

NJUA JIF Executive Safety Committee

Annual EJIF Update – Your EJIF Inspection



Christopher Gulics, VP of ERCP
Matthew Mee, Staff Scientist

NEW WEBSITE


www.njejif.org

Birdsall Services Group (BSG-PMK)

www.birdsall.com



Who Sponsors the Audits?



- The Environmental Joint Insurance **Fund** (EJIF) is a public, non-profit entity
- The Fund insures your Authority against economic losses due to environmental incidents

Birdsall Services Group (BSG-PMK)

- BSG-PMK Group is not the insurance company
- BSG-PMK Group is the environmental consultant hired by the EJIF to:
 - Perform Compliance Assistance Audits
 - Develop programs to reduce risk – Seminars & Environmental Alerts
 - Investigate potential claims – 24/7 Hotline: 1-800-289-6681



Why Audit?

Approximately 60% of releases to the environment resulting in claim investigations are potentially avoidable by implementing SOPs, including regular inspections:

- UST discharges
- AST/Drum discharges
- Truck/Hydraulic Line discharges



What should I have available?

UST Registration Certificates
UST Testing Records
SPCC Plan
DPCC Plan
AST Testing – Vapor Recovery
NJPDES (Stormwater) SPPP & Records
Air Permit Certificates
Emergency Generator Records



USTs

Since 2004

- 1 out of every 3 claim investigations are UST related
- About twice the number of claims as the next category: vehicle-related spills (49 UST claims vs. 26 vehicle claims)
- USTs are NOT automatically afforded coverage
- BSG-PMK reviews all UST systems for compliance with N.J.A.C 7:14B
 - BSG-PMK does not issue UST insurance.



The Checklist - USTs

Regulated UST Systems (tanks and piping) require:

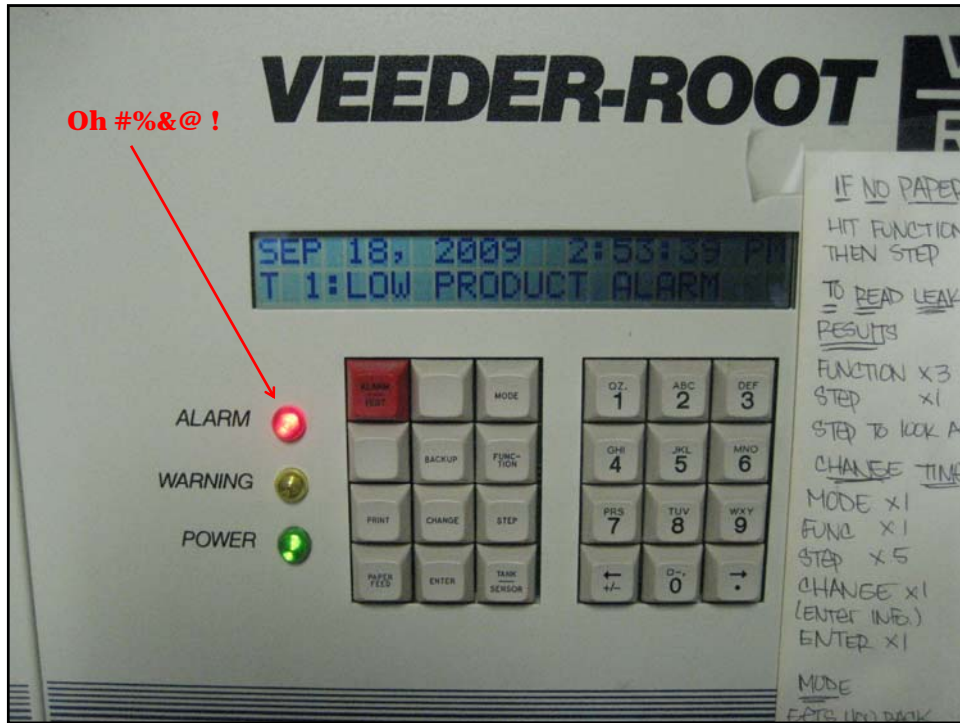
- o Proper registration with NJDEP, triennially renewed
- o Release Response Plan
- o Corrosion Protection – Non-corrosive material or triennial testing of cathodic protection/ 90-day impressed current
- o Overfill Protection – Alarm and/or flow restrictor
- o Spill Protection (all sumps) – Spill buckets
- o Leak Detection – Systems may require up to three forms
 - Tank – 4 Stick tests per week or if automatic, monthly recordkeeping
 - Pressurized piping – Line Leak Detectors & annual testing or monthly monitoring
 - Suction piping – Monthly monitoring or triennial testing
- o Proper Fill Port markings



