



EHS Compliance Update

Fall 2006

PM Environmental, Inc.

Inside this Issue

DEQ Director Congratulates Steelcase on Environmental Award	2
RCRA Orientation Manual 2006—It's FREE	2
EHS Training Programs	3/4
Common Waste Container	5
Bureau of Labor Statistics	5
EHS Training Programs	4
RAB Auditor Programs	6
Compliance Programs	7

Environmental Trivia

Which grocery bag takes more energy to produce?

- A. Paper
- B. Plastic

See Page 3 for Answer

See **NEW Team Building & Productivity** program on Page 3 !!!



PME saves money using our own equipment.

DOT—Will the real “Hazmat Employee” please stand up

Under 49 CFR 172 DOT requires that all Hazmat Employees receive training every 3 years. This training must include general awareness, function-specific, safety and security awareness training for all hazardous materials employees.

A hazmat employee is a person who is employed by a hazmat employer and who in the course of their employment directly affects hazardous materials transportation safety. Individuals, who, during the course of their employment perform any of the following activities:

- 1) Load, unload or handle hazardous materials
- 2) Manufacture, test, recondition, repair, modify, mark, or otherwise represents containers drums, or packages as qualified for use in the transportation of hazardous materials
- 3) Prepare hazardous materials for transportation
- 4) Has responsibility for safety of transporting hazardous materials
- 5) Operates a vehicle used to transport hazardous materials

This can include— Shipping Clerks, Maintenance, Forklift Drivers, and EHS staff. Managers responsible for these operations should also be training.

This is a very common violation for small to medium sized companies that ship relatively small quantities of hazardous waste. Many times your vendors fill out the paper work and simply ask you to sign in the dotted line. Make sure you've got the right people DOT trained. Please contact PME with any questions.

OSHA Issues Hexavalent Chromium Guidance for Small Businesses

The Occupational Safety and Health Administration (OSHA) today issued safety and health [guidance](#) to help small businesses comply with the Agency's new hexavalent chromium (Cr(VI)) requirements for general industry, construction and shipyards.

"This new resource is aimed at helping small businesses comply with the new standards, while helping them reduce the risk to employees potentially exposed to these compounds," said OSHA Administrator Edwin G. Foulke, Jr.

The guide describes the steps that employers are required to take to protect employees from hazards associated with exposure to Cr(VI). It is divided into sections that address the major provisions of the standards, and follows the same organization as the corresponding paragraph of the standards. However, the guide provides more detail than the standards to help employers better understand the requirements.

Permissible Exposure Limits (PEL), exposure determination, regulated areas, methods of compliance, respiratory protection, protective work clothing and equipment, hygiene areas and practices, housekeeping, and medical surveillance, are the major topics included in the guide.

Continued on Page 5

**EHS Management
Strategies Clients
include:**

- ◆ Lear Corporation
- ◆ Kraft Foods
- ◆ Alticor
- ◆ Delphi
- ◆ Dextech
- ◆ Consumers
Energy
- ◆ Dana Corporation
- ◆ American Axle &
Manufacturing
- ◆ General Motors
- ◆ Steel Case
- ◆ DTE Energy
- ◆ Pfizer
- ◆ Eaton Corporation
- ◆ Median
Automotive
- ◆ Exelon Energy
- ◆ Cascade
Engineering
- ◆ Gill Industries
- ◆ Herman Miller
- ◆ Hayworth
- ◆ SAIC
- ◆ Honeywell
- ◆ Textron
- ◆ Barnes Aerospace

**The Chinese used to
scatter firecrackers
around the house.
Reason: fire alarms.**

DEQ Director Congratulates Steelcase on Environmental Award

Department of Environmental Quality Director Steven E. Chester congratulated officials at Steelcase, Inc. of Grand Rapids today on receiving the Most Valuable Pollution Prevention Award by the National Pollution Prevention Roundtable in Washington, DC.

“This award recognizes Steelcase’s continuing commitment to pollution prevention practices that benefit the company, its community, and all of Michigan,” said Director Chester. “The company’s actions demonstrate that we can have both a healthy environment and a healthy economy throughout our great state.”

