



EHS Compliance Update

March 2005

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EHS Course Offerings

Management Systems

- Six Sigma Training*
- OHSAS 18001 Implementation*
- OHSAS 18001 Internal - Auditing*
- Transition to ISO 14001:2004*
- ISO 14001 Internal Auditor*
- ISO 14001 for Managers*
- Implementing ISO 14001*

Environmental Compliance

- The "Complete" Waste Management Course (DOT/RCRA)*
- Environmental Compliance for EHS Managers*
- Integrated Response Planning—SPCC, Storm Water, RCRA*

OSHA Compliance

- Hazwoper 8hr and 40hr*
- Confined Space*
- Site Supervisors*
- See pages 4 and 5 for complete course descriptions and schedule.*

OSHA Proposes to Significantly Reduce Hexavalent Chromium Exposure Limit

The Occupational Safety and Hazard Administration (OSHA) is proposing to significantly lower its permissible exposure limit (PEL) for hexavalent chromium (CrVI). The proposed rule (69 FR 59305) would reduce the current PEL from 52 ug/m³ to 1 ug/m³ of Cr(VI) as an 8-hour time weighted average. Facilities using materials containing CrVI are advised to evaluate potential employee exposure. Some activities that may cause exposure include welding, cutting, or performing other abrasive activities to CrVI plated metals or hardware such as screws, nuts, and bolts that may contain CrVI. The proposed rule also includes employee protection provisions such as preferred methods for controlling exposure, respiratory protection, protective work clothing and equipment, hygiene areas and practices, medical surveillance, hazard communication, and recordkeeping.

In comments on the proposed rule, the National Association of Manufacturing (NAM) told OSHA that its proposed PEL is the lowest of all industrialized nations and would not be feasible for facilities to meet. The NAM, along with US Chamber of Commerce and the Small Business Administration's Office of Advocacy suggested a more credible exposure limit of 23 micrograms per cubic meter. **(Continued Page 2)**

OHSAS 18001—So what's next

Many of you are just recovering from your QS9000 (Quality) and/or ISO14001 (Environmental) certifications and getting back to the manufacturing business. So what is this new OHSAS 18000 certification people are talking about? Well, the Occupational Health and Safety Assessment Series (OHSAS) guidelines and specifically OHSAS 18001:1999 **Occupational Health and Safety Management Systems – Specification** is an international framework and certification process for Occupational Health and Safety (OH&S) Management Systems. The good news is you're your customers have not yet mandated this certification and the bad news is many of your competitors are not waiting and moving ahead as a "competitive" differentiator and to drive down operating costs. So let's find out what OHSAS is all about and whether it makes sense to seek certification.

Because of the high costs associated with employee illness/injury, OSHA inspections, and employee concerns, most companies have well established H&S programs. The OHSAS standard does not require additional H&S programs it is simply a consolidation and formalization of these existing systems. And for those of you who have gone through the ISO 14001 process the OHSAS 18001 standard mirrors the ISO 14001. OHSAS 18001 is built on the Deming's PLAN-DO-CHECK-ACT process and the objective is "Continuous Improvement" of your health and safety performance. **(Continued on Page 6)**

What is OSHA's VPP Program?

The Voluntary Protection Programs (VPP) promote effective worksite-based safety and health. In the VPP, management, labor, and OSHA establish cooperative relationships at workplaces that have implemented a comprehensive safety and health management system. Approval into VPP is OSHA's official recognition of the outstanding efforts of employers and employees who have achieved exemplary occupational safety and health.

How Does VPP Work?

VPP sets performance-based criteria for a managed safety and health system, invites sites to apply, and then assesses applicants against these criteria. OSHA's verification includes an application review and a rigorous on-site evaluation by a team of OSHA safety and health experts

Find out more at OSHA's VPP web site.

<http://www.osha.gov/dcsp/vpp/index.html>

Contact **EHS** for help getting your site certified.

Hazardous Waste Tracking System Improved

EPA is improving the tracking of hazardous waste shipments by establishing a nationally standardized manifest form. This new form makes the nation's hazardous waste tracking system more efficient by replacing various state formats with one national form. This streamlined approach will benefit waste handlers and regulators by reducing the costs and time associated with managing multiple forms, while maintaining the safety of EPA's well established cradle-to-grave hazardous waste tracking system.

