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The RT Review

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Environmental and Energy Services Since 1988

RISK MANAGEMENT REGULATIONS RELAXED IN EPA FINAL RULE

The Clean Air Act mandates that EPA require Risk Management Plans (RMPs) for facilities storing specific chemicals above threshold amounts and develop risk management programs to prevent and mitigate accidents that could release those chemicals into the environment.

EPA published its first Risk Management Plan regulation in 1996. In 2017, EPA finalized a new regulation mandating new requirements and disclosure of additional public information. Following the finalization of this rule, EPA received and granted three petitions to reconsider the 2017 RMP regulations, including a petition from 11 states: Louisiana, Arizona, Arkansas, Florida, Kansas, Texas, Oklahoma, South Carolina, Wisconsin, West Virginia, and Kentucky.

Currently, EPA regulates approximately 12,500 RMP facilities throughout the country such as agricultural supply distributors, water and wastewater treatment facilities, chemical manufacturers and distributors, food and beverage manufacturers, chemical warehouses, oil refineries, and other chemical facilities.

Last week, EPA finalized changes to the RMP Reconsideration final rule, which removes what the Agency described as burdensome, costly, and unnecessary amendments while maintaining appropriate protections and ensuring first responders have access to all of the necessary safety information. This rule also resolves important security concerns.

With this action, under President Trump, EPA has finalized 48 deregulatory actions, which the agency projects have saved US companies more than

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DUKE ENERGY AGREES WITH SOUTHERN ENVIRONMENTAL LAW CENTER TO CLEAN UP COAL ASH

RALEIGH, N.C. -- Duke Energy Corp. has agreed to move 80 million tons of coal ash to lined landfills at six power plant sites in what state regulators are calling the biggest cleanup of its type in U.S.history.

The company said it would cost $8 billion to $9 billion to close all of its ash basins in the Carolinas, including the six power-plant sites.

The compromise between Duke Energy, state regulators and environmental groups likely puts an end to a years-long legal dispute in North Carolina over the environmental risks of the disposal of coal ash.

Coal ash is a byproduct of coal-fired power plants, which scrub potential air pollutants from their emissions. That ash can contain arsenic, selenium, lead and mercury. Coal ash has been commonly stored in pits on-site at power plants, which are often located near rivers and lakes since they need water to produce steam.

Duke said the agreement was reasonable, prudent and "a major achievement that puts the coal ash debate to rest in North Carolina."

Frank Holleman, a lawyer with the Southern Environmental Law Center, said the settlement ensures that North Carolina's water will be safer than it has been in decades.

Michael S. Regan, secretary of the state's Department of Environmental Quality, said the agreement ensures public health and protects natural resources. "We are holding Duke accountable and will continue to hold them accountable for their actions," Mr. Regan said.

Coal ash became a flashpoint in the state in February 2014, when a metal pipe running underneath an aging waste-storage pit poured tons of slurry into the Dan River in the central part of the state. In 2018, heavy rains from Hurricane Florence washed out a small portion of a coal-ash landfill near Wilmington, allowing some material to spill into a nearby lake.

Duke has long said it was acting responsibly by gradually phasing out coal-fired plants and ensuring previously generated material was safely stored at more than two dozen sites across the state. Some of the storage basins were lined but many weren't.

Environmentalists have said the material posed significant health risks, as it could leach into groundwater or flow from faulty basins into nearby bodies of water.

The agreement extends the life of some coal-ash recycling facilities, allows a few old, covered landfills below newer uncovered ones to remain intact and expedites the permitting process, according to a Duke spokeswoman.

The company will gradually be removing coal ash over the years, with the goal of closing all basins by the year 2034, the spokeswoman said.

"Five years from now, a heckuva lot of ash will be gone," said Mr. Holleman, the environmental lawyer. "Every year

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RISK MANAGEMENT REGULATIONS RELAXED IN EPA FINAL RULE ***(continued from page 1)***

$5 billion in regulatory costs.

"Today's final action addresses emergency responders' longstanding concerns and maintains important public safety measures while saving Americans roughly $88 million per year," said EPA Administrator Andrew Wheeler. "Accident prevention is a top priority of the EPA and this rule promotes improved coordination between chemical facilities and emergency responders, reduces unnecessary regulatory burdens, and addresses security risks associated with previous amendments to the RMP rule."

EPA's relaxation Chemical Disaster Rule comes some two years after EPA suspended the rule to try to prevent it from taking effect. Following a lawsuit in which Earthjustice represented communities from around the country affected by chemical disasters, a federal court reinstated the rule and said EPA's suspension made "a mockery of the statute." EPA did not appeal that ruling. During the unlawful suspension of protections, public reports showed at least 73 chemical releases, fires, and explosions occurred at facilities that would have been covered by the rule.

According to EPA, the final RMP reconsideration rule maintains important public safety measures. Under this final rule, no less safety information will be available to first responders and state and federal regulators than was available under any previous version of the RMP rule.

From 2007-2016, at least 90% of RMP facilities had no reported accidents and nearly half of accidents occurred at less than 2% of facilities reporting multiple releases. EPA is focusing on high-risk facilities and vigorously enforcing the original RMP rule. The revisions in final rule maintains public safety requirements without imposing substantial new regulatory requirements on all facilities in the RMP program. EPA believes this approach will effectively address the very small percentage of facilities that need increased supervision to improve their performance. In fact, accident rates in states that had adopted burdensome elements in the RMP Amendments rule show less decline in accident rates than RMP facilities nationwide under the original rule. Thus, there was little data supporting the claimed benefits of the RMP Amendments. According to EPA, this rule reduces the costs of compliance with unnecessary regulatory requirements and makes reasonable, practicable updates to improve the effectiveness of the rule.

