

MBAA Safety Toolbox Talk



Environmental Regulatory Awareness

Overview

Usually when you think of a brewery the first thought is not about Environmental permits that are needed to brew beer! The larger the brewing operation usually correlates with the more environmental permitting required. This toolbox talk will discuss the types of environmental permits that may be required and then a brief overview of how to know if the brewery qualifies for any of the regulatory requirements set forth by PADEP (Pennsylvania Department of Environmental Protection) and the EPA (Environmental Protection Agency).

Types of Environmental Permits

Depending how large the operation is and where the brewery is located environmental requirements may include; an air permit, POTW waste water permit, storm water permit, Hazardous waste permit, Registered Tank Permit, or Radiation license.

Air Permitting

This regulation is concerned with what the brewery emits into the atmosphere. One mistake businesses make is to think that because there are no bad chemicals used you do not need a permit – that is false. If it evaporates you need a permit. The largest, a Title V permit, is only for those facilities with major sources of emissions. A major source facility would need the potential to emit (PTE) of 100 tons per year (TPY) or more of these criteria pollutants; CO, NO_x, SO_x, PM 10, and VOCs (50 TPY) or HAPs (20 TPY). However, the actual emissions that are regulated for these are much lower and still considered a major source if the actual emissions are anywhere from 3-10 TPY depending on the pollutant. The second possible permit required has less regulatory obligations and is the Synthetic Minor Permit. *Please consult your local government's website for more detailed guidance to decide if the brewery needs to apply for an air permit.*

POTW Waste Water Permit

If the brewery is supplied water by the local city/town water then most likely the waste water going down the drain is also going to the local city/town waste water treatment plant. In this case, the city may issue the brewery a permit with certain requirements to sample annually or quarterly for BOD, COD, TSS (Solids), TKN (Nitrogen), and Oil/grease. If the brewery is older or a large operation the city/local municipality may also limit the waste water flow and sample for heavy metals in the waste water.

***If you are treating your waste water before it goes down to the local POTW beware of chemical reactions in the water.

Storm Water NPDES Permit

If the brewery comes with storm drains on the property, a creek or stream, waste water discharges to a water body, or if there is any construction onsite that is disturbing the land then a storm water permit may be required. If there is a project to disturb the land then the local conservation district may also need to be contacted to oversee the project. They will issue their own permit with their own requirements for the project management/construction portion. *Consult your local government's website for more information.*

Registered Certified Storage Tanks

The brewery chemicals that will most likely be regulated in tanks are the caustics and acids used for the CIP process. If the brewery has drums or totes of these chemicals they should be sitting on secondary containments but would not be subject to this regulation. If a tank of chemicals or oil is utilized on site of at least 250 gals then it will need to be registered as a certified PADEP above ground storage tank (AST). If the brewery is putting in a chemical storage tank of this capacity or more, a certified tank installer is required and must be arranged, along with completed paperwork, before the tank arrives onsite. The tank will require

secondary containment that must contain 110% of the tank contents. There may also be monthly inspection requirements for the tank/s onsite. *Consult your local government's website for more information.*

Hazardous Waste Permit

Even small breweries may be required to have a hazardous waste permit if there is disposal of waste oil, spent chemicals, flammable flavorings, light bulbs, batteries, electronics or spent refrigerant. Hazardous waste criteria; if the substance is ignitable, corrosive, reactive, or toxic. The allowance for a very small quantity generator (VSQG) is > 220.5lbs per month, Small Quantity Generator (SQG) is > 2,204.6lbs per month, and a Large Quantity Generator (LQG) is < 2,204.6lbs per month. *Consult your local government's website for more information.*

<https://www.epa.gov/hwgenerators/hazardous-waste-generator-regulatory-summary>

Radiation License

If the brewery has any quality systems such as an x-ray or Filtec then the facility will be required to obtain a Radiation License for those devices.

Refrigeration Requirements

Your government may require registration of refrigeration units and records of decommissions. *Consult your local government's website for more information.*

Additional Resources

EPA Website or your local government's website.