

# EHS Compliance Update

May 2006

EHS Management Strategies, LLC

## Hex chrome hazards & Welding

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HAZWOPER (8hr, 24hr, 40hr)

OSHA

Lean Manufacturing

DOT Hazardous Materials

Hazard Communications

EHS—ISO14001/OHSAS18001

Quality—ISO9000/TS16949

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Issues Forum**

May 10th  
Lansing, MI

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For workers in the welding industry, the new lower OSHA permissible exposure limit (PEL) for hexavalent chromium should be good news. "Hex chrome," a known human carcinogen, can be produced when welding on stainless steel or some painted surfaces. OSHA's new standard, published Feb. 28 as a result of a court order, reduces the PEL tenfold, from 52 to five micrograms of chromium per cubic meter of air as an eight-hour time-weighted average. **The rule becomes effective on May 30.**

Despite the lower limit, welders will still need to keep their guard up against exposure to hexavalent chromium (Cr(VI)). The rule will allow exposures five times higher than OSHA had initially proposed in 2004, and 20 times as high as the level that had been sought by activists who filed a lawsuit to force the agency to set a new standard. By OSHA's own estimates, 10 to 45 lung cancer deaths overall will occur per 1,000 workers over a lifetime at the five micrograms per cubic meter level.

### Inhalation Hazard

Chromium fume, including hexavalent chromium, is created by welding or cutting on stainless steel or metals that are coated with a chromium material. The fume can be inhaled, and without adequate control measures welding on stainless steel can lead to exposure well above the legal limit, the California Department of Health Services (CDHS) reports.

The composition of the base metals, the welding materials used, and the welding processes affect the specific compounds and concentrations found in the welding fume, according to the American Welding Society.

Major health effects associated with exposure to **(continued on Page 6)**

## Periodic Inspections of Lockout-Tagout Procedures

MIOSHA regulations mandate lockout/tagout documentation and also require periodic inspections of energy control procedures. According to *MIOSHA News*, "employers must conduct an inspection at least annually to review the energy control procedures for equipment and machines involved in the lockout-tagout program." Authorized employees other than the employees utilizing the procedures must perform these inspections.

Inspections should include review of procedures between the inspector, authorized employee, and any affected employees. This review should cover the following concerns:

- Current energy control methods
- Correct energy source identification
- Proper lockout device usage
- Release of stored energies
- Employee responsibilities and procedures used **(continued on Page 2)**

**EHS Trivia**

Under the Federal EPA hazardous waste regulations, a small quantity generator (SQG) cannot accumulate more than how much hazardous waste at any one time?

- a. 55 gallons
- b. 1000 kg
- c. 6000 kg
- d. 100 kg

Answer on Page 6

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**Periodic Inspections of Lockout-Tagout Procedures (con't)**

Employee complaints about the lockout/tagout program.

These inspections must include a review of each authorized employee implementing the lockout procedures. A group meeting between the inspector and all authorized employees who implement the procedures is acceptable.

In addition, review of tagout procedures must be conducted with the employee authorized to perform the tagout and all employees identified as "affected" in the standard.

Energy control procedures used less frequently than once a year should be inspected when they are used.

Employers must certify that inspections have been performed. Certification must include:

- Names of employees
- Date
- Inspector
- Machine or equipment on which procedures are performed

Should the inspection reveal deficiencies in performance or if procedures have changed, employees must be retrained. The standard requires the employer to provide retraining whenever the employer believes there are deviations from or inadequacies in employees' knowledge of energy control procedures.

**Toxic Release Inventory—who me?****Who must file TRI reports?**

Under TRI, an individual facility reports to EPA if it meets the following criteria:

- It employs the equivalent of at least 10 full-time workers.
- It "manufactures" or "processes" at least 25,000 pounds of a listed chemical or it "otherwise uses" at least 10,000 pounds of a listed chemical.

