

A publication of the Environmental Assistance Office

Helping Vermonters access environmental compliance & pollution prevention information
Free & Confidential Comprehensive Environmental Business Assistance

REGULATIONS

UST Rule Revisions and New AST Rules In-Progress

The Vermont Underground Storage Tank Rules are undergoing another set of revisions, and the Department of Environmental Conservation (DEC) is drafting a new set of rules for Aboveground Storage Tanks (AST).

There are relatively few significant changes to the UST rules this time, but the DEC would like your input and suggestions on the proposed changes.

Here is a quick summary of the proposed changes:

1. Monitoring wells and observation wells will have to be maintained with liquid-tight caps such that the well does not serve as a direct conduit for a surface spill to contaminate the groundwater. During our inspections, we frequently find monitoring wells with broken caps, providing a direct path for a surface spill to go straight into the groundwater.
2. Other minor clarifications in the wording of the rules, including new language that makes it clear that when a tank goes out of service, the tank owner is still required to provide financial responsibility (e.g. pay the annual assessment fee for the Petroleum Cleanup Fund).
3. Tanks located at marinas will have to meet the standards established in the Petroleum Equipment Institute's (PEI) publication RP 1000: Recommended Practices for the Installation of Marina

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Fueling Systems. Under the proposed rules, newly constructed fueling systems would have to meet the new standards immediately; already existing systems would have to meet the standards by the marina's opening date in the spring of 2013.

4. The DEC is also developing a completely new set of rules regulating Aboveground Storage Tanks (AST). The new AST rules will contain standards for the installation, operation, and closure of ASTs. Many of the requirements of the AST rules parallel the existing UST rules.

The DEC is seeking comments and feedback on both sets of rules. Four public hearings have been scheduled:

4/25/2011: Rutland Public Library, 10 Court Street, Rutland

4/27/2011: Dorothy Alling Memorial Library, 21 Library Lane, Williston

5/2/2011: St. Johnsbury Town Board Room (Back of Fire Station), 1187 Main Street, St. Johnsbury

5/4/2011: Barre City Fire Department Training Room, 15 4th Street, Barre

Hearings for UST Rules will run from 5:30 – 6:00 p.m.

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Hearings for AST Rules will run from 6:00 – 7:00 p.m.

The public comment period is open until May 13, 2010.

Copies of both sets of rules will be *available soon* on the Waste Management Division's web site:
www.anr.state.vt.us/dec/wastediv/ust/draft_reqs.htm



Waterbury State Offices,
March 8th, 2011

Revising VT Hazardous Waste Management Regulations

The VT Department of Environmental Conservation is beginning the process of revising Vermont's Hazardous Waste Management Regulations (VHWMR), which were last updated in October of 2006. While Vermont is authorized by the federal Environmental Protection Agency (EPA) to operate its own hazardous waste program in lieu of the federal program, Vermont must keep the VHWMR reasonably current with federal hazardous waste regulations as a condition of delegation.

In addition to adopting certain required federal hazardous waste rules, Vermont

is considering the adoption of several "optional" federal rules, as well as revisions to some existing VHWMR standards. Potential changes include:

- ✓ Adopt (optional) federal Academic Labs Rule
- ✓ Adopt the (required) federal rule governing the export of lead-acid batteries to countries belonging to the Organization for Economic Cooperation and Development (OECD)
- ✓ Clarify the scope of the 7-203(a) "household hazardous waste" exemption
- ✓ Remove the 7-203(y) IBM XL exemption (the IBM XL project was terminated)
- ✓ Clarify the applicability of the 7-204(a) recycling exemption
- ✓ Clarify the conditions of the 7-204(l) "fuel-to-fuel" exemption
- ✓ Re-evaluate the scope of the VT06 "pesticidal waste" hazardous waste listing
- ✓ Remove references to the terminated (federal) Performance Track program
- ✓ Consider adding provision to hold transporters/consultants accountable for improper waste determinations/management
- ✓ Re-evaluate the hazardous waste recycling regulations included in VHWMR Subchapter 6; also, consider adding the (optional) federal "legitimacy criteria" for recycling
- ✓ Clarify various elements of the VHWMR Subchapter 8 "Used Oil Management Standards";