"The National Association of SARA Title III Program Officials (NASTTPO) represents members and staff of State Emergency Response Commissions (SERCs), Tribal Emergency Response Commissions (TERCs), Local Emergency Planning Committees (LEPCs), various federal agencies, and private industry. Our membership is pleased with the Trump Administration and EPA Administrator Andrew Wheeler's finalized changes to the 2017 RMP rule, specifically with respect to its provisions impacting emergency planning and response. This includes final modifications to overly complex exercise requirements that placed resources burdens on LEPCs without recognizing these arbitrary requirements provided little or no benefit to community emergency preparedness or accident prevention," said NASTTPO Past-President and Board Member Tim Gablehouse. "We also appreciate that the final rule maintains critical access for first responders to necessary facility information that will result in improved local emergency response planning and public safety."

For more information on the proposed RMP Reconsideration Rule, see: https://www.epa.gov/rmp/proposed-risk-management-program-rmp-reconsideration-rule.

For history about the RMP Amendments Rule, see: https://www.epa.gov/rmp/final-amendments-risk-management-program-rmp-rule.

(Environmental Resource Center – 11/25/19)

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DUKE ENERGY AGREES WITH SOUTHERN ENVIRONMENTAL LAW CENTER TO CLEAN UP COAL ASH (continued from page 1)

that goes by, the level of pollution and the risk of catastrophe is being reduced."

(By Valerie Bauerlein – Wall Street Journal – 1-3-20)

Chris Blosenski and Gary Brown, P.E. of RT prepared reports on many of the sites for the Southern Environmental Law Center. Gary is a North Carolina P.E. and previously testified in a case where coal ash piles in North Carolina collapsed, as coal ash from the liners went down many rivers and impacted residences in Tennessee. The Tennessee Valley Authority was held responsible for the coal ash releases, considered one of the all-time world's worst environmental disasters.

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION ISSUES UPDATED MANAGEMENT OF FILL POLICY

The Pennsylvania Department of Environmental Protection issued an updated Management of Fill Policy which became effective on January 1, 2020. The Policy provides DEP's procedures for determining whether material is "Clean Fill" or "Regulated Fill". The Policy has been in effect since 2004 and this current update is the first major revision since the Policy was implemented. There continue to be provisions for using the General Permit for "Regulated Fill" which generally consists of materials with low level impacts (below the non-residential Statewide Health Standards of the Act 2 Program). The Policy does not apply to mined land reclamation activities nor fill used within the same project area or right of way. Further, the Policy does not apply to "the use of Clean Fill or Regulated Fill prior to January 1, 2020, unless the fill is moved to another receiving site, project area or off the project right-of-way after January 1, 2020."

Some key highlights of the updated Management of Fill Policy include:

- The prior Clean Fill and Regulated Fill numeric limits have been updated and are now consistent with the residential and non-residential Statewide Health Standards of the Act 2 Program, respectively.

- New definitions have been added to the Policy for clarification purposes as well as to provide the procedures for the establishment of background concentrations of constituents which may be used as Clean Fill.

- Historic Fill may be used as Clean Fill under certain circumstances and with appropriate testing; a specific screening list is provided by the Department.

- Environmental Due Diligence is further defined in the Policy and the policy provides the minimum level of due diligence to be completed in making Clean Fill determinations.

- Total PCBs (although as a group are not regulated under the Act 2 Program) are a key focus as there will be circumstances where US EPA will have a say in determining if the can be reused or not.

- The Department provides guidance on sampling plans for sites where analytical testing may be necessary to include *in-situ* testing and stockpile testing.

RT is conducting an in-depth review of the new Management of Fill Policy and will provide an evaluation of the Policy, including new and revised provisions and a comparison of the previous numeric concentration limits with the new numeric concentration limits to be used after January 1 2020.

We look forward to comments on the updated Management of Fill Policy, as we have been following the Management of Fill Program since 2004 and *RT Review* readers, and contractors and redevelopers always want to know the latest options to implement, particularly at Pennsylvania Brownfields sites, the most cost effective means to manage excess fill material both on and off of a project site. Keep in mind that as of January 1, 2020, Clean Fill concentration limits for many compounds will be reduced from the current Clean Fill concentration limits and there could be implications to project budgets going forward.

Gary R. Brown, P.E.
President
Walter Hungarter
Vice President

RT STAFF AND PROJECT NEWS

- Chris Ward, LSRP, is pleased to announce that Kevin Thomas has joined RT's New Jersey staff professionals. Kevin is already busy at work with Jen Berg overseeing the next stage of solar site development which is underway in Monroe Township, Monmouth County.

- Walter Hungarter is working with Gary Brown on a project in Upper Dublin Township related to mold. Issues arose at a large residential building under construction, where the very wet November and December period caused moisture intrusion and mold amplification that needed to be addressed promptly. Township code officials asked RT to mobilize to the site, and work was completed rapidly in conjunction with mold abatement staff. The issue of moisture intrusion is important when there is high humidity coupled with mold growth, as these types of issues should be addressed within 36 hours to minimize mold amplification.

- Chris Blosenski, who also is a first responder in Lititz, promptly responded to an issue at a Philadelphia City high rise building where moisture loss from an HVAC system caused the need for a prompt response. RT has managed mold issues for more than 15 years at RT and has Certified Microbial Consultant's on staff.

- Justin Lauterbach is successfully managing a large asbestos abatement contract in Pittsburgh with Stephanie Dinello, and is also working on remediation at a number of redevelopment Act 2 sites and storage tank sites across PA.

- Craig Herr is working on another Act 2 site in South Philadelphia. A previous project at this location requires expanded delineation of impacted soil and groundwater to meet appropriate PADEP requirements. The project is complicated because it involves multiple properties.

- Aaron Schneider is working with Gary Brown and Chris Blosenski on providing additional input on a landfill located in Alabama where concerns have arisen regarding proper stormwater management and groundwater monitoring. Gary Brown previously participated in evaluating and providing professional opinions for other locations in the southern states related to coal ash disposal, an issue which has received national attention. Gary Brown has been involved in the engineering, monitoring, and design of solid waste facilities since 1978.

We are looking forward to expanding services and serving our clients on projects in the northeast and at other locations in the United States in 2020 and beyond.

