

## Compliance Reminders!

### **T**oxics Release Inventory (TRI) Reporting – Due July 1, 2005 for Reporting Year 2004

Facilities subject to the TRI reporting requirements must meet the following criteria:

- ◆ The facility has 10 or more full-time employees or their equivalent (i.e. a total of 20,000 hours or greater); and,
- ◆ The facility is included in Standard Industrial Classification (SIC) codes 10 (except 1011, 1081, and 1094), 12 (except 1241), 20-39, 4911 (limited to facilities that combust coal and/or oil for the purpose of generating electricity for distribution in commerce), 4931 (limited to facilities that combust coal and/or oil for the purpose of generating electricity for distribution in commerce), 4939 (limited to facilities that combust coal and/or oil for the purpose of generating electricity for distribution in commerce), 4953 (limited to facilities regulated under RCRA Subtitle C, 42 U.S.C. Section 6921 et seq), 5169, 5171, and 7389 (limited to facilities primarily engaged in solvents recovery services on a contract or fee basis); and,
- ◆ The facility manufactures, imports, processes, or otherwise uses any EPCRA Section 313 chemical in quantities greater than the established threshold in the course of a calendar year.

Each facility meeting the above criteria must file a TRI report using either Form

A or Form R by July 1 for the previous calendar year. Form R must contain information about the facility and the usage of toxic chemicals on-site including total quantities, quantities released into each environmental medium, and quantities transported off-site.

New information for Reporting Year 2004 includes updated software that will allow companies to send forms over the Internet via EPA's Central Data Exchange (CDX). Please refer to [www.epa.gov.tri](http://www.epa.gov.tri) for reporting information and instructions.

### Storm Water Pollution Prevention Program Reporting - Due July 1, 2005 for Reporting Year 2004

The General Permit regulates federal, state, municipally owned, and private facilities from a broad range of categories such as (but not limited to):

- ◆ manufacturing facilities within SIC codes 24 (except 2434), 26 (except 265 and 267), 28 (except 283 and 285), 29, 311, 32 (except 323), 33, 3441, and 373; and,
- ◆ manufacturing facilities where industrial materials, equipment, or activities are exposed to storm water within SIC codes 20-23, 2434, 25, 265, 267, 27, 283, 285, 30, 31 (except 311), 323, 34 (except 3441), 35-37 (except 373), 38-39, and 4221-4225. Examples of common SIC codes include Refrigerated Warehouse/Storage (4222) and General Warehousing and Storage (4225).

In order to comply with the General Permit storm water requirements, an applicable facility must:

- ◆ file a **Notice of Intent (NOI)**;
- ◆ prepare and implement a **Storm Water Pollution Prevention Plan (SWPPP)**; and
- ◆ prepare and implement a **Monitoring Program (MP)**.

All facility operators shall submit an Annual Report by July 1 of each year to the Regional Water Quality Control Board responsible for the area where the facility is located. The report shall include a summary of the visual observations and sampling results, an evaluation of the visual observation and sampling / analysis results, laboratory reports, the Annual Comprehensive Site Compliance Evaluation Report, an explanation of why a facility did not implement any activities required by the General Permit (if not already included in the Evaluation Report), and records specified in the SWPPP program itself.

The Annual Report shall be signed and certified in accordance with Standard Provisions of the General Permit. Facility operators shall prepare and submit their Annual Reports using the annual report forms provided by the State Water Board or Regional Water Board or shall submit their information on a form that contains equivalent information.

Refer to <http://www.waterboards.ca.gov/stormwtr/industrial.htm> for more informa-

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## **Risk Group Update: Pressure Relief Valve Inspection and Replacement Guidelines**

Do pressure relief valves still have to be replaced every five years?

If your facility has Cyrus Shank, Hansen, Henry, Parker, or Rego Products (to name a few) pressure relief valves, which do not discharge to another part of the closed-loop refrigeration system, the recommended replacement period is five years from the installation date stamp on the individual relief valve.

International Institute of Ammonia Refrigeration (IAR) Bulletins are often consulted when industry standards or good engineering practices are referred to. IAR Bulletin 110 "Guidelines for Start-Up, Inspection, and Maintenance of Ammonia Mechanical Refrigerating System" Section 6.6.3 (Revised March ) refers to Pressure Relief Devices and states that, "relief valves shall be maintained and their external condition verified by annual visual inspection for corrosion or accumulation of scale and for leaks." Relief valve replacement is necessary if visual evidence of physical damage or deterioration exists. Therefore, if the relief valve appears to be in good working order during the annual inspection, the relief valve shall be replaced according to manufacturers' recommendations.



<http://www.hantech.com/products/relief.asp>

The Bulletin 110 Revision does indicate that "When a component reliability program is in place to verify relief valve functionality and longevity by history, testing, *disassembly and inspection*, and periodic statistical review of these activities, relief valves may be replaced at any interval justified by the findings of such a program." In the absence of a component reliability program, relief valves shall be replaced as recommended by the manufacturer (i.e. every five years). The Bulletin 110 Revision also states that, "In the absence of both a component reliability program and manufacturers' recommendations, relief valves shall be replaced every five years if not indicated earlier at annual inspection."