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also, consider making a regulatory distinction between “used oil” and “used oil fuel” within VHWMR Subchapter 8 to allow used oil fuel to be managed as a commodity (i.e., subject to limited management standards)

- ✓ Add “electronic waste” as a new category of universal waste (UW) under VHWMR Subchapter 9; consider combining the existing UW category of “cathode ray tubes” (CRTs) with the new “electronic waste” category; also consider the (optional) federal CRT exemption
- ✓ Consider combining the existing UW category of “thermostats” with the existing UW category of “mercury-containing devices”; also, evaluate the (optional) federal “mercury-containing equipment” UW rule (i.e., 40 CFR Part 273)
- ✓ Consider adding “pharmaceutical waste” as a new category of UW under VHWMR Subchapter 9

For more information or to suggest potential changes, please contact Steve Simoes, Hazardous Waste Section, at (802) 241-3878 or steve.simoes@state.vt.us

Environmental Research Tool for Public Use
Interactive Database or “WM-ID”



This web-based tool enables anyone to access up-to-date environmental information compiled and monitored by the

DEC. Property specific information concerning:

- hazardous waste manifest information
- contaminated groundwater sites
- hazardous materials spill sites
- underground storage tanks
- brownfield sites
- stormwater permitted sites

Users can tailor their search by entering one or a combination of search criterion to narrow down results or produce a specific list of records. The database is updated on a daily basis and gives you access to public records for many programs.

Example:

Hazardous waste generators and transporters may use the database to verify their own company information. You can also search for information about one company or identify all companies within a city or county.

Forgot the [WM-ID](#) link? You can always access it from the [SBCAP homepage](#).

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(Small & Large) Generators Utilizing Uniform Hazardous Waste Manifest: Take Note

It has come to the attention of the Hazardous Waste Section that some Designated Facilities (DF) are not returning required copies of their manifests to the state. The Vermont Hazardous Waste Management Regulations (VHWMR, §7-702(b)(10)) requires the generator to ensure a copy from the DF is sent to the generator state (VT). The issue seems to be that not all States require DFs to send manifests back to the Generator State. It is up to the VT generator to ensure that final copy makes its way back to VT. Here's an example:

ABC Company in VT shipped hazardous waste to a DF in Kentucky. The state of Kentucky does not require their DF's to return a copy to the generator state (Vermont in this case). Then ABC Company has to take some additional steps to ensure that DEC in VT receives a completed copy of the manifest.

Here are a couple of options to get completed copies to us:

- Check with the DF that will be receiving your hazardous waste. Explain that VT requires those completed copies. If the DF is not able or willing to return those copies then;
- Check the Hazardous Waste Generator database to see if the manifest has been received using the [WM-ID](#) database

- Once you have identified a missing manifest you can then forward copies of the completed copies you received from the DF.

How to locate your manifest report once at the WM-ID search engine:

Select: "*Hazardous Waste Generators*"
Then Search by: EPA ID number, generator name, and/or town.
Once you have found your facility, click "*View Button*", scroll to bottom and select "*View Manifest Report*"
Enter a date range, then select "*Run Report*".

This should give you a list of all the manifests under your company's EPA ID number that VT DEC has on file.

If you need further assistance, please do not hesitate to contact: Linda Joyal in the Hazardous Waste Section, at 802-241-3119 or linda.joyal@state.vt.us



February sunrise in Randolph Center

What is the Natural Resources Board?

The Natural Resources Board (NRB) was created by [Act 115](#) of the VT General Assembly to succeed the Environmental and Water Resources Boards on February 2005. The NRB is a [nine member board](#) which is divided into

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two panels, the *Land Use Panel* and the *Water Resources Panel*. Each panel has five members, including NRB Chair Ron Shems.

