

Environmental Permitting

Purpose and Scope	2
Responsibilities	2
Background	3
Standard Industrial Classification and North American Industrial Classification System Codes	3
Water Discharge Permits	4
Discharges to Publicly Owned Treatment Works (POTW)	5
NPDES/SPDES Permits	6
Stormwater Permits	8
Stormwater Monitoring	10
Stormwater Sampling	11
Air Permits	13
Underground Storage Tanks (USTs)	15
Hazardous Waste Registrations	15
Dredge and Fill Permits	16
Other Permits/Approvals and Review	16
Recordkeeping	17
Forms and Attachments	17

Attachment(s):
Environmental Monitoring Results Log



Purpose and Scope

Purpose This chapter provides information concerning environmental permits that may be needed for BOC operations. Also, it identifies BOC responsibilities for acquiring permits, including:

- determining if a permit is necessary
- applying for a permit
- compliance with permit requirements.

Scope This chapter applies throughout BOC in the United States.

Responsibilities

**Project Manager/
Location
Manager or
designee** The Project Manager (for new projects), or Location Manager or designee are responsible for:

- Notifying the Environmental Affairs Department when a new plant or plant modification may potentially require a new or modified permit
- Working with the Environmental Affairs Department to prepare a permit application
- Tracking site permit expirations and notifying Environmental Affairs at least 9 months prior to a permit expiration date
- Paying permit fees
- Assisting Environmental Affairs in submitting comments on draft permits
- Reviewing and understanding the permit conditions
- Maintaining site compliance with permit requirements including:
 - submission of any regulatory required reports
 - maintenance of required permit documentation
- Implementing any site corrective/improvement actions to comply with permit requirements.

**Environmental
Affairs
Department** Environmental Affairs is responsible for:

- Determining whether permits are required based on information provided by sites/project managers
- Managing the permit application/renewal process including any negotiations or comments associated with the permitting agency
- Providing support to help sites comply with permitting requirements
- Working with the site to manage BOC's response and/or corrective actions related to a permit violation.

Background

Environmental permit overview

An environmental permit typically acknowledges an activity that may have an impact on the environment, usually associated with some type of discharge or **Release** from the facility.

Environmental permits typically require:

- pollution control equipment to minimize environmental impacts or maintain a specific level of efficiency
- maintaining process operating parameters
- monitoring, inspections, reports, and recordkeeping to ensure compliance with the permit.

Note: Each state/local regulatory agency can have its own permitting requirements, in addition to or in lieu of federal requirements. Therefore, research is often required to determine whether a permit is necessary.

Permit requirements

By law, permits **must** be available on site, and site employees **must** be familiar with permit requirements. For example:

- monitoring and recordkeeping requirements
- allowable discharges
- operating condition limitations
- permit effluent limits.

As a result, project managers and location managers or designees **must** work closely with the Environmental Affairs Department to obtain required permits and maintain compliance.

Standard Industrial Classification and North American Industrial Classification System Codes

SIC Codes

Each BOC facility will generally come under a Standard Industrial Classification (SIC) and the new North American Industrial Classification System (NAICS) Code. In some cases, more than one SIC/NAICS Code may apply. Below are the SIC and NAICS Codes that generally apply to BOC facilities:

- **Industrial Gas Manufacturing** – Air Separation Plants, CO₂ Manufacturing Plants, Hydrogen Manufacturing, Helium Manufacturing, Acetylene Manufacturing (SIC Code 2813 and NAICS Code 32512)
- **Other Chemical and Allied Products Wholesalers -Industrial Gases** – Cylinder fill or Retail Facilities (SIC Code 5169 and NAICS Code 42269)
- **Other Support Activities for Road Transportation, Truck Terminal Facilities** – BOC Distribution Facilities (SIC Code 4231 and NAICS Code 48849)

It is important to know the SIC and NAICS Code of your facility for permitting applications and to determine whether certain regulations or permitting requirements apply. For further information, see the web site for the [North American Industrial Classification System](http://www.census.gov/pub/epcd/www/naics.html) (<http://www.census.gov/pub/epcd/www/naics.html>).

Water Discharge Permits

Industrial wastewater discharges

Any industrial wastewater discharges to surface water, groundwater, or to a public sewer system or septic system, could potentially require a permit.

