



Westward Environmental, Inc.

“Solutions for the Preservation of Industry
and the Environment ”

June 2007
Issue 12

REGULATORY ALERT!!

NEW HMP Stack Testing Requirements

It is our understanding that as of July 10, 2007, all drum dryer filter systems on all hot mix asphalt plants authorized under the TCEQ Standard Permit shall meet at least a front half outlet grain loading of 0.01 grains per dry standard cubic feet (gr/dscf) and a combined (front half and back half) total outlet grain loading of 0.04 gr/dscf.

According to (2)(C) of the Standard Permit, existing facilities must conduct sampling no later than September 8, 2007 to demonstrate compliance with this new standard.

The new standard of 0.01 gr/dscf for front half outlet grain loading is a more stringent requirement than the existing standard of 0.02 gr/dscf. The combined (front half and back half) total outlet grain loading of 0.04 gr/dscf will not change.

Under the TCEQ Standard Permit for hot mix asphalt plants, permittees are required to submit stack sampling to satisfy the permit requirements. Stack testing is to be completed in accordance 40 CFR Part 60 Subparts A and I, or a DILOT (Data In Lieu Of Testing) must be submitted, within 60 days of achieving the maximum allowable production rate or no later than 180 days from initial startup of the plant.

Also, hot mix asphalt plants under new air construction permits will have to meet the new requirements. Furthermore, permit amendments for existing plants will trigger a BACT review requiring compliance with the new standard.

For more information on this subject, please contact Matt Bellos, Environmental Specialist with Westward Environmental, Inc., by phone at 830.249.8284 or mbellos@westwardenv.com.

Inside this issue:

HMP Stack Testing	1
Toxic Release Inventory Reporting	2
Rocks in Your Mouth?	2
State of Texas Environmental Electronic Reporting System (STEERS)	3
Winds of Change Part II	3
Yes, We Can Do That	4
Contact Information	4



www.westwardenv.com

TOXIC RELEASE INVENTORY REPORTING

by Julie Morelli

The Emergency Planning and Community Right-to-Know Act (EPCRA) Section 313 requires some manufacturing facilities to report the total annual release or use of certain chemicals listed in Section 313. Toxic Release Inventory (TRI) reports provide information to the public and government officials about the use, release, disposal, and/or recycling of toxic and/or persistently bio-accumulative toxins (PBTs). Consideration is given to releases of subject chemicals into air, water, and land. Even storm water runoff must be evaluated when determining the quantity of chemical released to the environment.

A facility must meet all three of the following requirements to be subject to Section 313 reporting:

- The facility's SIC code is between 20 and 39-(*Asphalt Plants SIC 2951 are included*) and,
 - The facility has 10 or more full-time employees at the site (or the equivalent man-hours worked in a year, including all part-time and dedicated, off-site support labor); and,
- The facility manufactures, processes, or otherwise uses any of the chemicals listed in EPCRA 313. (*For Asphalt Plants - Lead and Lead Compounds and Polycyclic Aromatic Compounds-PACs are common triggers*).

TRI chemicals may be reported on one of two forms to the Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ). The short form (Form A) may be used for facilities that manufacture, process, or otherwise use non-PBT chemicals in quantities under 5,000 pounds per year and 2,000 pounds per individual chemical. The long form (Form R) must be used when these thresholds are exceeded. *Most asphalt plants trigger the requirement for TRI reporting due to PAC content in asphaltic cement, but often do not require the long Form R submittal.*

TRI reports are due to the EPA and TCEQ on or before July 1st each year. An owner/operator of a subject facility is required to submit a \$25 fee for each toxic chemical for which a form is required, a maximum fee of \$250.



ROCKS IN YOUR MOUTH? A Brighter Smile Thanks to Mining

by Michelle M. Lee, P.G.

This is the second in a series of articles that looks a takes a look at the intriguing world of rocks and minerals and their role in our everyday lives. Everything is made of something and the reliance on our natural resources is critical for enjoying a comfortable way of life and even for survival.

This article will take a little deeper into something you have probably not stopped to wonder about – toothpaste. Toothpaste? What do rocks and minerals have to do with toothpaste? Good question.

Well, for starters, what is it that actually cleans your teeth? You are probably thinking it is the action of the toothbrush that does most of the cleaning of those pearly whites. That is partially true. In actuality, there are abrasives in the toothpaste like silica, limestone, aluminum oxide and various phosphate minerals that rub and scrub your teeth too.

In addition, fluoride is used to reduce and prevent cavities from forming in our teeth. Today, kids are likely to get fluoride treatments at the dentist as part of a maintenance program to help keep decay at bay. Fluoride comes from the mineral Fluorite which occurs in beautiful purple, blue or pink colored crystals. You may also have heard of the term stannous fluoride. Well stannous is Latin for tin. So if you have this combination of cavity fighter in your brand of toothpaste, then you are in essence brushing with tin and fluorite. Stop by our office sometime and I will show what some of these rocks and minerals look like.