All appeals from District Environmental Commission (Act 250) decisions and District Coordinator Jurisdictional Opinions are heard by the Environmental Court. All appeals from permitting decisions of the Agency of Natural Resources are also heard by the Environmental Court, as well as local land use decisions.

Appeal information can be found at the [Environmental Court web site](#). Information about the Act 250 program, District Commission cases, and any pending rulemaking is found at the [Land Use Panel web site](#). The [Water Resources Panel web site](#) includes information about rules related to wetlands, lakes and other public waters in Vermont.

To contact the NRB: 802-828-3309
www.nrb.state.vt.us



Environmental Enforcement

[Electronic Reporting](#)
(click logo)

EAO Website Update's

What's a quick click from the **SBCAP Home Page?**

- AST / UST Contractors list
- Environmental Consultants list
- The Environmental Self-Assessment Guide Book
- Environmental Interactive Database or "WM-ID" Tool
- VBMX.org
- Vermont's E-Waste Program
- CEG On-Line Tutorial
- Funding Opportunities Fact Sheet
- And much more

WORKSHOPS

Workshops & Events

Environmental*VOSHA

Upcoming Vermont environmental, health & safety seminars from various providers that you may be interested in, in no particular order:

OSHA Training Institute Education Center hosted courses:

Occupational Safety and Health Standards for General Industry

4 days Mon-Tues, March 7-10
Champlain College Conference Ctr
Burlington

Update for Construction Industry Outreach Trainers

2.5 days Mon.-Wed, March 21-23
Windjammer Conference Ctr, South
Burlington

Update for General Industry Outreach Trainers

2.5 days Wed. – Fri, March 23-25
Windjammer Conference Ctr, South
Burlington

Register through: OTIEC
800.449.OSHA (6742)

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Tuition Fees & Credits Given

Registration Required

www.oshaedcenter.com

<http://oshaedcenter.com/files/VT.pdf>

2011 Vermont Governor's Workplace Safety Award Nominations now being accepted:

The Governor and VT Department of Labor have annually recognized VT based companies that have made outstanding achievements in Workplace Safety & Health, since 2005. The Governor's Award on workplace safety is the highest honor given by the State to recognize an employer's commitment to excellence in workplace safety & health. The Governor's Award has three categories (small, medium and large companies), as well as a special recognition category. The Governor is scheduled to announce recipients of these awards during the *7th Annual Workplace Safety Award Ceremony*, Thursday, May 12. Information including official State press releases, **nomination forms** are now posted on the VT Department of Labor's web site:

<http://labor.vermont.gov/Businesses/WorkplaceSafety/ProjectWorkSAFE/7thAnnualGovernorsWorkplaceSafetyAward/tabid/1632/Default.aspx>

9th Vermont Workplace Safety Conference & Governor's Awards
May 12, 2011

9am – 3:30 pm

Double Tree Hotel & Conference Ctr
1117 Williston Road, Burlington

An Excellent professional development opportunity for HR and safety staff.

Topics: Hiring Safe Employees; Home Grown "Safety & Accountability For Everyone" (S.A.F.E) Policy & Reward

Program; Workplace Risk Factors for Carpal Tunnel and other Ergonomic Injuries; VOSHA Updates; Employee Empowerment in Safety Panel and the *Governors' Safety Awards*. Sponsored by: The Partnership in Safety (Project WorkSafe, Green Mountain Coffee Roasters and VT Small Business Development Center), VELCO, Cabot Creamery; VT Safety & Health Council; and Columbia Forest Products. No registration cost for Governor's Awards only.

