



## Chapter 06: Safety and Compliance

# 12. Environmental Compliance

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Implement environmental compliance procedures including spill prevention and response to protect environmental resources.

## Roles and Responsibilities

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### Operations Leader:

- Oversee daily operations and coordinate between departments
- Authorize emergency response procedures and resource allocation
- Monitor safety compliance and operational excellence
- Coordinate scheduling across departments for operational coverage
- Review billing disputes and approve service adjustments
- Ensure regulatory compliance across all operations

## Process Steps

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### Spill Prevention Phase

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- **Implement spill prevention measures** - Install secondary containment, drip pans, and spill prevention equipment around fuel and chemical storage areas
- **Conduct facility inspections** - Regularly inspect storage tanks, piping, and equipment for leaks and potential spill sources
- **Maintain spill response equipment** - Ensure spill response materials and equipment are readily available and properly maintained
- **Train personnel** - Provide spill prevention and response training to all personnel handling hazardous materials
- **Develop prevention procedures** - Create specific procedures for preventing spills during fuel transfers and chemical handling
- **Monitor high-risk activities** - Provide additional oversight during activities with high spill potential

### Spill Response Phase

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- **Detect and assess spills** - Quickly identify spills and assess the type, quantity, and environmental

impact potential

- **Implement immediate response** - Stop the source of the spill and prevent further release of materials
- **Contain the spill** - Use appropriate containment methods to prevent spread to soil, water, or storm drains
- **Notify authorities** - Contact appropriate regulatory agencies and emergency responders as required
- **Clean up spilled materials** - Remove spilled materials using appropriate cleanup methods and equipment
- **Document the incident** - Record spill details, response actions, and environmental impact assessment

## Waste Management Phase

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- **Classify waste materials** - Properly identify and classify all waste materials according to EPA regulations
- **Establish storage procedures** - Store hazardous waste in appropriate containers with proper labeling and secondary containment
- **Maintain waste inventories** - Track waste generation, storage, and disposal quantities and types
- **Coordinate waste disposal** - Contract with licensed waste disposal companies for proper waste treatment and disposal
- **Complete waste manifests** - Prepare and track hazardous waste manifests and disposal documentation
- **Conduct waste audits** - Regularly audit waste management practices for compliance and efficiency improvements

## Air Quality Management Phase

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- **Monitor emissions sources** - Identify and monitor air emission sources including fuel vapors and equipment exhaust
- **Implement emission controls** - Install and maintain vapor recovery systems and emission control equipment
- **Conduct air quality testing** - Perform required air quality monitoring and testing as specified by permits
- **Maintain emission records** - Keep detailed records of emissions, monitoring results, and control system operation
- **Report emissions data** - Submit required air quality reports to regulatory agencies
- **Update air permits** - Renew and modify air quality permits as needed for operational changes

## Water Protection Phase

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- **Protect water resources** - Implement measures to prevent contamination of groundwater and surface water
- **Manage stormwater** - Control stormwater runoff from operational areas to prevent pollution discharge

- **Monitor water quality** - Conduct required water quality monitoring and testing as specified by permits
- **Maintain treatment systems** - Operate and maintain water treatment systems and oil-water separators
- **Control discharge** - Ensure all water discharges meet permit requirements and regulatory standards
- **Document water compliance** - Maintain records of water quality monitoring, treatment, and discharge activities

## Regulatory Compliance Phase

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- **Maintain environmental permits** - Ensure all required environmental permits are current and compliance requirements are met
- **Submit regulatory reports** - Prepare and submit required environmental reports to EPA, state, and local agencies
- **Conduct compliance audits** - Perform regular self-audits to verify compliance with environmental regulations
- **Coordinate inspections** - Support regulatory agency inspections and implement required corrective actions
- **Update procedures** - Revise environmental procedures based on regulatory changes and audit findings
- **Track compliance metrics** - Monitor environmental performance indicators and compliance status

## Tools and Resources

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### Spill Response Equipment:

- Spill containment materials and absorbent pads
- Emergency spill response kits and equipment
- Secondary containment systems and drip pans
- Spill response communication and notification systems

### Environmental Monitoring:

- Water quality testing equipment and sampling supplies
- Air quality monitoring devices and emission testing equipment
- Waste characterization and analysis services
- Environmental compliance tracking systems

### Documentation Systems:

- Environmental permit files and renewal tracking
- Spill incident reporting and investigation records
- Waste manifests and disposal documentation

- Environmental training records and certifications

## Common Issues and Solutions

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- **Issue:** Difficulty determining proper waste classification and disposal requirements
- **Solution:** Consult with environmental specialists and waste disposal contractors; maintain current regulatory guidance documents

**Issue:** High costs associated with hazardous waste disposal

**Solution:** Implement waste minimization programs; explore recycling options; consolidate waste streams for efficiency

**Issue:** Complex regulatory reporting requirements and deadlines

**Solution:** Use environmental compliance software; establish reporting calendars; assign specific personnel responsibility for reports

## Regulatory References

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- **40 CFR Part 112** - Oil Pollution Prevention regulations
- **40 CFR Part 262** - Standards applicable to generators of hazardous waste
- **40 CFR Part 122** - EPA administered permit programs (NPDES)
- **Clean Air Act** - Air quality regulations and permitting requirements
- **Resource Conservation and Recovery Act (RCRA)** - Hazardous waste management requirements
- **State and Local Environmental Regulations** - Additional environmental compliance requirements