FEDERAL REGULATORY UPDATES

ALL RETAIL DISTRIBUTION OF METHYLENE CHLORIDE TO CONSUMERS FOR PAINT AND COATING REMOVAL BANNED BY EPA

EPA regulations to prohibit the manufacture (including import), processing, and distribution of methylene chloride in all paint removers for consumer use went into effect on November 22, 2019. It is now unlawful for any person or retailer to sell or distribute paint removal products containing methylene chloride for consumer use, including e-commerce sales.

"EPA's action keeps paint and coating removers that contain the chemical methylene chloride out of consumers' hands," said EPA Administrator Andrew Wheeler.

EPA is encouraging all consumers to stop using methylene chloride products that they may have already purchased for paint and coating removal. EPA is also reminding all retailers that sales of these products to consumers is prohibited by EPA regulations under the authority of section 6 of the Toxic Substances Control Act (TSCA). To learn more about how to comply with the regulations, including recordkeeping requirements, please visit: www.epa.gov/assessing-and-managing-chemicals-under-tsca/small-entity-compliance-guidance-regulation-methylene

The final regulation on methylene chloride for consumer paint and coating removal use was published on March 27, 2019, and the prohibition related to manufacturing, processing and distribution of methylene chloride for consumer paint and coating removal use is now in effect. Less harmful substitutes are readily available for paint removal.

EPA is continuing to work through the process outlined in TSCA to review the risks associated with other uses of methylene chloride. This process is designed to thoroughly evaluate available science before taking action to manage the risk associated with the other uses of the chemical.

Learn more about methylene chloride: www.epa.gov/assessing-and-managing-chemicals-under-tsca/risk-management-methylene-chloride (https://usenvironmentalprotectionagency.cmail20.com/t/d-l-xdhlykd-alyjugo-y/)

(Environmental Resource Center – 11/25/19)

FEDERAL REGULATORY UPDATES

NJ UPDATES

NJDEP – LSRP PROGRAM UPDATES

The New Jersey Department of Environmental Protection (NJDEP) posted updated Remedial Action Permit (RAP) applications and forms, and issued listservs announcing the new forms were sent May 30, 2019 (www.nj.gov/dep/srp/srra/listserv_archives/2019/20190530_srra.html) and June 17, 2019 (www.nj.gov/dep/srp/srra/listserv_archives/2019/20190617_srra.html).

The new applications and forms include: RAP Initial, RAP Modification, and RAP Termination Applications for both soil and ground water, RAP Transfer/Change of Property Ownership Application, RAP Contact Information Change Form, as well as a new Deed Notice Termination Form.

It was announced at the June 18, 2019 training that there would be a phase in period for the use of these new applications and forms. Please be advised that the phase in period for the use of the old applications and forms will end as of January 1, 2020. As of January 1, 2020, it will be necessary to submit the new applications and forms.

The new remedial action permit applications and forms and instructions are available on the NJDEP's website. All the permit applications and forms can be found in a new section on the Forms page (www.nj.gov/dep/srp/srra/forms/#rap_forms) to make finding the new forms easier.

When submitting RAP applications and forms, please remember the following:

• Submit the current fee due for permit and transfer/change of ownership applications. For Post No Further Action cases, submit past historical fees (see the June 17, 2019 Compliance Notification at: www.nj.gov/dep/srp/enforcement/compliance.htm regarding post-no further action cases requiring a remedial action permit), and Biennial Certification fees.

• Ensure a complete submittal including, but not limited to, a Remedial Action Report (submitted through the portal for LSR cases), standalone electronic copy of the deed notice and separate deed notices for separate owners for soil applications, Remediation Cost Review Remediation Funding Source/Financial Assurance (RCR RFS/FA) form as applicable, signatures or proof of attempts, and LSRP retention.

• For Transfer/Change of Property Ownership Applications, ensure that the three contact sections contain the correct information, including the current Person Responsible for Conducting Remediation (PRCR) in the PRCR section. The PRCR remains on the permit for the duration of the engineering and institutional control. Please note possible reasons for permit modification which can be found in the permit modification form and instructions when processing a transfer/change of ownership application such as adding the new owner as a PRCR.

NJDEP 2019 BEACH FLORA SURVEY SHOWS MAJOR INCREASE OF ENDANGERED SEABEACH AMARANTH PLANTS SOUTH OF SANDY HOOK

(19/P103) TRENTON - An annual plant census along New Jersey's coastal beaches south of Sandy Hook shows a significant surge in the number of seabeach amaranth, a federally threatened and state endangered plant species, Department of Environmental Protection Commissioner Catherine R. McCabe announced today.

Biologists with the DEP and Conserve Wildlife Foundation of New Jersey counted 7,195 plants, a more than 600 percent increase from the 2018 total of 1,053 plants. Similarly, 1,591 of the plants are at Island Beach State Park, compared with 307 found there in 2018 -- a more than 500 percent increase.

"I am very pleased that the statewide surge of seabeach amaranth experienced in 2018 has been far exceeded this year," Commissioner McCabe said. "Our DEP biologists indicate that while the increase can be the result of many different factors, it could not have occurred without the presence and structural integrity of the habitat required by this species."

The resurgence of seabeach amaranth is particularly remarkable because the plant had not been observed in the state from 1913 to 2000 and was considered lost from New Jersey flora. The plant was rediscovered in 2000 near Sandy Hook following a beach-fill operation in Monmouth County for coastal storm protection and recreation. U.S. Fish and Wildlife Service grants pay for the DEP to do annual surveys of the plant since its rediscovery.

"Staff of the Division of Parks and Forestry and its many partners and

NJ UPDATES

NJ UPDATES (continued)

supporters should take a bow for their contribution to the resurgence of this very interesting and specialized plant," said Division of Parks and Forestry Director Olivia Glenn. "Of course, if a little bit of luck was involved, we are thankful for that, too."