Registration fee: \$70 until 4/15

\$80 after that – Register at:

vtsbdc.org/small-business-training-workshops/workplace-safety

Safety Performance Measures
Tuesday, March 8th 9 am- 11 am
Hosted by: Liquid Measurement
141 Morse Drive, Georgia

Sponsored by: *NW Chapter of the Vermont Safety & Health Council*

Terese Churchill, EverGreen

Environmental Health & Safety will present. Many safety practitioners in industry spend a fair amount of time attempting to measure safety performance. Participants will leave the workshop with a good awareness of the safety metrics available, and most importantly, have a good understanding of where and how each metric should be applied to be the most effective for their needs

RSVP Required – email:

edunsmore@nmcinc.org

Vermont Safety & Health Council and the Northeast Kingdom Safety & Health Chapter Sponsored:

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Fall Protection, Ladders and Scaffolds in Construction

Thursday, March 17

9 AM to Noon with Lunch

(Registration opens at 8:30 AM)

Charles Carter Facility, Lyndonville

Dan Whipple, VOSHA Compliance

Specialist will discuss VOSHA

Standards related to Fall Protection,

Ladder and Scaffold usage for

Construction. This training will cover

such requirements as competent /

qualified persons, jobsite training, and

the various equipment use methods;

Noon Lunch and Networking. There is

no charge for this event for VSHC

members, **\$20 non-members**. *Become*

a member and the fee will be waived.

Please register no later than March 11

by contacting Amy Morissette at:

amy.morissette@kennametal.com or

802-626-2263

OSHA 10-Hour

Sponsored & Hosted by: Hackett,

Valine, & MacDonald

140 Kennedy Drive, So. Burlington

8 AM – 1:30pm, both days

\$100 per person, payment required
prior to class date.

OSHA 10-Hour General Industry

Mar. 15 & 16

OSHA 10-Hour Construction

Apr 19 - Apr 20

For more information & to register go to:

www.hvm.com/risk_mgmt/seminar.php

or contact Penny Burritt at

pburritt@hvm.com / 802-658-1100

**Green Mountain Safety Consulting,
L.L.C. In Alliance with the Hickok &
Boardman Network of Companies**

3/8

[CPR Refresher](#)

3/15

[Standard First Aid/CPR](#)

3/29

(web)

[The Aging Workforce](#)

4/5

[Integrating Wellness and Risk
Management](#)

4/19

[Ergonomic Principles in Health
Care](#)

4/21

(web)

[Workplace Violence](#)

5/5-6

[10 Hour General Industry Course](#)

5/19

(web)

[New Employee Orientation](#)

5/26-27

[10-Hour Construction Course](#)

To register or for more information go to:

www.greenmountainsafety.com/seminardates.html

or email: holly@greenmountainsafety.com

Electrical Safety/NFPA 70E

Friday, April 15

8:30AM - 12:30PM

Lake Morey Resort, Fairlee

Electrical Safety Standards for NFPA

70E and OSHA Subpart S

4-hour program designed to help those

responsible for company safety

compliance get a grip on electrical

safety regulations and best practices.

Our featured speaker is Ken Mastrullo,

Regional Coordinator for OSHA Region

1 Office, Boston. There will be a panel

of electrical safety/70E experts sharing

their experience with implementing an

effective program at their company.

Attendees will leave with a better

understanding of arc flash hazard

analysis, written programs, qualification

requirements for electrical employees,

and PPE. Free to members, **\$20 non-**

members. Register:

www.vshc.org/calendar/index.php

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Electrical Safety/NFPA 70E

Wed, May 18

8:30AM - 12:30PM

Room 401A - VTC Blair Park

Williston, VT

Electrical Safety Standards for NFPA 70E and OSHA Subpart S 4-hour program is designed to help those responsible for company safety compliance get a grip on electrical safety regulations and best practices. Featured speaker: Lee Marchessault, Workplace Safety Solutions. Following Lee's presentation, there will be a panel of business safety managers, sharing their experience with implementing an effective electrical safety/70E program at their company. Attendees will leave with a better understanding of arc flash hazard analysis, written programs, qualification requirements for electrical employees, and PPE. Attendees will receive a sample audit form and draft written program. Sponsored by the VT Safety & Health Council. Free to VSHC members, **\$20 for non-members** (fee waived for those joining VSHC). Lunch included. Register: www.vshc.org/calendar/index.php