Steelcase’s environmental accomplishments include creating the world’s first Leadership in Energy and Environmental Design (LEED) certified manufacturing facility, using metal finishing operations that are free of all volatile organic compounds (VOCs), reducing hazardous waste generation by 99 percent since 1990, and targeting 100 percent water based wood finishes by the end of 2006.

Steelcase has also been a member of the Michigan Business Pollution Prevention Partnership since 1998 and is a recent recipient of the DEQ’s Neighborhood Environmental Partner award.

For more information on the DEQ’s Pollution Prevention Partnerships, go to: <http://www.michigan.gov/deqp2partnerships>.

RCRA Orientation Manual 2006—It’s FREE

This updated manual provides introductory information on the solid and hazardous waste management programs under the Resource Conservation and Recovery Act (RCRA). Designed for EPA and state staff, members of the regulated community, and the general public who wish to better understand RCRA, this document constitutes a review of the RCRA program and is not a substitute for RCRA or its implementing regulations. The manual comprises seven sections plus appendices:

- ◆ Introduction to the Resource Conservation and Recovery Act;
- ◆ Managing Solid Waste - RCRA Subtitle D;
- ◆ Managing Hazardous Waste - RCRA Subtitle C;
- ◆ Moving Forward: Materials Management and Resource Recovery
- ◆ Miscellaneous Statutory Provisions;
- RCRA and its Relationship to Other Environmental Statutes; and Public Participation in the RCRA Program.

<http://www.epa.gov/epaoswer/general/orientat/>

Satellite Accumulation Rules—didn’t know that

RCRA requires SQG and LQG to conduct training of personnel, however, do personnel gearing small quantities of waste and placing them into SAA require training? EPA says NO. The RCRA regulations do not require training of personnel working in SAAs. Personnel that have access to or work in central accumulation areas, including those that move hazardous waste from a SAA to a central accumulation area, must be trained. As the ones actually generating hazardous waste, however, personnel working in SAAs need to be familiar enough with the chemicals with which they are working to know when they have generated a hazardous waste so that it will be managed in accordance with the RCRA regulations.

MANAGEMENT SYSTEMS

- ◆ Advanced EMS Auditing
- ◆ **ANSI Z10 OH&S Management System (new)**
- ◆ OHSAS 18001 OH&S Implementation
- ◆ ISO 14001/TS16949 Internal Auditor
- ◆ ISO 14001/RC14001 Implementation
- ◆ Lead Auditor Programs 14001/TS16949/ISO9000

EHS COMPLIANCE

- ◆ **TOTAL WASTE COURSE**
- ◆ **Hazwoper 8hr, 24hr, 40hr Programs**
- ◆ **Confined Space**
- ◆ **Site Supervisor**

Management Systems

Lead Auditor Programs—TS 16949, ISO9000, ISO1400 (5 days): These are 5-day RAB accredited lead auditor program. Each program is 36 hours with a final exam, and qualifies the student to become accredited auditors.

Advanced EMS Auditing (1-day): This is a one day program designed to give your existing auditors a good understanding of ISO 14001:2004 and key differences. We will review conformance scenarios designed to highlight key changes in the standard. We will also review the ISO 19011 guidance on EMS auditing.

ANSI Z10 or OHSAS 18001 Occupation Health & Safety Management System Implementation (2 days): This course will provide a detailed overview of either the **Z10** or OHSAS standard and how to implement an Health & Safety management system. Each student will leave with a good working knowledge of the standard and the tools needed to develop a H&S Management System.

Internal Auditor Training— TS16949, ISO 14001 or OHSAS 18001 (2 days): 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.

ISO 14001 or RC14001 Implementation for Managers (2 days): This is a two day program designed to teach new managers or supervisors the requirements of their environmental management systems and how to implement ISO 14001 or RC 14001. The course provides a detailed understand of either standard, how to development the main elements and how to plan you implementation.