Deductions have been added to the checklist for these items

Release Response Plan		
Contacts:	Phone #	Contact Name
NJDEP Hotline:		---
Fire Department:	911	---
Facility Owner / Operator:	908-659-7470 908-400-5405	Christopher Meehan, Motor Vehicles
County Health Department:	908-654-9880	Les Jones, Health Official
Corrective Action/Repair Contractor:	610-278-7203	Crompco, LLC
Local Emergency Management	908-654-9881	Christopher Scaturro, OEM
Environmental Consultant	908-497-8900	Birdsall Services Group
Procedures		
1	Immediately notify the Facility Owner of any suspected release including all monitoring system alarms and observations of product within the piping sumps.	
2	Conduct a visual inspection of all readily accessible physical facilities (e.g. piping sumps) for evidence of leakage or discharge.	
3	Run diagnostic check on all monitoring systems; Check for a malfunction of the monitoring system. If alarm condition confirmed, take tank system out of service until repair contractor can evaluate cause of alarm.	
4	Contact tank system repair contractor, Crompco, LLC, to visit site and investigate suspected release.	
5	Facility Owner or designee must complete the investigation of a suspected release within 7 days of initial discovery. <i>N.J.A.C. 7:14B-7.1 Suspected releases</i>	
6	Facility Owner or designee shall immediately contact the New Jersey Department of Environmental Protection (1-877-962-6337) within 15 minutes of confirmation of the release.	
7	Refer to <i>N.J.A.C. 7:14B-8 Remediation Activities</i> or <i>N.J.A.C. 7:14B-9 Closure Requirements</i> for additional guidance following confirmation of a release.	
8	Facility Owner makes determination on what remediation activities are needed, consider contacting environmental consultant for additional guidance.	
UST Size and Contents	Tank ID #	Location Description
1,000 Gallon Gasoline	1	Galloping Hills Golf Course
1,000 Gallon Heating Oil	2	Galloping Hills Golf Course
	3	
	4	





The Checklist

American Petroleum Institute, Publication #1637

GASOLINES		DISTILLATES		
Unleaded	Ultra Low Sulfur	Low Sulfur	High Sulfur	
High grade Filled red circle with white "+"	U Filled yellow hexagon with black "U"	Yellow hexagon Diesel	Yellow hexagon with black horizontal line	
Middle grade Filled blue circle with white "+"		Purple hexagon No. 1 Fuel Oil	Purple hexagon with black horizontal line	
Low grade Filled white circle with black "+"		Green hexagon No. 2 Fuel Oil	Green hexagon with black horizontal line	
		U Kerosene Filled brown hexagon	Brown hexagon with black horizontal line	
ALCOHOL-BASED FUELS		BIODIESEL		
E85 Filled orange pentagon	Note: See 2.4.1 for specific labeling requirements	B2 Filled yellow pentagon	Note: See 2.4.1 for specific labeling requirements	
USED OIL Filled purple square	OBSERVATION OR MONITORING WELL Filled black triangle	VAPOR RECOVERY Filled orange circle		

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The Checklist

Non-Regulated UST Systems

Heating Oil Tanks <2000 gallons, site aggregate

- EPA & NJDEP agree that the risk for a bare steel UST to leak increases substantially after 10-15 years
- EJIF requires annual integrity (tightness) testing after 15 years



A deduction has been added to the checklist for this item

The Checklist - ASTs

- Aboveground Storage Tanks require only periodic visual inspections (unless regulated - SPCC)
- Potential Issues:
 - Tanks that are $\geq 10\%$ buried = USTs
 - Underground piping
 - Spill Kits
 - “Self-serve” used oil tanks
 - Secondary containment & Rain cover
 - Basic Industrial Stormwater Permit
 - SPCC...



