



Air Quality Permitting
and Inspections

SARA Title III Emergency
Planning and Community
Right-to-Know Act

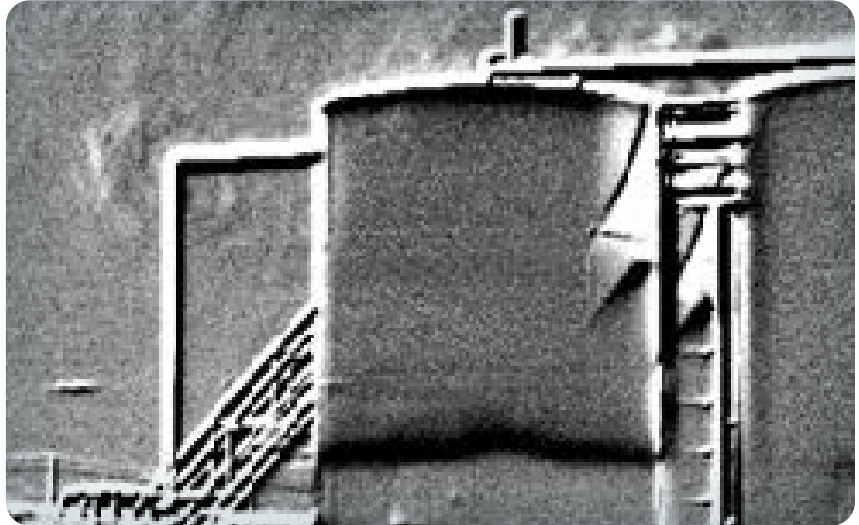
Spill Prevention, Control, and
Countermeasure (SPCC) Plans

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Air Quality Services

- Air permitting (federal, state, local)
- Permit strategy development
- Emissions tracking and quantification
- Permit application preparation
- Compliance management tools
- Compliance and Self-Certification assistance
- Control technology evaluations
- Emissions Reduction Credit assistance



2DOT's LDAR Program

We facilitate the development and implementation of LDAR programs including the following services:

- Defining LDAR program and training requirements
- Acquiring equipment and providing the associated training
- Onsite repair capabilities for quick and efficient corrective action timeline and tracking
- Optical Gas Imaging (OGI), M21, M22 and Audio, Visual and Olfactory (AVO) Inspections
- Integration with multiple LDAR databases such as ACTS, LeakDAS, FEMS, and GuideWare
- 2DOT LDAR reporting system with client specific GIS based data management platform

Our LDAR experience includes applicability and compliance support for facilities subject to New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAPS), Maximum Achievable Control Technology (MACT) and state specific requirements, including but not limited to:

- NSPS – 40 CFR 60, Subparts VV, VVa, KKK, OOOOa
- NESHAP – 40 CFR 61 F, J, V, and FF
- MACT – 40 CFR 63, Subparts HH
- State and local LDAR Regulations
- RCRA – Subpart BB

Superfund Amendments And Reauthorization Act (SARA)

The Emergency Planning and Community Right-to-Know Act (Commonly known as SARA Title III) sets requirements for local and state emergency planning around hazardous chemicals, the right of the public to access information on chemical hazards in their community, and the reporting responsibilities for facilities that use, store, and/or release hazardous chemicals.

- A properly maintained SDS library can be used to quickly create a chemical inventory, and is the first step to compliance.
- Four provisions:
 - Emergency Planning (Sections 301-303)
 - Emergency Release Notification (Section 304)
 - Hazardous Chemical Storage Reporting Requirements (Sections 311-312)
 - Toxic Chemical Release Inventory (Section 313)



Types of SPCC Plans

Any non-transportation facility with the potential to discharge oil to waters of the U.S., and who stores oil or petroleum products on-site in excess of 1,320 gallons, needs to prepare and implement a SPCC Plan.

- **Tier I SPCC Plan** – for facilities with less than 10,000 gallons capacity of oil and petroleum on-site
- **Tier II SPCC Plan** – for facilities with less than 10,000 gallons capacity of oil and petroleum on-site, but with at least one tank larger than 5,000 gallons capacity
- **PE-Certified SPCC Plan** – for facilities with more than 10,000 gallons capacity of oil and petroleum on-site
- Technical Amendments/Updates to existing SPCC Plans
- Five-Year Reviews of existing SPCC Plans

SPCC Plan is needed for:

- Any facility that stores oil or petroleum products in excess of 1,320 gallons (i.e., twenty-four [24] 55-gallon drums, or 31.4 barrels). Thus, even a site with no tanks, but with twenty-five (25) 55-gallon drums on-site storing oil or petroleum.

SARA Title III Chemical Inventory Reporting is needed for:

- Facilities with hazardous chemicals in quantities above certain thresholds



Qualifications:

- Professional Civil Engineer: WY, CO, and UT
- 40-hour OSHA HAZWOPER Training
- 10-hour OSHA Construction Industry Safety Training
- 8-hour OSHA Site Supervisor Training
- 4-hour OSHA Confined Space Entry Training
- Secondary Containment for SPCC Plan Training