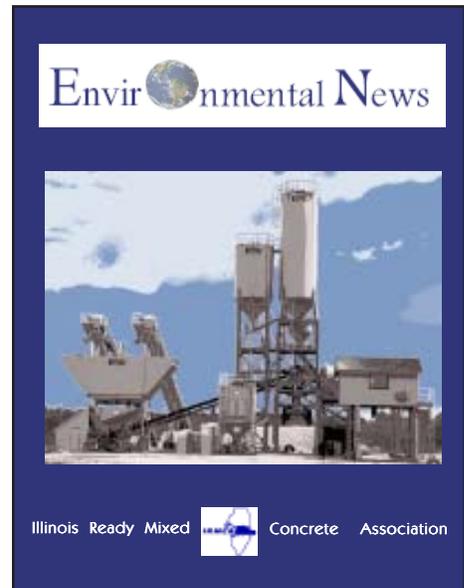


IRMCA Launches New Service for Members

The Illinois Ready Mixed Concrete Association and its Environmental Committee are pleased to announce its newest member service, a biannual publication titled *Environmental News*. The purpose of this publication is to keep producers current on environmental concerns in Illinois that might affect their businesses and to keep members aware of their environmental obligations. We envision producers adding each new issue to the accompanying binder; adding any special mailings IRMCA may send; and, if they like, keeping their annual permits in the binder also. This binder could become your environmental source book.

Questions & Answers: In future issues of *Environmental News*, we would like to include a question and answer section to respond to the many concerns of our members. Please call, mail, e-mail or fax your questions or concerns about environmental issues to the IRMCA office and we will answer them in the next issue. Questioners will not be identified.

Continued on back cover.



Tier II Reporting Due: Are You Prepared?

By Neil DeRynck

Under the federal Emergency Planning and Community Right-to-Know Act (EPCRA), there are reporting requirements that apply to ready mix concrete plants. A requirement that affects all or nearly all plants is found in Section 312: Annual Tier II Hazardous Chemical Inventory Reporting.

The section states that any plant owner or operator required to have material safety data sheets (MSDSs) for hazardous chemicals found on-site above certain quantities must report the presence of these chemicals to emergency management and response authorities. For most hazardous chemicals, the threshold quantity is 10,000 pounds. Hazardous chemicals commonly found at ready-mix plants

in quantities greater than this include diesel fuel, gasoline, admixtures, acids, cement, fly ash, slag, and even aggregates. Reporting is accomplished by submitting a properly completed Tier II Emergency and Hazardous Chemical Inventory Form to the Illinois Emergency Management Agency, the local Emergency Management Agency (usually a county agency) and the local fire department.

Continued on page 13.

Inside this issue of the *IRMCA Environmental News* --

Illinois Environmental Protection Agency.....	page 2
Environmental Internet Resources.....	page 3
10 Guidelines for Handling an EPA visit.....	page 4
Washout -- Watch Out!.....	page 5
Storm Water, Process Water Permits & NPDES.....	page 6
Air Emissions.....	page 8
Underground Storage Tanks.....	page 10
Clean Air Clips.....	page 12
Spill Prevention, Control, and Countermeasure Lans.....	page 14

Field Offices

2125 South First Street
Champaign, IL 61820
(217) 278-5800

2009 Mall Street
Collinsville, IL 62234
(618) 346-5120

595 South State
Elgin, IL 60123
(847) 608-3131

P.O. Box 767
Elk Grove, IL 60009
(847) 758-3412

12 Gunia Drive, Suite 2
LaSalle, IL 61301
(815) 223-1344

2309 W. Main Street
Marion, IL 62959
(618) 993-7200

1630 Fifth Avenue
Moline, IL 61265
(309) 797-3341

9511 W. Harrison Street
DesPlaines, IL 60016
(847) 294-4000

(Bureau of Air, Water)
5415 North University
Peoria, IL 61614
(309) 693-5463

(Bureau of Land)
7620 North University, Suite 201
Peoria, IL 61614
(309) 693-5462

4302 North Main Street
Rockford, IL 61103
(815) 987-7760

4500 South Sixth Street Road
Springfield, IL 62706
(217) 786-6892



New Illinois Environmental Protection Agency Director Appointed

Douglas P. Scott (pictured left) was appointed Director of the Illinois Environmental Protection Agency effective July 2005. His previous work experience includes Assistant City

Attorney and City Attorney for Rockford, Illinois State Representative for the 67th District, and Mayor of Rockford.

AGENCY ASSISTANCE

Environmental emergencies only (24 hours a day) -
(PH) 800.782.7860/217.782.7860.

Toll-free environmental helpline -
(PH) 888.372.1996.

Online publications - www.epa.state.il.us/small-business/publications.html.

Air Permit Division - (PH) 217.782.2113.

Land Permit Division - (PH) 217-524-3300.

Water Permit Division - (PH) 217.782.0610.

QUICK ANSWER DIRECTORY

Download at www.epa.state.il.us/quick-answer-directory/quickanswer-directory.pdf.

Request by phone - 888.372.1996.

Quick Answer Directory Feedback Form at www.epa.state.il.us/quick-answer-directory/quick-answer-feedback.html.

Fact Sheet Request Form at www.epa.state.il.us/quick-answer-directory/request-form.html or call 888.372.1996.

Small Business Online Helpline at www.epa.state.il.us/small-business/helpline-form.html or fax to 217.785.8643.