Seabeach amaranth (Amaranthus pumilus) is a low-growing plant with fleshy, spinach-like leaves and reddish stems. Plants germinate as early as April, and in June and July begin to produce inconspicuous yellow flowers that are wind-pollinated. Seed production soon follows, and plants typically grow about four inches across but sometimes may grow to a meter in diameter. Flowering and seed production continue until the plants die in the fall and early winter.

Seabeach amaranth is an annual plant, meaning that the individuals counted in any year are new plants resulting from seed dispersed in prior years. The seeds are durable, waterproof, and can be dispersed long distances by wave and wind action, or they may stay relatively close to the parent plant. The seed are also thought to remain viable for long periods, known as seed banking. Consequently, it is impossible to predict how abundant the plant will be from one year to the next.

On an undisturbed beach, seabeach amaranth may grow anywhere from the base of the dune to the high tide line. Managing human activity along the New Jersey coast, including beach raking as well as government and recreational vehicle use, also occur in the habitat that is vital for this and other species, whether rare or common.

The presence of seabeach amaranth is an indicator of a healthy or recovering habitat. It is one of only six plants in the state that are listed as either endangered or threatened by the U.S. Fish and Wildlife Service.

The DEP, in partnership with the US Fish and Wildlife Service, Conserve Wildlife Foundation of New Jersey, Pinelands Preservation Alliance and Raritan Valley Community College is working to protect the habitat where seabeach amaranth thrives.

Island Beach State Park has created special protection zones, known as plant protection strips that are marked with stakes, strings and signs to alert the public to the presence of a protected area along the base of dunes. This allows public recreation to continue near thriving plants. The protection zones have proven successful, with seabeach amaranth and other rare plant species continuing to repopulate and expand in these areas.

Between 2001 and 2015, Island Beach State Park had an average of seven seabeach amaranth plants per year. After the 2016 expansion of protections throughout the park, the average number of seabeach amaranth jumped to 479 plants annually.

The protection zones also create habitat essential for beach-nesting birds to raise new young successfully. The piping plover (Charadrius melodus), a federally threatened shorebird, returned for nesting at Island Beach State Park in 2016 following a 27-year absence. Plovers have returned each year since, with 2019 marking the most successful year for the species in the park since protections were put in place in 2016, with six young birds fledged.

The same protections also allowed American oystercatchers (Haematopus palliatus), a species of Special Concern in New Jersey, to successfully nest on the ocean beaches for the first time.

Habitat protection at Island Beach State Park began as a pilot project by Raritan Valley Community College in 2008 and has been implemented since 2016 with grant funding received by the Branchburg College serving Somerset and Hunterdon counties, and the Pinelands Preservation Alliance.

Additionally, through its annual issuance of beach and dune maintenance permits, the DEP is regulating municipal beaches where seabeach amaranth and other federally listed plant and animal species occur. These permits include actions that must be taken to protect habitat for these species based on data collected by the DEP and its partners.

"Beach and dune maintenance permits issued to public and private entities are predicated on annual coordination as seabeach amaranth take root and bird species come to nest," said Division of Land Use Regulation Bureau Chief Ryan Anderson. "The cooperation and willingness of our regulated partners to adjust their maintenance activities based on the presence of sensitive species cannot be understated in the resurgence of seabeach amaranth."

For a fact sheet on plant protection strips and other information, visit **https://urldefense.com/v3/__http://www.fws.gov/northeast/njfieldoffice/endangered/amaranth.html*photos__;Iw!!J30X0ZrnC1oQtbA!cjPqEDgpoW-57P8qheZVqA7sWG5w36uOPqt0zu57fDQWhb4ZnEDM6DC1xttw6XZwudmgwYcC$**

(New Jersey Department of Environmental Protection – 12-24-19)

NEW USACOE NATIONWIDE PERMITS

The Obama Era USACOE Nationwide Wetland permits were due to expire in 2022. However, the USACOE has plans to rescind the existing Nationwide Wetland Permits and replace them with New 2020 Nationwide Permits that will be valid until 2025.

When will this happen?

The process is expected to start in early 2020. The permits are expected to be effective in mid-2020.

What happens to my existing Nationwide Permit?

Once the new Nationwide Permits go into effect, you will have 12 months to complete your project under the old Nationwide Permit.

What is changing?

There is too much to cover in a single email. There are 12 "priority" Nationwide Permits that have already been addressed in previous USACOE announcements. Plus, the New Waters of the US definition is a factor in these permits.

How can I learn more about this?

Join The Swamp School for its January 23, 2020 Wetland Status and Trends Webinar (https://swampschool.org/product/2020-wetland-status-and-trends/).

PA UPDATES

PADEP CHANGES REQUIREMENTS FOR AST EMERGENCY CONTAINMENT STRUCTURES

The Pennsylvania Department of Environmental Protection is issuing a Guidance Document to carry out certain provisions of the Storage Tank Act and related regulations. Emergency containment structures are present around many existing above-ground storage tanks, although more recent tanks installed will typically have double-wall tanks as the industry trend is away from installing separate secondary containment areas around single-wall ASTs. Tank owners must ensure that emergency containment structures for existing above-ground storage tanks area properly maintained and evaluated to determine the integrity of the containment structure. Specific focus is on evaluating emergency containment structures for above-ground storage tanks installed on or before October 11, 1997. One requirement is that newly installed or replacement emergency containment structures or emergency containment structure for above-ground storage tanks installed after October 11, 1997 shall have a perimeter of less than 1 times 10-7 centimeters per second at anticipated hydrostatic head and be of sufficient thickness to prevent the released regulated substance from penetrating the containment structure for a minimum of 72 hours, until the release can be detected and recovered. For more information go to:

PADEP TECHNICAL GUIDANCE DOCUMENT:

Draft TGD: Verification of Emergency Containment Structures for Aboveground Storage Tanks (263-0900-022)

PA BULLETIN

http://www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol49/49-50/1858.html (published 12/14/2019)

PADEP MANGANESE LIMIT BEING UPDATED

PADEP has worked with EPA on updating the limits for manganese and changes are proposed as follows:

DEP is proposing updates to 25 PA Code Chapter 93 as follows:

• Delete the Public Water Supply (PWS) criterion of 1.0 mg/L from §93.7, Table 3

• Add a Human Health criterion of **0.3 mg/L** to §93.8c, Table 5

DEP is also proposing to change water quality protection requirements in 25 PA Code Chapter 96.3. Annex A includes language which supports two alternative points of compliance for the proposed manganese criterion.