The regulatory definitions of surface and groundwater are so broad that all discharges should be considered. The governing body requiring the permit can be any of the following:

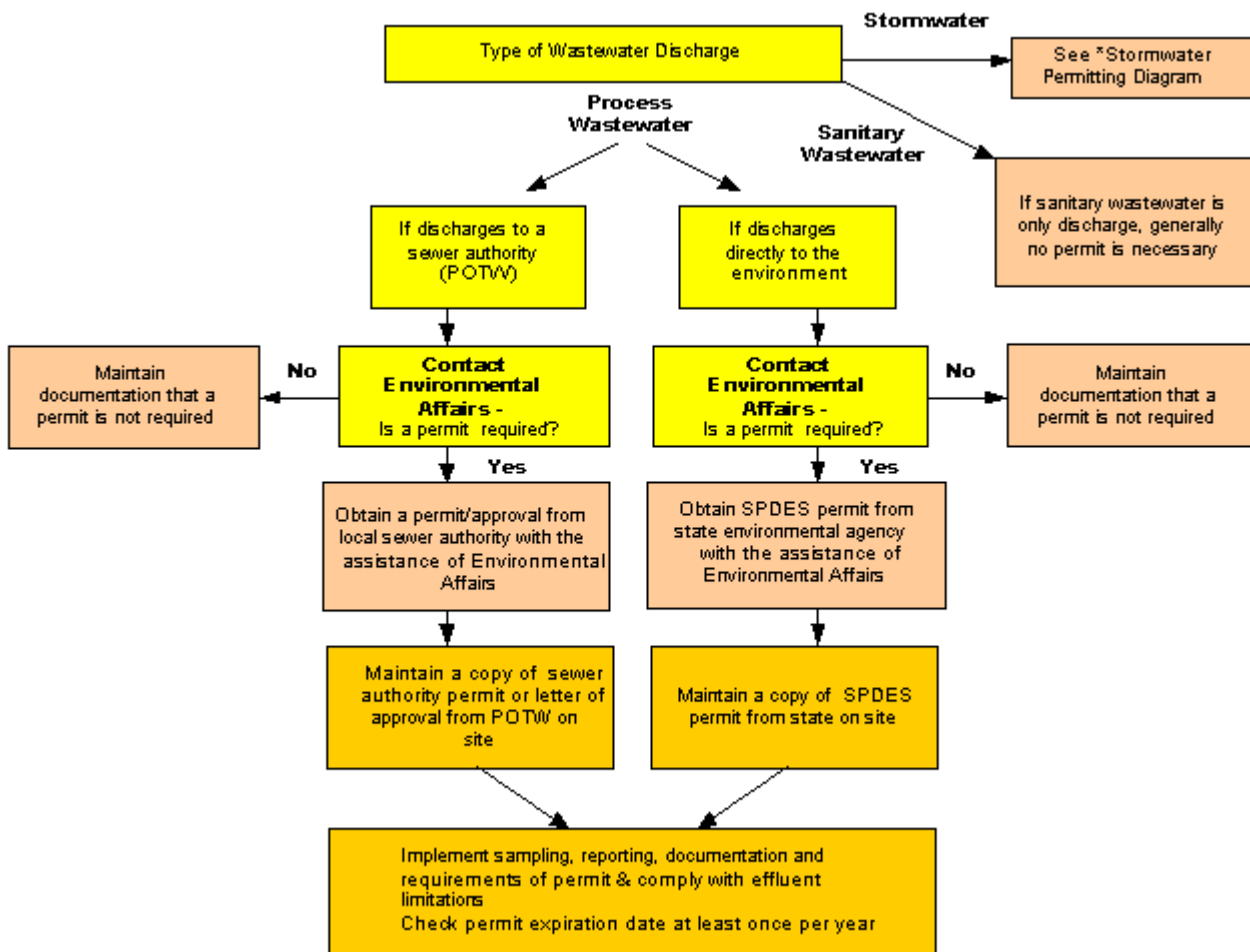
- United States Environmental Protection Agency (US EPA) (National Pollution Discharge Elimination System (NPDES) Permits)
- States (State Pollution Discharge Elimination System (SPDES) Permits)
- Local Water Boards
- The authority operating the sewer system/Publicly Owned Treatment Works (POTW), or
- A combination of any of these.

Note: Discharging industrial wastewater to septic systems, dry wells, soil surface, etc., is a particular concern and generally not permitted. The potential impact of such activity **must** be evaluated and corrective actions taken where necessary.

Is a wastewater permit necessary?

The diagram below helps to identify whether a wastewater permit is necessary.

