

# Tracer ES&T Times

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## What's New in 2008...

**H**appy New Year! It's time to start planning the new compliance year and 2008 has plenty. Aside from the standard annual submittals, there are a few new issues for 2008. The following list is not meant to be all-inclusive and does not include those day-to-day tasks that are required by the various regulatory agencies you need to keep happy (OSHA, EPA, CUPA, Regional Water Quality Control Board, Air Quality Management District, etc.).

- January 1, 2008: **California** Green House Gas (GHG) Mandatory Reporting becomes effective with first reports due in 2009 (see article).
- January 22, 2008: Chemical Facility Anti-Terrorism TOP Screen Surveys due to Department of Homeland Security.
- March 1, 2008: Hazardous Materials Business Plans or Tier II Report due to local CUPA or EPA (see article).
- July 1, 2008: Toxic Release Inventory (aka Form R) incident reports due to EPA.
- July 1, 2008: **California** Annual Storm Water Reports due to Regional Water Quality Control Boards.
- December 31, 2008: **California** Transportation Refrigeration Unit Permits / Emission Reduction Plan.

### ***Chemical Facility Anti-Terrorism – January 22, 2008***

The Department of Homeland Security has finalized Appendix A to the Chemical Facility Anti-Terrorism Standards (6 CFR Part 27). The final Chemicals of Interest list was published in the Federal Register on November 19, 2007. Some key changes include adding “threat” categories, increasing some of the Screening Threshold Quantities, and adding clarifications for various usage, handling, and mixtures.

**Purpose:** The final rule includes a list of approximately 300 chemicals that were deemed by the Department of Homeland Security (DHS) to have a “Security Issue” (e.g., release, theft, sabotage). If a facility handles in excess of the listed threshold quantity of a listed chemical, they are then required to complete a TOP-Screen survey to assist DHS in determining if additional security assessments are required.

Additional information is available at:

- The 7 bullet items needed to register each location  
[http://www.dhs.gov/xprevprot/programs/gc\\_1169503302924.shtm](http://www.dhs.gov/xprevprot/programs/gc_1169503302924.shtm)
  - The “CSAT Top Screen Survey” Questions and a User Manual  
[http://www.dhs.gov/xprevprot/programs/gc\\_1169501486197.shtm#3](http://www.dhs.gov/xprevprot/programs/gc_1169501486197.shtm#3)
- Some Qualifiers -

**Propane Qualifier:** When calculating the amount of propane, do NOT include propane in tanks of 10,000 pounds or less. Propane liquid density is 4.2 pounds/gallon and propane vapor density is 0.015 pounds/gallon.

**Hydrogen Sulfide Qualifier:** When determining the Theft & Diversion quantities, only include theft / diversion chemicals of interest in *transportation packaging*.

**Toxic Chemical Mixtures:** Only include Chemicals of Interest when they are present in a concentration equal to or greater than 1%.

**Flammable Chemical Mixtures:** When a Chemical of Interest is present in a concentration equal to or greater than 1% and the mixture has an NFPA rating of 4, then the entire material is required to be counted toward the Screening Threshold Quantity. If the NFPA of the material is less than 4, only count the total quantity of the Chemical of Interest.

### ***Toxics Release Inventory (TRI) Reporting – July 1, 2008 for Reporting Year 2007***

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

*(Continued on page 3)*

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## RISK GROUP UPDATE - REMINDER:

### California Hazardous Materials Business Plans and EPA Tier II Reports are Due on March 1st!!! (for most companies)

In 1986, the federal government passed the Emergency Planning and Community Right-to-Know Act (EPCRA) in order to encourage emergency planning efforts at the state and local levels, as well as to provide public and local governments with information regarding chemical hazards that may be present in their communities. Sections 301-303 and sections 311-312 of EPCRA require businesses or facilities to report information on hazardous materials that are present on-site and to document emergency response procedures should those chemicals be released into the environment. **In California**, facilities subject to these EPCRA requirements submit a Hazardous Materials Business Plan (HMBP), a document containing the required data on emergency planning and hazardous materials. The HMBP is submitted to the local Certified Unified Program Agency (CUPA) under California Code of Regulations, Title 19, Division 2, Chapter 4, Hazardous Material Release Reporting, Inventory, and Response Plans. THIS SUBMITTAL SATISFIES THE EPA TIER II SUBMITTAL REQUIREMENT.