According to EPA, approximately 30,000 facilities must file reports. Of that total, more than 6,000 new facilities, including utilities that burn coal or oil to generate electricity, are required to file TRI reports for the first time in 1999. **TRI reports are due July 1.**

**OSHA's Safety and Health Achievement Recognition Program (SHARP)**

The Safety and Health Achievement Recognition Program (SHARP) recognizes small employers who operate an exemplary safety and health management system. Acceptance into SHARP by OSHA is an achievement of status that will single you out among your business peers as a model for worksite safety and health. Upon receiving SHARP recognition, your worksite will be exempt from programmed inspections during the period that your SHARP certification is valid.

To participate in SHARP, you must:

- Request a consultation visit that involves a complete hazard identification survey;

**Continued on Page 6**

## OSHA's Top 10 Manufacturing Citations

The following are the top 10 OSHA citation for manufacturing sites with 100 to 249 employees between October 2004 and September 2005. Review you OSHA programs in these area to assure compliance with the applicable standards.

Rank	Standard	#Cited	Description
1	<a href="#">19100147</a>	700	The Control of Hazardous Energy, Lockout/Tagout
2	<a href="#">19100212</a>	529	Machines, General Requirements
3	<a href="#">19100134</a>	384	Respiratory Protection
4	<a href="#">19101200</a>	373	Hazard Communication
5	<a href="#">19100219</a>	371	Mechanical Power– Transmission Apparatus
6	<a href="#">19100305</a>	348	Electrical, Wiring Methods, Components and Equipment
7	<a href="#">19100178</a>	285	Powered Industrial Trucks
8	<a href="#">19100303</a>	265	Electrical Systems Design, General Requirements
9	<a href="#">19100215</a>	201	Abrasive Wheel Machinery
10	<a href="#">19100023</a>	186	Guarding Floor and Wall Openings and Holes

### 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

#### WEB Site of the Month

<http://www.msdssearch.com/DBLinksN.htm>

A great source for FREE MSDS's

Did you know that if you sign waste manifests that you need DOT training?

**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**

- ◆ DOT Hazardous Materials Course
- ◆ Hazwoper 8hr, 24hr, 40hr Programs
- ◆ OSHA Site Supervisor
- ◆ Ergonomics for Manufacturing (On-Line)
- ◆ Confined Space Entry
- ◆ Essentials of Fork Lift Training
- ◆ Toxic Release Inventory (TRI) Workshop
- ◆ RCRA or Hazard Communications (Site Specific)

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**Management Systems**

**Lead Auditor Programs—TS 16949, ISO900, 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**

**DOT Hazardous Materials Course (1 day):** This program provides the training required under DOT for hazardous materials transportation. The DOT training will cover the requirements of Subpart H, §172.700-172.704. Course includes DOT 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.

**Toxic Release Inventory (TRI) Workshop (1 day):** This program provides you with a complete understanding of what this law requires as well as detailed instructions on how to ensure your facility is in compliance. A clear explanation of your reporting requirements under Title III is provided so you will understand when and how to complete the Tier II, and Toxic Chemical Release (Form R) inventory report forms.

**Hazardous Waste Land Disposal Restrictions – [Webcast](#):** Our step by step procedures help you determine to whom and what the land disposal restriction regulations apply; which treatment, storage, disposal, and dilution prohibitions apply to your waste; wastewater and non-wastewater treatment standards outlined in the regulations for your waste; soil and debris alternative standards; and recordkeeping and documentation requirements. (**\$99—June 7, 2006**)

