



CTACHMM NEWSLETTER

VOLUME 14, ISSUE 1, WINTER 2014

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CT ACHMM President's Message



President's Message:

I hope you all had an enjoyable year, so far. We have some great plans for the Chapter. The Chapter is planning four General Membership meetings this year and there are the Board meetings that are open to all members. The Board is working on updating the Chapter on new and upcoming environmental regulation changes throughout the year; keep an eye out for meeting notifications. The Board also has started a tradition of "Celebrating the Holidays". Our second Celebrating the Holidays General Meeting was at J.Timothy's was a success; watch for announcements later in the year for our third holiday celebration being held in Dec 2014. If you have a favorite winery or brew pub, let one of the board members know. Hope to see you all at the next General Membership meeting.

Recent Chapter Meeting

The December 5, 2013 General Membership meeting at J. Timothy's was very well attended. This last meeting of the year was a regulatory update on air emissions, waste management, and water discharge.



Generators and other Stationary Engines are affected by this rule

Laura Zadrick, Chapter President presented the recent air emissions requirements for Reciprocating Internal Combustion Engines ("RICE"). These RICE rules, which include MACT and NESHAP regulations have been called the most complicated regulations ever issued by EPA. Depending on your engine status, various

registration, emission standards, and testing requirements are being phased in.



New waste rags regulations issued

Stephanie Boyd, Chapter Vice President, gave us an update on the EPA's waste rag regulations, and the compliance requirements under the rule. Connecticut has yet to adopt these regulations but may do so in the future.



Paul Simonetta of Triton Environmental outlined the new revised Connecticut DEEP Miscellaneous General Permit. This permit replaces many of the existing General Permits such as for non-contact cooling water, water treatment wastewater, and boiler blowdown, among others. Depending on volume and treatment of your discharge, CHMM or PE certification may be required, with higher volumes requiring a "Qualified" CHMM or PE.

CTACHMM SUCESSFULLY DEFENDS CHMM CREDENTIAL

The Connecticut Chapter of the Academy of Certified Hazardous Materials Managers (CTACHMM) once again conducted a spirited defense of the CHMM credential ensuring that our previously hard fought ability to certify existing permits and approvals established under the old CTDEP agency was included in any new permits drafted by the successor agency "CTDEEP". In December 2011 CTDEEP drafted a modified General Permit for Miscellaneous Sewer Compatible Wastewater which combined various existing permits but excluded the CHMM certifications. This action triggered a two year process of re-instating the CHMM certifications into the permit.

A very significant amount of work was performed over the two year period from December 2011 through October 2013 to ensure the CHMM certifying language was re- included in the new permit. Tracking the issuance of draft permits, reviewing permit language, checking for the inclusion or non-inclusion of the CHMM credential, attending informational meetings, submitting comments on draft permits, gathering signatures, petitioning for a hearing, attending a pre-hearing status conference, communicating our concerns and positions to agency representatives verbally and in writing, confirming what was agreed to at meetings, in telephone calls, etc. were some of the activities performed by the Chapter to defend the credential. These were very time consuming and tedious tasks and are a testament to the dedication of the Chapter particularly several key chapter members who spearheaded the defense and actively pursued this goal. A significant amount of work was performed by Chapter President Laura Zadrick, Secretary Whyndam Abrams and former President Paul Simonetta in

ensuring that our ability to certify was included in the final permit.

Timeline

It is important to remind ourselves how much effort went into this process. A timeline of the significant events that occurred during the two year period is as follows:

December 8, 2011

CTDEEP issued a Notice of tentative determination to modify the General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater (Miscellaneous General Permit), and to reissue the general permits for Discharge of Hydrostatic Pressure Testing Wastewaters, Minor Boiler-blowdown Wastewater, Non-contact Cooling and Heat Pump Water and Minor Tumbling Wastewaters. CHMM certifications were not included in any of these draft permits. A 60 day comment period was indicated.

January 4, 2012

CTACHMM attended a general information session on the proposed permits and confirmed the absence of the CHMM certifications.