ENVIRONMENTAL INTERNET RESOURCES

Illinois Environmental Protection Agency	www.epa.state.il.us
IEPA Air	www.epa.state.il.us/air
IEPA Air Forms	www.epa.state.il.us/air/forms/
IEPA Annual Emmissions Report	www.epa.state.il.us/air/aer
IEPA Annual Emissions Report Calculations	www.epa.state.il.us/air/aer/calculate/index.html
IEPA Green Illinois	www.epa.state.il.us/green-illinois/
IEPA Land	www.epa.state.il.us/land
IEPA Land Forms	www.epa.state.il.us/land/forms
IEPA Water	www.epa.state.il.us/water
IEPA Storm Water Permits	www.epa.state.il.us/water/permits/storm-water/industrial.html
IEPA Underground Tanks	www.epa.state.il.us/lust/index.html
IEPA Water Forms	www.epa.state.il.us/water/forms.html
IEPA Pollution Prevention	www.epa.state.il.us/p2/
Environmental Council of Concrete Organizations	www.ecco.org
Environmental Law Net	www.lawvianet.com
Illinois Department of Natural Resources	www.dnr.state.il.us
Illinois Environmental Regulatory Group	www.iereg.org
Illinois Pollution Board	www.ipcb.state.il.us
National Ready Mixed Concrete Association	www.nrmca.org/operations/environmental.asp
Office of the Illinois State Fire Marshal Above & Underground Storage Tanks	www.state.il.us/osfm/PetroChemSaf/home.htm
Office of the State Fire Marshall-boilers	www.state.il.usosfm/Boilers/Overview.htm
Small Business Environmental HomePage	www.smallbiz-enviroweb.org/
US Department of Energy	www.doe.gov
US Environmental Protection Agency	www.epa.gov
USEPA Compliance	www.epa.gov/compliance/
USEPA Region 5	www.epa.gov/region5/
Emergency Planning & Community Right to Know Act (Federal)	www.epa.gov/region5/defs/html/epcra.htm
USEPA Environmental Enforcement & Compliance History Online	www.epa.gov/echo/
USEPA Revised Ready-Mix AP-42 Air Emissions Factors	www.epa.gov/ttn/chief/ap42/index.html
Spill Prevention Control & Countermeasure Plan	www.epa.gov/oilspill/spcc.htm
US Green Building Council	www.usgbc.org
Leadership in Energy & Environmental Design	www.usgbc.org (click on LEED)

10

Guidelines for Handling an EPA Visit

Always handle environmental inquiries at the highest possible management level. Do not let inexperienced personnel talk to regulators! Have a designated manager identified in advance as a regular contact at each of your plants.

IEPA or local regulators rarely show up at your plant without a reason (usually the result of a complaint), though spring/summer visits are often made to check compliance with environmental complaints.

If one of your plant personnel makes the initial contact with the EPA inspector, instruct your employee to be polite and cordial.

Instruct your plant personnel to ask the inspector to please wait while they contact the designated manager.

Again, if one of your plant personnel makes the initial contact with the EPA inspector, instruct your employee to ask the inspector about the purpose of the visit.

If the inspector wants to see a permit, then retrieve only that permit from your files. If possible make the inspector a copy of the permit.

Have the designated manager prepared to either travel immediately to the plant to escort the inspector or to schedule a time to meet the inspector on site at the earliest opportunity.

If the inspector wishes to inspect anything within your yard, have your plant personnel politely inform the inspector that the company has a policy of cooperation with all regulatory agencies and that the designated manager would be happy to escort him/her around the plant to see specific items of interest.
Note: Your company rules should require that only a designated manager may escort the inspector on the plant property.

Instruct plant personnel to resist the urge to engage the inspector in any conversations regarding regulatory compliance. Plant personnel must politely inform an inspector that compliance matters and inquiries are handled only through the designated manager. Inspectors almost always leave once their specific inquiry has been satisfied. *Note: All company personnel should be instructed to avoid volunteering information of any kind to the inspector, thus avoiding the risk of creating additional inquiries from the EPA.*

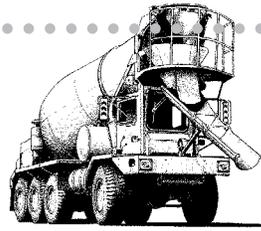
EPA inspections usually involve review of air emissions permits and storm water permits. You should take time to locate these permits and ensure that they are up-to-date.

Note: For additional guidance read "What to Expect From an Environmental Compliance Inspection", published by the Illinois EPA and available at www.epa.state.il.us/small-business/compliance-inspection/index.html.

Where and how your drivers wash down their chutes is far more important today than ever before. IEPA field observers are watching for wash out areas that allow the washed down materials off property and they are brandishing their citation books! Local enforcers are following suit. Tens of thousands of dollars in fines have been assessed and paid by IRMCA producers. Every city and county in Illinois will soon be

Washout Watch out!

company's problem. In Bloomington there is a large concrete contractor who – for every job - digs an on-site pit, lines it with straw then calls the ready mix plant and directs them where to wash out. On the other hand there's a home builder in Bloomington who consistently tells the ready mix driver to, "Take



driver and we hope it will be widely accepted. In the meantime, below are a few possible guidelines for a driver:

- If you are the first driver on the job, ask the foreman where to wash down and relay that information to your dispatcher.
- Always suggest to the contractor that you wash down on the lot on which you are pouring.
- If the washout area doesn't "look right" call the dispatcher for advice.
- Don't leave piles; wash the cement out of the aggregate before leaving.
- NEVER wash out into a storm sewer or a stream or onto a street.
- Carry a 5 gallon bucket in case site washout is impossible.
- If possible, wash your chutes before cleaning the customer's tools-always save water for your truck.



instituting strict limitations on where you can and cannot wash dirty chutes. You will be affected!

It's easy for producers to say, "That's the contractor's problem"; but how many producers are 100% certain that their drivers are sufficiently trained to know if what the contractor directs is proper or if it's just "convenient". There's a ready mix operation in Utah whose delivery ticket states "Customer will be charged a \$70.00 fee if a suitable washout area is not provided." Conversely, there is a prominent contractor's association in Illinois that believes the issue is strictly the ready mix

care of it yourself". In Chicago, improper disposition of washout can be a Class A misdemeanor for the first offence and a Class 4 Felony for the second!