OHSAS18001 Overview and Implementation (1 day): This one day program will provide an overview of the OHSAS 18011 standard and how the implement a Health & Safety Management system. We will also map integration with the ISO14001 management system. The student will leave with the tools needed to plan their OHSAS18001 certification.

EHS Compliance

Total WASTE Course (1 day): This program provides the training required under **DOT** for hazardous materials transportation and **RCRA** hazardous waste. The DOT training will cover the requirements of Subpart H, §172.700-172.704 and an overview of the RCRA regulations. Course includes materials, testing, and certification.

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.

Site Supervisor Training (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.

Team Building/Productivity Training (NEW!!!). We will develop a specific program to meet the needs of your organization. This program will address leadership skills, team communication, delegation, conflict resolution, and staff motivation. This program will pay for itself in less than a year.

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Environmental Trivia Answer

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- ◆ B. Plastic.
 - ◆ According to the Department of Energy, it takes 20-40 percent less energy to manufacture plastic grocery bags than paper ones. And, since plastics are lightweight and take up so little space, it is much more efficient to transport them. It takes seven trucks to deliver the same number of paper bags as can be carried in one truckload of plastic bags.
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Training Schedule Public Courses				
Course	Cost	November	December	January
ANSI Z10 OH&S Management System Implementation (new)	\$659	Orlando, FL	Detroit, MI	Chicago, IL
ISO 14001 Internal Auditor	\$699	Grand Rapids, MI Indianapolis, IN	Cincinnati, OH	Orlando, FL
Advanced EMS Auditing (ISO 14001:2004)	\$499	Chicago, IL		Detroit, MI Grand Rapids, MI
ISO 14001 Implementation	\$699	Chicago, IL		Lansing, MI Grand Rapids, MI
ISO14001 Lead Auditor Training	\$1,575*	Cincinnati, OH Tampa, FL	Chicago, IL Indianapolis, IN	Grand Rapids, MI
OSHAS 18000 Overview and Implementation	\$499	Atlanta, GA		Detroit, MI
TOTAL Waste Program (DOT & RCRA)	\$499		Grand Rapids, MI Detroit, MI	Chicago, IL
TS16949 Lead Auditor Training	\$1,575*	Buffalo, NY	Cincinnati, OH Cleveland, OH	Lansing, MI
TS16949 Internal Auditor (3 day)	\$1095*			Grand Rapids, MI
Principle of Ergonomics (3 days)	\$675	Ypsilanti, MI		
Hazwoper Refresher (8 hr) (Many more locations and dates please contact EHS plus our 24 hr and 40 hr programs)	\$125	Detroit, MI Minneapolis, MN Dallas, TX New Orleans, LA	Indianapolis, IN Detroit, MI Chicago, IL Lansing, MI	Detroit, MI Chicago, IL
OSHA 30 Hours—General Industry	\$750	Livonia, MI		
OSHA 10 Hours—General Industry	\$295	Livonia, MI		
OSHA - Site Supervisor (8 hr)	\$195	Oakland, CA Orlando, FL Dallas, TX		

To get specific dates and to register contact Jim Charles at Charles@PMenv.com. (*) These courses offered at significant discounts for 30, 60, and 90 day prepayment. Don't see your location contact us!!!

All pricing based on 30 day advanced payment subject to our cancellation policy. Add \$100 for late registrations.



Any of these courses can be held at your location with 6 or more students

Common Waste Container Violations

Hazardous waste generators are required to put waste into containers that are compatible with the type of waste that is placed in it, use containers that are in good condition, properly label the containers, and keep the containers closed. In addition, there are pre-transporter requirements regarding packaging and labeling shipping containers according to US Department of Transportation (US DOT) regulations.

COMMON VIOLATIONS INCLUDE:

- ◆ Listing incorrect or incomplete information on hazardous waste labels:
 - Missing the accumulation date (the date you first put waste into the container)
 - Missing the words "Hazardous Waste"
 - Missing the hazardous waste number
 - Failing to keep the containers closed, except when waste is added or removed
 - Leaving funnels in place that are not screwed into bung and do not have the capability of being kept closed
- ◆ Failing to have appropriate US DOT placards available for transporters

Remember: even though your transporter may provide placarding for his vehicle the generator still needs to have these available ONSITE.

