



Beyond Compliance

Promoting Environmental Stewardship, Safety & Health at all
University System of Georgia (USG) Institutions

"Creating a More Educated Georgia"

Volume 3, Issue 1

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USG Institutions Reducing Mercury Use

This spring and summer, five USG institutions are implementing programs to identify and reduce the amount of mercury in their laboratories. With funding assistance and support from EPA through the Pollution Prevention Assistance Division (P2AD) and the Board of Regents, each institution will promote and operate a "thermometer exchange" program. Through these programs, laboratory personnel will be educated on the hazards of mercury and will be encouraged to exchange their mercury-containing thermometers for equivalent non-mercury thermometers at no charge.

Mercury is a toxic metal that accumulates in the environment and can cause serious health and ecological problems. Human exposure to mercury occurs primarily through inhalation of inorganic mercury vapor after a spill, or ingestion of methylmercury from contaminated fish. If not properly cleaned up, mercury spilled from a broken thermometer will slowly volatilize at room temperature, exposing laboratory personnel to toxic mercury vapors. When released to the environment through waste disposal, inorganic mercury is transformed into methylmercury, which is highly toxic and accumulates in living tissue.

Thermometers are not a huge source of mercury in the environment – accounting for about 1% of total mercury use – yet they are a meaningful small source that can be easily reduced. Reducing mercury use on campus is consistent with our overall mission to promote environmental stewardship, safety,

and health at all USG institutions.

The participating institutions ultimately hope to eliminate over 1,500 mercury thermometers. The program results, educational materials, and "lessons learned" will be distributed to all USG institutions in the fall, and other institutions will be encouraged to pursue similar mercury reduction programs.

The participating institutions are:

- Georgia State University
- Medical College of Georgia
- North Georgia College & State University
- State University of West Georgia
- University of Georgia



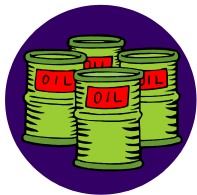
Upcoming Events:

- June 29—GISAC Agency Safety and Loss Prevention Coordinator Workshop, Atlanta (www.ganet.org/safety/loss_prevention_workshop.html)
- June 30—Chemical Inventories due to BOR
- July 4-7 — 2004 CSHEMA Conference and 50th Anniversary Celebration, Chicago (www.polarcub.com/cshema2004/)
- October 12-14—2004 Georgia DOL SH&E Conference, Duluth (www.projectsafageorgia.org)
- October 27-29—2004 USG Facilities Officers' Conference, Savannah

OUR MISSION:

TO SUPPORT THE BOARD OF REGENTS' MISSION OF "CREATING A MORE EDUCATED GEORGIA" THROUGH TEACHING, DISCOVERY, OUTREACH AND PUBLIC SERVICES BY PROVIDING LEADERSHIP AND SERVICES TO PROMOTE ENVIRONMENTAL STEWARDSHIP, SAFETY AND HEALTH AT ALL UNIVERSITY SYSTEM INSTITUTIONS.

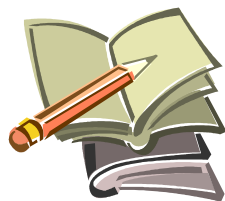
What is an oil?



The term “oil” means oil of any kind or in any form, including,

but not limited to: petroleum; fuel oil; sludge; oil refuse; oil mixed with wastes other than dredged spoil; fats, oils or greases of animal, fish, or marine mammal origin; vegetable oils, including oil from seeds, nuts, fruits, or kernels; and other oils and greases, including synthetic oils and mineral oils.

Quiz: Which Campuses Need a Plan?



Which of the following campuses would be required to prepare an SPCC plan?

Campus A has one 1000 gallon gasoline AST.

Campus B has one 500 gallon and one 300 gallon diesel fuel AST; three 55 gallon drums of oil and three 55 gallon drums of oil-based paint; and one 200 gallon used oil AST.

Campus C has three 10,000 gallon gasoline USTs with registration certificates.

Campus D has two 500 gallon gasoline AST, and ten empty 55-gallon oil drums

Campus E has no oil storage but operates ten buses, each with a 140 gallon gas tank.

See answers on p. 4

Does Your Campus Need an SPCC Plan?

In July 2002, EPA made major changes to the requirements for the preparation of Spill Prevention Control and Countermeasures (SPCC) plans. These regulatory changes may affect whether your campus is required to have an SPCC plan.

What is the purpose of an SPCC plan?

