

# Regulatory News to Kick Off 2017

INFORMATION, NEWS, AND SUPPORT



## Stormwater MSGP Facilities Annual Reports Due January 30<sup>th</sup>

Facilities applicable to the 2015 Stormwater MSGP must submit an Annual Report to the Environmental Protection Agency (EPA) electronically, by January 30<sup>th</sup> for each year of permit coverage containing information generated from the past calendar year.

The following information must be included with each report:

- ♦ The results, or a summary of the past year's routine facility inspection documentation and guarterly visual assessment documentation
- Information copied or summarized from the corrective action documentation (if applicable).
- ♦ Address prior year's benchmark monitoring results.
- ♦ Any incidents of noncompliance observed or, if there is no noncompliance, a certification signed stating the facility is in compliance with the MSGP.

#### Federal - Tier II Reporting Required By March 1<sup>st</sup>

Tier II reporting is required by the (EPA) for all facilities that store hazardous materials. These reports, detailing on-site chemical storage, must be sent to the Fire Department, Local Emergency Planning Commission (LEPC), and State Emergency Response Commission (SERC) for emergency planning purposes.

The typical reporting threshold for common chemicals (like oil and propane) is 10,000 pounds. For example, if you store more than 1,370 gallons of fuel oil you are subject to this reporting. Some extremely hazardous substances have reporting thresholds of 500 pounds.



### Massachusetts – Restricted Emission Status (RES) Report Due March 15<sup>th</sup>

Facilities that are subject to an RES final approval must report actual monthly and 12-month rolling emissions data on the Annual Air Quality Reporting Form. Submit this to the appropriate MassDEP Regional Office by March 15<sup>th</sup> of each year for the previous calendar year.

### Massachusetts – Greenhouse Gas (GHG) Reporting Due April 15<sup>th</sup>

A facility that emits more than 5,000 tons per year of carbon dioxide equivalents (CO2e) and/or is regulated under *Title V of the US Clean Air Act* and *310 CMR 7.00, Appendix C*, must report its CO2e emissions to the MassDEP by April 15<sup>th</sup> for the previous calendar year. CO2e chemicals include: carbon dioxide, methane, nitrous oxide, sulfur hexafluoride, hydrofluorocarbons, and perfluorcarbons.

Important Note: Starting in 2017, MassDEP will no longer be using the Climate Registry Information System (CRIS) software, although it has not yet officially identified the system it intends to use. Stay tuned for more information, or visit the MassDEP website <a href="http://www.mass.gov/eea/agencies/massdep/climate-energy/climate/approvals/facilities-required-to-report-greenhouse-gas-emissions.html">httml</a> for updates.



The following key regulatory plans must be updated as noted:

- ♦ Wastewater Treatment Staffing Plan every 2 years (Massachusetts)
- ♦ Oil Spill Prevention Control, and Countermeasure Plan every 5 years (Federal)
- ♦ Hazardous Waste Contingency Plan every 2 years (Federal)
- ♦ Local Wastewater Discharge Permits varies from one to five years (local authority)
- ♦ Risk Management Plan Audit –every 3 years (Federal)
- ♦ Risk Management Plan Five Year Update every 5 years (Federal)
- ◆ Process Hazard Analysis Five Year Update every 5 years (Federal)

Note that most regulatory programs require more frequent updates when there are major changes in personnel or facility operations.

#### **Are These Eight Required Trainings** on Your Radar?

Some important general training requirements, and their required frequency, to keep on your radar include:

- ♦ Hazardous waste management training for LQGs – annual (Federal)
- ♦ Licensed wastewater treatment operator training - 10 TCHs per year for a total of 20 over a two-year period (Massachusetts)
- ♦ Stormwater pollution prevention training – recommended annually (Federal)
- ♦ Oil spill prevention, control, and countermeasure plan training recommended annually (Federal)
- ♦ Hazardous material shipper (DOT) training – every 3 years (Federal)
- ♦ Backflow prevention device testing semi-annual (Massachusetts, New Hampshire, Connecticut)
- ♦ Hazard communication training annual (Federal)
- ♦ HazWoper 8-hour refresher annual (Federal)

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#### **Conference Center Training Dates '17**

March 9	4-hour DOT Hazardous Waste Shipping	Westwood
March 9	2-hour Hazardous Waste Management	Westwood
March 30	4-hour UST Operator Training	Westwood
March 21 - April 18	20-hour Wastewater Treatment Operator Exam Prep	Multiple Locations

On-site training and more information available upon request





For additional help, contact Wayne Bates at 781-708-9847 or WEBates@tighebond.com

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