Vermont Partnership in Safety presents
**Commercial Driver Compliance,
Safety and Accountability**

Thurs June 2 1:00 - 4:00 pm

Green Mtn. Coffee Roasters'
81 Demeritt Place Training Center,
Waterbury

The Federal Motor Carrier Safety Administration (FMCSA) evaluates the safety performance of motor carriers and drivers, under its Compliance, Safety, Accountability (CSA) initiative. Discussed will be how a driver's habits

can positively or negatively impact a carrier's safety rating. Who has access to a driver's violation record? What are the seven "Behavior Analysis and Safety Improvement Categories"? What impact will roadside inspections have on safety ratings? How can you as a driver or carrier challenge a violation on an inspection? This is a chance to get your questions answered with accurate information by VT Department of Motor Vehicles, Enforcement and Safety Division Training Officer, Lieutenant Patrick McManamon. Free, pre-registration requested, email pcrawford@vtc.edu or call 802-728-1423.

1st Annual Vermont Safety & Health Conference, June 7th & 8th, 2011

At The University of Vermont, Burlington, sponsored by the Safety & Health Council of Northern New England, UVM, and the National Safety Council. Information at: www.shcnne.org

Find Vermont Safety seminars at: www.vshc.org (the Vermont Safety & Health Council - the non-profit membership organization dedicated to promoting workplace safety).

Cerberus EHS Seminars:

Meeting RCRA, OSHA, and US DOT Training Requirements

8am-5pm

US DOT Training

3/31 Bennington

RCRA training

4/2 Chester & 5/5 Colchester

US DOT training

6/9 Colchester

HAZWOPPER training

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5/19 Colchester & 6/22 Chester

\$185 per person

All courses include:

Lunch and Certificate of Completion

Register with Mike Nelson at:

vermont8@hotmail.com

or phone: (802) 321-9005

**Vermont Green Workshops For
Restaurants & Lodging Properties:
Green Your Bottom Line!**

Learn from experts and colleagues about how to further green your property, reduce your operating costs and boost your property's image.

9:00am – 12:30 pm

4/27- Norwich, Norwich Inn

4/28- Burlington, Doubletree Hotel

4/29 - Rutland, Holiday Inn

Topics: Reduce Your Energy Bills: Advances in Lighting, Refrigeration, HVAC, and more. Learn about the 2011 incentives for investing in energy efficiency.

Reduce Your Water Bills; Green, Safer Cleaning Products; Green Purchasing; Green Meetings and Weddings; Solid Waste Reduction; Green Hospitality Roundtable discussion.

Registration \$20, at:

<http://vtsbdc.centerdynamics.com/Events.aspx> or call 728-1423

Sponsors: VT Business Environmental Partnership, Efficiency Vermont; VT Chamber of Commerce, US EPA and Boston Green Tourism.

Industrial Hygienics Corp Trainings:

40-Hr HAZWOPER (29 CFR 1910.120)

\$695.00 March 14 – 18

24-Hr HAZWOPER (29 CFR 1910.120)

\$500.00 March 14 – 16

Register at IHC: 802-879-2711

cmcbride@safetymgmt.com

Marina Workshop

Friday, April 1st

9am – 12 noon, No Cost

Ice House Restaurant

171 Battery Street, Burlington

Hosted by Lake Champlain Basin

Program and VT Boat & Marina Assoc

RSVP to LCBP: 802-372-3213 or 800-468-5227

Workshop to cover marina and recreational boating issues. Please Speakers will cover “State of Lake Champlain”, Updates on Environmental Regulations, Current Perspectives on Recreational Boating Issues (Panel Presentations & Discussion)



Creative Compliant Labels

Solve your in-house dilemma by allowing staff to be involved in problem solving. Reward winning ideas.

Have a Best Management Practice you'd like to share with us?

Email us a photo and caption.

