



# SPCC PLANS & ENVIRONMENTAL COMPLIANCE TECHNICAL SUPPORT

## PROJECT DESCRIPTION

AEI prepared Spill Prevention, Control, and Countermeasure (SPCC) Plan(s) in accordance with 40 CFR 112, state, and local regulations for the 81st RD; identified the Clean Air Act (CAA) regulatory compliance requirements for 81st RD facilities located in Puerto Rico (PR) and developed a database for regulatory compliance and assess management; and performed site assistance visits at three 81st RD facilities to provide environmental sampling and analysis and interpretation of analysis results and regulatory requirements.

**SPCC Plans.** AEI prepared and P.E. certified SPCC Plans for thirty-three 81st RD facilities. Successful completion of these plans required our team to coordinate closely with the 81st RD Regional Facility Operation Specialist, Area Facility Operations Specialist and Area Environmental Protection Specialist to complete pre-site data collection and schedule/conduct field visits to visually inspect all storage tanks in containers greater than 55-gallons. Data collected and presented in the final SPCC Plans included: facility characteristics, prevention and contingency planning, potential releases and pathways, secondary containment, emergency procedures, inspections, training, and other procedures.

**CAA Regulatory Asset Data Management Plan & Database.** We created an inventory and inspection checklist to collect data for the assets (emergency generators and fire pump engines) regulated under the CAA for the 81st RD facilities located in PR. We prepared a report to summarize the asset data (e.g., manufacturer, engine rating, fuel, estimated runtime, associated fuel tank specifications, etc.) and regulatory compliance status (e.g., permit status, Reciprocating Internal Combustion Engines National Emission Standards for Hazardous Air Pollutants and New Source Performance Standards compliance, U.S. Environmental Protection Agency Emission Tiers, Certificate of Conformity, etc.). Our team created a Microsoft Access database to house the CAA data collected, to enable future CAA data collection and inspections, and to integrate with the 81st RD current database products.

**Environmental Sampling.** AEI provided comprehensive technical support for Resource Conservation and Recovery Act (RCRA) compliance in accordance with 40 CFR Part 261.24. Tasks included conducting waste stream characterization sampling and analysis for waste streams at two 81st RD facilities in FL with a corresponding summary report and performing a site assessment at an 81st RD vehicle maintenance/motor pool facility. The site assessment included collecting and analyzing liquid and soil samples from the servicing septic tank system and the vehicle wash rack recycling system. Samples were analyzed for volatile organic compounds and petroleum range organics and compared to the Florida Department of Environmental Protection (FDEP) Groundwater and Soil Cleanup Target Levels.

## PROJECT DETAILS

### PROJECT CLIENT:

U.S. Army Corps of Engineers (USACE), Mobile District for the U.S. Army Reserve (USAR), 81<sup>st</sup> Readiness Division (81st RD)

### PROJECT LOCATION:

AL, FL, GA, KY, MS, NC, SC, TN, PR

### SERVICE LINE AREAS:

-  Environmental Compliance
-  Water Resources Studies

### EXPERTISE:

- SPCCs
- Air Quality
- RCRA Compliance
- Environmental Sampling
- Environmental Site Assessment
- Waste Stream Characterization