

Tracer ES&Times

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UST or Not to Be

Underground Storage Tanks (hereinafter referred to as UST's) are often thought of as a thing of the past. Although a large majority of UST's in the United States were removed and/or upgraded by the federal and state deadline of December 22, 1988 we are seeing an upsurge in the discovery of UST's with the most recent land transactions.

Many new land owners are inheriting the abandonment liability and responsibility of removing and remediating previous UST sites. They are discovering the sites by various means, laying new lines, digging up old asphalt roads or even stumbling across old vent-lines coming from underground. Although California Health & Safety Code 25404 delegates authority for implementing and enforcing statewide UST requirements to the local Certified Program Agency (CUPA) the local regulations become very tangled and complex. Tracer ES&T has recently been involved in multiple suc-

cessful UST removals in and around Santa Barbara County. The most important aspect to removing a historic UST is planning.

There are many aspects to successful removal such as degassing of a petroleum storage tank (which must follow the applicable APCD rule), having a licensed contractor conduct the actual removal, having the proper OSHA approved equipment onsite, implementing a site safety plan for the days of removal, notifying and filing all proper permit documents with agencies involved and having a registered geologist onsite to take ground and wall samples as required by the local CUPA.

For a landowner or even an operator, the end goal is to receive a letter of clean closure after the UST has been removed. The letter of clean closure removes any encumbrances to the land's title and certifies that the land has been cleaned up per the local CUPA's standards.

At Tracer ES&T we have counseled many clients in the discovery and removal of UST's. The important thing to note is that ignoring a UST is not a viable solution. It is the land owner's responsibility and legal requirement to report the existence of a UST and remove it per local standards. The removal and remediation (if required) can be very smooth and cost efficient and staff in the Tracer ES&T Santa Maria office is here to help. Please contact us for further information if you feel that your land could be impacted by a historic UST. ✓

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Retrieval of UST

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Risk Group Update

Environmental Management Standard ISO 14001:2004

ISO, the International Standard Organization, is an internationally accepted consortium of programs that cover all industries such as Food Processing, Automotive and Aeronautical, as well as a set of cross-sectional programs such as Metrology, Quality, and Environmental standards. ISO 9000 (Quality Management) is probably the most recognized cross-sectional program in the US, with ISO 14001 coming in second.

ISO 14001:2004 Environmental Management System (EMS) is a specific standard developed for environmental management. The standard was developed to help all types of organizations protect the environment, prevent pollution, and improve their environmental performance. The ISO 14001 system consists of five main parts:

- Environmental Policy
- Planning (Development of environmental targets, goals, and objectives)
- Implementation (Training, Documentation of Processes, and Standard Operating Procedures)
- Checking and Corrective Action (Internal Auditing, External Verification Audits, and Corrective /Preventative Actions)
- Management Review

Environmental Policy serves to manage company actions with a view to prevent, reduce or mitigate harmful effects on nature and natural resources, while ensuring that changes to the environment created by the company's processes do not pose harmful effects on humans.

Planning is the act of developing environmental-related targets, goals and objectives. In other words, how an organization's activities, products or services interact with the environment (e.g., recycling, conservation, reuse, etc.).

Implementation is the meat of the program and requires buy -in from all parts of the organization from top management to the hourly employee. Implementation entails taking the environmental policy and objectives developed during planning and incorporating them into current facility practices as well as to develop new facility practices to reduce pollution and comply with local, state, and federal regulations. This also includes bringing new ideas from all areas of the company to develop new programs and procedures that benefit both the environment as well as the bottom line.

Checking and Corrective Action is required to maintain certification. ISO 14000 uses an Internal Audit System to self check that all required measures, as well as the company's targets, goals, and objectives are being reached. The use of corrective and preventative actions serves to provide a "road-map" for facility personnel to improve and implement changes per the company's environmental policy. The ISO 14001 EMS registration provides a standard method for compliance by a non-partial third party verification.

Management Review assesses opportunities and the need for changes to the EMS, environmental policy, and/or environmental objectives. The objective of these reviews is to ensure that the ISO 14001 EMS remains suitable, adequate and effective.

Internally EMS provides assurance to management that it is in control of the organizational processes and activities having an impact on the environment, while also assuring employees that they are working for an environmentally responsible organization.

Externally EMS provides assurance to external stakeholders – such as customers, the community, and regulatory agencies, that your company:

- complies with environmental regulations;
- supports the claims about its own environmental policies, plans and actions; and
- provides a framework for demonstrating conformity such as assessment of conformity by an external stakeholder – such as a business client – or for certification of conformity by an independent certification body.

Why should a company spend money and time on the ISO 14001 EMS?

The major driver behind the implementation of ISO 14001 EMS is the requirements of Customers. Improved risk management and the reduced liabilities associated with environmental issues is the leading reason U.S. companies are implementing ISO 14001.

(Continued on page 4)

One Year of Tracer Texas—An Update from “Houston Control”



June 2008, I left Corporate America to help Tracer ES&T build a satellite office in the Houston, Texas area. My first thoughts were of the possibilities of all the freedoms of running a small office. The opportunities to meet new clients, work beyond the restraints of Corporate America (HR, cost cutting, etc.). What a learning experience it has been.