<b>Training Schedule Public Courses</b>				
<b>Course</b>	<b>Cost</b>	<b>May</b>	<b>June</b>	<b>July</b>
<b>ANSI Z10 OH&amp;S Management System Implementation (new)</b>	\$659	Orlando, FL	Detroit, MI	Chicago, IL
<b>ISO 14001 Internal Auditor</b>	\$699	Grand Rapids, MI	Indianapolis, IN Cincinnati, OH	Chicago, IL Detroit, MI
<b>Advanced EMS Auditing (ISO 14001:2004)</b>	\$499	Cleveland, OH	Detroit, MI Grand Rapids, MI	Chicago, IL
<b>ISO 14001 Implementation</b>	\$699	Orlando, FL	Lansing, MI Grand Rapids, MI	Toledo, OH
<b>OSHAS 18000 Overview and Implementation</b>	\$499	Atlanta, GA	Detroit, MI	St. Louis, MO Chicago, IL
<b>DOT Hazardous Materials</b>	\$499	Traverse City, MI	Grand Rapids, MI	Detroit, MI Chicago, IL
<b>ISO14001 Lead Auditor Training</b>	\$1,575*	Indianapolis, IN Chicago, IL	Cleveland, OH Orlando, FL	Myrtle Beach, SC
<b>Toxic Release Inventory Workshop</b>	\$399		Chicago, IL	
<b>TS16949 Lead Auditor Training</b>	\$1,575*	Indianapolis, IN Atlanta, GA		Lansing, MI
<b>TS16949 Internal Auditor (3 day)</b>	\$1095*	Milwaukee, WI	Chicago, IL Cleveland, OH	Grand Rapids, MI Fort Wayne, IN
<b>RC14001/RCMS Implementation</b>	\$795*		Chicago, IL	Detroit, MI
<b>Hazwoper Refresher (8 hr) (Many more locations and dates please contact EHS plus our 24 hr and 40 hr programs)</b>	\$125	Indianapolis, IN Detroit, MI Chicago, IL St. Louis, MO Cincinnati, OH Madison, WI	Indianapolis, IN Detroit, MI Chicago, IL Lansing, MI Madison, WI Philadelphia, PA	Indianapolis, IN Detroit, MI Chicago, IL Lansing, MI Philadelphia, PA Denver, CO
<b>Confined Space</b>	\$215	Las Vegas, NV	Cleveland, OH Milwaukee, WI	Detroit, MI
<b>Site Supervisor</b>	\$195	Chicago, IL		

To get specific dates and to register contact Jim Charles at [Charles@PMenv.com](mailto: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

## OSHA SHARP Program (con't)

- Involve employees in the consultation process;
- Correct all hazards identified by the consultant;
- Implement and maintain a safety and health management system that, at a minimum, addresses OSHA's 1989 Safety and Health Program Management Guidelines;
- Lower your company's Lost-Workday Injury and Illness rate (LWDII) and Total Recordable Case Rate (TRCR) below the national average; and
- Agree to notify your state Consultation Project Office prior to making any changes in the working conditions or introducing new hazards into the workplace.

### Look whose SHARP certified:

**Aleris International-Fillmore Rd. (Formerly IMCO Recycling, Inc), Coldwater, MI**

**Gestamp HardTech, Mason, MI**

**Northern Coasting & Chemicals, Menominee, MI**

**Steel Industries, Redford, MI**

**Gallagher Corporation, Gurnee, IL**

**Laser Technologies, Batavia, IL**

**Reynolds Food Packaging, Grant Park, IL**



<b>Trivia Answer: (c)</b>
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## Hex chrome hazards & Welding (continued)

hex chrome include lung cancer, nasal septum ulcerations and perforations, skin ulcerations, and allergic and irritant contact dermatitis. Overexposure can also cause symptoms such as nausea, headaches, dizziness and respiratory irritation.

The two best ways to prevent inhaling or ingesting chromium-containing particles, reports CDHS, are substituting chromium-free materials and using local exhaust ventilation. If a substitute cannot be found, a mechanically powered local exhaust hood should be placed at the point where chromium is released into the air, or the entire process should be contained within the hood. Properly designed and maintained local exhaust ventilation draws off most of the chromium before it can be inhaled.

Wearing an air-purifying respirator such as a paper mask or rubber mask with screw-in filters is a less effective way to control exposure, CDHS reports. In fact, the Cal/OSHA respirator standard allows respirator use to prevent overexposure only as a last resort. This is because the use of respirators is complex and prone to error, often resulting in inadequate protection.

If using a respirator, according to CDHS, it must be approved for the type of particles in the air. For example, a paper dust mask designed for removing powder particles will not remove the fume particles created by welding. The respirator must also be fit-tested, and workers should be medically examined for their ability to wear a respirator. Even when these requirements are met, leakage of contaminated air into the respirator may still occur.

