

U.S.A. REGULATIONS 1992 UPDATE

- 1. OSHA's Process Safety Management Act 1910.119**
- 2. EPA's Clean Air Act Amendments (1990) Update**
- 3. Stormwater Regulations**
- 4. RCRA - Hazardous Waste Identification Rule**
- 5. SARA Title III Form "R" Reporting**
- 6. Louisiana Air Toxic Regulations**
- 7. CFC's**
- 8. Environmental Crimes Act of 1992**

ELEMENTS PROCESS SAFETY MANAGEMENT

- 1. Written Plan of Action for employee participation**
- 2. Process Safety Information**
- 3. Process hazard Analyses**
- 4. Standard Operating Procedures**
- 5. Training Program**
- 6. Contractor Safety Awareness & Performance Program**
- 7. Pre-Startup Review Program**
- 8. Mechanical Integrity Procedures**
- 9. Hot Work Permits**
- 10. Management of Change**
- 11. Incident Investigation**
- 12. Emergency Plan of Action**
- 13. Compliance Audits**
- 14. Trade Secrets**

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CLEAN AIR ACT UPDATE

TITLE III: Air Toxics

Initial list of Categories of Sources - July 16, 1992

174 industries requiring control of emissions of HAP

10 Tons per year of any HAP

25 Tons per year of any combination of HAP's

- **Polyvinyl Chloride and Copolymers Production
Synthetic Organic Chemical Manufacturing
189 Substances - HAP
Maximum Achievable Control Technology
(MACT)**

TITLE I: Provisions for Attainment and Maintenance of National Ambient Quality Standards

January 1993 - NJ Traffic Congestion & Air Pollution Control Act

- **Companies with 100 plus employees at worksite
25% increase in average vehicle occupancy by November 1996
Approved plan by November 1994**

HAZARDOUS WASTE IDENTIFICATION RULE (HWIR)

BACKGROUND

Haz Waste - 1) 4 Characteristics
2) Listed F,K,U, or P

Broadened the universe of listed Haz Waste by:

"Mixture Rule"

"Derived From Rule"

"Contained-in Interpretation"

Example: K019/K020 Spill into waste water

Dec. 6, 1991 - Court Declared "Mixture Rule & Derived from Rule"
unlawful

EPA temporarily reinstated Rule, April 1993

Proposed (HWIR) - EPA, May 1992
(CBEC) Concentration Based Exemption Criteria)

<u>Tier 1</u>			<u>Tier 2</u>	
<u>Soil</u>	<u>EQC Soils</u>	<u>Leachate</u>	<u>EQC Leachate</u>	<u>Leachate</u>
EDC 10mg/kg	.005 mg/kg	.05 mg/L	.0005 mg/L	0.5 mg/L
	(detection limit)		(detection limit)	
VCM 0.6	-	.02 mg/L	-	0.2 mg/L

LOUISIANA AIR LAWS UPDATE

- DEQ ADOPTED AN AIR TOXICS PROGRAM ON 12/20/91
- MOST INDUSTRIAL FACILITIES TO MEET TECHNOLOGY AND RISK-BASED CONTROL STANDARDS
- STATE DEADLINES OUTPACE FEDERAL DEADLINES
- 97 CHEMICAL, INCLUDING AMMONIA, ON STATE LIST
- FACILITIES MUST DEVELOP AN MACT STANDARD APPROVABLE BY DEQ
- 10 TPY/25 TPY "MAJOR SOURCE" DEFINITION
- DEQ MOST DETERMINE PERMIT APPLICATION COMPLETENESS WITHIN 110 DAYS OF SUBMITTAL
- NO "PERMIT SHIELD" FOR SOURCES NOT NAMED IN PERMIT
- MODIFICATIONS MAY TRIGGER MACT NEW SOURCE REVIEW
- COMPLIANCE PLAN MUST BE SUBMITTED BY 12/20/92
- EMISSION STANDARDS APPLY FOR:
 - MERCURY
 - VINYL CHLORIDE
 - BENZENE EQUIPMENT LEAKS
 - TRANSFER OPERATIONS
 - BENZENE WASTE OPERATIONS
 - ASBESTOS
 - BERYLLIUM
 - BERYLLIUM ROCKET MOTOR FIRING
 - VOLATILE LTAP EQUIPMENT LEAKS

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U.S.A. REGULATION 1992 UPDATE

Storm water Permit Application - October 1, 1992

CFC - July 1, 1992 CAA prohibits venting

SARA Form "R" Reporting

- ▷ **Source Reduction and Recycling Activities**
- ▷ **Energy Recovery**
- ▷ **CFC's**
- ▷ **RTKM**
- ▷ **EPA Proposing to add 80 chemicals (RCRA Haz. Waste List)**

Environmental Crimes Act of 1992

- ▷ **Death or serious injury through environmental offence**

\$250,000 fine
15 years jail

- ▷ **Environmental Audits by Court**
- ▷ **\$10,000 Rewards**

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U.S.A. REGULATIONS

1992 UPDATE

VINYL CHLORIDE SAFETY ASSOCIATION

OCTOBER 1-2, 1992

BALTIMORE, MARYLAND

**Burley R. Melton
Formosa Plastics Corporation
Livingston, New Jersey**

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