Not all facilities are required to submit an HMBP / Tier II Report. Only those that store hazardous chemicals over the threshold quantities must submit. **In California**,

the requirement for submittal is any hazardous material (AKA any material with an MSDS) in excess of 55 gallons, 500 pounds, or 200 cubic feet must be included in your HMBP submittal. Outside of California, the threshold quantities are higher, unless you have "extremely hazardous substances"; these materials are subject to much lower threshold values. Therefore, for business owners who are unsure whether or not they are required to submit an HMBP, it is best to consult the EPA website or their local CUPA.

As mentioned, an HMBP contains information regarding a facility's hazardous materials and emergency response planning. Hazardous materials information includes inventories that specify the type, quantity, and health risks of all chemicals stored at the facility. A facility site map that shows where hazardous materials are located is also included within the Plan. Emergency planning information is comprised of evacuation and notification procedures implemented in an event of a chemical spill, fire, or other type of emergency. Contact information for the local police, hospital, and fire department are also listed. In addition to these two components, California HMBPs include reporting information

about the amount of training given to employees who implement emergency response procedures or are authorized to handle hazardous materials. A description of the training is usually required as well. Again, it is important to check with the local CUPA to know what type of information is required.

A complete HMBP must be submitted for all new businesses. After the first submission, facilities must annually review and recertify their HMBP by submitting the Hazardous Materials Business Plan Certification Statement. However, facilities that handle "extremely hazardous substances" must submit a new HMBP every year. **These documents, whether it may be a new Hazardous Materials Business Plan or a Certification Statement, are due to the local CUPA by March 1 of every year.** NOTE that some CUPA's require an earlier submission (e.g., Los Angeles County requires submittal by December 31 of each year).

Sources:

- <http://es.epa.gov/techinfo/facts/proact6.html>
- <http://www.epa.gov/region5/defs/html/epcra.htm>
- <http://www.co.san-diego.ca.us/deh/hmd/bp.html> ✓

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Do you have questions about an article appearing in Tracer ES&Times?  
Call us at (760) 744-9611.

## Did You Know? . . .

**T**Tracer ES&T offers Continuous Emissions Monitoring Systems (CEMS). Support Capabilities include the following:

- System Design & Installation
- Station Operation & Maintenance
- Regulatory Coordination
- Data Analysis & Reporting
- Source/Receptor Relationships &
- QA/QC

For more information regarding air quality measurement issues, contact Paul Schafer at 760-744-9611, ext. 111. Also, tune in to the March / April 2008 Newsletter for **MUCH MORE** information. ✓

*(What's New in 2008, continued from page 1)*

(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.

**California Annual Storm Water Reports – Due July 1, 2008 for Reporting Year 2007**

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 **Standard Industrial Classification (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 an **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.html>

**California Transportation Refrigeration Unit Permits / Emission Reduction Plan – Due December 31, 2008**

California Code of Regulations, Title 13, Chapter 9, Division 3, Article 8, Section 2477, AIRBORNE TOXIC CONTROL MEASURE (ATCM) FOR IN-USE DIESEL-FUELED TRANSPORTATION REFRIGERATION UNITS (TRU) AND TRU GENERATOR SETS, AND FACILITIES WHERE TRUs OPERATE, was written to implement the provisions of the Diesel Risk Reduction Plan, adopted by the Air Resources Board (ARB) in October 2000, to reduce diesel particulate matter (PM) emissions.

**OPERATOR REQUIREMENTS:**

All operators of TRU and TRU gensets must begin to develop a plan to bring their diesel engines into compliance. The first compliance deadline for operators of TRUs and TRU gensets is **December 31, 2008**. This plan can include the following

information either in a spreadsheet or database:

- Group each TRU by Engine Model, Model Year, Rated Horsepower, and Serial Number.
- Group each TRU in two categories: Greater than 25 hp and Less than 25 hp.
- Review each engine's emission control label and tabulate: Engine Manufacturer, Engine Model, Engine Family.