• The first alternative is to move the point of compliance to the point of all existing or planned surface potable water supply withdrawals. (This is the alternative that is consistent with Act 40, which was orchestrated by the coal industry.)

• The second alternative is to maintain the existing point of compliance in all surface waters (i.e., at the point of discharge).

DEP is seeking public comment on both alternatives.

For a complete picture, the following are links to the proposed rulemaking:

• DEP's recent presentation. Note page 7 for the calculations as to how they came up with 0.3 mg/l and page 7 for a self-explanatory map. DEP has included a safety margin of 3 in their calculations. This is based on a recommendation from EPA. **(http://files.dep.state.pa.us/PublicParticipation/Public%20Participation%20Center/PubPartCenterPortalFiles/Environmental%20Quality%20Board/2019/December%2017/7-553_Mn_EQB%20Dec172019.pdf)**

• Executive Summary **(http://files.dep.state.pa.us/PublicParticipation/Public%20Participation%20Center/PubPartCenterPortalFiles/Environmental%20Quality%20Board/2019/December%2017/7-553_WQS_Mn_Proposed/01_7-553_WQS_Mn_Proposed_ExecSum.pdf)**

• Preamble which explains DEP's rationale. **(http://files.dep.state.pa.us/PublicParticipation/Public%20Participation%20Center/PubPartCenterPortalFiles/Environmental%20Quality%20Board/2019/December%2017/7-553_WQS_Mn_Proposed/02_7-553_WQS_Mn_Proposed_Preamble.pdf)**

• Annex A which is the actual proposed reg. This may change slightly due to Senator Yaw's request and other interventions. **(http://files.dep.state.pa.us/PublicParticipation/Public%20Participation%20Center/PubPartCenterPortalFiles/Environmental%20Quality%20Board/2019/December%2017/7-553_WQS_Mn_Proposed/03_7-553_WQS_Mn_Proposed_Annex_A.pdf)**

• Regulatory Analysis form which is required by law and supposedly justifies DEP's actions. **(http://files.dep.state.pa.us/PublicParticipation/Public%20Participation%20Center/PubPartCenterPortalFiles/Environmental%20Quality%20Board/2019/December%2017/7-553_WQS_Mn_Proposed/04_7-553_WQS_Mn_Proposed_RAF.pdf)**

• Human Health Rationale **(http://files.dep.state.pa.us/PublicParticipation/Public%20Participation%20Center/PubPartCenterPortalFiles/Environmental%20Quality%20Board/2019/December%2017/7-553_WQS_Mn_Proposed/05_7-553_WQS_Mn_Proposed_Rationale.pdf)**

PACA is recommending that you look at, or have your consultants look at, your NPDES permit applications for what Mn levels you may have reported as part of the NPDES permit application process. Also, if you have a monitor and report or a limit for manganese in your permit, you may want to look at your Discharge Monitoring Reports to determine if you will be able to meet the proposed manganese level. If you have no Mn data, we are also strongly recommending that you take two - four samples upstream and downstream of your discharge to be able to at least make the argument that any high manganese values are not from your discharge. These should be taken in different seasons to get an overall picture.

We thank Josie Gaskey of PACA for this important update.

MODIFICATIONS TO THE DEP AIR QUALITY PROGRAM IN PENNSYLVANIA

Modifications to the DEP Air Quality Program in Pennsylvania were announced and final form Rulemaking Air Quality Fees are being modified, and final form Rulemaking is expected in the fall of 2020.

Increases in the fee packages are significant and there are changes in annual operating maintenance fees. Other changes include changes in the definition of

PA UPDATES (continued)

"synthetic minor facility" and there are Operating Permit modifications and associated permit fee increases as well. Requests for Determinations will now have fees that escalate in future years, however there is good news in that there is a small business exemption for the Request for Determinations.

More information can be found here: presentation
http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Advisory%20Committees/Air%20Quality%20Technical%20Advisory%20Committee/2019/12-12-19/AQ%20Fees%20FRN%20PPt%20for%20AQTAC%20Dec%2012%202019.pdf

revised Annex A
http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Advisory%20Committees/Air%20Quality%20Technical%20Advisory%20Committee/2019/12-12-19/AQ%20Fees%202019%20FRN%20AQTAC%20Draft%20Annex%20A%20Dec%2012%202019.pdf

CO2 budget trading
http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Advisory%20Committees/Air%20Quality%20Technical%20Advisory%20Committee/2019/12-12-19/AQTAC%20CO2%20Trading%20Program%20Regulation%20Concepts.pdf

TECHNOLOGY UPDATES

NEW DOCUMENTS FROM TECH DIRECT – 10-1-19

Green Remediation Best Management Practices: Excavation and Surface Restoration (EPA 542-F-19-002). Excavation of soil, sediment or waste material is often undertaken at contaminated sites to address immediate risk to human health or the environment; prepare for implementation of remediation technologies and construction of supporting infrastructure; and address contaminant hot spots in soil or sediment. The excavation and subsequent backfilling processes rely on use of heavy earth-moving machinery and often involve managing large volumes of material. Many opportunities exist to reduce the environmental footprint of the various cleanup activities and improve ultimate restoration of the disturbed land, surface water and ecosystems. The updated "Green Remediation Best Management Practices: Excavation and Surface Restoration" fact sheet issued by the U.S. Environmental Protection Agency outlines specific best management practices (BMPs) that can be used to minimize the environmental footprint concerning emission of air pollutants and use of water, energy, and other resources at excavation sites. The refined set of BMPs is based on recent experiences reported by regulators, property owners, cleanup service contractors and other stakeholders in the cleanup community (August 2019, 5 pages). View or download at:
https://clu-in.org/greenremediation/.