By employing a streamlined and consistent national standard, hazardous waste handlers can better track complicated shipments, such as container residues, rejected wastes and international shipments. The new form also makes it easier to collect data for hazardous waste reporting. The Manifest will be printed to precise EPA specifications that ensure uniformity, and each form will carry a unique preprinted manifest tracking number. EPA will oversee the registration process. Waste handlers can generate their own manifest forms once they have registered with the Agency. Record keeping, reporting requirements, and other changes also vastly improve and modernize hazardous waste tracking. The new form will be phased in over an 18-month transition period. Once the new form is in place, handlers will be able to obtain new forms from any source that has registered with EPA to print and distribute them. More than 139,000 businesses, in approximately 45 industries, are expected to achieve time and cost efficiencies through use of the new tracking system. These businesses ship approximately 12 million tons of hazardous wastes annually, and use between 2 and 5 million hazardous waste manifests.

More information is available at: <http://www.epa.gov/epaoswer/hazwaste/gener/manifest/mods.htm>.

Satellite Accumulation Areas (SAA)

Question : Do containers in SAAs have to comply with the air emission standards of Part 265 Subparts AA, BB, and CC?

Answer : No. Containers in SAAs are not required to comply with the air emission standards of Part 265 Subparts AA, BB, and CC.⁵ Likewise, SQGs are not required to comply with the air emission standards at their 180-day accumulation areas.

LQGs, however, are required to comply with the RCRA air emission standards at their 90-day accumulation areas. Therefore, when an LQG transfers waste from an SAA to a 90-day central accumulation area, the applicable portions of the air emission standards of Part 265 Subparts AA, BB, and CC must be met at the 90-day central accumulation area.

Hexavalent Chromium Exposure Limit (Con't)

OSHA is holding a public hearing in Washington, DC on the proposed hexavalent chromium PEL from February 1 to February 17. The federal register notice can be viewed online at http://www.osha.gov/FedReg_oshapdf/FED20041004.pdf.

DOT Amends HMR to Align with International Standards

RSPA is amending the Hazardous Materials Regulations (HMR) to maintain alignment with international standards by incorporating various amendments, including changes to proper shipping names, hazard classes, packing groups, special provisions, packaging authorizations, air transport quantity limitations and vessel stowage requirements. Because of recent changes to the International Maritime Dangerous Goods Code (IMDG Code), the International Civil Aviation Organization's Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO Technical Instructions), and the United Nations of Dangerous Goods (UN Recommendations), these revisions are necessary to facilitate the transport of hazardous materials in international commerce.

The effective date of these amendments is January 1, 2005. Unless otherwise specified, compliance with the amendments adopted in this final rule is required beginning January 1, 2006.

Amendments to the HMR in this final rule include, but are not limited to the following:

- ◆ Amendments to the Hazardous Materials Table (HMT) which add, revise or remove certain proper shipping names, hazard classes, packing groups, special provisions, packaging authorizations, bulk packaging requirements, passenger and cargo aircraft maximum quantity limitations and vessel stowage provisions.
- ◆ Amendments to the List of Marine Pollutants.
- ◆ Revisions and additions of special provisions.
- ◆ Removal of the air eligibility marking requirement.
- ◆ Addition of a "KEEP AWAY FROM HEAT" marking

(Continued on Page 8)

EHS Management Strategies Clients include:

- ◆ Dana Corporation
- ◆ American Axle & Manufacturing
- ◆ General Motors
- ◆ Steel Case
- ◆ Pfizer
- ◆ Eaton Corporation
- ◆ Median Automotive
- ◆ Exelon Energy
- ◆ Cascade Engineering
- ◆ Gill Industries
- ◆ Herman Miller
- ◆ Hayworth
- ◆ SAIC

EHS News

EHS is please to offer the following new training programs:

- ◆ ISO 14001:2004 Transition
- ◆ The "Complete" Waste Course
- ◆ Environmental Compliance of EHS Managers
- ◆ Integrated Contingency Planning

These programs have been developed based on our discussions with clients about what they need to meet their compliance requirements.

The **ISO 14001:2004** course is a one day program designed to show facilities the changes to the ISO 14001 standard and modify their existing systems.

The **Complete Waste Course** combines the DOT and RCRA requirements into one program.

Many EHS managers are new or came from a safety background. The **Environmental Compliance for EHS Managers** program was designed to provide these people with a good understanding of environmental regulations.

Most facilities are required to have emergency response plans under multiple regulatory programs. Our **Integrated Contingency Planning** program will review the regulations for SPCC, RCRA, and Stormwater plans and demonstrate how to integrate these into one concise emergency response plan.

Management Systems

OHSAS 18001 Implementation (1 day): This course will provide a detailed overview of the OHSAS standard and how to implement an OHSAS Health & Safety management system. Each student will leave with a good working knowledge of the standard and the tools needed to develop an HSMS.