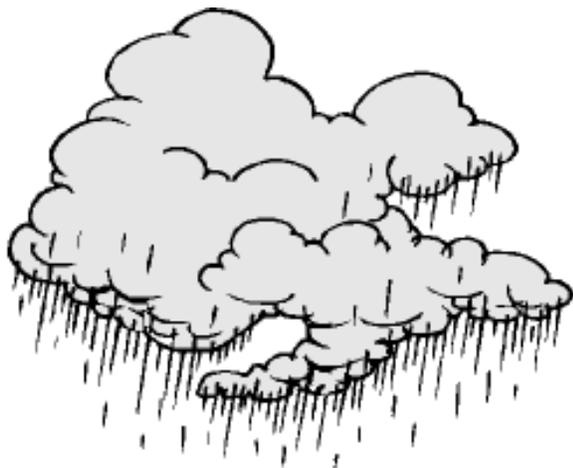
Your IRMCA Environmental Committee has assumed the task of composing a washout guideline that can be used statewide. It will define the responsibilities of both the contractor and the ready mix

Important Note: *The committee is also addressing the issue who has responsibility for mud left on the street by the ready mix truck. Both this and the washout problem are significant dangers to our pocketbooks. If you have thoughts or experience with these issues, please share them with IRMCA. Help us write these guidelines.*

Don't forget: air emissions permits must be filed by May 1, 2006.

Storm Water and Process Water Permitting

& NPDES Regulations



By Mitch Mariotti, Environmental Committee Chair

Storm water and process water permits are derived from National Pollutant Discharge Elimination System (NPDES) regulations. NPDES regulations (see page 7) date back to 1990 and are an update of the Clean Water Act (CWA) passed by congress in the 1970s.

For ready-mix plants, the objective of the NPDES permit is to control sediment and pH in run off. All ready-mix

plants that are not covered by a quarry or gravel pit permit must have their own storm water permit. These permits regulate all water that leaves your property.

WARNING: In the near future, the definition of "leaving your property" will also include any water that would discharge into the ground, such as through an unlined settling pit or pond. Surrounding states (Wisconsin, Michigan) have already broadened that definition. In fact, in 2004, the Wisconsin Department of Natural Resources (WDNR), upon revising its Concrete Products Operations permit, initially required pH sampling of washout pit water in unlined washout pits. Fortunately, upon facing a challenge from the Wisconsin Ready Mixed Concrete Association (WRMCA), the WDNR backed off that enforcement, for now. It is simply a matter of time in Illinois before this regulatory change becomes reality for us.

COMPLIANCE & ENFORCEMENT

- √ Read your permit! Note especially your record keeping requirements, annual inspection and other reports, and be aware of reporting requirements.
- √ Be aware of your plant's material condition & house keeping practices. Take appropriate measures to control runoff and discharge, implement BMPs, and inspect your plant regularly.

Hex Chrome Said to Have Low Impact on Concrete Workers

Cincinnati, Ohio-based Shaw Environmental, Inc., the organization chosen by OSHA to prepare the technical and economic feasibility analyses for the agency's Office of Regulatory Analysis on the proposed hexavalent chromium standard, recently presented at the American Industrial Hygiene Conference and Exposition in Anaheim, CA. Shaw did not comment on exposure levels in the ready mixed concrete manufacturing sector, which accounts for 75% of all U.S. domestic portland cement shipments (Source: USGS Minerals Yearbook: Vol. I, Metals and Minerals, Cement, 2003). Shaw did note, however, that pre-cast concrete producers are among five industry groups that will experience a relatively low impact from the proposed regulation.

For more information, contact NRMCA's Tom Harman at 1-888-846-7622, ext. 1155 or by e-mail, tharman@nrmca.org.

This article is reprinted with permission from the National Ready Mixed Concrete Association.

NPDES REGULATIONS

NPDES regulations established 2 basic types of permits:

STORM WATER PERMIT

1. Illinois EPA General NPDES Permit for Storm Water Discharges from Industrial Activities:
 - covers many industries
 - not very specific to ready-mix
2. In general, these permits regulate only storm water that falls on your plant & property and runs off the property. Any storm water that would stay on your property, such as in a retention pond, would not be regulated by NPDES regulations or permits.
3. These permits specifically exclude any Process Discharges that may co-mingle with the storm water. Process discharges include:
 - mixer drum wash out
 - mixer truck wash down
 - boiler blow-down
 - spill over from filling surge tanks
 - anything that is not storm water
4. Individual site sampling is not required
 - thanks to a group sampling effort from IRMCA back in 1993
 - permit requires Best Management Practices or BMPs
5. BMPs mandate house keeping practices
 - to keep pollutants out of storm water
 - to keep process water out of storm water

NPDES "DISCHARGE" PERMIT

1. Regulates process water discharges
 - directly from process water source to off-site
 - process water co-mingled with storm water to off-site
2. Process discharges include:
 - mixer drum wash out
 - boiler blow-down
 - mixer truck wash down
 - spill over from filling surge tanks
 - anything else that is not storm water
3. Regulates pH & Total Suspended Solids (TSS)
 - pH requirements of 6.0 to 9.0 pH units
 - impossible to meet without pH treatment system
 - solids must be properly settled out of run-off
4. Requires regular sampling for pH & TSS
5. pH treatment systems require their own construction & discharge/operating permits

GENERAL PERMIT CONDITIONS

1. Written by Illinois EPA
2. Generally has no restrictions on discharge quantity
3. Record Keeping
 - personnel training
 - SWPPP - storm water pollution prevention plan
 - SPCC plan - Spill Prevention, Control, & Countermeasure Plan (if required)
 - BMPs - best management practices
 - housekeeping
 - annual reporting and sampling requirements

READY MIX CONCRETE BATCH PLANT AIR EMISSIONS

By Mitch Mariotti, Environmental Committee Chair

The regulated air pollutants for a ready-mix concrete batch plant are Particulate Matter (PM) and Particulate Matter less than 10 microns (PM₁₀). All Illinois EPA batch plant air permits specify the use of control equipment and dust control management practices within the permit.