Ok, we know that to this point, there are about 10 or so minerals and elements in toothpaste to clean your teeth and help prevent cavities. What else is there? Let's discuss how toothpaste looks. Titanium dioxide is used for coloring some pastes white and shades thereof. Titanium dioxide comes from the minerals rutile, ilmenite and anatase. Guess what else titanium dioxide is used in? It is the white M on those sugary, yummy M&M candies. All the more reason to brush your teeth. The sparkling flakes in some brands are the mineral mica also known as muscovite.

Your toothbrush is made of plastics which come from primarily from petroleum and other minerals. So what did people use to clean their teeth with in the olden days before these modern day marvels were discovered? Well, according to the Minerals Information Institute (MII), from where this information was borrowed, a toothbrush was either wool moistened with honey or a twig that was chewed on one end to soften it, making it into a primitive toothbrush. Ready for this? Ever wonder what early day toothpaste was made of? The toothpaste used by some was ground up bones of mice. Porcupine quills were used as toothpicks in some areas.

One more tasty fact for you, dentists across the United States use about 13 tons of gold for crowns, bridges and dentures! So I guess you can really say there are rocks in your mouth. Just be sure not tot talk with your mouth full!

THE WINDS OF CHANGE—Part II

By David Knollhoff

This article is a follow up of the previous article from Newsletter #11 titled *The Winds of Change - Part I*.

Even with the official implementation of the new regulatory air dispersion model (AERMOD - which is replacing ISC3) as of December 9, 2006, the Texas Commission on Environmental Quality (TCEQ) is continuing to allow the old air quality dispersion model, ISC3, to be utilized for an unspecified timeframe (if you will, an extended grace period) in Texas.

Within a TCEQ minutes memo titled *TCEQ, Air Permits Division Modeling and Effects Review Advisory Group Minutes* dated October 26, 2006, the author states (that even though TCEQ prefers that AERMOD be utilized for all refined air dispersion modeling demonstrations) that TCEQ will allow ISC3 to be utilized for a minor source of emissions (i.e., hot mix asphalt plant) when applying for a state New Source Review (NSR) air quality pre-construction permit, and AERMOD will be required to be utilized for a major source of emissions when applying for a federal NSR permit. Ultimately, the Air Permits Division (APD) at TCEQ wants to provide the maximum level of flexibility in the modeling process when industry evaluates predicted off-site concentrations, and the allowance of the use of ISC3 for small sources of emissions provides the stated flexibility. However, the author also states that once AERMOD is utilized for a site, no matter the reason for its use, AERMOD must continue to be utilized if additional air modeling demonstrations would be required.

In defense for the need for the replacement model, the Environmental Protection Agency (EPA) has documented that the predicted concentrations of air emissions from AERMOD are closer than ISC3 in most of the tested scenarios to the actual air emissions collected and measured by monitors strategically placed near industrial facilities. The improvement is attributed to new and improved algorithms in AERMOD, especially those improvements related to the meteorological data components and building downwash impacts.

Here at Westward Environmental, Inc. we are committed to finding solutions to the challenges that exist within the air permitting process.

Please send comments or questions to
dknollhoff@westwardenv.com.



