



PPC PLAN RECERTIFICATIONS - ANNUAL FREQUENCY FOR SOME FACILITIES

Facilities that have prepared a Preparedness, Prevention and Contingency Plan (PPC Plan) under the PADE "Guidelines for the Development and Implementation of Environmental Emergency Response Plans" (400-2200-00 August 6, 2005) AND which are EPCRA Section 313¹ Facilities, must comply with Section 2, Element H of "Supplemental Guidance for the Development and Implementation of Preparedness, Prevention and Contingency (PPC) Plans Under the National Pollutant Discharge Elimination System (NPDES) Storm Water Permitt Program". The Supplemental Guidance can be found in the Addendum to the Guidelines.

One component of Element H is that a "Professional Engineer shall certify that he or she has examined the facility and is familiar with the provisions in the PPC Plan and can attest that the PPC Plan has been prepared in accordance with good engineering practices. The Professional Engineer must recertify the PPC Plan once a year."

This annual recertification frequency differs from the otherwise applicable recertification of SPCC Plans, (every 1 years or when there have been technical changes to the SPCC Plan).

RT has in depth experience in assisting facilities in preparation and/or review of both PPC Plans and SPCC Plans. For more information on PPC or SPCC Plans please contact Lawrence W. Bily by phone at 610-201-1510 extension 236 or at lbily@rtenv.com; or contact Gary R. Brown at extension 234 or gbrown@rtenv.com.

¹ An EPCRA Section 313 Facility means a facility that manufactures, imports, processes or otherwise uses listed toxic chemicals and which, pursuant to Section 313 of SARA Title III, are required to annually report releases of those chemicals to any environmental media.



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