In summary, even with the lower PEL, welders must still respect the dangers of hex chrome exposure.

- ◆ How welders can guard against overexposure?
- ◆ Do not breathe fumes and gases. Keep your head out of the fumes.
- ◆ Use enough ventilation or exhaust, or both, at the arc to keep fumes and gases from your breathing zone.
- ◆ If ventilation is questionable, use air sampling to determine the need for corrective measures.
- ◆ Keep exposure as low as possible.

**EHS Management Strategies**

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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, TSI6949, 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**

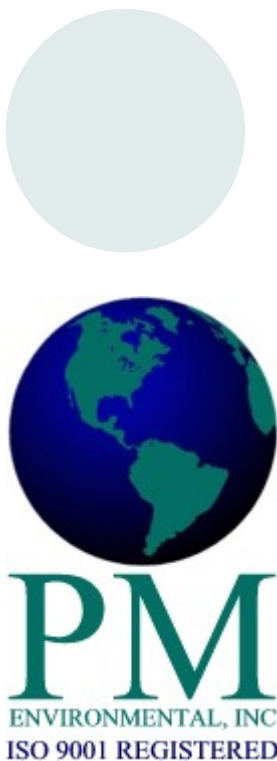
Onsite From \$2,900  
Individual: From \$699

**EHS Management Strategies**

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

- ◆ 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

EHS 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.**



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[Laboratory Safety](#)  
[Labeling](#)  
[Ladder Safety](#)  
[Light Duty Work](#)  
[Lock Out Tag Out](#)  
[Machine Guarding](#)  
[Office Safety](#)  
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[Sexual Harassment](#)  
[Supervisor Safety](#)  
[Welding Safety](#)  
[Workplace Violence](#)

Many times new EHS managers find themselves in a situations where their facility may have many programs that have not been developed or nothing is consistent. You then ask yourself... Where do I begin?

EHS through one of our alliance partners is bringing your complete safety plans and training templates for all these programs. Very quickly you can develop site specific compliance programs. Stop losing sleep worrying about OSHA inspections.

Below are a few of the programs available. Please contact us at: [JimCharlesPE@charter.net](mailto:JimCharlesPE@charter.net) or (616) 262-9780 with any questions on any of our programs.



### Lockout / Tag-out Discount Package

Written Plan and Training Program For OSHA Compliance (Plan & Training)

**\$279.95**

### Machine Guarding Discount Package

Written Plan and Training Program For OSHA Compliance (Plan & Training)

**\$279.95**



### Asbestos Safety Program

Written Plan and Training Program For OSHA Compliance (Plan only)

**\$129.95**



### Hazard Communication Program

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<b>EHS Compliance Programs</b>	<b>Cost</b>
<p><b>Environmental Compliance Assessment:</b> 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><b>\$2,650 (1-day)</b>  <b>\$3,150 (2-day)</b></p>
<p><b>DOT Training:</b> 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 &amp; 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><b>\$1,550</b></p>
<p><b>Hazard Communications and RCRA Training:</b> 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><b>\$2,990</b>   <b>\$975 (training)</b></p>
<p><b>Waste Management Plan:</b> 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><b>\$3,345</b></p>
<p><b>Chemical Inventory and MSDS Review:</b> 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><b>\$2,445</b></p>
<p><b>ISO 14001 Internal Auditor Training<sup>(2)</sup>:</b> 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><b>\$2,850 (2-day)</b>  <b>\$1,950 (1-day)</b></p>
<p><b>Advanced EMS Auditor Training<sup>(2)</sup>:</b> 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><b>\$1,700</b></p>
<p><b>ISO 14001 or OHSAS 18001 QuickStart:</b> 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><b>\$2,900</b></p>
<p><b>Integrated Contingency Planning:</b> 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><b>\$3,200</b></p>
<p><b>In Plant Services:</b> 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><b>\$595/day</b></p>
<p><b>SPCC Review/Certification:</b> 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><b>\$1,250</b></p>