission source 3. Identify significance of each emission source 4. Evaluate state/local regulations to determine permit applicability to your facility
	Air Quality — Permit Issuance	40 CFR 50	Assure that your facility adheres to air quality standards, while allowing for economical growth	<ol style="list-style-type: none"> 1. Determine permit type based on your facility's Potential to Emit (PTE) 2. Recommend steps to avoid or comply with Prevention of Significant Determination (PSD) 3. Evaluate the location of your facility regarding ambient air quality non-attainment areas 4. Apply for construction and operating permits 5. Complete basic air toxic modeling as needed 6. Assist with permit drafting questions and comments, and review draft permit for accuracy 7. Provide instruction on the compliance requirements of the permit
	Air Quality — Permit Modifications	40 CFR 50	Amend existing air permits to accommodate changes in production, new equipment, new raw materials, etc.	<ol style="list-style-type: none"> 1. Determine permit type based on new potential to emit (PTE) 2. Complete a permit modification (construction/operation) 3. Submit the modification and support the submittal process 4. Provide instruction on the compliance requirements of the modification

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	Air Quality — Permit Compliance	40 CFR 50, 60	Maintain the proper records and submit the required reports as mandated by your permits	<ol style="list-style-type: none"> 1. Write letters explaining permit requirements 2. Provide guidance on monthly recordkeeping 3. Provide guidance through deviation and compliance reporting 4. Complete annual emissions reports 5. Handle permit renewals, modifications and amendments
	Air Quality — National Emission Standards for Hazardous Air Pollutants	40 CFR 61, 63	Meet the established standards for hazardous air pollutants that are known to cause serious health problems for “major” and “area” sources	<ol style="list-style-type: none"> 1. Determine applicability of potential NESHAPS 2. Add requirements to current permits for ongoing compliance 3. Provide reports for subpart 63 compliance 4. Provide guidance for recordkeeping at your facilities 5. Provide guidance on testing/monitoring requirements
	Risk Management Planning (RMP)	40 CFR 68	Meet the requirements of Section 112(r) of the 1990 Clean Air Act amendments for chemical accident prevention guidance to companies using extremely hazardous substances	<ol style="list-style-type: none"> 1. Determining applicability to subpart 68 2. Completion of EPA RMP information submittals 3. Assistance with offsite consequence modeling 4. General RMP program audits
	Ozone Depleting Substances	40 CFR 82	Meet various Clean Air Act requirements if your facility has an industrial process refrigeration system that contains Class I or Class II Ozone Depleting Substances	<ol style="list-style-type: none"> 1. Assess the facility for industrial process refrigeration equipment 2. Review repair records for leaking equipment 3. Draft letters of “Leak Rate Exceedence” for EPA
	Water Programs — Storm Water Pollution Prevention	40 CFR 122	Meet the National Pollutant Discharge Elimination System (NPDES) permit or General Storm Water Permit requirements if your site has potential to pollute storm water	<ol style="list-style-type: none"> 1. Conduct on-site storm water assessment 2. Evaluate discharges from facility and potential exposures to storm water
	Water Programs — Storm Water Pollution Prevention	40 CFR 122	<ol style="list-style-type: none"> 1. Determine if your facility requires a General Storm Water Permit or an individual NPDES Permit and, if so, develop and implement a Storm Water Prevention Plan (SWPPP) within 180 days of obtaining the permit 2. Revise your SWPPP as required by facility changes or at a minimum of every 5 years 	<ol style="list-style-type: none"> 1. Evaluate for SWPPP applicability 2. Determine potential(s) to pollute storm water 3. Determine current management practices that reduce potential to pollute storm water 4. Determine best management practices to further reduce potential to pollute storm water 5. Assemble a facility specific SWPPP 6. Update SWPPP as needed or required
	Water Programs — Storm Water Permit General Requirements	40 CFR 122	Meet additional requirements beyond the Storm Water Pollution Prevention Plan (SWPPP) if your facility requires a General Storm Water Permit or an Individual NPDES Permit	<ol style="list-style-type: none"> 1. Complete periodic Storm Water Site Inspections 2. Complete Annual Comprehensive Site Inspections 3. Complete Annual Reports 4. Provide storm water testing assistance 5. Provide Storm Water Pollution Prevention Training

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	Water Programs — Industrial Wastewater Discharge	40 CFR 400-471	Assess, complete and submit an Industrial Discharge Permit Application if necessary	<ol style="list-style-type: none"> 1. Collect and submit information to complete application 2. Determine wastewater regulatory authority 3. Complete Industrial Discharge Permit Application 4. Submit Application to regulatory agencies 5. Complete permit renewals and amendments as necessary
	Water Programs — Industrial Wastewater Discharge	40 CFR 400-471	Complete reporting in regard to the wastewater discharged	<ol style="list-style-type: none"> 1. Collect and analyze required information and documentation, baseline monitoring reports, discharge monitoring reports (DMRs), and Categorical Compliance Reports as needed 2. Complete and submit necessary regulatory reports 3. Help develop site-specific plans, if needed
	Water Programs — Spill Prevention Control and Countermeasures	40 CFR 112	Determine applicability to SPCC requirements	<ol style="list-style-type: none"> 1. Inspect facility to determine applicability of SPCC regulation 2. Assemble information and draft SPCC if needed 3. Obtain certification of SPCC plan 4. Arrange for annual SPCC on-site training as required

Contact us today for a no-obligation discussion at 888-473-4638 or visit JJKeller.com



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