The SPCC Rule is part of the oil pollution prevention regulation in 40 CFR 112. The overall goal of this regulation is to prevent oil discharges from reaching navigable waters of the U.S. or adjoining shorelines. An SPCC plan is a written plan that contains measures to be taken at your campus to prevent and control oil spills. This includes spills resulting from human operational error or from equipment failures.

How do I know if I need an SPCC plan?

You need an SPCC plan if your institution has at least one of the following oil storage capabilities (see box to left for the definition of ‘oil’):

- total aboveground oil storage capacity $\geq 1,320$ gallons; or
- completely buried oil storage capacity greater than 42,000 gallons.

Previously, the threshold for aboveground oil storage was 660 gallons, which means that some institutions that already have a plan may no longer need one. Note that the threshold is based on container capacity (maximum volume), not the actual amount of oil stored (operational volume).

Also, some containers and tanks are exempted from inclusion in the threshold. Completely buried underground storage tanks (USTs) that are subject to the UST regulations in 40 CFR 280 or 281 are exempted, as are containers under 55 gallons.

If my campus needs a plan, when do I have to have the plan done?

If you have an existing SPCC plan, you have

until August 17, 2004 to update your plan and until February 18, 2005 to implement it.

(NOTE: EPA may announce an extension of these deadlines in June or July.)

If you currently do not have an SPCC plan and need one, you should write and implement the plan immediately.

What should the plan include?

An SPCC plan for your facility should address three main areas:

- The operating procedures your facility implements to control oil spills
- Control measures installed to prevent oil from reaching navigable waters or adjoining shorelines
- Countermeasures to contain, clean up, and mitigate the effects of an oil spill that has an impact on navigable waters or adjoining shorelines.

Can I prepare my own plan?

As the facility owner or operator, you can prepare an SPCC plan for your facility. However, a licensed Professional Engineer (PE) must certify your plan and attest to the following:

- They are familiar with the requirements of 40 CFR 112;
- They or their agent has visited and examined the facility;
- the Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of part 112;
- procedures for required inspections and testing have been established; and
- the Plan is adequate for the facility.

My campus is not in a coastal area or close to any lakes or rivers. Do I still have to have an SPCC plan?

EPA Performance Track Welcomes 1st University

Last fall, Washington State University in Pullman became the first major university to be accepted to EPA's Performance Track Program. The program recognizes top environmental performers and encourages organizations to go beyond compliance and commit to specific environmental improvements over a three-year period.

To qualify for the program, an organization must meet four criteria:

- A sustained compliance record, with no major unresolved environmental violations;
- a basic environmental management system (EMS) in place;
- a commitment and goals in four major areas; and
- A commitment to public outreach.

In return for their commitment, members receive such benefits as public recognition, low inspection priority, and special services from EPA.

According to EH&S Director Dwight Hagihara, reduced inspection priority and increased public recognition were Washing-

ton State University's main incentives for joining the program.

The university committed to improved environmental performance in energy usage and solid waste management. Some of the specific performance objectives include decreasing air pollutants through the construction and use of a new energy plant. By 2005 the University commits to reduce nitrogen oxide emissions by more than 50%, and sulfur dioxide emissions by more than 85%.

Among the outreach efforts Washington State University committed to are web updates on their environmental management system. These updates can be viewed at <http://www.ehs.wsu.edu/EPAPT.asp>.

The University also invited the city planner, director of a local non-profit environmental organization, EPA performance track staff, and the director for the regional Department of Ecology to speak at an EMS class taught by Mr. Hagihara. As part of that class, the students are writing an EMS section for the University.

SPCC Plans, continued from p. 2

The determination of whether your campus could reasonably discharge oil to navigable waters or adjoining shorelines is based solely upon a consideration of the geographical and locational aspects of the facility. You should consider your campus' location in relation to streams, ponds and ditches (perennial or intermittent), storm or sanitary sewers, wetlands, mudflats, sandflats, or other navigable waters. The distance to navigable waters, volume of material stored, worse case weather conditions, drainage patterns, land contours, soil conditions, etc., must also be taken into account.

In addition, this determination may NOT include consideration of man-made features such as dikes, equipment or other structures which may serve to restrain, hinder, contain or prevent an oil discharge.

Where can I get more information?

EPA's Oil Program has many useful SPCC resources available on line at

<http://www.epa.gov/oilspill/spcc.htm>

Changes to EPD's Asbestos Program Recommended

An audit report released by the Georgia Department of Audits in July 2003 concluded that EPD's asbestos program cannot currently provide reasonable assurance that demolition projects are conducted safely.

The report recommends the following changes to the program:

- Development of a standard inspection checklist to ensure on-site inspections are thorough and uniform
- Addition of a requirement that the contractor sign the inspection report
- Development of formal guidelines on prioritizing site inspections so as to inspect sites with greatest risks to public health first
- Implementation of fines for firms that do not submit complete project notifications or fail to update project notifications.
- Amendment of state law to require asbestos contractors to maintain minimum levels of liability and property damage insurance.

The audit report is available at www.audits.state.ga.us/internet/pao/pcorpts/pao-03-0236full.pdf

Answers to SPCC Quiz

Campus A: No. Total oil storage capacity is <1,320 gallons. This campus would have required a plan under the previous regulation, but does not under the revised rule.

Campus B: Yes. Total oil storage capacity is 1,330 gallons.

Campus C: No. Registered USTs are exempted from SPCC requirements.

Campus D: Yes. Total oil storage capacity is 1,550 gallons.

Campus E: No. Buses and vehicles are considered transportation-related, and are under the jurisdiction of the Department of Transportation. Consequently, they are generally not subject to the SPCC requirements.

Common Sources of Emissions at Colleges and Universities:

- **Boilers**
- **Furnaces**
- **Fuel Storage Tanks**
- **Emergency generators**
- **Lab equipment**
- **Kilns**
- **Paint Booths**
- **Print Shops**

Georgia Southern University Receives Final Funding for Wind Retrofit Project

Source: www.gema.state.ga.us

The Georgia Emergency Management Agency (GEMA), on behalf of Governor Sonny Perdue, has reimbursed Georgia Southern University (GSU) \$20,772 in final funding for expenses related to wind retrofitting campus buildings. The total for the project was \$129,070.

GSU is the first State University to wind retrofit nine campus buildings diffusing the impact of airborne debris during a hurricane or high wind storm. The project, funded through the Georgia Emergency Management Agency's (GEMA) Hazard Mitigation Grant Program (HMGP), has an estimated benefit of \$3,097,683 equating to an avoided annual loss of \$223,843.

GSU installed a reinforcement film on the inside of the buildings' windows which will hold the glass together upon impact reducing the risk of damage to the building, contents and occupants. The film used is tough and durable, combining multiple micro-thin layers of material. The Nessmith-Lane Continuing

Education Building, Health Services, Fielding D. Russell Union, Recreation Activity Center, Landrum Court, Hanner Field House, Public Safety, Carroll Building, and GEMA Field Office have all been outfitted with this technology. The buildings will house emergency management and law enforcement officials, allowing them to continue their duties during an emergency, as well as serve as shelter and feeding locations in the event of a severe storm, protecting individuals who have evacuated their residences.

"While we cannot always predict the occurrence of natural hazards, this grant program is designed to help local governments and state agencies take measures to reduce or eliminate the long-term risk to human life and property," said GEMA Director Mike Sherberger. "GSU has taken extra precautions to ensure that their vital buildings are operational and prepared to assist students in the aftermath of a storm."

For more information on hazard mitigation planning, call GEMA at 1-800-TRY-GEMA or visit www.gema.state.ga.us.

Time to Review Your Air Emissions!

The BOR's Office of Environmental Affairs recommends that each USG institution annually review its air emissions and permit status. This is particularly important for institutions that are expanding or altering facilities, and institutions located in the metro Atlanta ozone nonattainment area, which now has a lowered Title V major source threshold for emissions of NOx and VOCs.

All emissions sources on campus (see box at left for examples) should be inventoried and reviewed annually. The purpose of this review is to verify that no new sources have been added or are planning to be added that would require modification to an existing air permit or cause the institution to become a "major source" under the Title V permit program.

Boilers are usually the largest source of emis-

sions on a campus, emitting particulate matter, sulfur dioxide (SOx), nitrogen oxides (NOx), and carbon monoxide. Some USG institutions are adding or planning to add new boilers in anticipation of future facilities expansions. Depending on the size and location of the boiler, the Potential to Emit (PTE) may need to be calculated. PTE is based on operating the boiler 24 hours per day, 365 days per year, at maximum design and emission rates.

If the PTE of a new boiler may cause the institution to exceed the major source threshold, voluntary operational limits such as restrictions on operating hours or type and quantity of fuel burned may be necessary to avoid more stringent regulatory requirements. The PTE and any operational limits must be determined *before* the boiler is constructed and operated.