Technology Innovation News Survey Corner. The Technology Innovation News Survey contains market/commercialization information; reports on demonstrations, feasibility studies and research; and other news relevant to the hazardous waste community interested in technology development. Recent issues, complete archives, and subscription information is available at https://clu-in.org/products/tins/. The following resources were included in recent issues:

- Voluntary Remediation Program Compliance Status Report: Thomasville National Bank, 301 N. Broad Street, Thomasville, Thomas County, Georgia
- Development and Optimization of Analytical Methods for Simultaneous Determination of IM and Legacy Explosive Compounds
- The Use of Advanced Molecular Biological Tools in Groundwater Contaminated with Chlorinated Solvents [Webinar]
- A Rigorous Demonstration of Permeability Enhancement Technology for In Situ Remediation of Low Permeability Media
- Hexavalent Chromium Treatment Technologies
- Assessment of Pump-and-Treat System Impacts on 200 West Aquifer Conditions: Interim Status Report
- PFAS and Other Emerging Contaminants Conference
- Green Remediation Best Management Practices: Sites with Leaking Underground Storage Tanks
- Geophysical Methods for Characterization and Monitoring at Groundwater Remediation Sites

Overview of a large scale Phytoremediation project in the USA. With the Great Lakes Restoration Initiative, the Forest Service works in partnership with cities, counties, and corporations to install phytoremediation sites. The initiative is in its fourth year of annual funding, and altogether, about 20,000 trees have been planted at 16 phytoremediation sites in the Lake Michigan and Lake Superior watersheds. The trees are mostly fast-growing willows and poplars, which are ideal for phytoremediation because they grow quickly and have deep and extensive root systems. View more information at https://www.usda.gov/media/blog/2019/08/30/trees-can-do-dirty-work
waste-cleanup

TECHNOLOGY UPDATES

CL:AIRE BULLETIN: BIO-RESTORATION OF METAL-CONTAMINATED SOIL USING BIOCHAR TO ENHANCE THE PRODUCTIVITY OF MARGINAL LAND (2019)

CL:AIRE INSPIRATION bulletins describe practical aspects of research which have direct application to the management of contaminated soil or groundwater in an agricultural context. This bulletin describes how the properties of biochar can influence its performance for the restoration of metal-polluted soil. View more information at *https://www.claire.co.uk/component/phocadownload/category/66-inspiration-bulletins?download=692:ib8-bio-restoration-of-metal-contaminated-soil-using-biochar-to-enhance-the-productivity-of-marginal-land-2019.*

(USEPA – Tech Direct – 10-1-19)

TECHNOLOGY UPDATES (continued)

2019 WAS THE 2ND WETTEST YEAR ON RECORD FOR THE U.S.

The nation also experienced 14 billion-dollar weather and climate disasters last year

It was another year of record-making weather and climate for the U.S. in 2019, which was the second wettest behind 1973.

Warmer-than-average temperatures were felt by much of the country including Alaska, which logged its hottest year on record.

Alaska also experienced destructive wildfires that, when combined with those in California, caused damages in excess of $1 billion. Thirteen other billion-dollar disasters that struck the U.S. last year included Hurricane Dorian, historic flooding and severe storms.

Here's a recap of the climate and extreme weather events across the U.S.in 2019:

Climate by the numbers

2019 | January through December

Precipitation across the contiguous U.S. totaled 34.78 inches (4.48 inches above the long-term average), ranking 2019 as the second-wettest year on record after 1973, according to scientists from NOAA's National Centers for Environmental Information.

By year's end, 11 percent of the contiguous U.S. was in drought. In April, drought conditions had reached a low of 2.3 percent, the smallest drought footprint in the 20-year history of the U.S. Drought Monitor.

The average temperature measured across the contiguous U.S. in 2019 was 52.7 degrees F (0.7 of a degree above the 20th-century average), placing 2019 in the warmest third of the 125-year period. Despite the warmth, it was still the coolest year across the Lower 48 states since 2014.

There were some standouts in 2019, including Alaska, which had its hottest year ever recorded — 6.2 degrees F warmer than the long-term average. Georgia and North Carolina also saw their hottest year on record, while Michigan, Minnesota, North Dakota, South Dakota and Wisconsin each had their wettest year ever recorded.

(NOAA – 1-8-2020)

(USEPA – Tech Direct -10-1-19)

OEPA RULES EFFECTIVE JANUARY 1, 2020
RESTRICTION ON LANDS WHERE HAZARDOUS OR SOLID WASTE FACILITIES WERE OR ARE OPERATED

Rules Governing
Authorizations to engage in filling, grading, excavating, building, drilling, or mining on land where a hazardous waste facility or a solid waste facility was operated.

Notice is hereby given that the Director of the Ohio Environmental Protection Agency (Ohio EPA) has final filed the following rules of the Ohio Administrative Code:

3745-27-13	Procedure to engage in filling, grading, excavating, building, drilling or mining on land where a hazardous waste facility or solid waste facility was operated.	Rescind
3745-513-01	Procedure to engage in filling, grading, excavating, building, drilling or mining on land where a hazardous waste facility or solid waste facility was operated – applicability.	New
3745-513-02	Definitions.	New
3745-513-05	Exclusions.	New
3745-513-20	Issuance, denial, termination, and revocation of an Authorization to engage in chapter 513 activities.	New
3745-513-300	Application procedures for modern and historic facilities.	New
3745-513-350	Implementation requirements for modern and historic facilities.	New
3745-513-370	Certification report for modern and historic facilities.	New
3745-513-400	Application procedures for sampling, testing, or delineating the limits of waste placement.	New
3745-513-450	Implementation requirements for sampling, testing, or delineating the limits of waste placement.	New
3745-513-470	Certification report for sampling, testing, or delineating the limits of waste placement.	New

The Director's order of adoption was issued on December 11, 2019. These adopted rules will become effective on January 1, 2020.

