

NOVEMBER 2015

The Flying Green is designed to help keep you informed on what is happening in the Environmental world at Fort Rucker. Please send comments or questions to <u>melissa.g.lowlavar3.civ@mail.mil</u>.

Upcoming Changes to Federal Air Pollution Regulations – Aerospace NESHAP

The Aerospace NESHAP is designed to reduce organic and inorganic HAP emissions by:

- Limiting VOC and HAP concentration for coatings, adhesives, solvents, and other materials
- Requiring emission controls for cleaning, application, and de-painting
- Requiring specific monitoring, recordkeeping, and reporting activities depending on the application method, type of materials used, and volume of each material applied per year

On December 7, 2015, the EPA finalized the residual risk and technology review (RTR) and published final amendments to the Aerospace NESHAP. The amendments establish limitations for VOCs and HAPs for specialty coatings; remove exemptions for periods of startup, shutdown, and malfunction (SSM); and streamlined certain recordkeeping requirements. The amendment also clarified the official definition of Non-HAP containing materials as well as other miscellaneous minor changes.

What that means primarily for Ft. Rucker is that specialty coatings, which were previously exempt from Aerospace NESHAP requirements are now regulated under the updated rule. Specialty coatings meet the definition of a primer, topcoat, or self-priming topcoat and have additional performance criteria due to their specific applications. Examples of specialty coatings include, but are not limited to, flexible primer, fuel tank adhesive, and high-temperature coating.

Certain types of specialty coatings will now be required to meet HAP and VOC content limits, and specialty coating application operations will be required to be controlled in a manner similar to topcoat and primer application operations, which have been regulated since 1995. Additionally, specialty coatings will be subject to the same recordkeeping and reporting requirements as primer and topcoats. This will require contractors and other Ft. Rucker personnel that utilize these newly regulated materials to begin keeping records of usage, which will be used to

calculate HAP emissions and will periodically be reported to ADEM.

There are a few critical dates associated with the updated rule but the compliance date that affects Ft. Rucker is December 7, 2018. On that date, Ft. Rucker personnel that are affected by the rule should have identified any newly regulated material they work with and established a plan to track and record material usage amounts.

If you are potentially affected by the update to the Aerospace NESHAP and are not sure what your requirements are, contact your organization's environmental contact or you may contact Kyle Flowers, DPW-ENRD air program coordinator, at 255-0484 or kyle.m.flowers.ctr@mail.mil.

January Training Schedule		
15 JAN 19	0800-1000	90-DAY HWAS (2 hr)
15 JAN 19	1300-1500	HWSAP Manager (2hr)
16 JAN 19	0800-1600	EO Training (1 day)
17 JAN 19	0800-1000	SPCC Training (2hr)
22 JAN 19	0800-1600	EO Training (1 day)
23 JAN 19	0800-1000	HWSAP Manager (2hr)
23 JAN 19	1300-1500	SPCC Training (2hr)
24 JAN 19	1300-1500	90-DAY HWAS (2 hr)

"In every walk with nature, one receives far more than he seeks." John Muir

Remember to check the Sustainable Fort Rucker website for more information! https://www.fortrucker-env.com





The Compliance Corner is focusing on **Natural Resources** this quarter. Let us know if you would like Information about a particular topic, and we will include it in the next issue.

Tricolored Bat - Species of Concern at Fort Rucker

The tricolored bat is found in 38 states, including Alabama, and was once believed to be the most common bat species in Alabama. However, in recent years, the species has been decimated by white-nose syndrome and has seen 95-100 percent declines in population in areas where the disease has taken hold.



A fungus, *Pseudogymnoascus destructans*, or Pd, causes white-nose syndrome, which affects many, but not all bat species that come into contact with it. Of those affected, bat populations have declined by more than 90 percent.

The tricolored bat (*Perimyotis subflavus*, formerly the eastern pipistrelle) is now considered a species potentially warranting listing by the USFWS. This bat occurs throughout Alabama including southeast Alabama, where Fort Rucker is located, although none have been documented in surveys on Fort Rucker.

United States Fish and Wildlife Service officials at the Daphne, AL field office have asked Fort Rucker to give consideration to this species in our Integrated Natural Resources Management Plan in an effort to reduce adverse impacts on the tri-colored bat from limiting factors other than whitenose syndrome. In December 2017, the U.S. Fish and Wildlife Service (USFWS) issued a notice that 90-day findings have been reached in response to petitions to list five species as threatened or endangered, including the tricolored bat. The USFWS found that a 2016 petition to list the tricolored bat as threatened or endangered contained substantial information showing that listing under the Endangered Species Act may be warranted.



Fort Rucker is treating the tricolored bat as a Species at Risk (SAR) and is managing it proactively. Recommended management actions by USFWS include limiting growing season burns during the May - October timeframe and considering timing of timber harvests to avoid roosting habitat disruption or destruction.

ENVIRONMENTAL IQ

LAST QUESTION: What is the typical gopher tortoise habitat?

ANSWER: Gopher tortoises need relatively deep, sandy, soils in which to burrow and open sunny sites for nesting. They thrive in longleaf pine forests. They need large parcels of undeveloped land not fragmented by roads, buildings, parking lots, and other structures. Such barriers in natural habitat limit food availability and burrow space for tortoises plus expose them to closer contact with humans and their vehicles.

NEW QUESTION: Has the federally listed Red Cockaded Woodpecker been located at Fort Rucker?