

ACTION DAY August 5, 2020

H₂0 LINE NEWSLETTER



VOLUME 14 ISSUE NO. 2 SUMMER 2020

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We will hold a virtual meeting on August, 4, 2020 at 10:00 - 11:00 a.m. The topic will be "Grand Prairie COVID updates" and "How to Get Involved in Clean Air Action Day." For more information, contact Jody Cason at (972) 237-8070 or jcason@gptx.org. Zoom meeting information is provided above this document.

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CLEAN AIR ACTION CHALLENGE

This challenge is all about taking steps to reduce harmful ozone and keep our community healthy. You still have time and it's easy – having employees take personal pledges and reducing energy in the workplace are a few ways. Perhaps some of your staff is working from home and reducing emissions.

Please join in by submitting the simple one page application that can be found at www.gptx.org/CleanAir to cleanair@gptx.org and encourage employees to take their pledge. The deadline for submission is 8/7/2020. If you have any questions please feel free

to contact **Eric Straw** at estraw@gptx.org. Join the industry challenge, get creative, and win!



P2 PLANNING: UPCOMING DUE DATES AND WORKSHOPS

Facilities that have completed a five-year P2 reporting cycle in 2020 must renew a five-year P2 Plan and submit an Executive Summary, a Certificate of Completeness and Correctness (C3) to the TCEQ by January 1, 2021. Additionally, facilities who become subject to P2 Planning must create an initial five-year P2 Plan and submit an Executive Summary and C3 to the TCEQ within 90 days of submitting the first TRI Form R or first Annual Waste Summary, whichever comes first.

WORKSHOPS

Once again this year, the University of Texas-Arlington Zero Waste Network is offering multiple Pollution Prevention Workshops throughout Texas in conjunction with the TCEQ:

September 16, 2020 Virtual P2 Waste Management Workshop

November 9-10, 2020 Arlington, TX

These Workshops will provide you with strategies on how to improve efficiency, decrease waste, and eliminate pollution. For more information, please visit www.P2Plan.org.

COVID-19 STRATEGIES FOR BUSINESSES

To reduce the impact of COVID-19 on businesses, workers, customers, and the public, it is important for all employers to have a working plan. This plan may involve updating other available plans to address the specific exposure risks, sources of exposure, routes of transmission, and other unique characteristics of COVID-19. Employers should prepare themselves and their workers as far in advance as possible of potentially worsening outbreak conditions. Employers should consider implementing the following strategies to help stop the spread of COVID-19:



Promote telecommuting when feasible



Implement policies and practices for social distancing



Promote good respiratory hygiene (e.g face covering, cough/sneeze etiquette)



Encourage employees to wear face coverings in the workplace



Minimize contact between workers and customers



Encourage workers to stay home if they feel sick



Promote regular handwashing and use of hand sanitizers



Have a plan to wipe and disinfect commonly used areas and surfaces



Have a plan and policies for isolation of employees and return to work



Conduct a hazard assesment of the workplace



Discourage workers from sharing equipment when possible



Encourage employees to self-monitor for symptoms for COVID-19

A lack of a continuity plan can result in a cascade of failures as employers attempt to address challenges of COVID-19 with insufficient resources and workers. Additionally, workers might not be adequately trained for jobs that they may have to perform under pandemic conditions. For additional information visit: www.osha.gov.

MULTI-SECTOR GENERAL PERMIT 2021 REVISIONS

On Oct. 18, 2019, the Texas Commission on Environmental Quality (TCEQ) held a public meeting to discuss the upcoming renewal of the Multi-Sector General Permit (MSGP) TXR050000 that is set to expire in August 2021. Some of the proposed changes include:

- 1. Change provisional coverage from 7 days to 48 hours after postmark date for paper applications to be consistent with other general permits
- 2. Add submittal of signatory letters delegation on STEERS
- Revise tables in Part V of the MSGP for the sectorspecific numeric limitations to clarify SIC code activities that are required to conduct monitoring and consolidate reporting requirements in Part III of the MSGP
- 4. Require reporting through NetDMR unless qualified for an eReporting waiver
- 5. Clarify how to report sampling and monitoring results under eReporting/NetDMR
- 6. Add the following items to the notice of intent (NOI) application:

- a. sector-specific activities with the correlated numeric effluent limitation
- b. discharging a pollutant of concern
- c. the status of a facility (active/inactive)
- 7. Expanding items that require a notice of change (NOC). The NOC form will be required to report the changes in the status of a facility (active/inactive) or the changes in the outfall locations (adding or removing locations). In addition, the NOC will be required to request discontinuation of benchmark monitoring after two years and, to request hazardous metals monitoring waiver
- 8. Require permittees to document the qualification criteria for the hazardous metals waiver and include documentation in the Stormwater Pollution Prevention Plan (SWP3)

The TCEQ plans to publish the Industrial Stormwater MSGP TXR050000 permit revisions for the Texas register in December 2020, with a 30-day comment period for the public. These changes are all aimed at streamlining the permitting process and making data management more efficient.

RADON

President's Trump 2021 proposed budget calls for a 26% budget cut to the Environmental Protection Agency, (EPA). This cut would affect 50 EPA programs including a program that some scientists have been questioning for years. Radon is a naturally occurring radioactive gas released in rock, soil, and water that can build up to dangerous levels inside homes. According to the EPA, radon is second only to cigarette smoking as a leading cause of lung cancer, causing over 21,000 deaths in the US every year. Critics of the program disagree with this figure and are wanting radon regulations rolled back.