**COMPLIANCE DEADLINES:**

Operators must work to meet the LETRU and ULETRU compliance criteria for their diesel engine either by finding alternative fuels or meeting this criteria by the following deadlines:

- Model Year 2001 TRU or older must meet LETRU by December 31, 2008.
- Model Year 2002 TRU must meet LETRU by December 31, 2009
- Model Year 2001 TRU or older must meet ULETRU by December 31, 2015.
- Model Year 2002 TRU must meet ULETRU by December 31, 2016.
- Model Year 2003 and younger already meet the LETRU. Compliance for ULETRU is December 31, 7 years following manufacturer's model year.

**ALTERNATIVES:**

- Electric Standby
- Cryogenic Temp. Control Systems
- Alternative-fueled Engines
- Alternative diesel fuel.
- Power by fuel cells.

**RECORD KEEPING AND REPORTING:**

In addition to the compliance plan and deadlines for upgrading the diesel engines, all of your diesel TRUs and TRU gensets must be permitted with the California Air Resources Board (ARB). On or before January 31, 2009, California-based TRU and TRU genset owners / operators must apply for an ARB identification number.

Finally, all operators subject to this regulation must submit an Operator Report to ARB by January 31, 2009. This report must be updated within 30 days if changes are made to the required information.

If you have any questions regarding Calendar Year 2008, please contact your Tracer ES&T representative. ✓

# Compliance Group Update - Recent Changes in Southern California Air Quality Rules

Air quality in California is regulated by the California Air Resources Board at the state level and by various air districts at the local level. The following summarizes the Southern California air quality rules that changed between approximately April and November 2007. Tracer ES&T offers a comprehensive set of permitting services including New Source Review (NSR), RECLAIM, Title V, air quality impact assessments, and air toxic risk assessments. If you need assistance with air quality permits, please contact Mr. Greg Hauser at (760) 744-9611 x106.

**Antelope Valley Air Quality Management District (AVAQMD)**

(<http://www.avaqmd.ca.gov/>)

Rule 301 - Permit Fees (Proposed amendments 7/17/07)

Rule 444 - Open Fires (Proposed amendments 6/27/07)

**Imperial County Air Pollution Control District (ICAPCD)**

(<http://www.arb.ca.gov/drdb/imp/cur.htm>)

No changes

**Kern County Air Pollution Control District (KCAPCD)**

(<http://www.arb.ca.gov/drdb/ker/cur.htm>)

No changes

**Mojave Desert Air Quality Management District (MDAQMD)** ([http://www.mdaqmd.ca.gov/rules\\_plans/rule-toc.htm](http://www.mdaqmd.ca.gov/rules_plans/rule-toc.htm))

Rule 1406 - Emission Reduction Credits for Paving Unpaved Roads (Hearing on draft new rule 8/27/07)

Rule 1162 - Polyester Resin Operations (Hearing on draft new rule 8/27/07)

Rule 1165 - Glass Melting Furnaces (Hearing on draft new rule 8/27/07)

**San Diego Air Pollution Control District (SDAPCD)**

(<http://www.sdapcd.org/rules/rules/andr.html>)

Rule 11 - Exemptions from Rule 10 Permit Requirements (Amended 4/25/07)

Rule 40 - Permit Fees (Amended 7/25/07, effective 7/1/07)

Rule 67.6 - Solvent Cleaning Operations (Repealed effective 5/28/08)

Rule 67.6.1 - Cold Solvent Cleaning and Stripping Operations (Adopted and effective 5/23/07)

Rule 67.6.2 - Vapor Degreasing Operations (Adopted and effective 5/23/07)

**San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD)**

(<http://www.valleyair.org/rules/1ruleslist.htm#reg1>)

Rule 1177 - Gasoline Dispensing Facility Tester Certification (Adopted 6/21/07)

Rule 3147 - Fees for Certification of Gasoline Dispensing Facility Testers (Adopted 6/21/07)

Rule 4103 - Open Burning (Amended 5/17/07)

Rule 4603 - Surface Coating of Metal Parts and Products (Amended 9/20/07)

Rule 4604 - Can and Coil Coating Operations (Amended 9/20/07)

Rule 4605 - Aerospace Assembly and Component Coating Operations (Amended 9/20/07)

Rule 4606 - Wood Product Coating Operations (Amended 9/20/07)

Rule 4607 - Graphic Arts (Amended 9/20/07)