Bureau of Labor Statistics Releases 2005 Workplace Fatality Data

The rate of workplace fatalities in 2005 declined slightly from a year earlier, to 4.0 per 100,000, the Labor Department's Bureau of Labor Statistics (BLS) reported this month. BLS announced Aug. 10 that a total of 5,702 fatal work injuries were recorded last year, down from 5,764 in 2004. OSHA Administrator Ed Foulke said in a statement that the report is "positive news for our nation and all workers," noting the decline in fatalities among women, a drop in fatal fall injuries, and a decrease in the fatality rate among Hispanic employees. Foulke emphasized that the data also highlights areas where the agency needs to focus its resources to further reduce workplace fatalities.

OSHA Issues Hexavalent Chromium Guidance for Small Businesses (Con't)

Hexavalent chromium compounds are widely used in the chemical industry as ingredients and catalysts in pigments, metal plating and chemical synthesis. Cr(VI) can also be produced when welding on stainless steel or Cr(VI)-painted surfaces. The major health effects associated with exposure to Cr(VI) include lung cancer, nasal septum ulcerations and perforations, skin ulcerations, and allergic and irritant contact dermatitis.

Employers are responsible for providing a safe and healthful workplace for their employees. OSHA's role is to assure the safety and health of America's employees by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual process improvement in workplace safety and health. Contact PME with any questions charles@PMENV.com.



Don't start building your SAFTEY Manual from Scratch. Contact us to discuss how our EHS tools can save you time and money AND build an OSHA complaint program. Charles@PMenv.com or (616) 285-8857

PM Environmental, Inc.

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RAB Lead Auditor and Internal Auditor Programs

Internal Auditing is one of the key's to an effective management system. EHS offers these programs for **ISO14001, OHSAS18001, TS16949, and ISO9000** management systems.

Lead Auditor Training (5-day)

This is a RAB accredited course that is necessary to become a RAB certified Lead EMS Auditor. This 36 hour program will cover all aspects of ISO 14001 and auditing protocol. The student will leave with a detailed understating of the standard, how to conduct EMS audits, and how to setup an auditing program. We will walk the student through a variety of auditing exercises and hands on workshops that will give the students confidence in their ability to conduct audits. Upon course completion and passing the exam the

student will receive a Lead Auditor Training certificate. This course is offered through our partner program.

Internal Auditor Training (2-day)

This program is designed for people who will conduct internal audits of their facility. The program will cover the standard, auditing protocols, and hands on auditing exercises. The auditor will leave the course with the ability to start doing internal audits.

Both of these programs are offered onsite and through our public course offerings

Lead Auditor Training

Onsite: From \$6,500
 Individual: From \$1,075

Internal Auditor Training

Onsite From \$2,900
 Individual: From \$699

PM Environmental, Inc.

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

- ◆ SPCC Certification and Planning
- ◆ Environmental Management Information Systems (EMIS) implementation and training
- ◆ RCRA Permitting and Corrective Action
- ◆ EHS Auditing
- ◆ EHS Compliance Planning and Training Development
- ◆ Sustainability Planning
- ◆ Environmental liability assessments and financial reporting (Sarbanes-Oxley Compliance)
- ◆ Site remediation technology and closure evaluations
- ◆ Integrated Contingency Planning—SPCC, Stormwater, RCRA, Risk Management Plans
- ◆ Hazardous Waste Management and Cost Minimization
- ◆ ISO 14001 / OHSAS 18001 Management Systems
- ◆ ASTM Phase I/ BEA / Due Diligence
- ◆ Process Safety Management (PSM) Tools
- ◆ Air Quality & Permitting
- ◆ Remediation Technologies (patented)
- ◆ Data Management & IT Tools

PME specializes in delivering these services in a manner that integrates compliance into your business operations. Our compliance assessment services focus on best management practices as well as regulatory compliance. **Please consider us for your next consulting assignment.**