All ready-mix operations in Illinois are regulated by 1 of 3 different Illinois EPA air permits, each of which limits production so that air emissions are less than 25 tons per year. The permits are nearly identical except for the AP-42 emissions factors upon which they are based. In general, every batch plant will have one of the following permits:

1. *Lifetime General Operating Permit* limits annual production to 480,000 cubic yards.
2. *Lifetime General Operating Permit For A Truck Mix Concrete Batch Plant* limits annual production to 262,600 cubic yards.
3. *Lifetime General Operating Permit For A Central Mix Concrete Batch Plant* limits annual production to 621,900 cubic yards.

The first permit is based on 1995 AP-42 emissions factors. The second and third permits are based on 2001 AP-42 emissions factors. Any permit issued prior to the 480,000 cubic yard permit will have expired by now, and the renewal of any such older permit would have resulted in the 480,000 cubic yard permit being issued.

Transit Mix:					
Concrete production:				262,600.00	cyds/yr
Concrete production converted to tons:				525,200.00	tons/year
Cement:				65,000	tons
Cement Supplement:				10,000	tons
Aggregate:				245,000	tons
Sand:				188,000	tons
		Emission Factor		Emissions	
Operation	Throughput (KT/Yr)	PM (Lb/Ton)	PM ¹⁰ (Lb/Ton)	PM (Ton/Yr)	PM ¹⁰ (Ton/Yr)
Aggregate Transfer	245.00	0.00690	0.00330	0.85	0.40
Sand Transfer	188.00	0.00210	0.00099	0.20	0.09
Cement Silo Loading ¹	65.00	0.00099	0.00034	0.03	0.01
Cement Supplement Loading ¹	10.00	0.00890	0.00490	0.04	0.02
Weigh Hopper Loading	508.00	0.00510	0.00240	1.30	0.61
<u>Truck Loading²</u>	<u>75.00</u>	<u>0.61000</u>	<u>0.15000</u>	<u>22.88</u>	<u>5.63</u>
		Totals:		25.29	6.77
				Tons PM	Tons PM¹⁰

Central Mix:					
Concrete production:				621,900.00	cyds/yr
Concrete production converted to tons:				1,243,800.00	tons/year
Cement:				153,000	tons
Cement Supplement:				23,000	tons
Aggregate:				580,000	tons
Sand:				444,000	tons
		Emission Factor		Emissions	
Operation	Throughput (KT/Yr)	PM (Lb/Ton)	PM ¹⁰ (Lb/Ton)	PM (Ton/Yr)	PM ¹⁰ (Ton/Yr)
Aggregate Transfer	580.00	0.00690	0.00330	2.00	0.96
Sand Transfer	444.00	0.00210	0.00099	0.47	0.22
Cement Silo Loading ¹	153.00	0.00099	0.00034	0.08	0.03
Cement Supplement Loading ¹	23.00	0.00890	0.00490	0.10	0.06
Weigh Hopper Loading	1,200.00	0.00510	0.00240	3.06	1.44
<u>Mixer Loading²</u>	<u>176.00</u>	<u>0.22000</u>	<u>0.07800</u>	<u>19.36</u>	<u>6.86</u>
		Totals:		25.07	9.56
				Tons PM	Tons PM¹⁰

Figures 1 & 2: These emissions are based on standard AP-42 emission factors and the average composition of concrete as detailed in AP-42, Chapter 11.12, and a maximum concrete throughput of 525,200 tons (262,900 cubic yards) and 1,243,800 tons (621,900 cubic yards) respectively per year. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

¹Particulate matter control due to baghouse.

²Based on cement and cement supplement only.