The Director's action in this matter is pursuant to the procedural requirements of Ohio Revised Code Chapter 119 and is based upon the record of the public hearing conducted by Ohio EPA on October 24, 2019, and comments received during the public comment period.

You are hereby notified that this action of the Director is final.

NJDEP AWARDS MORE THAN $14 MILLION IN GRANTS TO LOCAL AND COUNTY GOVERNMENTS TO ENHANCE RECYCLING EFFORTS

The New Jersey Department of Environmental Protection is awarding more than $14 million in grants to municipal and county governments to enhance recycling efforts, Commissioner Catherine R. McCabe announced today.

The annual https://www.nj.gov/dep/dshw/recycling/stats.htm are awarded through the state's Recycling Enhancement Act, which authorizes a $3 per-ton surcharge on trash disposed at solid waste facilities to fund recycling efforts. The DEP allocates this money back to municipalities and counties based on their recycling accomplishments. This year's grants are based on recycling performance in 2017.

"Recycling remains an important way for residents to help protect the environment," Commissioner McCabe said. "Recycling conserves resources, reduces the amount of trash that is sent to solid waste facilities, and helps reduce emissions of greenhouse gases. These grants will fund efforts that have become even more important as we look for ways to address changes and challenges in recycling markets that are occurring across the nation."

Each year, recipients use these grants to improve recycling rates through a variety of initiatives, including funding recycling coordinator positions, providing recycling receptacles and pickup in public places, upgrading recycling drop-off centers, conducting education and outreach, and implementing curbside recycling pickup programs.

The DEP attributes the 4-percent decline in the 2017 municipal solid waste recycling rate to manufacturers of consumer products, such as drink bottles, continuing to shift to lighter materials such as plastic over glass. Manufacturers are also using thinner and lighter weight plastics. In addition, the volume of newspaper recycled continues to shrink as consumers increasingly rely on smartphones, tablets, and other electronic devices for information.

The DEP is also making available up to https://www.nj.gov/dep/grantandloanprograms/swrea-higher-ed.htm for New Jersey's higher-education institutions to conduct research and demonstration projects to strengthen recycling in the state. Specifically, the new grants will provide funds for projects in each of four categories to:

• Research recycling markets and identify the role government can plan in encouraging recycling while identifying impediments to recycling markets and programs; • Study the composition of the state's waste stream – including the amount of the waste stream that is comprised of food waste – to better inform recycling and source-reduction efforts in the state; • Research, design and implement a solid waste and/or food waste recycling-exchange-reduction-reuse project or demonstration at an institution, and; • Create a public outreach campaign to educate and motivate residents to reduce the amount of food they waste.

"New Jersey is proud to be the first state to require recycling," said DEP Assistant Commissioner for Site Remediation and Waste Management Mark Pedersen. "We expect that these grants will further ongoing recycling efforts in our communities and educate the public about the importance of proper recycling."

Municipalities receiving recycling tonnage grants of $100,000 or more are:

Vineland, Cumberland County, $330,051; Jersey City, Hudson County, $267,960; South Brunswick, Middlesex County, $261,467; Paterson, Passaic County, $236,050; Newark, Essex County, $220,124; Woodbridge, Middlesex County, $211,903; Toms River, Ocean County, $190,415; Parsippany-Troy Hills, Morris County, $179,992; Edison, Middlesex County, $172,233; Passaic City, Passaic County, $160,267; and Hamilton, Mercer County, $150,719.

Also, Paramus, Bergen County, $144,982; Secaucus, Hudson County, $144,738; Logan, Gloucester County, $143,023; Lakewood, Ocean County, $140,559; Raritan, Hunterdon County, $137,008; Fair Lawn, Bergen County, $135,480; Clifton, Passaic County, $127,762; Middletown, Monmouth County, $122,861; Florence, Burlington County, $119,553; North Bergen, Hudson County, $116,714; Monroe, Middlesex County, $114,965; Cherry Hill, Camden County, $114,682; Brick, Ocean County, $112,023; and East Orange, Essex County, $106,334.

(NJDEP News – 12-20-19)

FEDERAL REGISTER NOTICES

http://www.federalregister.gov

EPA Proposed Rule – National Emission Standards for Hazardous Air Pollutants: Lime Manufacturing Plants Residual Risk and Technology Review
(Federal Register – 9/16/19)

EPA Notice – Intent to Develop a Policy on the Determination of a Harmful Algal Bloom (HAB) and Hypoxia as an Event of National Significance in Freshwater Systems
(Federal Register – 9/16/19)

EPA Proposed Rule – National Emission Standards for Hazardous Air Pollutants: Taconite Iron Ore Processing Residual Risk and Technology Review
(Federal Register – 9/25/19)

EPA Proposed Rule – National Emission Standards for Hazardous Air Pollutants: Iron and Steel Foundries Residual Risk and Technology Review
(Federal Register – 10/9/19)

EPA Proposed Rule – National Emission Standards for Hazardous Air Pollutants: Generic Maximum Achievable Control Technology Standards Residual Risk and Technology Review for Ethylene Production
(Federal Register – 10/9/19)

EPA Rule – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
(Federal Register – 1/13/19)

EPA Proposed Rule – National Primary Drinking Water Regulations: Proposed Lead and Copper Rule Revisions
(Federal Register – 11/13/19)

EPA Proposed Rule – Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category
(Federal Register – 11/22/19)

EPA Rule – Increasing Recycling: Adding Aerosol Cans to the Universal Waste Regulations
(Federal Register – 12/9/19)

EXXON DENIES IT MISLED INVESTORS ON CLIMATE RISKS

NEW YORK (AP) — Climate change might be the defining risk for oil and gas companies in coming decades, and attorneys for New York state are saying Exxon Mobil misled investors about how it was handling that risk.

The state made closing arguments Thursday in a case that accused the energy giant of downplaying the impact of stricter climate regulations in a warming world.

Exxon countered that the company has been taking climate change risks seriously and its executives did nothing wrong.

The lawsuit, brought by New York State Attorney General Letitia James, says Exxon Mobil used two sets of books to account for how potential regulations would impact its business.

