

SECTION III ENVIRONMENTAL CONCERNS AND THE WORK ENVIRONMENT

MAINTENANCE SHOP RELATED REGULATIONS AND REGULATIONS IN THE 1990s

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Using New York State Department of Transportation's experiences with a state OSHA plan in place since 1980, it was my intention to create an awareness by the participants of the importance of occupational safety and health in the work environment, specifically in the equipment management setting. I discussed our efforts to meet "the letter of the law" compliance with OSHA standards, and roadblocks encountered in that endeavor. More important was the realization that our efforts were not succeeding, and subsequent identification of the changes necessary to meet our program objectives. They were:

- Developing better lines of communication among Department managers regarding OSHA full compliance;
- Hiring an Industrial Hygienist to identify exposures;
- More emphasis on engineering controls;
- More reasonable time tables for phasing compliance with other standards; and
- More precise interpretation of standards by the Labor Department, the enforcement agency.

As a result of these actions, our compliance efforts are "back on track."

In closing, I asked the audience to:

- Give safety their personal attention--get involved, be supportive;
- Think as if OSHA exists in their state, whether it does or not, use the standards as guide;
- Realize that all states will probably adopt OSHA by the year 2000;
- Develop safety standards voluntarily, before it becomes the law, this will make the transition easier;
- Be proactive, not reactive;
- Develop a safety program appropriate for their specific needs--no more, no less;
- Pay attention to safety in their own program area, before someone in their organization tries to do it for them;
- Get the employees involved in the process;

- Use engineering controls, when feasible; and
- Institutionalize safety into their operations--everyone benefits.

LEAKING UNDERGROUND FUEL TANK MANAGEMENT SYSTEM

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The North Carolina Department of Transportation (NCDOT) leaking underground storage tank (UST) management system was developed as a result of state regulations for underground storage tanks, which have been under development since 1985 when the General Assembly authorized the Environmental Management Commission to develop and adopt such regulations. These regulations have provided technical standards for construction and installation of new UST systems, for corrective action in cases of leaking systems, for closure of systems taken out of service, and for release and action of new and old systems.

The NCDOT is composed of 14 divisions in 100 counties with 108 refueling facilities. An active program of installing new fiberglass tank systems along with removing existing out of service tanks and piping was initiated in 1988. In 1989 an annual tank testing program was started for 24 year old tanks and older. Tank testing was eventually expanded to include the State Highway Patrol, Ferry Divisions, and Welcome Centers. Currently, 200 underground storage tanks are scheduled for testing in 1990.

Shortly after the program was initiated, several petroleum contaminated sites were discovered and it became apparent that an organized approach to deal with leaking UST sites was needed. A standard operating procedures manual was drafted and distributed throughout the NCDOT. This draft outlines procedures for initial response, remediation and sampling, should contamination be encountered, as well as, basic site closure steps for clean sites.

Detailed preliminary site investigations are being conducted by NCDOT personnel. These investigations explore the lateral, vertical and horizontal extent of petroleum releases. They include all aspects of regional hydrology, site hydrogeology, magnitude and direction of groundwater flow, delineation of contaminant plume, and proposed remedial action plans and systems. Re-