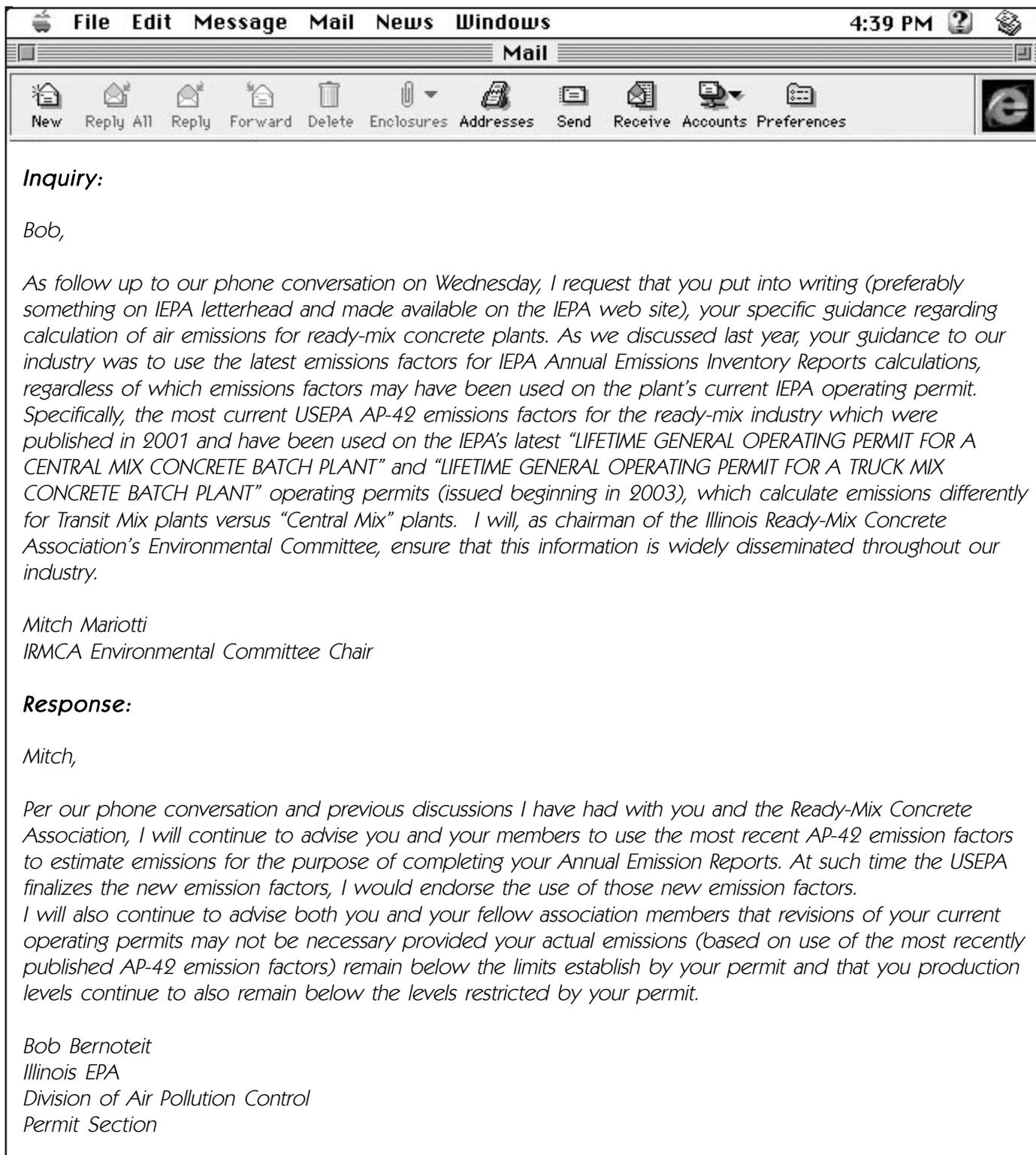


Figure 3: Correspondence between Mitch Mariotti and Bob Benoteit.

Current Illinois EPA air permitting guidance given by Bob Bernoteit, head of the Illinois EPA Air Permitting Office, is that older permits are valid until some modification of the existing permit is required (see Figures 1 & 2). Newer versions of air permits are issued only upon modification of existing permits, or for newly permitted batch plants. Illinois EPA does not require or desire owners of batch plants with older permits to request the newer, updated permit unless necessary. Illinois EPA does require, however, that annual emissions inventory report calculations be based upon the lasted version of AP-42 emissions factors for our industry (see Figure 3).

Continued on back cover.

Office of the State Fire Marshal Focusing Increasing Attention on Underground Storage Tanks

By Larry Hasse, Environmental Committee

Underground Storage Tanks (USTs) have been receiving increasing attention from the Office of the State Fire Marshal www.state.il.us/osfm. This increase in attention has resulted in more thorough UST inspections than most companies have dealt with in previous years. This bulletin is being published with the goal of providing some helpful tips and basic guidance to help you prepare for a potential UST inspection by the Office of the State Fire Marshal (OSFM).

Compliance Status Decals

The OSFM issues "Evidence of Compliance Status" decals or tags for all USTs. This decal or tag is an indicator of compliance (green) or non-compliance (red) for USTs. Tags are issued for fill-pipes when your facility has multiple UST systems and one or more of the UST systems has been found to be non-compliant. If all of your USTs are in compliance, then you would only be issued a decal. The decals are for display either in a window near the main entrance to the facility or inside the window of the dispenser unit.

If your decal is lost, missing, or has been destroyed, please contact Jan Spoor from the Office of the State Fire Marshal at (217) 785-1020 and she will assist you in getting another decal issued.

Record Keeping and Record Retention Requirements

As we all know, first impressions may set the tone for the entire inspection. An inspector from the OSFM will want to

inspect your records for each UST system. We recommend maintaining an organized and presentable binder as a central point for all of your required UST system records.

All records are required to be kept at the UST site or available to the OSFM inspector within 30 minutes or less via fax, e-mail, or other transfer of information.

Three-year Retention Requirements:

1. Automatic tank gauge print outs of tank leak tests. If no tape is available from the unit, a log showing date, initials of person conducting the test, and leak results is required.
2. Tank leak detection testing and monitoring records.
3. Line leak detection testing and inspection records.
4. Manual tank gauging records for tanks under 2,000 gallons (weekly inventory).
5. Vapor and ground monitoring records (if vapor and ground monitoring is required).
6. Documentation of all calibration, maintenance, inspection, and repair of release detection equipment.
7. All records of repairs to UST systems.
8. All records pertaining to removal or change-in-service of a UST system.
9. The results of any sampling, testing or monitoring conducted or otherwise required.

Five-year Retention Requirements:

1. Records of results of tank tightness testing.
2. Physical internal tank inspection records.
3. Schedules of required calibration and maintenance provided by the release detection equipment manufacturer (applies to tanks installed within the last five years).

Other Retention Requirements:

1. Corrosion protection inspection and testing records for STIP 3 (Cathodically Protected Steel) tanks. Inspection and testing for these types of tanks is required every three years and records from two previous inspections must be kept on site.
2. Corrosion protection inspection and testing records for tanks, lines and flex connectors with sacrificial anode corrosion protection. Testing of this type of equipment is required every three years and records from two previous inspections must be kept on site.

Additional Resources

- ✓ Office of the State Fire Marshal, www.state.il.us/osfm
- ✓ Illinois Administrative Code, Title 41: Fire Protection, Chapter 1, Part 170

Monthly Inspections

Monthly walk-through inspections (see Figure 1) of your UST system(s) are highly recommended so you can ensure that your essential equipment is working properly and that you have release response supplies on hand.

When you perform your walk-through inspection it is recommended that you check the following:

1. **Release Detection System:** Is your release detection equipment working properly? For example, did you run a quick self-test of the ATG to verify it's working properly? Or did you check your manual dip stick to make sure it's not warped or worn?
2. **Spill Buckets:** Are spill buckets clean, empty, and in good shape?
3. **Overfill Alarm (if you have one):** Is your overfill alarm working and easily seen or heard?
4. **Impressed Current Cathodic Protection System (if you have one):** Is your cathodic protection system turned on? Are you checking your rectifier at least every 60 days?
5. **Fill and Monitoring Ports:** Are covers and caps tightly sealed and locked? Is the area around the fill port free of debris and spillage?
6. **Spill and Overfill Response Supplies:** Do you have the appropriate supplies for cleaning up a spill or overfill? Recommended spill and overfill response supplies include the following:
 - Containment devices, such as containment booms, dikes, and pillows.
 - Absorbent material, such as chopped corn cob, sand, sawdust, and oil dry.
 - Mats or other material capable of keeping spill or overfill out of nearby storm drains.
 - Spark-free shovels
 - Reels of "caution tape," traffic cones, and warning signs
 - Personal protective gear



Underground Storage Tanks being placed.