EHS Compliance Programs	Cost
<p>Environmental Compliance Assessment: EHS has developed a risk based approach to conducting environmental compliance assessments needed to reduce your risks of regulatory enforcement and to comply with your ISO 14001 EMS. This program includes a pre-audit assessment, 1 or 2 days onsite audit, and preparation of an audit report. This will include a review of the applicable air, water, and waste regulations. A draft assessment report will be issued with a detailed list of findings and finalized upon approval from the client.</p>	<p>\$2,650 (1-day) \$3,150 (2-day)</p>
<p>DOT Training: EHS will deliver a one day DOT Hazardous Materials training program designed to meet the requirements for DOT training required every 3 years. This program will cover identification of hazardous materials, shipping papers, labeling & marking, security, and site safety. We will incorporate information for the specific materials managed at your plant. This program includes training documentation and testing as required. (up to 6 students)</p>	<p>\$1,550</p>
<p>Hazard Communications and RCRA Training: EHS will conduct an onsite review of your operations, review the waste and chemical management program, and develop a site specific Hazard Communications and RCRA training program. We will provide an electronic copy of all training materials. We can also deliver the training .</p>	<p>\$2,990 \$975 (training)</p>
<p>Waste Management Plan: EHS will conduct an on-site review of your facilities waste and recycling programs. We will then develop a written plan for how these wastes are to be disposed of and recommended disposal facilities. We will look for opportunities to re-characterize waste and identify savings on waste disposal. The plan will identify the generated waste streams, record keeping, and training requirements. We will typically identify \$1,000's in annual waste reduction savings.</p>	<p>\$3,345</p>
<p>Chemical Inventory and MSDS Review: EHS will spend a maximum of 2 days at your facility developing a detailed chemical inventory for your facility. This inventory will be summarized in an excel spread sheet. We will also verify that the facility had an MSDS for each material.</p>	<p>\$2,445</p>
<p>ISO 14001 Internal Auditor Training ⁽²⁾: EHS has developed an interactive and highly effective auditor training program. This program will provide a detailed overview of the ISO 14001 standard, the auditing process, ISO 19011 auditing guidance, and how to plan and conduct an internal audit. It includes many hands on exercises to re-enforce the auditing skills needed. (up to 6 students)</p>	<p>\$2,850 (2-day) \$1,950 (1-day)</p>
<p>Advanced EMS Auditor Training ⁽²⁾: EHS will deliver a one day training program to your internal auditors to provide an update of the ISO 14001:2004 Standard and review of advanced auditing materials. The last portion of the program will be evaluating conformance scenarios relative to the revised standard.</p>	<p>\$1,700</p>
<p>ISO 14001 or OHSAS 18001 QuickStart: This is program designed for those getting ready to implement an ISO 14001 or OHSAS 18001 management system. EHS will meet with plant management to identify the goals, help establish the implementation team, review of existing management systems, training for implementation team, and prepare a detailed implementation plan. This program will fully prepare any plant to begin implementation.</p>	<p>\$2,900</p>
<p>Integrated Contingency Planning: Many sites have multiple contingency plans required under various regulatory programs. EHS has developed this program to allow sites to develop a single integrated contingency plan (ICP). A PE will review the existing contingency plans and site operations to determine which regulations are applicable. EHS will then prepare a boiler plate ICP under the applicable regulatory programs and coordinate data collection with plant personnel and preparation of a draft ICP. Once the draft plan is completed by plant personnel, EHS will review the ICP, provide detailed list of discrepancies, and certify the final plan.</p>	<p>\$3,200</p>
<p>In Plant Services: Many times a plant EHS manager needs temporary help to get a project completed or EHS expertise to help resolve a compliance issue. EHS will provide a professional to support your projects – permitting, EHS reporting, waste water optimization, EHS audits, site remediation, or any others.</p>	<p>\$595/day</p>
<p>SPCC Review/Certification: A PE will spend one day at your facility reviewing your updated SPCC plan and providing certification. Any discrepancies be discussed and PE will complete a final review and issue certification of your plan once the plan has been updated.</p>	<p>\$1,250</p>