Internal Auditor Training—ISO 14001 or OHSAS 18001 (2 day): This is program is for anyone who wants to conduct internal audits. It will provide a detailed overview of the ISO14001 or 18001 standards and auditing techniques. This is a very “hands on” program filled with exercises.

Transition to ISO 14001:2004 (1 day): This is program is for anyone who wants to conduct internal EMS audits. It will provide a detailed overview of ISO14001 and auditing techniques. This is a very “hands on” program filled with exercises.

ISO 14001 for Managers (1 day): This is a one day program designed to teach new managers or supervisors the requirements of their environmental management systems. The course will focus on the standard and provide the new manager with a good understanding of the operating requirements and their responsibilities.

ISO 14001 Implementation (1 day): This is a one day program designed to train facilities how to implement an ISO 14001 compliant environmental EMS. You will get a good understanding of the ISO 14001 standard, how to plan an implementation, and development of major EMS components.

Six Sigma Programs: EHS offers the following Six Sigma training program; Executive Leadership (1 day), Champion (3 days), Green Belt (5 days) and specialized Black Belt training (24 days). Other programs include Six Sigma Lean Manufacturing, Transactional Lean, and other Six Sigma tools.

Environmental Compliance

The “Complete” Waste Management Course (1 day): This program provide the training required under **DOT and RCRA** for hazardous materials and waste management. The DOT training will cover the requirements of Subpart H, §172.700-172.704. The RCRA training includes waste characterization and management, manifesting, record keeping, LDR, training, contingency planning, universal wastes, and biennial reporting. This training meets the annual RCRA training requirements.

Environmental Compliance for EHS Managers (1 day): This program provides a good overview of the environmental regulations that apply to industrial and manufacturing operations. This course is ideal for the new EHS manager or anyone that needs a good understanding of environmental regulations. It will cover Waste Management (RCRA & non-hazardous), Water Discharge (NDPES & POTW), Emergency Preparedness (SPCC, Stormwater), and EHS Training requirements.

Integrated Response Plans—SPCC, RCRA, Stormwater (1 day): This is a one day programs designed to cover the development of an integrated response plan and the applicable emergency preparedness regulations. It will cover the SPCC, RCRA Contingency, and Stormwater regulations, and the process of combining these into a comprehensive emergency response plan.

OSHA Compliance

Hazwoper 8hr, 24hr, and 40 hr Courses: These programs meet the requirements for 29 CFR1910.120 for initial and annual hazardous operations training.

Confined Space (1 day): This course fulfills the classroom requirements of 29 CFR 1910.146 for Confined Space Entry.

OSHA Site Supervisor (1 day): This course meets OSHA training requirements for supervisors and managers involved in the management and administration of waste site activities. Per 29 CFR 1910.120, each site must have a Supervisor who has received an additional 8 hours of training beyond their initial 40 hour certification.

Referral Program—EHS will pay a referral fee to YOU for any people referred to a course. Contact us for details.

Multiple Student Discounts— Sign-up two students and receive a 50% discount on the third student.

To subscribe to this newsletter or information on any of these services contact:

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Training Schedule Public Courses					
Course	Cost	March	April	May	June
ISO 14001 Internal Auditor	\$599	Grand Rapids, MI Buffalo, NY Detroit, MI Phoenix, AZ St. Louis, MO	Philadelphia, PA Milwaukee, WI Indianapolis, IN Orlando, FL Minneapolis, MN Cleveland, OH	Atlanta, GA St. Louis, MO Kansas City, MO Louisville, KY	Huston, TX Knoxville, TN Greenville, SC Pittsburg, PA Columbus, OH Edison, NJ
ISO 14001:2004 Transition	\$399	Detroit, MI	Chicago, IL	St. Louis, MO	Edison, NJ
ISO 14001 for Managers	\$399	Chicago, IL Detroit, MI St. Louis, MO	Orlando, FL Grand Rapids, MI Indianapolis, IN	Minneapolis, MN Milwaukee, WI	
ISO 14001 Implementation	\$399	Chicago, IL Detroit, MI St. Louis, MO	Orlando, FL Grand Rapids, MI Indianapolis, IN	Minneapolis, MN Milwaukee, WI	
OSHAS 18000 Overview and Implementation	\$399	Detroit, MI Buffalo, NY	Chicago, IL Orlando, FL	St. Louis, MO Cleveland, OH	Edison, NJ Philadelphia, PA
The “Complete” Waste Management Course	\$459	Detroit, MI	Chicago, IL	St. Louis, MO	
Environmental Compliance for EHS Managers	\$459		Chicago, IL	Lansing, MI	Atlanta, GA
Intergraded Response Planning—SPCC, Stormwater, RCRA	\$459		Lansing, MI	Chicago, IL	Atlanta, GA
Six Sigma Executive Leadership Overview	\$750	Las Vegas, NV	Chicago, IL	Boston, MA New York, NY	
Six Sigma Champion Training	\$2,950			Miami, FL	
Six Sigma Green Belt	\$5,950	San Diego, CA		Dallas, TX	Niagara Falls
Hazwoper Refresher (8 hr) (Many more locations and dates please contact EHS)	\$125	Atlanta, GA Charlotte, NC Detroit, MI Chicago, IL	Indianapolis, IN Lansing, MI Detroit, MI Chicago, IL	Phoenix, AZ Orlando, FL Detroit, MI Chicago, IL	Huston, TX Philadelphia, PA Detroit, MI Chicago, IL
Confined Space	\$299	Chicago, IL	Detroit, MI	Raleigh, NC	Orlando, MI
Site Supervisor	\$195	Denver, CO	Atlanta, GA	Tampa, FL	