Frequent Walk-Through Inspection Checklist

Date of Inspection					
Release Detection System: Inspect for proper operation.					
Spill Buckets: Ensure spill buckets are clean and empty.					
Overfill Alarm: Inspect for proper operation. Can a delivery person hear or see the alarm when it alarms?					
Impressed Current System: Inspect for proper operation.					
Fill and Monitoring Ports: Inspect all fill/monitoring ports and other access points to make sure that the covers and caps are tightly sealed and locked.					
Spill and Overfill Response Supplies: Inventory and inspect the emergency spill response supplies. If the supplies are low, restock the supplies. Inspect supplies for deterioration and improper functioning.					
Dispenser Hoses, Nozzles, and Breakaways: Inspect for loose fittings, deterioration, obvious signs of leakage, and improper functioning.					
Dispenser and Dispenser Sumps: Open each dispenser and inspect all visible piping, fittings, and couplings for any signs of leakage. If any water or product is present, remove it and dispose of it properly. Remove any debris from the sump.					
Piping Sumps: Inspect all visible piping, fittings, and couplings for any signs of leakage. If any water or product is present, remove it and dispose of it properly. Remove any debris from the sump.					

Continued on page 13.

Figure 1. This checklist was provided courtesy of the USEPA, and a full-size copy is available via fax, mail, or e-mail from the IRMCA office upon request (800-235-4055). Initial each box below the date of the inspection to indicate that the device was inspected.

IRMCA receives a quarterly newsletter published by the Department of Commerce and Economic Opportunity called *Clean Air Clips*. The articles in the newsletter are timely and often pertinent to Illinois Ready Mix producers. An example of an article is printed below.

DID YOU REMEMBER TO RE-ORDER YOUR RECORDKEEPING CALENDARS?

January 2006 the SBEAP will have new calendars for:

- Dry Cleaners
- Air Quality Compliance for Grain Elevators, **Concrete Batch Plants**, Rock Crushers and Quarries

Then, in March 2006, a new calendar will be available for gas stations who comply with Stage 1/2 Vapor Recovery requirements.

For your free copy of any of the 2006 calendars mentioned above, call the SBEAP helpline at 800/252-3998 or send an e-mail with your complete mailing address to: sbeap@illinoisbiz.

Current and back issues of *Clean Air Clips* can be accessed from the internet as follows:

- 1 Go to www.illinoisbiz.biz.
- 2 Click on *Business Assistance*.
- 3 Click on *Entrepreneurship and Small Business*.
- 4 Click on *Small Business Environmental Business Assistance Program*.
- 5 Click on *Clean Air Clips*.

Note: You might want to look at other choices on these web pages for further environmental information pertinent to your business.

The *Environmental News* is published periodically by the Illinois Ready Mixed Concrete Association.

Staff

Bruce Grohne, executive director
Jennifer Bedell, editor & project coordinator
John Reed, promotional director
Whitney Rush, office manager
Environmental Committee
Mitch Mariotti (chair), Randi Wille (chair),
John Albinger, Mark Blager, Chad Broege,
Roger Daily, Larry Hasse, Jr., Becky
Kazmierski, Lou Marcy, Curt Martinson,
Mike Painter, Dennis Probst, Pam Rieger

303 Landmark Dr., Suite 1-A
Normal, IL 61761
Ph: 309-862-2144/800-235-4055
Fx: 309-862-3404
www.irmca.org/irmca@irmca.org



Mission:

To equip Illinois Ready Mixed Concrete Association members to be responsible stewards of the Illinois environment.

Pay Attention to the Environment!

The Move toward Energy Efficiency and Sustainability WILL Benefit the Concrete Industry.

Inside EPA Environmental NewsStand recently wrote that "Architects are adopting an aggressive agenda of promoting energy efficient buildings and sustainable communities, ultimately aiming to achieve buildings that are *carbon-neutral* to help tackle climate change concerns." The American Institute of Architects (AIA) signed a Memorandum of Understanding with the EPA earlier this year that promotes "fostering green building and site designs", as well as "developing environmentally sound, affordable communities." The AIA has promised to address the need for better measurements of the life-cycle costs of energy use and savings achieved through green building design and construction.

"Architects are adopting an aggressive agenda of promoting energy efficient buildings and sustainable communities, ultimately aiming to achieve buildings that are *carbon-neutral* to help tackle climate change concerns."

of Chicago has recently decreed that all their new construction be as energy and environment friendly as possible. Architects and engineers all over the country are designing and constructing buildings in accordance with standards set forward in the Leadership in Energy and Environmental Design (LEED) program as designed by the Green Building Council.

Concrete stands out as a uniquely qualified product in aiding the efforts to "build green". Compared to asphalt, concrete consistently reads several degrees cooler. Concrete is an inert product – nothing bad leaks from it. Concrete can be made with recycled products. Former waste products such as fly ash and slag are now added to concrete. Concrete homes hold down energy costs and pervious concrete pavement helps clean and return stormwater to the ground.

It's a given – the one single biggest concern in the future of all construction will be the environment.

Add to the promises by AIA, the insistence of hundreds of governing units that new construction be as "green" as possible. The City

Watch for concrete to increasingly become the product of choice.

Tier II continued from front cover.

So, if you own or operate a ready mix plant, ask yourself: *Did my plant have present at any one time a hazardous chemical or substance, in an amount equal to or greater than 10,000 pounds, for which I am required to have a MSDS sheet on-site?* If yes - and chances are it will be yes - you are required under EPCRA to submit, by March 1st of each year, completed Tier II report forms.