January 12, 2012

CTACHMM submitted a letter along with supporting documentation to CTDEEP requesting that the Certified Hazardous Material Manager (CHMM) credential be included as authorized certifying parties for wastewater discharges without engineered treatment systems, for the following proposed or re-issued wastewater General Permits:

- General Permit for Miscellaneous Discharges of Sewer Compatible Wastewater
- General Permit for the Discharge of Minor Boiler Blowdown Wastewater

- General Permit for the Discharge of Minor Tumbling or Cleaning of Parts Wastewater

Our letter indicated that CHMMs had been included within various General Permits going back over ten (10) years, and as recently as 2007 their inclusion was upheld in revisions to the General Permit for the Discharge of Minor Printing and Publishing Wastewater and General Permit for the Discharge of Groundwater Remediation Wastewater to a Sanitary Sewer. The letter re-iterated that CHMMs were well qualified to perform the applicable certifications within these General Permits and served as our Request for Public Hearing.

January 16, 2012

CTACHMM initiated the process of requesting a public hearing from CTDEEP by obtaining the minimum 25 petition signatures from CTACHMM members and submitting a formal Request for a Public Hearing to CTDEEP.

February 9, 2012

The CTDEEP Hearing Officer issued a "Notice of Status Conference" indicating that a public hearing had been requested by CTACHMM regarding the general permits and that the pre-hearing process would begin with a status conference on February 23, 2012 in the CTDEEP Russell Hearing Room in Hartford. The purpose of this conference was to establish prehearing procedures and schedule a date for the hearing.

February 23, 2012

A pre hearing status conference was held on February 23, 2012 and attended by Laura Zadrick, Whyndam Abrams, Paul Simonetta and CTDEEP representatives, including the CTDEEP Hearing Officer. DEEP indicated the reason CHMMs were not listed in the MISC draft permit was because in the past they had incorporated CHMMs only within those types of permits that had specified treatment system language, but could not do so with this permit

that covered many different wastewater types. This was not exactly true, but that was their rationale.

At the status conference, CTACHMM discussed the types of wastewater that normally have pre-engineered treatment systems, and identified them as printing and publishing wastewater with silver recovery filters, air compressor condensate, tumbling and cleaning, and food processing wastewaters, with oil separation. It was agreed that CHMMs could be included in these "treatment" certifications. CTDEEP indicated that 3rd party "Qualified CHMMs" could also certify those 3rd party certifications for >=25,000 gpd (Significant Industrial User) discharge applications without engineered treatment. The conference set up a framework for resolution of the matter.

February 23, 2012

CTDEEP Hearing Officer, J. Deshais issued an email summarizing discussions at the status conference and indicating that by March 15, 2012 CTACHMM would submit a letter to DEEP summarizing proposed changes to the General Permit for Miscellaneous Discharges of Sewer Compatible Wastewater (the MISC GP).

March 8, 2012

Based on the outcome of the status conference, CTACHMM submitted a letter to CTDEEP stating CTACHMM's overall understanding of the conference discussions and withdrawing the request for a public hearing for two of the General Permits:

- General Permit for the Discharge of Minor Boiler Blowdown Wastewater (GBB)
- General Permit for the Discharge of Minor Tumbling or Cleaning of Parts Wastewater (GTC)

This was based upon CTACHMM's understanding that the boiler blowdown permit would be to groundwater only, and that testing (and professional review of certain exceedances) would not be required, and that

the tumbling and cleaning permit would be reissued to expire on June 11, 2013.

Regarding the draft General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater, based on CTACHMM's understanding, CHMM's would be authorized to certify the following MISC Permit registrations:

- Printing and photo processing wastewater with pre-manufactured silver recovery filter treatment
- Air compressor condensate & blow down, cutting and grinding wastewater, and food processing wastewater with pre-manufactured oil/water separators.

For registrations requiring 3rd party certification for Discharge Group I and II with daily volume ≥ 25,000 gpd, unless treatment other than as referenced above is required (or if no treatment is required), "Qualified CHMMs" (with a definition similar to Qualified PE) would be added to the permit. CHMMs would also be added as authorized to prepare and certify violation reports, other than when engineering redesign of treatment systems is required.

June 19, 2013

CTDEEP extended the existing General Permit for Miscellaneous Sewer Compatible Wastewater to October 30, 2013.

September 23, 2013

CTDEEP contacted CTACHMM verbally indicating DEEP had prepared draft permit language incorporating CHMM's for certain approvals in the General Permit for Miscellaneous Sewer Compatible Wastewater.