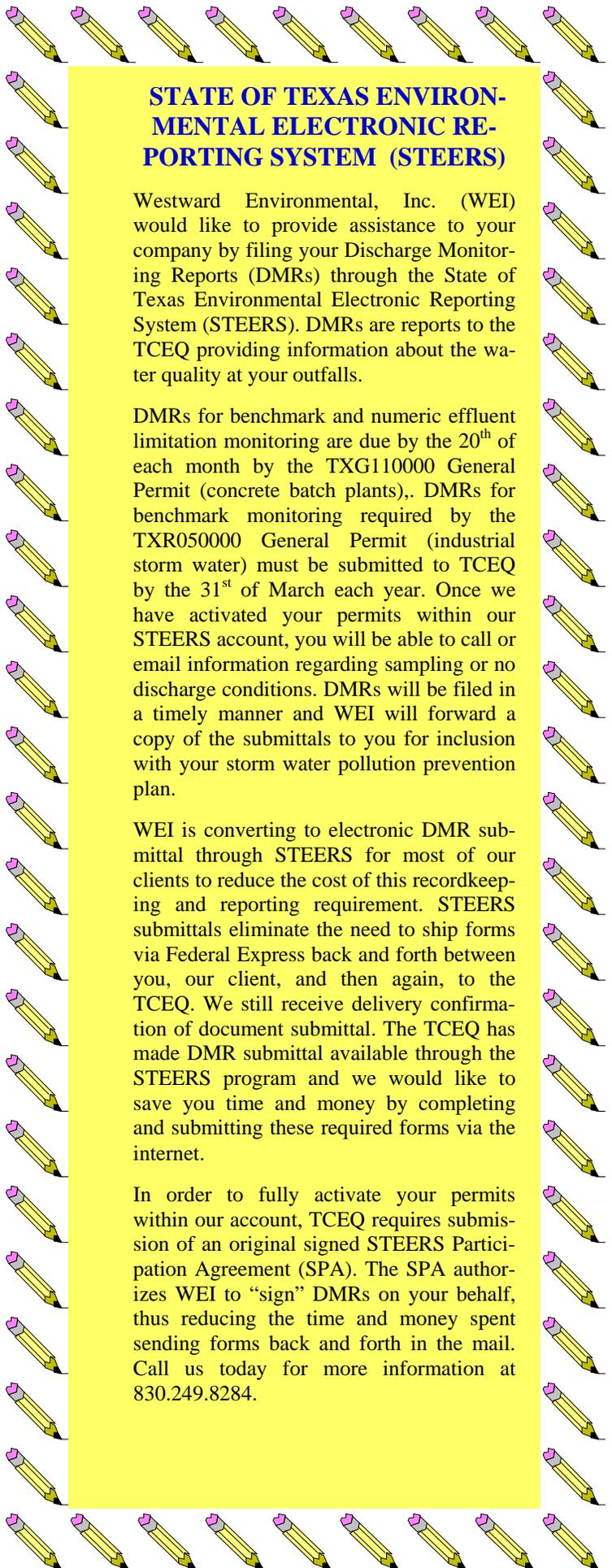
STATE OF TEXAS ENVIRONMENTAL ELECTRONIC REPORTING SYSTEM (STEERS)

Westward Environmental, Inc. (WEI) would like to provide assistance to your company by filing your Discharge Monitoring Reports (DMRs) through the State of Texas Environmental Electronic Reporting System (STEERS). DMRs are reports to the TCEQ providing information about the water quality at your outfalls.

DMRs for benchmark and numeric effluent limitation monitoring are due by the 20th of each month by the TXG110000 General Permit (concrete batch plants),. DMRs for benchmark monitoring required by the TXR050000 General Permit (industrial storm water) must be submitted to TCEQ by the 31st of March each year. Once we have activated your permits within our STEERS account, you will be able to call or email information regarding sampling or no discharge conditions. DMRs will be filed in a timely manner and WEI will forward a copy of the submittals to you for inclusion with your storm water pollution prevention plan.

WEI is converting to electronic DMR submittal through STEERS for most of our clients to reduce the cost of this recordkeeping and reporting requirement. STEERS submittals eliminate the need to ship forms via Federal Express back and forth between you, our client, and then again, to the TCEQ. We still receive delivery confirmation of document submittal. The TCEQ has made DMR submittal available through the STEERS program and we would like to save you time and money by completing and submitting these required forms via the internet.

In order to fully activate your permits within our account, TCEQ requires submission of an original signed STEERS Participation Agreement (SPA). The SPA authorizes WEI to "sign" DMRs on your behalf, thus reducing the time and money spent sending forms back and forth in the mail. Call us today for more information at 830.249.8284.





Westward Environmental, Inc.

“Solutions for the Preservation of Industry
and the Environment ”

“YES, WE CAN DO THAT”

Westward Environmental has been providing unparalleled, quality consulting services to the aggregate, construction and mining industries for over 10 years. We started in the mining business and have seen the evolution of technology, increased awareness and involvement of both public and private entities, felt the sting of stricter regulations and gas prices, watched a giant almost brought to its knees by a tiny bug and stood on the steps of the Capitol and witnessed greatness and a circus almost at the same time. We have been there to.

Over the last 10 years, Westward has grown to meet the ever changing needs of industries that provide the quality of life that we all want. Many companies talk of needing vertical integration, turn key services, high level of knowledge, experience and responsive actions. We are here to tell you,

“Yes, We Can Do That”

Let us re-introduce ourselves. We are Westward Environmental Inc. and we are here for you. Our staff has worked for the big companies and the not so big companies and most everywhere in between. We have registered Professional Geologists, Engineers, Environmental Managers and a host of folks in training.

We can find a greenfield quarry site for you, explore it, drill it, map it, test it, get a mine permit for it, get an air permit for it, get a storm water permit for it, write the other required plans for it, look for species on it, look for wetlands on it, suggest the best way to mine it, predict the weather for it, train people to work safely in it, design a community relations program for it, make sure you are in compliance with it and draft a reclamation plan for it.

“Yes, We Can Do That”

Corporate Office

P.O. Box 2205
102 South Main Street, 2nd Floor
Boerne, Texas 78006
Phone: (830) 249-8284
Fax: (830) 249-0221



Dallas-Fort Worth Office

1103 Keller Parkway, Ste. 205
and Ste. 206
Keller, Texas 76248
Phone: (817) 741-7324
Fax: (817) 741-7334