For further clarification, the 2003 International Mechanical Code (Fourth Printing: May 2004) does not indicate inspection and/or replacement guidelines of relief valves on pressure vessels. The 2001 Edition of the Boiler and Pressure Vessel Code - Division 1 Section UG-136(c)(3): Minimum Requirements for Pressure Relief Valves, indicates that permission to apply the UV Code Symbol, "shall expire on the fifth anniversary of the date it is initially granted. The permission may be extend for 5 year periods if the following tests are successfully repeated within the 6-month period before expiration." Sections UG-136(c)(3)(a - d) of the Boiler and Pressure Vessel Code describe the necessary tests to re-certify relief valves.

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Tracer feels that a component reliability program, as mentioned above, would receive heightened scrutiny during an audit or inspection by a regulator. The cost difference between replacing relief valves per the five-year manufacturers' recommendation/industry standard and conducting the "disassembly and inspection" portion of a reliability program should be reviewed with your refrigeration contractor. For facilities' electing to implement a reliability program to extend the replacement criteria of facility relief valves, Tracer strongly recommends a thoroughly detailed inspection log to track and document such inspections. Otherwise the best practice is to follow the industry standard and manufacturer's recommendation to replace or re-certify all relief valves (except those relief valves which are piped to discharge into the closed-loop refrigeration system), five years from the installation date stamp on the individual relief valve.

*If you have any questions regarding inspection and/or replacement of your relief valves, please contact Tracer ES&T. ✓*

News Flash - New Team Members

**Ms. Jackie Musgrove** is a Senior Scientist at Tracer ES&T's Central Coast office. She is responsible for conducting various environmental compliance projects for Tracer clients. Ms. Musgrove has over 27 years environmental compliance experience in gas transmission, heavy manufacturing, paper industries, and surface mining. Ms. Musgrove has developed a facility environmental training program for over 100 facilities in 22 states. The training program incorporated both corporate policy and state and federal regulatory requirements. Prior to joining Tracer ES&T, Ms. Musgrove was self employed for 10 years and her primary work product was the annual update of another firm's proprietary environmental and health and safety 'Audit System' for the Petroleum and Chemical Industry. Ms. Musgrove also conducts facility audits and regulatory reviews on environmental due diligence efforts for major acquisitions and divestitures.

**Ms. Lesley Evans** is a Staff Engineer at Tracer ES&T. Her main area of concentration is risk analysis. She has a B.S. in Chemical Engineering. Ms. Evans is responsible for the documentation of Process Safety Management Programs (PSM), Risk Management Programs (RMP) and California Accidental Release Prevention (CalARP) Programs for facilities using regulated substances. Prior to joining Tracer ES&T, Ms. Evans worked as a Control System Engineer for General Atomics. She was responsible for the design, installation, integration, and startup of the software control system for the Munitions Cryofracture Demilitarization Facility at McAlester Army Ammunition Plant in McAlester, Oklahoma. Ms. Evans also designed and implemented the integrated process control system for the ICF Target Injection and Tracking System at General Atomics. ✓

## Tracer Conducts Air Monitoring Task for the American Lung Association

Tracer ES&T was recently retained to perform ambient air quality monitoring for the American Lung Association of San Diego and Imperial Counties. The project was conducted March 29<sup>th</sup> through the 31<sup>st</sup> and consisted of collecting air samples for selected toxic compounds as well as the use of continuous monitors for criteria pollutant measurements. Measurements were conducted at three separate locations in the vicinity of the Mid-City Chollas Landfill in San Diego, CA. Sampling locations included the Carver Elementary School, Chollas Recreational Park, and Holy Spirit Church. The following parameters were measured with strict adherence to the required sampling methods and established protocols.

Compound	Method	Required Media
Formaldehyde	TO-11A	Silica gel cartridge
Hydrogen Chloride	CARB 421M	Glass fiber filter coated w/ potassium hydroxide
PM10	Method PM	Quartz Fiber Filter
CO, NO <sub>x</sub> , SO <sub>2</sub>	Continuous	None
VOC's	TO-15	Summa Canister
Hydrogen Sulfide	ASTM D5504	Tedlar bag

Following sampling and analytical exercises, Tracer ES&T delivered a data summary report to the American Lung Association. Tracer ES&T provided no interpretation or conclusions relative to the data collected. This project was supported by a grant from the National Institute of Health (NIH). Should you have any questions regarding this program, please contact Paul Schafer at Tracer ES&T's San Marcos office. ✓

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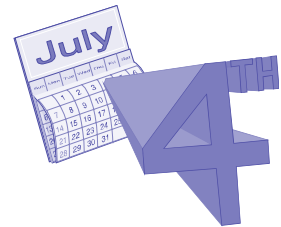
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Happy Memorial  
Day on  
May 30th

§ Happy



## Tracer ES&T Anniversaries

Some of the Tracer ES&T staff have been together through several name changes: Tracer Technologies, Team Environmental Services, and now, Tracer ES&T. Our staff is the foundation for this company and we appreciate their effort and dedication.

22 Years	Tom Rappolt	(3/3/83)
16 Years	Lee Pyle	(5/9/89)
4 Years	Mary-Pat Lemon	(4/3/01)
1 Year	John Deacon	(5/17/04)
New-Hire	Lesley Evans	(3/7/05)
New-Hire	Jackie Musgrove	(4/7/05)