The Tier II forms and instructions are available for download:

- Instructions - [http://yosemite.epa.gov/oswer/ceppoweb.nsf/vwResourcesByFilename/t2-instr.pdf/\\$File/t2-instr.pdf](http://yosemite.epa.gov/oswer/ceppoweb.nsf/vwResourcesByFilename/t2-instr.pdf/$File/t2-instr.pdf)
- Forms - [http://yosemite.epa.gov/oswer/ceppoweb.nsf/vwResourcesByFilename/t2form.pdf/\\$File/t2form.pdf](http://yosemite.epa.gov/oswer/ceppoweb.nsf/vwResourcesByFilename/t2form.pdf/$File/t2form.pdf)

For more information, consult the Illinois Emergency Management Agency (www.state.il.us/iema) and Illinois Environmental Protection Agency (www.epa.state.il.us) or contact the IRMCA @ 800-235-4055..

Underground Storage Tanks continued from page 11.

In addition, the following quick visual checks are recommended:

1. Dispenser Hoses, Nozzles, and Breakaways: Are they in good condition and working properly?
2. Dispenser and Dispenser Sumps: Any signs of leaking? Are the sumps clean and empty?
3. Piping Sumps: Any signs of leaking? Are the sumps clean and empty? If you find any problems during the inspection, you or your UST contractor should to take action quickly to resolve these problems and avoid a serious release.

IT PAYS TO PLAN

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLANS

Reprinted with permission from *Environmental Issues*, September 2005

WHY? - SUMMARY AND PURPOSE:

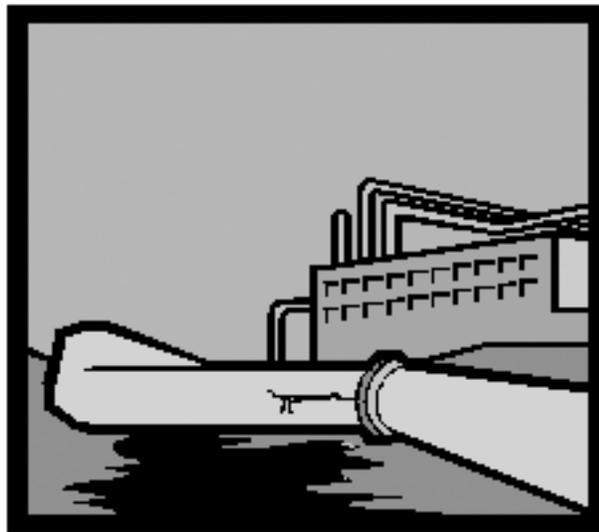
On July 17, 2002, the United States Environmental Protection Agency ("USEPA") issued a final rule amending its Oil Pollution Prevention regulation promulgated under the authority of the Clean Water Act. This rule addresses requirements for Spill Prevention, Control and Countermeasure Plans ("SPCC plans"). The SPCC rule is designed to prevent the discharge of oil from non-transportation-related onshore and offshore facilities into or upon the navigable waters of the United States. The rule was also written to ensure effective responses to oil discharges and specifies that proactive measures be used to respond to oil discharges.

USEPA has proposed revisions to the SPCC rule on three occasions, in 1991, 1993 and 1997. The final SPCC rule addresses these revisions and became effective on August 16, 2002. USEPA published a final rule on August 11, 2004, which extended the deadlines by which facilities must amend, or for new facilities, prepare, and implement their SPCC plans. If you know your facility is required to have one of these plans, read on for a review of the plan requirements and pay close attention to the new compliance deadlines. If you're not sure whether you need one of these plans, read on to find out.

IF? ARE YOU AFFECTED:

If your facility drills for, produces, gathers, stores, uses, processes, refines, transfers,

distributes, or consumes oil and oil products and might reasonably be expected to discharge oil in quantities that could be harmful to navigable waters of the United States, adjoining shorelines, or waters of the contiguous zone or in connection with activities under the Outer Continental Shelf Lands



Act or Deepwater Port Act or affecting certain natural resources, you probably need an SPCC plan.

Under the regulations, "Oil" is broadly defined as oil of any kind or in any form, including but not limited to, petroleum, fuel oil, sludge, synthetic oil, mineral oil, or oil refuse, as well as fats, oils, or greases of animal, fish, or marine mammal origin, and vegetable oils.

Keep in mind that USEPA's idea of what constitutes a "discharge" is also quite broad, and it is pretty unlikely that your facility will avoid being covered based on this alone. Note also, the 2002 rule includes users of oil.

Now for the part you have been waiting for—the exemption. The

SPCC rule exempts facilities which meet two criteria. First, if your facility has 42,000 gallons of oil or less in completely buried storage capacity, it is exempt. The "completely buried storage capacity" of a facility does not include the capacity of a completely buried tank, connected

underground piping, underground ancillary equipment and containment systems that are subject to either the federal technical requirements, or are subject to state technical requirements that have been approved by da feds. Also excluded is the capacity of a container that is "permanently closed."

Second, the aggregate aboveground storage capacity of the facility must not exceed 1,320 gallons. Only those containers of oil with a capacity of 55 gallons or more must be counted. Also, any containers that are "permanently closed" are not counted.

WHO? - WHICH AGENCY ADMINISTERS THIS REG?

Da feds. USEPA administers this program with some input from the Illinois Environmental Protection Agency. Unless you have a release at your facility of more than 1,000 gallons, or two releases of more than 42 gallons within a year, you don't need to submit your plan to anyone. If you have had a such a release, you must submit your SPCC plan to USEPA, and at the same time, provide this information to the state agency in charge of oil pollution control activities in the

state in which your facility is located. In Illinois, this is the Illinois Environmental Protection Agency. The state agency is authorized to review and make further recommendations to USEPA regarding your plan.