Rule 4612 - Motor Vehicle and Mobile Equipment Coating Operations - Phase II (Amended 9/20/07)

Rule 4651 - Soil Decontamination Operations (Amended 9/20/07)

Rule 4653 - Adhesives (Amended 9/20/07)

Rule 4661 - Organic Solvents (Amended 9/20/07)

Rule 4662 - Organic Solvent Degreasing Operations (Amended 9/20/07)

Rule 4663 - Organic Solvent Cleaning, Storage, and Disposal (Amended 9/20/07)

Rule 4682 - Polystyrene, Polyethylene, and Polypropylene Products Manufacturing (Amended 9/20/07)

Rule 4684 - Polyester Resin Operations (Amended 9/20/07)

Rule 4703 - Stationary Gas Turbines (Amended 9/20/07)

**San Luis Obispo County Air Pollution Control District (SLOAPCD)**

(<http://www.arb.ca.gov/drdb/slo/cur.htm>)

Rule 250 - Registration of Agricultural Diesel Engines (Adopted 5/16/07)

Rule 302 - Schedule of Fees (Revised 7/25/07)

**Santa Barbara County Air Pollution Control District (SBCAPCD)**

(<http://www.sbcapcd.org/rules/rulesnew.htm>)

Rule 210 - Fees (CPI Adjustments effective 7/1/07)

Rule 213 - Fees for Registration Program (Adopted 10/18/07)

Rule 1201 - Registration of Agricultural Diesel Engines (Adopted 8/16/07)

**South Coast Air Quality Management District (SCAQMD)**

(<http://www.aqmd.gov/rules/recentrules.html>)

Rule 219 - Equipment Not Requiring a Written Permit Pursuant to Regulation II (Amended 6/1/07)

Rule 301 - Permitting and Associated Fees (Amended 5/4/07)

Rule 303 - Hearing Board Fees (Amended 5/4/07)

Rule 304 - Equipment, Materials, and Ambient Air Analysis (Amended 5/4/07)

Rule 304.1 - Analyses Fees (Amended 5/4/07)

Rule 306 - Plan Fees (Amended 5/4/07)

Rule 307.1 - Alternative Fees for Air Toxics Emissions Inventory (Amended 5/4/07)

Rule 308 - On-Road Motor Vehicle Mitigation Option Fees (Amended 5/4/07)

Rule 309 - Fees for Regulation XVI (Amended 5/4/07)

Rule 311 - Air Quality Investment Program (AQIP) Fees (Amended 5/4/07)

Rule 313 - Authority to Adjust Fees and Due Dates (Adopted 5/4/07)

Regulation IX - Standards of Performance for New Stationary Sources (Amended 4/6/07)

Rule 1113 - Architectural Coatings (Amended 7/6/07)

Rule 1173 - Control of VOC Leaks and Releases from Compounds at Petroleum Facilities and Chemical Plants (Amended 6/1/07)

Rule 1175 - Control of Emissions from the Manufacture of Polymeric Cellular (Foam) Products (Amended 9/7/07)

Rule 1309.1 - Priority Reserve (Amended 8/3/07)

Rule 1315 - NSR Tracking System (Re-Adopted 8/3/07)

Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities (Amended 10/5/07)

Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines (Amended 6/1/07)

Rule 2004 - Requirements (Amended 4/6/07)

Rule 2007 - Trading Requirements (Amended 4/6/07)

Rule 2010 - Administrative Remedies and Sanctions (Amended 4/6/07)

**Ventura County Air Pollution Control District (VCAPCD)**

(<http://www.arb.ca.gov/drdb/ven/cur.htm>)

Rule 42 - Permit Fees (Revised 4/10/07)

Rule 48 - Agricultural Engine Registration Fees (Adopted 9/11/07)

Rule 250 - Registration of Agricultural Engines (Adopted 9/11/07) ✓

## California Greenhouse Gas (GHG) Regulatory Update

The regulatory development process continues to move forward regarding the implementation of California's Global Warming Solutions Act of 2006 (also known as Assembly Bill 32 or AB32). The goal of AB32 is to reduce the statewide emissions of greenhouse gases (GHGs) to 1990 levels by the year 2020. The general timeline is as follows:

- 2007 - List of early actions developed to reduce GHG emissions
- 2008 - Mandatory reporting of GHG emissions
- 2009 - State of California develops scoping plan containing the main strategies to reduce GHG emissions (e.g. direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market based mechanisms such as a cap and trade system)
- 2010 - Early actions measures go into effect
- 2011 - GHG limits and measures adopted
- 2012 - GHG limits and measures operative
- 2020 - Reduce statewide GHG emissions to 1990 levels

The State of California is currently focusing upon the following GHG sectors and activities:

- Agriculture
  - General Manure Management Activities
  - Manure Management Strategies
  - Manure Management Protocols
  - Agricultural Offroad Equipment
  - Nitrogen Land Application GHG Reductions Co-Research
  - Electrification of Stationary Agricultural Engines
- Manufacturing
  - Semiconductor Industry PFCs Reduction
  - Blended Cements
  - California Cement Facilities Energy Efficiency
- Forests
  - Forest Protocol Adoption
- Waste Management/Landfills
  - Landfill Methane Control Measure
- Electricity
  - (Coming soon)
- Oil & Gas/Refining
  - Low Carbon Fuel Standard
  - Above Ground Storage Tanks
  - Gasoline Dispenser Hose Replacement
  - Reduction of Venting / Leaks from Oil and Gas Systems
- Transportation
  - Automobile Regulation
  - Green Ports
  - SmartWay Truck Efficiency
  - Tire Inflation Program
  - Anti-Idling Enforcement
  - Commercial Harbor Craft
  - Cool Automobile Paints
  - Hybridization of Medium and Heavy-Duty Diesel Vehicles

- Port Trucks
- Portable Outboard Marine Tanks
- Privately Owned On-Road Trucks
- Standards for Off-Cycle Driving Conditions
- Strengthen Light-Duty Vehicle Standards
- Transportation Refrigeration - Electric Standby
- Truck Stop Electrification with Incentives for Truckers
- Vessel Main Engine Fuel Specifications
- Vessel Speed Reductions
- Non-Agricultural Offroad Equipment
- High Global Warming Potential (GWP)
  - HFC-134a Reduction from DIY MVAC Servicing
  - AC Leak Tightness Test / Repair Required for Smog Check
  - HFC Release Ban from MVAC Service / Dismantling
  - Low-GWP GHGs Requirement for New MVACs
  - High-GWP Refrigerant Tracking, Reporting, and Recovery
  - Consumer Products High GWP GHGs Reduction
  - SF6 Reduction in Non-Electric Sector
  - Alternative Suppressants in Fire Protection Systems
  - Commercial Refrigeration Specifications
  - Foam Recovery / Destruction Program
  - SF6 Reduction in Electricity Generation
- Government
  - Local Actions (Local Government Protocols, Cool Communities)
  - Business GHG Reduction Guidance / Protocols

On December 6, 2007, the California Air Resources Board (ARB) held a public meeting to consider the adoption of regulations requiring mandatory reporting of GHG emissions from California facilities. The proposed GHG reporting regulation would require annual emissions reporting from facilities that account for approximately 94% of the total carbon dioxide (CO<sub>2</sub>) produced in California from industrial and commercial stationary sources. Facilities applicable to the GHG reporting requirements may include electricity generating facilities, electricity retail providers, electricity marketers, oil refineries, hydrogen plants, cement plants, cogeneration facilities, and industrial sources that emit over 25,000 metric tonnes per year of CO<sub>2</sub> from stationary source combustion.

Annual reports will be prepared using methods, equations, and emission factors specified in the proposed regulation. The proposed regulation also specifies the reporting requirements for each GHG sector, and defines which facility processes and GHGs must be reported. In general, all facilities will report their on-site stationary source combustion emissions of CO<sub>2</sub>, N<sub>2</sub>O (nitrous oxide), and CH<sub>4</sub> (methane). Note, facilities will also be required to report fugitive emissions under the proposed regulation. The first emissions report must be submitted to the ARB in 2009 based on 2008 emission levels. Contact Greg Hauser at 760-744-9611 ext. 106 for more information. ✓

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Best Wishes in 2008!



**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.

<b>20 Years</b>	<b>Charles Barney</b>	<b>(02/01/88)</b>
<b>6 Years</b>	<b>Jeanna Emmons</b>	<b>(01/23/02)</b>