"The question in this case is whether Exxon's disclosures were accurate, and the evidence shows they were not," said attorney Jonathan Zweig, arguing for the state.

In shareholder meetings and reports, Exxon was using two different metrics to account for stricter climate regulations: greenhouse gas costs, which measure how local regulators may tax emissions, and proxy costs, which aim to predict how demand for oil and gas may change around the world due to regulations. Exxon attorneys and executives have said the company applied appropriate costs depending on the situation.

But the state says Exxon was conflating these concepts, leading investors to believe the company was applying a projected cost of $80 per ton for its emissions when it was not, and making some oil and gas development projects look more attractive to investors, Zweig said.

"Exxon applied much lower costs or no costs at all," Zweig said.

For example, Exxon made an $850 million investment into a chemical facility in Beaumont, Texas, but didn't apply the appropriate greenhouse gas costs in its projections, Zweig said. Instead, "Exxon was making a business as usual assumption that existing law would be frozen in place forever," Zweig said.

In assessing an oil sands project in Alberta, Canada, Exxon assumed costs would remain flat through 2030 and 2040, instead of applying escalating costs for the likelihood of increasingly stringent climate regulation, Zweig said.

"The reality is that many investors, including some of the largest financial firms in the world, believe there is a real likelihood that governments will rise to the challenge of climate change," Zweig said.

Exxon Mobil denied the charges, saying the energy giant developed internal metrics to determine how future climate regulations would impact its business.

"Exxon Mobil took climate risk seriously," said Ted Wells, an attorney from law firm Paul, Weiss, Rifkind, Wharton & Garrison who represented Exxon. "This is not a case where we said one thing to the public externally and ignored it internally. We did what we said, and we showed you the model so you could see it."

Exxon denied using two sets of books and said its executives made it clear they were applying proxy costs in all cases and greenhouse gas costs where appropriate, because each situation is different.

In Alberta, Exxon executives drilled down on the greenhouse gas issue and decided to use existing local regulations in their projections because they did not think politicians would escalate their policies, Wells said.

New York failed to prove investors were harmed because none of the state's witnesses were investors who read Exxon's reports and later said they felt misled, he said.

"I'm not saying they have to bring hundreds of investors into the courtroom, but they've got to bring somebody," Wells said.

(Courier Post – 11/9/19)

PENNSYLVANIA BULLETIN NOTICES

8/31/19 – Regulations – The Department of Environmental Protection published notice of a proposed State Air Quality Implementation revision to implement EPA's regional haze requirements and update DEP's best available retrofit technology determinations for public comment.

8/31/19 – Technical Guidance – The Department of Environmental Protection published notice of draft technical guidance related to Pennsylvania Sewage Facilities Act Program Guidance; Site Suitability and Alternatives Analysis Guidelines for New Land Development Proposing Onlot Sewage Disposal.

9/28/19 – Technical Guidance – The Department of Environmental Protection published notice of a federal consistency determination under the Coastal Zone Management Act for the development of an autoport facility at the Philadelphia Navy Yard.

10/19/19 – Regulations – The Public Utility Commission published notice setting the schedule for electric and natural gas utilities to submit Energy Conservation and Universal Service Plans and related impact evaluations.

10/19/19 – Technical Guidance – The Department of Environmental Protection published notice inviting comments on draft technical guidance on Radioactivity Monitoring at Solid Waste Processing and Disposal Facilities adding provisions related to the oil and gas industry (DEP ID: 250-3100-001).

11/2/19 – Regulations – The Environmental Quality Board published notice inviting comments on proposed changes to regulations on water supply replacement related to surface coal mining operations.

The primary purpose of the rulemaking is to bring state regulations into conformance with federal requirements, codify language in regulation that current exists in technical guidance and to include provisions for temporary water supplies, among other changes.

11/2/19 – Permits – The Department of Environmental Protection published notices of Nutrient Credit Trading Program certification requests and mass certification in Chesapeake Bay Watershed.

11/23/19 – Permits – The Department of Environmental Protection published notice that the per acre Reclamation Fee for 2020 will be $100 per acre. Since 2010, the Reclamation Fee has been $0.00, except for calendar year 2016 when it was $100 per acre.

12/7/19 – Permits - The Department of Environmental Protection published notice it has extended the term of the basic General NPDES Permit covering Stormwater Associated with Construction Activities – PAG-02 for another 5 years.

12/7/19 – Permits - The Department of Environmental Protection published notice it is renewing Base General Permit WMGR096 through June 2021 to allow time for the agency to review the many extensive comments it received on the permit during a public comment period in October.

12/7/19 – Permits - The Pennsylvania Infrastructure Authority and the Department of Environmental Protection published notice of environmental assessments approved for drinking water and waste water infrastructure improvement projects to be considered for funding.

12/14/19 – Technical Guidance – DEP Finalizes Policy on Public Participation in Development of Regulations – The Pennsylvania Department of Environmental Protection published notice of a final version of its Policy for the Development and Review of Regulations is now available. (DEP ID: 012-0820-001)

This document explains the process the Department follows to develop regulations necessary to effectively implement Commonwealth and Federal environmental laws for promulgation as appropriate, based on the expertise of Department and other Commonwealth agency staff, Departmental advisory committees, boards and councils, and based on comments received during the public participation process.

The draft document was made available for a 60-day public comment period in October of 2017 and received comments form 11 individuals and organizations.

Clarifying revisions were made in response to the comments received, including adding environmental statutes to the list appearing on the first page of the policy, amending the regulatory review flow chart and the addition of two appendices.

12/21/19 – Regulations – The Environmental Quality Board published notice of a final regulation setting additional requirements for the control of fine particulate matter.

2019

2ND WETTEST YEAR ON RECORD IN THE US

SEE PAGE 8

RT Environmental Services, Inc.
215 West Church Road
King of Prussia, Pennsylvania 19406

PRSRT STD
U.S.Postage
PAID
Lehigh Valley, PA
Permit #159

KEY HIGHLIGHTS

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