Don't see your location??? Contact us to add your location!!!

Please contact us for specific dates for each program and registration information at:

JimCharlesPE@aol.com or (616) 901-5957. We will work to accommodate your schedule. These programs can be offered at your location with 6 to 8 students. All classes subject to cancellation if minimum class size not meet.

OHSAS 18001 (Con't)

So let's see what is required for certification to this international standard.

OHSAS 18001 specification provide the requirements for an OH&S management system to enable an organization to control its OH&S risks and improve performance. The management system will have the following major components:

OHSAS 18001 Standard	
1) OH&S Policy	2) Planning <ul style="list-style-type: none"> ◆ Planning for hazard identification, risk assessment and risk control ◆ Legal and other requirements ◆ Objectives ◆ OH&S management programs
3) Implementation and operation <ul style="list-style-type: none"> ◆ Structure and responsibilities ◆ Training, awareness and competence ◆ Consultation and communication ◆ Documentation ◆ Document and data control ◆ Operational Control ◆ Emergency preparedness and response 	4) Checking and corrective action <ul style="list-style-type: none"> ◆ Performance measurement and monitoring ◆ Accidents, incidents, non-conformance and preventative action ◆ Records and records management ◆ Audit
5) Management Review	

You can see the similarities to the ISO 14001 standard and the PLAN-DO-CHECK-ACT process. The following provide a brief overview of the effort required to develop each major component of an OHSAS 18001 conformant OH&S management system.

OH&S Policy – The OH&S policy is where a facility makes a commitment to the OH&S management system. The commitment includes commitments to continual improvement of H&S performance and to comply with current applicable OH&S legislation. The policy must be approved by top management, available to all interested parties, and periodically reviewed. A facility should wait until completion of the planning elements prior to finalizing their policy to insure that it is in deed appropriate to the nature and scale of there organization and can include specific OH&S risks, as appropriate.

Planning – The planning process includes a formalized process for hazard identification, assessment of potential risk, and risk control. While most facilities intuitively know there high risk operations and have control mechanisms in place. This process will require a complete inventory of all OH&S risks associated with an organizations operation (small and large) and a process to assess the risks of the identified hazards. This evaluation needs to include routine and non-routine activities and the activities of all employees including subcontractors. The process to evaluate these risks can vary widely across industries and organizations. The hazard identification and risk assessment is extremely important as this establishes the basis for the entire OH&S management systems.

The organization also needs to conduct an assessment of all legal and other OH&S requirements it is subject and include this in the above risk assessment. This must be formalized in a procedure that describes how the legal requirements are identified and how this information is kept up-to date.

OHSAS 18001 (Con't)

The final component of the planning process is the establishment of OH&S goals for improvement of the organizations OH&S performance and the continuous improvement process. The goals should consider all significant risks and focus on areas with the highest cost. The goals should be specific and include a timeframe for completion and clearly state who is responsible.

Implementation and operation – During the implementation and operation phase the organization will define the structure and responsibilities, training requirements, communication process, document control, and emergency preparedness. The organization will designate a OH&S Management Representative (OHS-MR) who will be responsible for the implementation and operation of the OH&S management system. The standard states that this responsibility should be a member of the organization's "Top Management".

Training and awareness requires a systematic identification of the OH&S competencies required at each level of your organization. Again, no additional training is required, however, all personnel need to be aware of how they and their position impact the OH&S performance of the organization and the consequences of deviations from specified procedures. The training procedures should outline the requirements for training, new employees and the assessment of "competencies".