To view the diagram, click here:



**Note:*The Stormwater Permitting Diagram mentioned above is available in *Stormwater Permits*.

Examples

The types of water discharges at BOC facilities that may require a permit include, but are not limited to, the following:

Examples of Discharges Requiring a Permit	
Ammonia collection water	Discharges to lime ponds
Boiler blow-down	Equipment washing discharges
Building floor drain discharges	Oil/water separator discharge
Compressor condensate	Process discharges
Compressor cooling water	Sanitary treatment plant discharges
Cooling tower blow-down	Scrubber wastewater (non-hazardous)
Cylinder cooling water	Truck washwaters
Cylinder testing/cleaning waters	

Discharges to Publicly Owned Treatment Works (POTW)

POTW discharges

If part of a facility’s wastewater discharge goes to the POTW, or sewer system, particularly if it is from an industrial activity, the sewer authority **must** be notified.

The sewage treatment facility has its own water discharge permit and operates based on what comes into the treatment plant. Specific pretreatment requirements and a permit may apply to BOC sewer discharges particularly if flows exceed 25,000 gallons per day.

POTWs generally establish their own permitting programs and application processes. Sites **must** work with Environmental Affairs when applying for a permit with a POTW. Industrial discharges to sewer systems are often not regulated as stringently as discharges to surface waters, since further treatment is provided by the treatment facility prior to discharge.

Notifying the POTW

If a permit is not available for an industrial discharge to a POTW, a site **must** have the following on file:

- A letter of approval from the POTW
- A copy of a letter sent via certified mail notifying the sewer authority of any industrial discharge. The letter should indicate:
 - source of the industrial water discharge
 - average and peak volumes, and
 - any known pollutants in the water.

Site modifications and maintenance

When making modifications or installing new equipment, routing wastewater discharges to sewer systems should be considered, and appropriate approvals obtained.

In addition, one-time discharges, such as cooling system cleaning or deriming, may require permission from the sewer authority.

Note: Facilities that have only sanitary wastewater discharges are usually not regulated and do not have to document a notification.

NPDES/SPDES Permits

NPDES/SPDES permits

Facilities that discharge industrial wastewater directly to the environment normally require a permit (see *Examples of Discharges Requiring a Permit*). To obtain a National or State Pollution Discharge Elimination System (NPDES or SPDES) permit, a comprehensive application **must** be submitted to the appropriate regulatory authority.

Permit application process

Sites or new plant project managers **must** work with Environmental Affairs to prepare the permit application. Since wastewater discharge(s) do not generally exist during the application process for new facilities, this information **must** be estimated based on similar facilities or through prediction models. Typical technical information required on the application, includes:

- wastewater quantity
- location of discharge
- wastewater quality
- site operational information

Normally the application **must** be submitted at least 180 days before any wastewater discharges can commence.

Note: BOC facilities that have water discharges to surface or ground waters but do not have a permit should contact Environmental Affairs. Environmental Affairs will help evaluate the need for a permit and assist in the preparation of a permit application if one is necessary.

Permit conditions

Water discharge permits usually have operating conditions (maximum flows, hours of operation, discharge locations, specified additives, etc.) that **must** be complied with beyond pollutant limits. Concentration (mg/l) and mass limits (lbs/day) are often established for the following pollutants:

- Total suspended solids
- Dissolved solids
- Biochemical oxygen demand
- Chlorine
- pH
- Oil and grease

Note: Additional pollutant limits may be included depending on the type of discharge and the quality of the water body receiving the discharge. Pollutant limits are often established for average monthly and maximum daily values. If a facility has several different discharges, specific effluent limits can apply to each discharge.

Effluent limitation guidelines for ASUs For BOC facilities, the following US EPA guidelines may apply for oxygen and nitrogen production:

- oil and grease: (0.0020 (maximum) and 0.0010 (30 day avg.) lbs. per 1000 lbs. of product)
- pH: (6-9)

State requirements States generally establish minimum surface-water quality standards for any body of water as well as very “clean” standards for water bodies that provide a valuable resource, such as a stream that supports trout or wild and scenic rivers. For highly degraded water bodies, states often establish more stringent requirements to wastewater discharges when permits are renewed in order to try to improve water quality.

States are also beginning to look at the Total Maximum Daily Loads (TMDLs) a water body can accept to establish individual discharge permit limits. TMDLs essentially consider the total carrying capacity of the water body for pollutants to remain within surface-water quality standards while considering other nearby discharges to the water body.

Discharge Monitoring Report (DMR) Facilities with NPDES/SPDES permits generally **must** conduct sampling and analysis of their discharges, either monthly (most common), daily, weekly or quarterly. In many cases, DMRs **must** be submitted to state agencies providing the analytical results.

