



## ECS Regulatory Alert Summer 2011

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## EPA Puts a Hold Final Boiler MACT Rule

Just a few weeks after our last regulatory alert went out, the EPA decided to put a hold on the Boiler MACT rule implementation. The Boiler MACT Rule will likely be implemented sometime this year, but for now, EPA is again seeking public comment on the rule. ECS will keep our clients updated as new developments occur.

## Are Amendments Eminent for SSOA and Permit by Rule Permit Holders?

The answer is very likely YES! On May 31, 2011, IDEM sent out letters to companies with SSOA and Permit by Rule type permits. The purpose of this letter was to alert permit holders of IDEM's intent to modify their permits to meet current US EPA standards. Permit holders have until the end of June to make comments for IDEM's consideration. The contact at IDEM for such comments is Amy Smith and you can reach her at (317) 233-8628 or [asmith@idem.in.gov](mailto:asmith@idem.in.gov).

These rule changes are not surprising since IDEM must demonstrate to US EPA that they are meeting all federal guidelines in their air permitting programs. The SSOA and Permit by Rule programs have not been modified to keep up with such requirements as current emission factors, reporting and documentation requirements, etc.

At this time, IDEM has not specified exactly what this means to the permit holders. ECS suspects that once IDEM has approval by US EPA to update their programs, permit holders may have to reapply for their SSOA or Permit by Rule status in order to update information and assure that they still fall below category thresholds. ECS will keep our clients updated on IDEM's plans as they release information.

### We take requests!

Please submit your topic requests for the next regulatory update to:  
[Jennifer@ecshelp.com](mailto:Jennifer@ecshelp.com)



QUESTIONS? CALL US AT 812-945-1541 OR EMAIL [JENNIFER@ECShelp.COM](mailto:JENNIFER@ECShelp.COM)

## 2011 Reminders

All companies with environmental regulatory obligations should have an environmental calendar. This is a great time of year to make sure you have yours set up for 2011. Some key dates to include:

**Air Permit Reporting Deadlines:** quarterly reporting (if applicable), annual certification.

**Wastewater:** sampling and reporting deadlines as dictated by your permit.

**Stormwater:** sampling, reporting and inspecting as per your SWP3 document and your permit. Don't forget the annual audit requirement.

Do you have a list of when all your permits expire and the timetable for submitting renewal paperwork?

**EPCRA: SARA Title 3, Tier II** due March 15, **SARA 313, TRI** report due 6/30. Note on your calendar to get purchasing reports if applicable.

**Hazardous Waste:** Annual Reports are due in March. Start accumulating your manifests at the end of the year.

## Hot Dot—Exciting New Technology for Heat Exhaustion Management



An ECS client recently introduced us to the “Hot Dot” made by IonX in Lexington, KY. The Hot Dot is a small one inch “dot” which is placed on the skin to detect overheating.

The Hot Dot color shifts as demonstrated above. It starts out as a black dot and as the person wearing it gets hotter, the dot begins to convert to bright yellow.

The material from which the Hot Dot is made is actually yellow. On top of that material is sprayed a special type of black ink. When the wearer’s body core becomes overheated, the ink on the dot “stands up” revealing the bright yellow. As the wearer’s body cools back down, the dot returns to black.

A single Hot Dot is meant to be placed on the wearer on such locations as the inside of the elbow or on the neck. It has a similar adhesive to a band-aid and will last for one working day.

The Hot Dot was used on workers cleaning up the Gulf Oil Spill this past year. The workers started their project using military protocols of 30 minutes working and 30 minutes cooling off. The next day they used the Hot Dot and started cool down periods based on the color of the dot, returning to work when the dot was black again.

Using military protocols, the cleanup team still had 12 recordable incidents for heat related illnesses. With the Hot Dot, the team had more frequent cool down periods, but those cool down periods were also shorter since the cooling was monitored by the dot. In addition, there were zero heat related illnesses using the Hot Dot.

The cost of the Hot Dot is about \$1 per dot. The company sells in bulk for a discounted rate. If you’d like to learn more about how you can purchase the Hot Dot for your organization, call (859) 258-2690 or visit their website at [www.ionxalert.com](http://www.ionxalert.com).