OHSAS's communication requirements are unique in that it requires the employees input into key OH&S elements. It states that the employees shall be involved in the development and review of key policies, be consulted about changes that may affect safety, and be represented on OH&S matters.

Document control is one of the major areas that your various management systems can be integrated. A single document control system should be used and documents can be differentiated (quality, environmental, OH&S) using a defined labeling systems. Most plants have implemented an electronic document control system to store documents, track revisions, and document approvals. This is the one area where some capital investment is needed to minimize the long term costs associated with the operation of these management systems. Get a good system that works for your organization – don't go CHEAP.

OH&S operational control procures is where you will formalize the procedures that you use to control and minimize the risks associated with your operations. Operational control is required for "operations with identified risks where control measures need to be applied". For many of you this may be a simple as getting your existing OH&S procedures into your document control system.

The emergency preparedness component of the standard is simply a formalization of your emergency response programs. The will include your SPCC/PIPP, RCRA contingency, risk management plans (RMP), and evacuation plans. The only changes are that you are required to review your response plans after each incident and periodically conduct emergency responses drills.

Checking and corrective action – The checking and corrective process should drive the continuous improvement for the organization. The key to this is a very effective auditing program and well trained internal auditors. The auditing program needs to be proactive and focused on finding opportunities for "continuous improvements" not just chasing down paper work errors. Your organization should also place as much importance on the identification of preventive actions as they do on finding corrective actions.

Management Review – This is the acting component of the continuous improvement process. Many plants already have regular H&S reviews used to improve safety performance. An effective management review process requires the organizations top management be engaged and the OHS-MR reporting on all elements of the OH&S management systems. This includes the findings of the internal audits, preventative actions, and progress towards the defined safety goals.

OHSAS 18001 (Con't)

So now the question is “does my site need an OHSAS 18001 conformant OH&S management system”? I believe the answer is YES and Maybe. The process of developing an OH&S management system using the frame work of this standard can be very beneficial and be used to accomplish improvement of your OH&S performance and drive down operating costs. The MAYBE piece is whether or not to seek registration from a third party registrar. Registration has the benefit of demonstrating to customers and other stakeholders (employees, bankers, insurance companies, regulatory agencies) that you have a well managed OH&S system and does tend to keep a system active through the surveillance audit process. However, the improvement in OH&S performance can be achieved without the added expense of seeking certification. Top management should decide, like with any other investment, if the return is worth the cost.

DOT Amends HMR (Con't)

- ◆ requirement for packages offered for transportation by air.
- ◆ Amendment to require that aerosols that are carried aboard an aircraft in accordance with Sec. 175.10(a)(4) have their release devices protected by a cap or other suitable means.
- ◆ A grandfather provision to allow the shipment of materials classified as corrosive to steel or aluminum under ASTM G 31-72.
- ◆ A provision to require that the word "overpack" be marked on overpacks to indicate that inside packages comply with prescribed specifications.
- ◆ An amendment to the criteria for classification of materials that are corrosive to metals.
- ◆ Revision of the limited quantity provisions for Class 6.1, PG II materials and for materials with a subsidiary hazard of 6.1, PG II.
- ◆ Amendments to the packaging requirements for materials classified as Division 6.1, Packing Group I, Hazard Zone A or Hazard Zone B.
- ◆ Revision of the organic peroxide packaging requirements in order to have one consolidated packaging section for organic peroxides. The revised section will include three separate tables for organic peroxides authorized for transport in non-bulk packagings, IBCs, and bulk packagings other than IBCs, respectively. Additionally, the packaging tables will be updated through the amendments to the organic peroxide requirements that will add, revise, or delete certain entries in the organic peroxide tables.

For a Section-By-Section Review, visit the Federal Register Notice at

<http://hazmat.dot.gov/regs/rules/final/69fr/69fr-76043.htm>.

EHS Consulting Services

EHS offers high quality cost effective consulting services in the following areas:

- | | |
|---|---|
| ◆ SPCC Certification and Planning | ◆ Environmental liability assessments and financial reporting |
| ◆ Environmental Management Information Systems (EMIS) implementation and training | ◆ Site remediation technology and closure evaluations |
| ◆ EHS Auditing | ◆ Integrated Contingency Planning—SPCC, Stormwater, RCRA |
| ◆ EHS Compliance Planning and Training Development | ◆ Hazardous Waste Management and Cost Minimization |
| ◆ Sustainability Planning | ◆ ISO 14001 / OHSAS 18001 Management Systems |