

## Regulatory News – Hot Topics for August

### EPA Requires Annual Stormwater Compliance Inspections in Massachusetts & New Hampshire – Due September 30th



Massachusetts & New Hampshire are not delegated states in terms of stormwater permitting. Therefore, industrial facilities in Massachusetts & New Hampshire that maintain NPDES discharge permits for stormwater must submit [annual reports to EPA](#). Reports must be submitted annually that summarize comprehensive site inspection and corrective actions taken during the year for the Multi-Sector General Permit (MSGP). EPA has developed an annual reporting form, which can be used by permittees, to submit this information to EPA. All inspections must be completed before September 30; you then have 45 days from the inspection date to submit your report to EPA.



“Stormwater runoff is generated when precipitation from rain and snowmelt events flows over land or impervious surfaces and does not percolate into the ground. As the runoff flows over the land or impervious surfaces (paved streets, parking lots, and building rooftops), it accumulates debris, chemicals, sediment or other pollutants that could adversely affect water quality if the runoff is discharged untreated. The primary method to control stormwater discharges is the use of best management practices (BMPs). In addition, most stormwater discharges are considered point sources and require coverage under an NPDES permit.”

Also, The 2008 MSGP expired at midnight on September 29, 2013. Facilities that obtained coverage under the 2008 MSGP prior to its expiration are automatically granted an administrative continuance of permit coverage. The administrative continuance will remain in effect until a new permit is issued. The EPA is likely working with Fisheries & Historic Commissions on the new permit, and a draft will hopefully be available in the fall of 2014.

If you need additional information, contact **David Horowitz, P.E.** at (413) 572-3211 or [DPHorowitz@TigheBond.com](mailto:DPHorowitz@TigheBond.com).

### The Climate Registry (TCR) Releases New General Verification Protocol

The Climate Registry (TCR) has released the General Verification Protocol version 2.1 (GVP v. 2.1), that took effect on July 1, 2014.

There are two updates within the protocol that are particularly noteworthy:

1. TCR members may now choose the level of assurance (reasonable or limited) that best meets their reporting needs and objectives on an annual basis.
2. For verifications conducted to a reasonable level of assurance, the verifier may forgo facility visits in the second three-year verification cycle if certain conditions are met.

These changes are part of an ongoing evolution of their program that is primarily in response to member feedback. Complete, accurate, and consistent reporting remains integral to TCR's program, and a Greenhouse Gas (GHG) inventory that is verified to a reasonable level of assurance. However, it has become evident that companies have varying goals and uses for their GHG data, and TCR has responded by providing flexibility to companies to choose the level of verification rigor that matches their needs and objectives. For both reasonable and limited assurance, inventories must still be 95% accurate and conform to TCR's General Reporting Protocol.

You can find the updated protocol and a summary of changes on the [GVP page](#) of TCR's website. You can find minor updates to TCR's General Reporting Protocol for consistency with GVP v. 2.1 [here](#).

If you need additional information contact **Tim Kucab** at (413) 875-1607 or [TKKucab@TigheBond.com](mailto:TKKucab@TigheBond.com).

### OSHA Provides New Guidance Resources for Creating Effective HazCom Programs



Two new OSHA publications are available that are designed to provide information to help employers create effective hazard communication programs. The "[Small Entity Compliance Guide for Employers That Use Hazardous Chemicals](#)" is intended to help small employers comply with OSHA's hazard communication standard. Included in this publication are six steps an employer can follow that will help them develop an effective hazard communication program, as well as a sample written hazard communication program, and a brief guide to hazard communication training.

Additionally, a new [OSHA fact sheet](#) has been released that briefly describes the agency's recommended steps for implementing an effective hazard communication program.

If you need additional information contact **Jason Hayward** at (508) 471-9614 or [JLHayward@TigheBond.com](mailto:JLHayward@TigheBond.com).

### Compliance Specialist Spotlight - Tim Kucab



Compliance Specialist **Tim Kucab** provides regulatory compliance and permitting support to Tighe & Bond's industrial clients. A certified Environmental and Safety Compliance Officer, he has nine years of experience in the field of environmental analysis and policy. Tim also has a working knowledge of the Massachusetts Department of Revenue's Underground Storage Tank Program, which gives him additional resources with which to understand and solve environmental issues for a wide variety of clients.

Tim's experience includes providing compliance assistance to metal finishers, screen printers, flexographic printers, foundries, plastic injection molders, hospitals, community colleges,

municipalities, aerospace support facilities, utility companies, electric generating facilities, coated paper manufacturers, landfills and metal fabricators.

Tim holds a Bachelor's Degree in Environmental Analysis & Policy from Boston University. He also has completed graduate coursework in Environmental Health & Risk Assessment at Tufts University.

You can reach Tim at 413-875-1607, or [TKKucab@TigheBond.com](mailto:TKKucab@TigheBond.com). Feel free to introduce yourself to him, or let him know if you have any compliance related questions!

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