The office has been through hurricane Ike and the June 22, 2009 RMP resubmit deadline. I have enjoyed meeting new faces at the RETA conference in Hershey, PA, the IIAR conference in Dallas, TX, and at the Houston RETA Chapter.

Our primary focus continues to be PSM/RMP compliance for ammonia refrigeration systems associated with food production, warehousing and distribution as regulated under the PSM/RMP.

Tracer ES&T has been and continues to be at the forefront of PSM/RMP development and implementation. Lee Pyle, Jeanna Emmons and the entire Tracer ES&T Risk Management Group (past and present) have developed a first class program that has helped this office through our formative phase.

“I am proud to stand on the shoulders of giants.”

Woody ✓

Happy 4th of July
From all of us at Tracer ES&T



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Do you have questions about an article appearing in Tracer ES&Times?

Call us at (760) 744-9611.

Air Quality Compliance Update

The California Air Resources Board (CARB) recently updated the implementation timeline for greenhouse gas (GHG) scoping plan measures. Key measures with planned adoption dates in 2009 include (but are not limited to):

Planned Adoption Date	Scoping Plan Measure	Implementation Date
January 2009 (adopted)	Motor vehicle air conditioning (MVAC) systems reduction of refrigerant emissions from non-professional servicing (discrete early action)	2010
February 2009 (adopted)	SF ₆ limits in non-utility and non-semiconductor applications (discrete early action)	2010
February 2009 (adopted)	Reduction of perfluorocarbons in semiconductor manufacturing (discrete early action)	2012
March 2009 (adopted)	Tire pressure program (discrete early action)	2010
April 2009 (adopted)	Low carbon fuel standard (discrete early action)	2010
June 2009	Landfill methane control measure (discrete early action)	2010
June 2009	Cool car standards and test procedures	2012
September 2009	Stationary equipment refrigerant management program – refrigerant tracking, reporting, deposit program	2010
October 2009	Energy efficiency and co-benefits audits for large industrial sources	2010
December 2009	SF ₆ emission reductions from the electricity sector and particle accelerators	2011
2009	Tire tread program	2010
2009	Enforcement of federal ban on refrigerant release during servicing or dismantling of MVAC systems	2010
2009	Renewables portfolio standards	2020
2009	Increasing combined heat and power use by 30,000 GWh	2020

For further information please visit <http://www.arb.ca.gov/cc/cc.htm> or contact Mr. Greg Hauser at (760) 744-9611 x106.√

(Risk Update, continued from page 2)

According to an EPA news release ... In 2008, the EPA levied fines of \$11.8 billion on pollution controls, cleanup and environmental projects, a record for EPA. Cost of implementing ISO 14001 varies with the size of the company. Average costs for implementation are proportional with the size of the company, ranging from \$15,000 for smaller companies to \$150,000 for larger companies.

According to an article by Susan Graff, published in *Industrial Management*, the largest cost of implementation is employee time. Capital costs of EMS development are relatively low in com-

parison, assuming companies already have appropriate control equipment and monitoring instrumentation in place to be in compliance with federal, state, and local requirements.

As always, cost benefit analysis of a system such as this is difficult to measure. How do you value a preventive system? The costs incurred in the course of complying with regulations such as monitoring and permit requirements are potentially hidden among other items, such as overhead accounts. Increase in Consumer response does have a value, but is dependent on where your company is positioned with the issues as well as the company's goals.

Tracer ES&T is now providing support to companies who currently have implemented or going to implement the ISO 14001 EMS program. We can provide internal audits and guidance on program development, training and implementation for our clients. The trend toward environmental management systems is well established. While your company may already have a few key elements of a system in place, many companies are finding considerable value added through implementing a complete system that integrates environmental aspects into business planning. √

Upcoming Events...



RETA's 100th National Conference

October 13 — 16, 2009, Monterey, CA

Watch for Tracer ES&T's Booth #108

Lee Pyle will be speaking on
"You're a Contractor—What is Your Responsibility?"

go to: <http://www.reta.com/convention/2009/>



RETA LA Chapter 2

Meets the 3rd Wednesday
of each month

*Note that we will NOT
have a meeting during the
months of July and August*

For details contact Jeanna Emmons
760-744-9611 x112



RETA Inland Empire Chapter

Meets the 2nd Tuesday
of each month

*The July 14 meeting will be a tour
at the Costco Wholesale
Mira Loma facility (6 pm – 8 pm)*

For details contact Lee Pyle
760-744-9611 x108

*Note that we will NOT have a
meeting in the month of August*



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Tracer ES&T Anniversaries

Some of the Tracer ES&T staff have been together through several name changes: Tracer Technologies, Team Environmental Services, and now, Tracer ES&T. Our staff is the foundation for this company and we appreciate their effort and dedication.

13 Years

Jake Tilley

(07/29/96)

9 Years

Paul Schafer

(08/21/00)

3 Years

Marjorie Buyson

(07/10/06)