October 8, 2013

CTDEEP sent an email to CTACHMM transmitting excerpts from the revised draft of the General Permit for Miscellaneous Discharges of Sewer Compatible wastewater incorporating CHMM certifications. CTACHMM performed a thorough review of the revisions.

October 17, 2013

CTACHMM submitted a letter to CTDEEP withdrawing our request for a public hearing regarding the proposed General Permit for Miscellaneous Sewer Compatible Wastewater indicating that the revisions in the DEEP's email of October 8, 2013 were satisfactory.

October 30, 2013

CTDEEP re-issued the modified General Permit for Miscellaneous Sewer Compatible Wastewater effective October 31, 2013. CTACHMM re-confirmed that the requested revisions allowing permit registration certification by CHMMs and Qualified CHMMs were included in the final permit. Included in the Permit are the following definitions:

"Certified Hazardous Material Manager" or "CHMM" means a person who has gained recognition as a CHMM in accordance with the requirements developed and administered by the Institute of Hazardous Material Management.

"Qualified Certified Hazardous Materials Manager" or "Qualified CHMM" means a Certified Hazardous Materials Manager who: (1) has, for a minimum of eight years, engaged in the planning or compliance certification of pre-engineered systems for the treatment of industrial and commercial wastewaters including, but not limited to, a minimum of four years in responsible charge of the planning or compliance certification of pre-engineered systems for such discharges; (2) is not an employee, as defined by the Internal Revenue Service of the Internal Revenue Code of 1986, of the registrant for the general permit; (3) does not have a financial interest, of any kind, in the activity for which a certification is being submitted; (4) has not engaged in any activities associated with the preparation, planning, or installation of the pre-engineered treatment systems, or the preparation of other documentation (e.g., an operation and maintenance plan, spill prevention and control plan, current permit registration, etc.) for which

a certification is being submitted; and (5) is not under the same employ as any person who engaged in any activities associated with the preparation, planning, design or engineering of the plans and specifications for the pre-engineered treatment systems, or the preparation of other documentation (e.g., an operation and maintenance plan, spill prevention and control plan, current permit registration, etc.) for which a certification is being submitted.

Once again, due to the diligent efforts of the Connecticut Chapter, CHMM's continue to be authorized as certifying agents in various General Permits (several of which were incorporated into the newly proposed General Permit for Miscellaneous Sewer Compatible Wastewater), including:

- General Permit for the Discharge of Stormwater Associated with Industrial Activity,
- General Permit for the Discharge of Groundwater Remediation Wastewater Directly to Surface Water,
- General Permit for the Discharge of Vehicle Maintenance Wastewater,
- General Permit for the Discharge of Minor Printing and Publishing Wastewater,
- General Permit for the Discharge of Groundwater Remediation Wastewater to a Sanitary Sewer,
- General Permit for the Discharge of Food Processing Wastewater, and;
- General Permit for Miscellaneous Sewer Compatible Wastewater.

TIER2 SUBMIT CHANGES

For the 2013 reporting year, Tier2 Submit has been overhauled to reflect changes intended to improve reporting through the addition of new data elements, as well as revisions of existing data elements. As of January 1, 2014, facilities required to submit

Tier II reports must use the new reporting forms that are available with instructions at <http://www2.epa.gov/epcra-tier-i-and-tier-ii-reporting/tier-ii-forms-and-instructions>.

Changes to the Tier2 Submit system include:

- Added "Manned/Unmanned" facility checkboxes
- Added "Dun and Bradstreet Number (Parent Company)" field (only available when Parent Company is chosen as a Contact Type)
- Added "Confidential" checkbox for chemical storage locations
- Added "Maximum Code" range field (for maximum daily amount of chemical onsite) for mixture components
- Added "Maximum No. of Occupants" field
- Removed "Number of Employees on Site" field
- Removed latitude/longitude method and description fields

- Now use new 2013 range code values for Maximum and Average Daily Amounts of chemicals onsite
- Now use full descriptive phrases (rather than codes) for container type, pressure and temperature

In addition, for those facilities that are unable to submit Tier II forms via Tier2 Submit, paper form changes include:

- Updated complete paper report option based on field changes
- Removed original-style report option
- Enhanced search behavior so that submitters can use either the on-screen Search button or the keyboard Enter/Return key to start a search
- Expanded window size and screen layout
- Updated state-specific fields
- Minor bug fixes and changes