If your organization decides to try the Hot Dot, send ECS a note telling us how it worked for your organization!

Special thanks to Chris Cruise of Orica Inc. for sharing this terrific technology.

## Crooks & Triplett to speak at the AHMP Conference

Evelyn Crooks and Jennifer Triplett will be making a presentation at the annual Alliance of Hazardous Materials Professionals Conference (formerly ACHMM). The conference will be held the last week of August in Austin, Texas.

The presentation is entitled, “Your Aspects Really Do Matter!” This presentation is designed to help companies with an ISO 14001 system to shore up their program and make the most of their Environmental Management System.

If you’d like to get more information about attending the conference, check out the AHMP conference page at: <http://www.ahmpnet.org/sites/conf/austin2011/home.php>

Our presentation is scheduled for Monday, August 29th at 4:15.

We hope to see some friendly faces in the audience!

QUESTIONS? CALL US AT 812-945-1541 OR EMAIL [JENNIFER@ECSHELP.COM](mailto:JENNIFER@ECSHELP.COM)

## Environmental Stewardship Aboard a Cruise Ship

I just came back from an Alaskan Cruise with my family. My parents and all my siblings & spouses were on this trip celebrating my parent's 50th wedding anniversary.

Ever mindful of how environmental, health & safety issues affect every aspect of our lives, I like to look for regulatory issues even on vacation (yes, I am a regulatory nerd). This article is about my interview with the EHS manager on board the Holland America Westerdam.

As some of you know, my father is an ISO 14001 and 18001 auditor and since we were on the cruise together, I called the EHS manager and asked for an audience for the two of us. The EHS Manager (only introduced himself as "Roy") was gracious to receive us and speak with us for the better part of an hour.

We learned that all of the Holland America cruise ships have a full time EHS manager. Roy's duties include not only environmental, health & safety, but also food safety.

It turns out that the Holland America Corporation is ISO 14001 certified by Lloyds of London. Roy said he believes that they were perhaps the first line of cruise ships with this certification. It is apparently becoming more common for cruise lines to seek 14001 certification.

The cruise ship industry has been plagued with bad PR due to waste dumping in the ocean. As a result, the 14001 certification is an excellent way for a cruise line to differentiate themselves and be held accountable for their performance.

Due to security issues, we were unable to tour the facilities below decks, but we were given an Environmental Stewardship DVD which gave an overview of the technology and processes used on board.

I was amazed to learn that the Westerdam has a desalination plant and drinking water treatment plant on board. So the water we were drinking on the cruise was in fact ocean water which had the impurities removed.

In addition, the Westerdam also has a wastewater treatment plant for "black water" which includes waste from toilets, cleaning water and kitchens. Gray water from showers could be directly discharged to the ocean, however the Westerdam usually combines all waters for treatment.



I asked EHS Mgr Roy how they handled adhering to regulatory requirements since they make so many stops in port. He indicated that their corporate office investigates the regulations from their Flag State (the country of origin), the Port State (the state/country where they will dock) and any other regional requirements. In addition, they are subject to MARPOL regulations which are the United Nations regulations particular to ships.

Now, you probably thought dealing with one state and federal entity making rules for your organization was taxing enough, but just imagine the number of rules applicable to cruise ships with many different itineraries.

Holland America has integrated programs, procedures and technology which allow them to minimize the impact to the environment. This includes sorting waste, recycling and grinding food waste into a paste prior to discharging it deep into the ocean as "fish food".

In addition to handling wastewater and drinking water, the ship also processes bilge water to remove any oil prior to discharge. Holland America has invested in new technology to assure that oil is stripped from the bilge water and doesn't contaminate the ocean.

They are currently experimenting with scrubber technology to diminish the diesel particulate coming from their engines. They are using salt water from the ocean, spraying it into the diesel exhaust to collect the SO<sub>2</sub> and NO<sub>2</sub> prior to discharge. Then, they run the water back through a filter to remove the contaminants prior to discharging.

All in all, I was impressed with the efforts Holland America has gone to assure not only environmental compliance but regulatory excellence! I would definitely cruise on Holland America again!