

# **MISCELLANEOUS ENVIRONMENTAL TOPICS**

February 2017

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# CONCRETE MIX WASHDOWN

- ❑ True or False: Just dump wash out water on the ground and go?
- ❑ IDNR position: Inert materials which cause no damage
- ❑ If wash out water causes a problem or violation of “other” rules then it cannot be done

# IOWA DOT 'S POSITION

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- Iowa. Dept. of Transportation
  - + “proper handling” of concrete washout is an industry wide issue
  - + Rely on the “general compliance requirements” outlined in 1107.07”
  - + They rely on industry to follow good operating procedures and police itself
  - + IDOT obtains a NPDES Permit #2 for its projects; subcontractors are all co-permittees



# POSITION OF MOST METRO AREAS IN IOWA

- ❑ Most metro areas in Iowa suggest construction projects must:
  - + Have “concrete waste management practices” to prevent runoff of concrete wash water
  - + Generally regulated through Planning and Zoning, Building Code Enforcement or MSW4 Permits

# EXAMPLES OF REGULATIONS

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- ❑ Construction entrances and exits must be designated
- ❑ Erosion and sediment controls must be put in place *prior* to any excavation
- ❑ “rock” placed at entrances and exits to minimize tracking and dust generation

# US EPA'S RECENT ACTIVITIES

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- ✘ U. S EPA's reoccurring Storm Water Initiative
- ✘ Increased inspections at what they consider are major sources of water pollution caused by storm water runoff
  - + Big Box Stores
  - + RM Plants
  - + RM Plants in Pits or Quarries
  - + Pits/Quarries



# INSPECTIONS

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- ❑ U.S. EPA/IDNR inspections focus on both “paperwork” problems and site issues
  - + Have permits been obtained when needed??
  - + Has a SWPPP been developed & implemented?
  - + Has required annual employee training been done?
  - + Has EVERYTHING been documented?

# STORAGE OF PETROLEUM PRODUCTS

- ❑ Federal Regulation....not State
- ❑ Capacity of 1,320 gallons (containers 55 gallons or larger)
- ❑ Can spill get to Navigable Waters of the U.S.?
- ❑ Are tanks contained or double wall tanks?
- ❑ Has annual training been done for all employees who “handle” oil products?
- ❑ How is “Oil Handling” defined?
- ❑ Does new employee training need to be done?



# GOING FORWARD

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- ❑ In the future these activities will come under closer scrutiny by a greater number of regulatory agencies and the general public
- ❑ IDNR and USEPA are doing more in the area of water quality issues; runoff and storm water enforcement

# SUGGESTIONS

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- ❑ If unsure about level of compliance or not in compliance....take necessary actions to get everything fixed before an inspector stops by
- ❑ If looking at new operations or acquisitions have environmental staff person or consultant perform “due diligence” inspection to identify potential problems or issues...may save you a great deal of money

# CONCLUSIONS

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- ❑ Most companies are committed to preventing pollution of any sort....whether it air, water or soil
- ❑ We must be part of this process and all “do the right thing”