BOC sites should generally hire a consultant to collect the samples and conduct the analyses unless the permit requires very simple grab samples. The samples should be sent to a state-certified laboratory, unless there is a major reason for BOC to conduct required permit analysis on-site. .

Permit violations In general, if a daily maximum permit limit is exceeded, sites **must** notify the agency within 24 hours and provide a written explanation to the agency within five days identifying:

- non-compliance description
- cause
- period of non-compliance and dates/times
- corrective/preventative actions that have been/will be taken

At a minimum, whenever a permit violation has occurred, the above information should be provided with the DMR being submitted. Contact Environmental Affairs immediately for assistance whenever a permit limit or condition is not being met.

Permit expiration and renewal Permits often expire five years after they are issued. It is important that sites:

- check the expiration date at least annually
- work with Environmental Affairs to submit the renewal application 180 days before the permit expires to ensure permit coverage
- begin work on the application with Environmental Affairs at least nine months before the permit expiration date.

Stormwater Permits

About stormwater permits

The Clean Water Act Amendments of 1987 required the US EPA to establish specific regulations to control stormwater discharges associated with industrial activities under the NPDES program.

Recent updates to the regulations require that facilities with “stormwater discharges associated with industrial activities” obtain appropriate discharge permits. Most states have the authority to manage stormwater permits under the NPDES program. In states without NPDES authority, stormwater is regulated by the US EPA.

Permit requirements

Stormwater permitting requirements are applicable to discharges from any conveyance used for collecting stormwater run-on or run-off that is directly related to manufacturing, processing, operations of raw material, or waste storage/transfer/disposal activities.

In general, BOC facilities that are covered under the stormwater permitting requirements include those considered:

- SIC Code 2813 (air separation, carbon dioxide manufacturing, hydrogen manufacturing, acetylene manufacturing, and other manufacturing plants) or
- SIC Code 4231 (distribution with truck maintenance and/or fueling) locations.

BOC facilities such as cylinder fill, retail, and administrative facilities are generally **not** required to obtain a stormwater permit.

Note: Construction activities involving more than one acre also require a separate stormwater permit prior to construction.

Exemptions

Point source stormwater discharges associated with industrial activities that reach waters of the U.S. or discharge through municipal separate storm sewer systems are required to obtain an NPDES stormwater permit. Waters of the US include streams (including intermittent streams), lakes, ponds, bays, wetlands, rivers, prairie holes, etc.

A site could be exempt from obtaining a stormwater permit if it is not under SIC Code 2813 or 4231, or if it meets any of the following criteria:

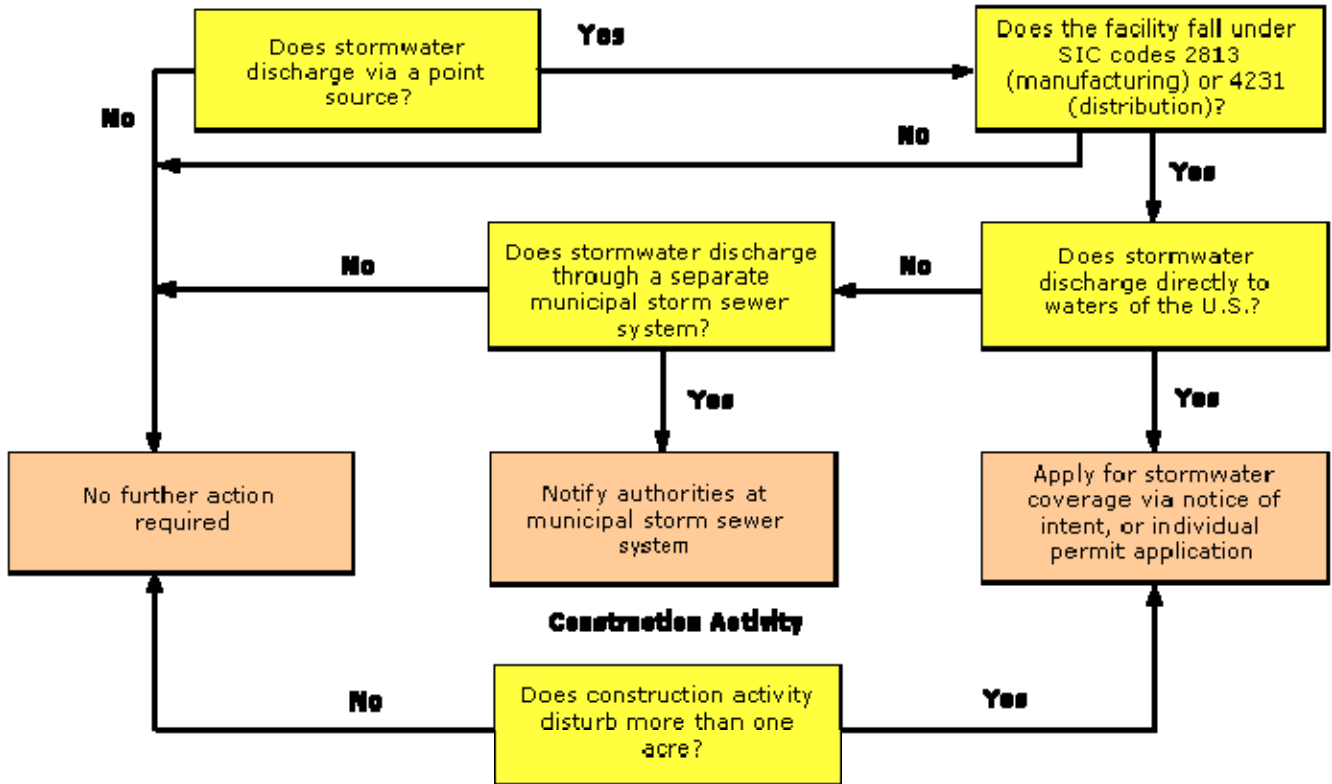
1. Site does not have a point source stormwater discharge. In this case, a stormwater sample would not be able to be collected from the facility from a storm sewer, ditch, pipe, culvert, etc. For example, there is only sheet runoff.
2. Site does not have a point source stormwater discharge associated with industrial activity. For example, no industrial operations occur outdoors or no industrial operations could affect stormwater.