The scientists are not suggesting that radon doesn't cause cancer. It most certainly does. The issue is with how much radon causes cancer. Critics say that the science only shows that radon is carcinogenic at high doses. Doses that you would receive in mine shafts not

Sources of Radon

Well water

Bedrock

in homes. Some critics argue that EPA's model for developing the radon standard might actually be harming people. The model assumes that increased radiation and increased mutations cause cancer. Some scientists think that this assumption is wrong because it ignores biology.

DNA mutations are developed by people all the time. Most don't turn into cancer. One theory is that the immune system moves in and removes those afflicted cells early on. Dr. Mohan Doss, a physician at the Fox Chase Cancer Center in Philadelphia, goes as far to say that low dose radiation might prevent lung cancer. He points to animal studies that show low doses of radiation might help them fight cancer by activating the immune system to clear away mutated DNA.

Trump's budget has yet to pass and how it ultimately affects the radon program is unclear. What is for certain is that without funding, the ability to study the biological effects of low dose radiation will be hindered making the task of answering the question of whether low dose radiation is harmful or beneficial difficult to answer.



COVID 19 OUTBREAK CAUSES HUGE DROP IN CHINA'S POLLUTION



We're all looking for silver linings during this trying time. Well, NASA scientists have found one – a dramatic decline in China's notorious air pollution. The drop in atmospheric nitrogen dioxide, a byproduct of burning fossil fuels, correlates with the drastic reduction of economic activity from China's quarantine efforts. NASA satellites first recorded the drop at the outbreak epicenter, near Wuhan, before tracking decreasing air pollution levels across the country as the transportation and factory work tailed off. This is good news for air quality and makes for one less respiratory problem the people of China have to worry about for the moment. While North Texas' air pollution isn't as poor, it stands to reason we will see a similar improvement in our air quality; less bad ozone days this spring and summer. That's one positive. So as we seek ways to destress in the outdoors – at least we'll have clean air to breathe!

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MASKS REQUIRED

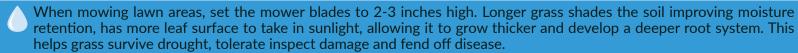
WATER CONSERVATION FOR BUSINESSES THIS SUMMER



Only water the lawn when necessary. If you water the landscaping, only do it once a week. If rainfall isn't sufficient. Avoid watering on windy and hot days. Water the landscaping in the morning or late in the evening to maximize the amount of water which reaches the plant roots (otherwise most of the water will evaporate). Use soaker hoses to water flower beds. If sprinklers are used, take care to be sure they don't water walkways and buildings. When you water, put down no more than 1 inch (set out a empty cans to determine how long it takes to water 1 inch) each week. This watering pattern will encourage more healthy, deep grass roots. Over-watering is wasteful, encourages fungal growth and disease, and results in the growth of shallow, compacted root systems that are more susceptible to drought and foot traffic. If an automatic lawn irrigation system is used, be sure it has been properly installed, is programmed to deliver the appropriate amount and rate of water, and has rain shut-off capability.

Maximize the use of natural vegetation and establish smaller areas. For portions of your lot where a lawn and landscaping are desired, ask your local nursery for tips about plants with low water demand. Consider planting more trees, shrubs, ground covers, and less grass. Shrubs and ground covers provide greenery for much of the year and usually demand less water. Use native plants in

flower beds. Cluster plants that require extra care together to minimize time and save water.



Apply mulch around shrubs and flower beds to reduce evaporation, promote plant growth and control weeds.

Always use a broom to clean walkways, driveways, and entrances rather than hosing off these areas.

Add compost or an organic matter to soil as necessary to improve soil conditions and water retention.

Collect rainfall for irrigation in a screened container (to prevent mosquito larvae growth).



Our newest staff member in Environmental Quality is Otilia (Tilly) Webb. She comes to us from the City of Waxahachie. In 2019, she received the prestigious 2019 Water Operator of the Year from the Texas Water Utilities Association. She has her Bachelor of Science in Environmental Science from the University of Texas at San Antonio. Tilly grew up in the DFW area and is excited to assist our industries with questions on drinking water quality and backflow devices. Tilly can be reached at (972) 237-8225 or at owebb@gptx.org.

A plastic film extrusion plant in Orange County was assessed \$16,312 for failing to comply with their permitted outfall limitations at their stormwater outfalls.

An environmental consulting company in Nueces County was assessed \$938 for failing to submit a written notice to the TCEQ which includes the type of industrial solid waste to be recycled, the method of storage prior to recycling, and the nature of the recycling activity 90 days prior to engaging in such activities.

A coffee producing and canning facility in Travis County was assessed \$563 for failing to get approval prior to utilizing floor wash water for on-site irrigation.

A paper and cardboard recycling facility in Bexar County was assessed \$10,596 for failing to obtain authorization to discharge stormwater associated with industrial activities, failing to provide a written estimate showing the cost of hiring a third party to close the facility by disposition of all processed and unprocessed materials, and failing to have a fire prevention and suppression plan and make it available to the local prevention authority.

An oilfield tool rental company in Reagan County was assessed \$1,312 for failing to not cause the unauthorized disposal of municipal solid waste.

TEXAS TROUBLE *

This newsletter is a publication of: Environmental Services Department Environmental Quality Division Submit your comments and suggestions to: Editor: Cindy Mendez Phone: 972-237-8225 Fax: 972-237-8228 Email:Cmendez@gptx.org Environmental Service Department Environmental Quality Division 300 West Church St., 2nd Floor Grand Prairie, TX 75050