

Environmental, Health & Safety News

New Look, New Content

Change is fun. You can't miss the new format and layout. You will also note that the title has changed to include environmental and health topics along with the usual safety reminders. As has always been the case, I would appreciate your input. Let me know what you think and provide ideas on topics to cover. Future issues will have contributions from the entire EHS Team: Terry Jones, Bill Shipe, Brian Hood, Steve Henderson, Mark Michael and of course your editor-in-chief—Walt Tharp. If you have something that could be of interest to the imi family related to environmental, health and safety issues, please submit it to your local representative or send it to me.

Words of Wisdom:

Most folks are about as happy as they make up their minds to be."
--Abraham Lincoln,
16th U.S. president



USEPA 3-Year Enforcement Initiative Targets Ready-Mixed Concrete Industry— by Brian Hood

The USEPA recently announced a 3-year enforcement initiative which will target three industries, including ready mixed concrete facilities (along with residential development and big-box development). The enforcement initiative will also include aggregate facilities (sand & gravel, and crushed stone), both with and without co-located concrete plants.

This effort will take place over a 3-year period, with the initial phases being taken up by outreach and education, followed by enforcement action against those who continue to act in a manner contrary to regulation.

This enforcement effort is directed towards "storm water", given the USEPA's belief that there is a significant level of non-compliance in these industries. It is highly likely that this enforcement effort will also concentrate on non-storm water issues, such as process wastewater management, management of commingled discharges (storm water + process water), petroleum and chemicals (particularly SPCC plans). Inspections conducted to date have shown that virtually anything having to do with environmental compliance will be fair game during these inspections.

These inspections (and enforcement action, if necessary) will occur in both NPDES delegated and non-delegated states, and may (or may not) occur in conjunction with state inspections. In other words, depending upon a good relationship with a state environmental regulatory inspector may not be enough.

The following are steps we should continue implementing not only in response to this enforcement effort but also in keeping with the requirements in our current permits:

1. Perform environmental audits at each location.
2. Ensure compliance with NPDES storm water discharge permits, including having an up-to-date SWPPP/BMP, conducting inspections and monitoring as required, implementing BMPs, and recordkeeping requirements.
3. Ensure we know the difference between storm water and non-storm water discharges, particularly as they relate to our storm water/process water discharge permits.
4. Ensure process wastewater is being managed appropriately at our plants and at jobsites.
5. Ensure we have an up-to-date SPCC plan at each location where it is required.
6. Train our personnel in environmental matters.
7. Job Site wash-off. This is becoming a hot-topic for USEPA and many municipalities as enforcement of workplace sediment control plans increases. It is important that our drivers understand that the only acceptable place to wash-off is within a sediment control structure. USEPA has established rules for water runoff, States have been required to meet these rules, and municipalities are involved on the local level in assuring compliance. More training on this issue is forthcoming.