Note: In this case, a certification **must** be submitted to the regulatory authority.

3. Site has a point source stormwater discharge associated with industrial activity that does not discharge to a storm sewer or to waters of the U.S. In this case the discharge remains on-site in a retention pond or percolates into the ground before reaching a storm sewer or U.S. water.
4. Site already has a NPDES permit covering stormwater and other industrial discharges.
5. Stormwater is discharged to a combined (stormwater and sanitary) sewer system or to a Publicly Owned Treatment Works (POTW). However, the site may be subject to municipal code or the pretreatment facility discharge regulations.

Is a stormwater permit necessary?

The diagram below helps to determine whether a stormwater permit is necessary:



Notice of Intent (NOI) In order to obtain a stormwater permit, which may include specific sampling and reporting requirements, a Notice of Intent (NOI) **must** be submitted to the appropriate state agency. Sites or project managers should work with Environmental Affairs to submit a NOI.

Stormwater Pollution Prevention Plans (SWPPP) and Training All sites that have a stormwater permit will be required to develop and implement a SWPPP. For further information, see *Storm Water Pollution Prevention Plan (SWPPP) (in IMS-22-07)* in the chapter Water Quality Regulatory Compliance. Sites **must** also provide annual training to site employees in Pollution Prevention.

Training Site employees **must** receive annual training in stormwater pollution prevention. For further information, see *Stormwater Pollution Prevention Training (in IMS-22-07)* in the chapter Water Quality Regulatory Compliance.

Permit expiration Stormwater permits generally expire after 5 years.

Stormwater Monitoring

Visual and Analytical monitoring

Stormwater permits often require periodic monitoring. This typically involves quarterly visual monitoring, which documents observations of color, odor, clarity, floating/settled/suspended solids, foam, oil sheen or other obvious indicators of stormwater pollution

Requirements could also involve laboratory analysis of stormwater quality. Parameters sometimes covered include suspended solids, oil and grease, COD, pH, metals, etc.

For sites with SIC code 2813, the federal permit requires semiannual sampling of aluminum and iron. Guidelines/limits for these parameters can also be included. When guidelines/limits are exceeded, pollution prevention actions **must** be evaluated and implemented (when appropriate) to reduce stormwater pollutant concentrations. This often requires a revision of the Site Environmental Plan.

Samples should be taken within 30-60 minutes from the beginning of any precipitation event. Precipitation events **must** be at least 0.1 inches in magnitude and occur at least 72 hours after the previous storm event that exceeded 0.1 inches.

Reporting requirements

A report on the visual monitoring **must** include the following:

- the examination date and time
- name of examiner
- nature of the discharge, and
- visual quality of the discharge.

Visual monitoring data normally does not have to be submitted to the applicable regulatory agency. Analytical monitoring data usually has to be submitted to the permitting agency on a periodic basis on forms provided by the agency.

Stormwater Sampling

Stormwater discharge sampling

Samples **must** represent the total quality and quantity of storm water discharged from the facility. If storm water commingles with process or non-process water, where practicable, the sample will be taken before it mixes with the non-storm water discharge. Samples will not be taken off surface water flowing from the pavement into a drain, as this is not representative of the entire drainage area. To obtain a representative sample, the sample will be taken at the drain.

It may be necessary to sample more than one location. For example, there may be two or more separate storm drains that drain different areas of the property. If there are two or more outfalls with “substantially identical effluents,” the facility may sample and analyze only one of the identical outfalls and use the results as representative of the other. “Substantially identical effluents” are defined as discharges from drainage areas undergoing similar activities where the discharges are expected to be of similar quantity and quality, and indistinguishable in expected composition.

Other Criteria

Stormwater samples will be taken during a rainfall event (within 1 hour of initial rainfall) defined as follows:

- measured precipitation is greater than 0.1 inches
- event occurs at least 72 hours after previous event, and
- event results in a discharge

The site will use local weather forecasts, national weather data, or similar information to help plan for a sampling event. An on-site rain gauge can be used to verify a rainfall event is greater than 0.1 inches.

When samples are taken, the date, duration (in hours), starting and ending time of storm event, duration between storm event sampled and previous measurable (greater than 0.1 inch) rainfall, will be recorded on the **Environmental Monitoring Results Log (see attachment)** or by a similar method.

Documenting factors that interfere with monitoring

There may be times when weather conditions do not permit sampling. For example, during severe weather, such as local flooding, high winds, hurricane, tornadoes, electrical storms, drought, extended frozen conditions, etc. If this occurs, the weather condition will be documented on the Site Environmental Monitoring/Evaluation Records Log or similar method to explain why no sampling occurred.

Sampling guidelines

The following guidelines should be used prior to taking samples and once the samples have been collected.

Prior to sampling The samples will be taken and analyzed using good quality control/quality assurance techniques. The samples will be analyzed only by an EPA-certified laboratory using EPA-certified techniques. The guidelines below ensure compliance with these requirements.

- The person taking samples will be trained and familiar with this SWPP Plan.
- All stages of the sampling event will be documented on the Site Environmental Monitoring/Evaluation Records Log
- The sample type will be in the form of a grab sample.
- Prior to sampling each outfall, all bottles will be labeled with date, time, name of sampler, and analysis type.
- Storm water sample containers will be cleaned and prepared for field use according to the procedures set forth in 40 CFR Part 136. After the decontamination procedures have been completed, the sample containers will be capped or sealed with foil. The lab will provide containers for sampling and documentation of cleaning upon request.
- If discharge allows, the sample can be collected directly in the sample containers. If this is not practical, the sample can be transferred from another collection container to the sample container to be delivered to the lab.
- The sample will be taken within the first 30 minutes of discharge. If this is not practical, sample will be taken within the first hour of discharge.
- Care will be taken to obtain the grab sample from the horizontal and vertical center of the flow.
- Sample preservation is required for some samples, in the form of chemical fixation or refrigeration. If preservatives are used care should be taken to keep preservative from flowing over or coming in contact with skin. Laboratory personnel will provide further guidance if necessary.
- Use of an ice chest or refrigerator may be necessary to keep samples cool prior to pickup from lab.
- Each analysis will require a minimum volume of the sample. The lab will specify the volume needed for each analysis.

After sampling Once samples have been obtained and collection procedures are properly documented, a written record of the chain-of-custody will be made. “Chain-of-custody” refers to the documented account of changes in possession occurring for a particular sample or set of samples. The lab will provide a standard form for this purpose. The following information **must** be included in chain-of-custody records:

- name of the person(s) collecting the sample
- sample ID numbers
- date and time of sample collection
- location of sample collection
- names and signatures of all persons handling the samples in the field and in the laboratory
- holding time (time before sample is analyzed at lab). The holding time starts when the sample is taken and will be noted as such on the chain of custody form. For samples taken on Friday or before a holiday, coordination with the lab will occur to ensure holding limits are not exceeded.

All sample shipment chain-of-custody records should be kept on file.

Calculations

Calculations are often required on the Discharge Monitoring Report (DMR). The following equations and assumptions will be used to calculate total volume of discharge and maximum flow rate during a rainfall event.

Total Discharge Volume

The total discharge volume (cubic feet) is calculated using the following equation:

$$\text{runoff volume (cubic feet)} = (\text{Total rainfall (feet)} \times (\text{facility area in (sq. feet)} \times (\text{runoff coefficient}))$$

- To convert rainfall event in inches, divide by 12 = Total rainfall in feet
- To convert acres to square feet, multiply by 43,560
- For light industrial areas use a runoff coefficient of 0.50 to 0.80
- For heavy industrial areas use a runoff coefficient of 0.60 - 0.90
- Typically a runoff coefficient of 0.65 can be used

Flow Rate

The bucket and stopwatch method of estimating flow rate is the easiest of all the flow rate estimation procedures. However, it can only be used when:

- the flow or discharge to be measured is flowing from a small pipe or ditch
- the flow or discharge is free-flowing.

The procedure involves recording the time that each sample is taken, the time it takes for the container to be filled, and the volume of discharge collected. The flow rate is then calculated in gallons per minute (gpm) using the following equation:

$$\text{flow rate (gallons per minute)} = \text{vol. of bucket (gallons)} \times \frac{60 \text{ seconds/minute}}{\text{time to fill (seconds)}}$$

Unsafe conditions

Stormwater sampling will not be done during unsafe conditions. If unsafe conditions, such as flooding, high winds, or a lightning storm are present, samples will be taken from another representative storm event. Samples will be taken only during daylight hours.

If sampling is performed in manholes, culverts or ditches, appropriate safety precautions will be taken. It may be necessary to evaluate the area for confined space entry requirements.

Air Permits

Federal air permit requirements

The US EPA requires every state to have a permitting program for air pollution sources. Sources that have the following *potential to emit* require an air permit. Since the term *potential to emit* looks at maximum operating conditions, relatively small sources could be impacted:

- 10 tons per year of a listed hazardous air pollutant
- 25 tons per year total hazardous air pollutants.

Note: In an **Attainment Area**, the federal threshold (Prevention of Significant Deterioration) for any criteria pollutant, such as Volatile Organic Compounds (VOCs), NOX, CO, SO₂, particulates or lead, is 250 tons per year for most sources (100 tons per year for listed sources).

In an ozone extreme non-attainment area, thresholds can be as low as 10 tons per year for VOCs.

Major air emission sources

Generally, major air emission sources include those stationary facilities that emit 100 tons or more per year of a regulated air pollutant. Regulated pollutants include compounds such as carbon monoxide, particulates, volatile organics, sulfur dioxide, and nitrogen oxides.

Smaller sources are considered "major" in areas that are not meeting the national air quality standards for a particular pollutant. For example, certain sources releasing 25 or even 10 tons of pollutant emissions per year are considered "major" in areas with extreme ozone (urban smog) non-attainment problems.

The EPA operating permit program also covers a variety of other significant operations, including:

- Large coal-burning utility boilers and industrial boilers subject to control requirements under the acid rain provisions of the Clean Air Act.
- Sources that are subject to requirements under New Source Performance Standards and National Emission Standards for Hazardous Air Pollutants.
- Sources of toxic air pollutants (for example, any source that emits more than 10 tons per year of an individual toxic air pollutant or more than 25 tons per year of any combination of toxic air pollutants).
- Sources required to have pre-construction or new source permits (under New Source Review or Prevention of Significant Deterioration requirements).

Small sources

Due to the Clean Air Act Amendments (CAAA) of 1990, many states may require permits for existing and new facilities that emit relatively low levels of pollutants. Small sources may require a permit, such as:

- parts-cleaning bench
- overall systems that have fugitive emissions from valve and fitting leaks, such as:
 - refrigeration systems
 - cylinder filling [hazardous gases]
 - acetylene manufacturing

A Permit to Install as well as a Permit to Operate may be required. Operating requirements, pollution controls, emission limits, monitoring requirements, and/or fees are likely to be associated with these permits. Environmental Affairs will assist in the review of state regulations, to determine if a BOC facility requires an air permit.

Note: Releases of nitrogen, oxygen, argon, carbon dioxide, or other atmospheric gases are exempt from permitting since they are distillates of air.

State/local variability

The need for an air permit varies widely from state to state, and any source of air pollutants could potentially require an air permit.

Note: When an air permit is required, it is critical to note that the permit **must** be obtained **before** construction of an air pollution source.

Potential sources

The following BOC sources have the highest potential for requiring an air permit (depending on state or local requirements):

Sources Potentially Requiring an Air Permit	
Acetone tanks	Emergency generators
Acetylene cylinder requalification	Flare stacks

Acetylene facilities	Fugitive emissions
Ammonia and other chemical tanks	Hydrogen reformers
Any air pollution control devices	Incinerators
Any combustion equipment	Paint booths
Boilers	Safety Kleen benches
CO ₂ facilities	Scrubbers
Cylinder blow-down (vent) lines	Shot blasting machines
Demisters	Underground storage tanks (gasoline)

Is an air permit necessary? Please contact Environmental Affairs to assist in the review of state regulations and determine if your facility or new equipment requires an air permit.

Air permit recordkeeping For details see [Recordkeeping \(Page 17\)](#).

Underground Storage Tanks (USTs)

Registering a UST All USTs **must** be registered with the state. Many states require a fee when registering the tanks, however, all states can impose heavy fines if the tanks are **not** registered. It is particularly important to have a tank registered if it is going to be removed, even if it has been empty for some time. A claim against a state UST Trust Fund can only be made if the tank is registered.

To register a UST, contact the state's UST management office. Most states manage their own UST program and have their own registration forms. Annual re-registrations or fees may be required. States may also have financial assurance requirements.

Note: Environmental Affairs can assist sites with UST registrations and with financial assurance requirements.

Hazardous Waste Registrations

Need for an EPA identification number A BOC facility that generates hazardous waste **must** have an EPA identification number. An EPA ID number is a site-specific number that **must** appear on all hazardous waste shipping manifests. Once a number is assigned to a facility, it is permanent unless the site requests the EPA to deactivate the number. This is done only if the site will never generate any hazardous waste in the future.

If there is uncertainty about whether the site generates hazardous waste, see the chapter [IMS-22-08 : Waste Regulatory Compliance](#) or call Environmental Affairs.

Applying for an EPA identification number To obtain an EPA ID number for the purpose of generating and eventually disposing of hazardous waste (off-site):

- Contact Environmental Affairs to obtain an activity notification package
- Complete a hazardous waste activity notification form and submit to the EPA.

Note: Environmental Affairs will assist in completing forms if necessary.

Dredge and Fill Permits

Requirements for dredge and fill permits Section 404 of the Clean Water Act established a program to regulate the discharge of dredge and fill material into waters of the United States, including wetlands.

The premise of the program is that no discharge of dredge or fill material can be permitted if a practicable alternative exists that is less damaging to the aquatic environment, or if the nation's waters would be significantly degraded. Therefore, when the site applies for a permit, it **must** show that it has:

- taken steps to avoid wetland impacts where practicable
- minimized potential impacts to wetlands
- provided compensation for any remaining, unavoidable impacts through activities to restore or create wetlands.

Individual and general permits Regulated dredge and fill activities are controlled through a permit review process. An individual permit is usually required for potentially significant impacts, but for most discharges that will have only minimal adverse effects, up-front general permits are granted.

These may be issued on a nationwide, regional, or state basis for particular categories of activities, such as minor road crossings, utility line backfill, and bedding, as a means to expedite the permitting process.

Contact Environmental Affairs whenever any work is planned near or in wetlands or water bodies to determine whether a permit is required. Environmental Affairs will work with the appropriate BOC representative to prepare the application and manage the permit requirements.

Other Permits/Approvals and Review

Additional state/local requirements Other permitting requirements, not mentioned in this chapter, may be necessary depending on the state or local government. As an example, a number of BOC facilities **must** have permits/approvals for storing and handling hazardous materials. All sites should be familiar with and comply with their local requirements. For information on legislative requirements, see the chapter [IMS-22-04 : Environmental Regulatory Compliance](#).

Review All sites should closely review their activities and waste streams, and work with Environmental Affairs to determine if environmental permits or approvals are required. If required, sites and Environmental Affairs will work together to obtain permits/approvals with acceptable requirements.

Recordkeeping

Records and Retention Times At a minimum all sites **must** keep up-to-date copies of their permits as well as the application(s) submitted to obtain the permit. In addition, permits usually have requirements to keep records/documentation related to permit compliance.

These records should be kept for at least 6 years (3 years for Discharge Monitoring Reports) according to the BOC Group, Inc. Records Retention Policy. For further information, see **Retention (in IMS-16-06)** in the chapter Generation, Use and Maintenance of Records.

SPPP recordkeeping Records of Stormwater Pollution Prevention Planning efforts **must** be kept for at least six years.

Forms and Attachments

Forms Following are the forms in this chapter:

- ***Environmental Monitoring Results Log (see attachment)***