WHEN? KEY OBLIGATIONS:

On August 11, 2004, USEPA extended by an additional eighteen months the compliance deadlines for a facility to amend and implement its SPCC plan. Thus, the current deadlines are as follows. If your facility was in operation on or before August 16, 2002, you must maintain your plan and must amend it, if necessary to ensure compliance, on or before February 17, 2006, and you must implement the amended SPCC plan as soon as possible, but not later than August 18, 2006. If your facility becomes operational after August 16, 2002, through August 18, 2006, and could reasonably be expected to have a discharge as described in 40 CFR 112.1(b), you must prepare a SPCC plan on or before August 18, 2006, and fully implement the plan as soon as possible, but not later than August 18, 2006. If your facility becomes operational after August 18, 2006, and could reasonably be expected to have a discharge as described in 40 CFR 112.1(b), you must prepare and implement a plan before your facility begins operations. A mobile facility must amend its plan, if necessary, and implement such amendments by August 18, 2006.

Note, however, that on December 2, 2005, USEPA gave unofficial notice that it plans to propose extending these deadlines until October 31, 2007. See <http://www.epa.gov/oilspill/nprm.htm> for details, and keep an eye out for an official notice of this proposal in the Federal Register.

WHAT? KEY OBLIGATIONS:

Currently (see further discussion below), the obligations of a facility covered by the SPCC rule are as follows. A facility covered by this rule must prepare a written SPCC plan and have it certified by a licensed Professional Engineer. The regulations provide a list of information that must be included in this plan.

First, your written SPCC plan must include a description of the physical layout of the facility and include a facility diagram, which details the location and contents of each container. Your plan must be detailed enough to enable a person reporting a discharge to relate all the appropriate information.

Second, you must include a prediction of the direction, rate of flow, and total quantity of oil that could be discharged where experience indicates a potential for equipment failure.

In addition to the written requirements, your facility must provide appropriate containment and/or diversionary structures or equipment to prevent a discharge. Your facility is also required to conduct periodic inspections and tests to ensure that plan requirements are met. You must keep records of these inspections and tests, signed by a supervisor or inspector, with your plan for at least three years.

At a minimum, you must train your oil-handling personnel in the operation and maintenance of equipment, discharge prevention procedures, pollution control requirements, general facility operations and contents of the SPCC plan. You should designate one person at each facility to be accountable for discharge prevention, and who reports to facility management.

“A facility covered by this rule must prepare a written SPCC plan and have it certified by a licensed Professional Engineer.”

Facilities other than oil production facilities must maintain appropriate security when the facility is not in production or when unattended. Further, if applicable, the facility must have a proper containment system for each loading/unloading area.

Once you have prepared your plan, and made sure you have met the requirements discussed above, you must maintain a written copy of the plan at your facility. You should keep a copy of the plan at the nearest field office if your facility is not normally attended for at least four hours per day. Also, make sure you have an available copy of the plan for on-site review by the Feds during business hours.

While you keep the above in mind, also keep an eye out for some amendments to the SPCC requirements that USEPA plans to propose. These (as currently intended) would include allowing certain facilities to self-certify their SPCC plans, providing an alternative to secondary containment for facilities with certain types of equipment, and other changes. See <http://www.epa.gov/oilspill/nprm.htm> for details on USEPA's planned changes.

WHERE CAN I GET MORE INFORMATION?

For more information, visit USEPA's SPCC web page located at www.epa.gov/oilspill/spcc.htm. To report a spill, call the National Response Center at 800-424-8802.

Air Emissions continued from page 9.

As a final note, revised ready-mix AP-42 emissions factors are pending from the U.S. EPA (see Figure 4). Stay tuned to IRMCA for news of these revised emissions factors. Additional information on these emissions factors may be found at the following web site: <http://www.epa.gov/ttn/chief/ap42/ch11/draft/d11s12.html>.

Note: The emissions calculation spreadsheet (Figures 1 & 2, page 8) is available via e-mail to members upon request. Please note that due to some apparent rounding by the IEPA in their calculations, the calculations worksheet slightly exceed 25.00 tons, which is the IEPA limit for this type of permit. The calculations will be, however, accurate and in accordance with EPA instructions. Simply enter your data into the shaded box for the appropriate type of batch plant, and their emissions will be calculated for you. Producers who are not concerned about how their emissions get calculated can use the IEPA tool found at www.epa.state.il.us/air/aer/calculate/concrete.html.

New Service continued from front cover.

Experiences: We also urge all our members to share experiences with the IL-EPA or with local governing entities. In the past, it is proven that if an ordinance or rule is passed in one area, it won't be long before it spreads. We need to share our experiences. If time sensitive, we will send out alerts immediately.

Agencies and local officials are being pressured to keep our environment as clean as possible. Because our industry is by nature very visible and potentially untidy, we make a convenient target. Please share your experiences and concerns – we're in this together.

ENVIRONMENTAL RESEARCH PROJECT

Air Emission Factor (AP-42) Related Testing Phase I

The research and development of a new AP-42 Chapter 11.1 will provide ready mixed concrete producers with accurate information that will allow them to assess the actual emissions of total filterable particulate matter from mixing operations from their plants and the impact these emissions have on air quality. This data will be helpful to NRMCA in negotiating future regulatory control strategies for National Ambient Air Quality Standards being developed by the U.S. Environmental Protection Agency (EPA). The updated factors can be used as a tool to demonstrate that ready mixed concrete plants and the entire industry are environmentally friendly. Because operating permit fees are based on emission rates, updated and more accurate emissions factors will result in lower costs.

Air Emission Factor (AP-42) Related Testing Phase II

The EPA has begun its review of the data compiled through Phase I of this project as presented by NRMCA. However, they have requested some additional data and data analysis. This phase will gather the additional data and will perform the analysis requested by EPA. It is anticipated that this additional information will answer all of EPA's remaining questions.

Progress Report: The AP-42 Project contractor, Air Control Techniques of Car, NC, completed the three rounds of testing which included evaluations of both truck mixed and central mixed plants. In all cases, when comparing the new findings to existing EPA standards, the new data shows improvement in factors of at least 100, in most cases 1000. NRMCA is using this data to work with EPA for its adoption into the AP-42 ad will present the new research and analysis once completed. Several state EPAs have adopted the new standard and other have shown interest.

Figure 4: Reprinted with permission from the RMC Research Foundation.