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**EPA Regulatory Reform
"Listening Session"
Scheduled**

Monday, March 21, 10:00 – 1:00

www.epa.gov/improvingregulations/index.html

(Boston, Mass. – Mar. 9) As part of President Obama's Executive Order to modify or repeal regulations that are obsolete, unnecessary, unjustified, excessively burdensome, or counter-productive, the U.S. EPA will host a listening session in our regional headquarters in Boston on March 21.

Individuals or groups wishing to raise concerns with existing regulations, or wishing to present recommendations on new regulations or modification to existing regulations, are invited to attend. Any individual or group wishing to provide input are also strongly encouraged to provide input in writing as well as verbally at the listening session.

Attendees may RSVP, and walk-in attendees are also welcome. The listening session is Open Press.

RSVP to Kate Renahan
renahan.kate@epa.gov 617-918-1491
EPA New England's Office of Public Affairs

WHAT: EPA Listening Session on President Obama's regulatory reform effort

WHEN: March 21, 10:00–1:00

WHERE: John McCormack Bldg
5 Post Office Square,
Boston

Memorial Hall, 1st Floor

Directions: From State Street T station, walk down Congress St. towards Post Office Square; Building will be on right side, between Water and Milk Streets

THE DEC NOTES:

While the primary focus of the session is on retrospective review, there is a section which deals with how regulations should be written in the future.

To submit comments online:
[Least Burdensome / Flexible Approaches Docket EPA-HQ-OA-2011-0165](https://www.epa.gov/epahome/least-burdensome-flexible-approaches-docket-epa-hq-oa-2011-0165)

Feel free to use the following questions to guide your comments to EPA:

- Which regulations have proven to be excessively burdensome? What data support this? How many facilities are affected?
- What suggestions do you have for reducing the burden and maintaining environmental protection?
- Which regulations impose paperwork activities (reporting, recordkeeping, or 3rd party notifications) that would benefit from online reporting or electronic recordkeeping?
- Tell EPA whether regulated entities have flexibility in providing the required 3rd party disclosure or notification. What data support this? What

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suggestions do you have for how EPA could change the regulation?

- Which regulations could be made more flexible within the existing legal framework? What data support this? What suggestions do you have for how EPA could change the regulations to be more flexible?

We hope to have information about a possible **Call-In Number**. It will be posted to the SBCAP website if/when available. Or contact [Judy Mirro](#), VT SBCAP for more information.

Want to Learn More?
Environmental Regulations

It is not easy to understand environmental regulations. There are State Statutes, Department of Environmental Conservation (DEC) Policies, Federal Regulations, and DEC regulations (delegated by the Federal Government).

The regulations and rules are most often written in legal ease and challenging to interpret. That's where the DEC Environmental Assistance Office can help. The Small Business and Municipal Compliance Assistance Programs are able to assist you when trying to comply with environmental regulations and keep you up-to-date on new regulations that may affect your business or industry operations.

Our Programs help implement solutions that make sense for businesses and

municipalities to keep them in compliance.

Our Programs have worked to reduce the regulatory burden for businesses and municipalities through better environmental management.

Whether it is sector specific or a general overview of regulations, permit assistance, workshops, onsite visits, publications, research services, hotline or email - the Environmental Assistance Office can offer you assistance complying with state and federal environmental regulations.

Our Programs are voluntary, confidential, and come to you at no cost. Whether you require assistance with Air, Water or Waste... *we can help.*



Helping Small Businesses Access Environmental Compliance and Pollution Prevention Information

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As always, feel free to contact any
of us at the
Environmental Assistance Office
for support with your environmental
inquiry.

Judy Mirro
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judy.mirro@state.vt.us

John Daly
Municipal Assistance
john.daly@state.vt.us

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Pollution Prevention (P2)
paul.vanhollebeke@state.vt.us

Vicky Viens
Business Recognition Programs
vicky.viens@state.vt.us

Permit Assistance
www.anr.state.vt.us/dec/ead/pa/index.htm

800-974-9559
www.eaovt.org