Discharges from ASTs and drums account for 11% of all claim investigations since 2004.



Deductions have been added to the checklist for these items

The Checklist - SPCC

Applicability:

- A facility's aggregate petroleum storage capacity of containers (55+ gallons) >1320 gallons, AND
- A release could potentially impact "navigable" waters
 - "Navigable waters" - All surface waters of the State of NJ

Requirements:

- SPCC Plan (Tier 1 & 2 Template or custom)
- Secondary containment of tank, hose, and transfer truck
 - Includes bulk transfers and vehicle fueling from USTs
- Inspection schedule
- Annual Employee training



A deduction has been added to the checklist for this item

The Checklist - DPCC

Applicability:

- 200,000 gallons of Petroleum
- 20,000 gallons (167,043 pounds) of hazardous substances
 - Chlorine
 - Sodium Hypochlorite
 - Polymer (solid)

Requirements:

- DPCC Plan
- Secondary containment & controls of tank, hose, and transfer truck
- Inspection schedule, Emergency training, testing
- Annual Employee training



A deduction has been added to the checklist for this item

The Checklist - NJPDES

- New Jersey Pollution Discharge Elimination System
 - Point-source pollution reduction
 - Floor drains – groundwater & surface water discharges
 - Oil-water separators
 - Air compressor blowdown
 - Boiler blowdown
 - **Spill Kits**
 - Non-point-source (NPS) pollution reduction
 - Vehicle Washing
 - Drum/Dumpster Storage
 - Equipment storage



The Checklist - Industrial Stormwater

- If your MUA has a designed treatment capacity 1.0 MGD and greater...
- And you have source operations or material present...
 - You are in!
 - Source Material includes – gasoline & diesel ASTs, fueling areas, generator fueling operations
 - Septage transfer areas that drain to Plant still qualify for Industrial Permit!
- Permanent No Exposure only applies if all operations & materials are inside a building!



The Checklist – Air Emissions

Ultra-Low Sulfur Diesel (ULSD)

- After October 15, 2006, all on-road diesel vehicles must use ULSD
- Delivery ticket must contain pre-printed product
- Dispensers must display proper decal



The decal, such as this one, must be legible, and high-contrast



The Checklist – Air Emissions (cont.)

All fuel combustion equipment rated at 1MMBTU/hr or greater must be permitted

Gasoline Tanks 2,000 gallons or greater must be permitted AND require Stage II Vapor Recovery IF they dispense 10,000 gallons/month (12 month rolling average)

- Stage II Vapor Recovery requires 2-3 annual tests and 1 triennial test depending on the type of system.
- If you have Stage II Vapor Recovery, but don't need it, tests still must be conducted as scheduled
- DAILY !!! Vapor recovery equipment inspections are required by your permit!



Vapor Recovery Systems



Vapor Balance System
Stage II Vapor Recovery



Vacuum-Assist System
Stage II Vapor Recovery



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The Checklist – Air Emissions (cont.)

Generators 37 kW and greater can only run for maintenance on Good or Moderate Air Quality days – www.airnow.gov

About AIRNow | AIRNow Partners | FAQ's | Contact Us Search: Go

LOCAL AIR QUALITY CONDITIONS AND FORECASTS

Zip Code: Go State: New Jersey Go


U.S. Air Quality Summary (text)

AIRNow Home >> **New Jersey**
Data courtesy of: New Jersey Department of Environmental Protection

Forecast Current AQI AQI Animation

Today's AQI Forecast

Wednesday, December 15, 2010



0 20 40 60 Miles
Generated: 2010-12-15 16:59:21Z

Good
Moderate
Unhealthy
Unhealthy
Very Unhealthy
Hazardous
! Action Day

Click on the city name for more detailed information. printable summary	FORECAST		CURRENT AQI
	Wed Dec 15	Thu Dec 16	
Brigantine	25	25	n/a
Camden	25	25	n/a
Chester	25	25	n/a
Clarksboro	25	25	n/a
Flemington	25	25	n/a
Fort Lee	25	25	n/a
Millville	25	25	n/a
Monmouth	25	25	n/a
New Brunswick	25	25	n/a

The Checklist – Air Emissions (cont.)

Tub grinders/wood chippers....

- Requires an air permit if the combined weight of raw materials can exceed 50 pounds in any one hour, OR if the engine of the equipment is 1MMBTU/hr gross heat input or greater

Parts Washers...Heated units, and unheated units using a solution containing 5% or more of VOCs, HAPs, or a combination...

- Require an air General Permit when the open-top measures more than 6 square feet, OR if the solvent storage capacity is more than 100 gallons, OR use 1/2 gallon or more per hour, OR use a conveyORIZED surface cleaner, or
- Are subject to Operating Rules if they store 2-gallons or more of solvent



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The Checklist – Maintenance

- Unused Vehicles – Can leak, unnoticed
 - Active Fleet
 - Vehicle Maintenance SOP
 - Damaged/Disabled Vehicles
 - Store inside or under cover, and use drip pans while undergoing repairs
 - Decommissioned Vehicles
 - Drain fluids if stored on-site



Discharges of fluids from trucks, usually those on active duty, account for 16% of all claim investigations since 2004, roughly 4 events per year

The Checklist – Waste Management

All waste should be contained and covered

- Latex Paint
- Tires (solid waste, stormwater, mosquitoes)
- Contaminated Absorbent

Universal Wastes must also be labeled, dated and tracked

- Expired Pesticides
- Used Rechargeable Batteries - USDOT regulations also require separating terminals for transport
- Fluorescent Bulbs
- Electronics



The Checklist – Waste Management



All materials are stowed, labeled, dated, and picked up quarterly. Even the Area is labeled.



The Checklist – Container Management

Compressed Gas Cylinders

- Cap and chain to a wall for safety, or use a cabinet
- Incompatible cylinders must be stored at least 20 feet apart or separated by a noncombustible barrier at least five (5) feet high having a fire-resistance rating of at least one-half hour [29 CFR 1910.253(b)(4)(iii)].

Drums

- Label
- Cover
- Contain
- Clean



The Checklist – Score/Signature

- Following the Audit, the inspector will review the checklist with you and will give you a score based on the point deductions in the checklist.
- Your signature merely confirms that a Authority representative participated in the audit of the facility(s).
- A copy of the checklist will be left with you including the audit recommendations - for your records and review.



Claim Investigations

BSG-PMK may be called upon to investigate a possible claim when:

- A spill or release is called in to the EJIF Emergency Hotline (1-800-289-6681), or
- Requested by EJIF Officers, Risk Managers or Underwriting Managers, or
- Requested by the Claims Administrator, Peter J. King, Esq., or
- In an emergency situation.

BSG-PMK reviews actions taken by Members and contractors, timelines, causes, and costs and submits reports to the Claims Administrator



Resources

BSG-PMK can provide you with the following resources:

- BSG-PMK Hotline Poster
- Environmental Alerts (2003 – current)
- UST Release Response Plan / Fill Port Guidance (API #1637)
- SPCC Template for Tier 1 Qualified Facilities
- Air General Permit Applications & Compliance Plans
- ULSD Label Template
- Emergency Generator Recordkeeping Log
-etc....



Resources

www.njejif.org

Environmental Information

- Audit Paperwork and Associated Information
- Environmental Alerts
- Annual Seminar Presentations

Claims Procedures

- EJIF/BSG/NJDEP Hotline Poster
- Emergency Response Plan Guidance

Contacts

- Executive Committee
- Fund Professionals
- Member JIFs



Questions?

Birdsall Services Group

800-879-6681

Chris Gulics

cgulics@birdsall.com

Matt Mee

mmee@birdsall.com

