



DEPARTMENT OF PUBLIC WORKS

Environmental Sustainability Division

m e m o r a n d u m

TO: PW
FROM: Scott R. Tess, Environmental Sustainability Manager
DATE: January 3, 2014
SUBJECT: **Internal Environmental Compliance and Safety Plan**

To ensure compliance with environmental rules and to maintain a safe workplace, Public Works invited the Illinois Sustainable Technology Center (ISTC) compliance assistance staff to conduct a site review and make recommendations for improvement at the Public Works facility. The report ISTC provided was distilled into a 2013 calendar checklist. 90% of the items were completed by the end of the year.

Preparatory Activities

10/30/12 ISTC HazWaste Compliance Assistance Walk-through

12/6/12 ISTC Compliance Report Review

Corrective Actions

January-April

- ✓ Conduct waste determination for potentially hazardous wastes
 - (40 CFR 262.1(c); 262.11; 262.40(c); 35 IAC 722.111)
- ✓ Conduct Hazardous Waste Generator Status Determination
 - (40 CFR 261.5 – Conditionally Exempt Small Quantity Generator, 40 CFR 262.44 - Small Quantity Generators, 40 CFR 262 - Large Quantity Generator and IAC Title 35 Part 721.105)
- ✓ Determine if NPDES Industrial Stormwater Discharge permit is needed
 - (40 CFR 122.26):
- ✓ Register for EPA Hazardous Waste Generator ID Number
 - (40 CFR 262.12; 35 IAC 722.112)
- ✓ Determine if OSHA Hazardous Chemicals or SARA Title III reporting is required
 - (40 CFR 370.21, 370.25)
 - (40 CFR 355.30)
 - (40 CFR 370.20(a) and (b))

May-August

- ✓ Install Hazard Diamond placards on building
- ✓ Revise paint spray equipment cleaning practices
- ✓ Install secondary containment for the storage of batteries
- ✓ Install electrical grounding equipment to ground containers with flammable and combustible materials stored in this area
- ✓ Dispose of dried paint on concrete pad

- ✓ Maintain aisle space adjacent to hazardous waste accumulation points sufficient to allow normal passage of personnel
 - (40 CFR 265.35; 35 IAC 722.134(j)(8))
- ✓ Identify the contents and dispose of containers stored outside
- ✓ Dispose of PCB testing equipment
- ✓ Label containers and accumulation points for special wastes and hazardous wastes including accumulation start dates
 - (40 CFR 279.22(c)(1))
 - (29 CFR 1910 Subpart H and 1910.253, 49 CFR 171-179)
 - (40 CFR 112)
- ✓ All containers except those in use are closed
 - 373-3.9(d)(1)
- ✓ Store and/or dispose of waste fuel
- ✓ Store or dispose of form oil drums
- ✓ Dispose of traffic marking paint
- ✓ Assign staff to conduct and document weekly inspections of universal waste, special waste, and hazardous waste generation points and accumulation points
 - (40 CFR 265.174 and 265.195(c); 35 IAC 721.105)
- ✓ Determine if a Spill Prevention Control and Countermeasures Plan is required for petroleum storage
 - (40 CFR 112)
- ✓ Create OSHA Hazard Communications Plan
 - (29 CFR 1910.1200)
- ✓ Create and document short annual training on handling and disposal of universal wastes, special wastes, and hazardous wastes
 - (29 CFR 1910.120, 49 CFR 172.704(a)(1))
- ✓ Create Preparedness and Prevention Program
 - 40 CFR 262.34(d)(4)

September-December

- Revise SDS List and update SDS collection
- ✓ Review fuel, chemical, pesticide, and fertilizer storage rules and best practices
- Review opportunities to substitute non-hazardous chemicals for hazardous chemicals
 - Parts washer
 - Spray solvents
 - Paints
 - Mercury containing lamps
- Consider closing the floor drain in the materials storage area
- ✓ Consider creating an Asbestos management plan
 - (40 CFR 228.121; 71 IAC 500)
- ✓ Determine whether inlets in the lot discharge to sanitary or storm sewer and cover materials storage appropriately
- ✓ Evaluate need for flammables/chemicals cabinets at fleet and LRC

Attachments:

cc:

