



EHS Compliance Update

October 2005

Inside this Issue

Lock Out / Tag Out—Die Machines	2
Occupational Health and Safety Management Systems—What are my options?	3
International Update China Issuing RoHS-Like Substance Ban	3
Top 10 Injuries According to OHSAS	3
EHS Training Programs	4
DOT—Person who offers	6
EHS University	6
Brain Gym for Professionals	7
Satellite Accumulation Areas—did you know?	9
RCRA Comer Define waste water	10
OSHA Issues Record Setting Fine	10
Compliance Programs	11

EHS Metrics—How do I make them meaningful?

The first step in evaluating the EHS performance of your business is to establish meaningful EHS metrics. There are two elements to the word meaningful—1) They should reflect the major EHS impacts of your business and 2) To get the attention of your management team they should be high cost or high risk activities. The following are some example EHS metrics:

- Water Consumption
- Electricity Consumption
- Gas Consumption
- Hazardous Waste Quantities
- Recycled Waste Quantities
- Waste to Landfill Quantities
- Packaging Material Usage
- Paper Usage

- Refrigerant gas usage
- Major Non-conformances raised during external and internal audits
- Injury Rate Severity Rate

Once the appropriate metrics are selected you will need to establish a base line for comparison. One approach is to average metrics for the past 2 to 3 years to establish the baseline. The next step is to normalize these based on production to be sure that increases or decreases are not a function of variations in business. This can be done using man-hours worked, revenue generated, number of parts produced, etc. Once you have established your metrics and baseline you are ready to begin improving EHS performance.

Keeping your Auditors Fresh

Your internal audit program is one of the main drivers of continuous improve for your management systems (quality/environmental/health & safety). It also costs a great deal of time and effort so it is important to maximize this investment by keeping your auditors “fresh”. A few ways to maximize the effectiveness of your audit program is to:

- 1) Rotate in new auditors every 2 to 3 years
- 2) Make sure that auditors are assigned different parts of the

plant and MS to audit

- 3) Get the auditors together as a team on a quarterly basis to review internal audit results and discuss successes/challenges
- 4) Encourage auditors to note opportunities for improvement and preventative actions
- 5) Provide refresher training to your auditors every 2 years.

This will keep your audit programs fresh and improve audit program effectiveness.

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

New Training programs SEE Page 4—Environmental Performance, Sustainable Manufacturing Practices, and Environmental Reporting, OSHA Recordables and Loss Mitigation, Air Calculations and Emission Inventories, Design an Effective Safety Management Program

European EHS Directives

WEEE—Waste Electrical and Electronic Equipment

RoHS— Restriction of Hazardous Substances

If you sell your products in Europe how do these effect you?

Lock Out / Tag Out—Die Machines

Assuming that all other required safety provisions such as operator training, control reliability, etc. are properly implemented, may die-setters unfasten, remove, replace, and refasten dies in a hydraulic press without locking out the machine as long as the press is in "inch" mode with properly installed and located two-hand controls? Would this alternative safeguarding method protect the die-setters during die-changing operations?

No, the use of a safety device, such as an *inch* mechanism, does not adequately control all hazardous energy exposures to die-setters when their body parts are in, on, or in close proximity to machines or equipment danger zone areas. As detailed in §1910.147(f)(1), an *inch* mechanism can protect the die-setter from hazards associated (**Continued on Page 8**)

Occupational Health and Safety Management Systems (OHSMS) - What are my options?

In 1995, ISO began efforts to draft an international **occupational health and safety management system (OHSMS)** standard. That effort failed. Since that time, a number of countries have developed their own OHSMS guidance standards. In addition, at the international level, the international Labor Organization (ILO) published guidance on **Occupational Safety and Health Management Systems in 2001 (ILO-OSH 2001)**.

In the United States, the **ANSI Z10** standard (Occupational Health and Safety Management Systems) was published as a **final standard in July of 2005**. This standard is formatted into two columns. The left column states the requirements that must be met if an organization wishes to demonstrate its conformance to Z10. The right column provides recommendations and explanatory notes. Some organizations may wish to use the Z10 standard for third-party certification of their OH&S management systems.

Certification is the process by which a party gives written assurance that a product, service, process, system or material conforms to specific requirements, such as those contained in a consensus standard. There are hundreds of certification or registration bodies around the world that certify everything from electronic components and laboratories to management systems. Most of these bodies provide what is known as third-party certification. The fundamental requirement for third-party certification is independence of the registration body from the organization being certified.

In addition to the standards developed through formal standard-setting processes, another OHSMS guidance document was developed by an ad-hoc group – **OHSAS 18001:1999**. This document, although not an ISO standard, is being used for third-party certification of occupational safety and health management systems. Although it is difficult to determine an exact number, a review of existing information sources indicates that worldwide some 10,000 organizations have sought third-party certification of their OHSMS to OHSAS 18001.

Each of these standards has benefits depending on your operations. Contact EHS and we can help you determine the best system for your operations.



EHS Management Strategies

is pleased to announce our strategic partnership with **Enviante**. The **Enviante System** is deployed at 750 facilities in over 55 companies and used by the most demanding Fortune 1000 companies and government organizations. Contact EHS for a demonstration of this powerful system free of charge at:

JimCharlesPE@Charter.net

"The **Enviante System** is the only system we found that had the flexibility to do whatever we needed. With other software packages, we would have needed to change our processes or customize the software - neither of which was a good option for us. With Enviante, we just set it up the way we needed and it worked right away across all 21 of our facilities."

Celia Bayless
VP, Environment, Health and Safety
Fujicolor Processing

International Update

China Issuing RoHS-Like Substance Ban

China recently signed laws authorizing the implementation of substance bans similar to the European Union's (EU's) Restriction of Hazardous Substances (RoHS). China has not released many details regarding their regulations but, according to the information we have seen, the proposal will, at least initially, restrict the same substances: Lead, Mercury, Cadmium, Hexavalent Chromium, Polybrominated Biphenyls (PBB) and Polybrominated Diphenyl Ethers (PBDE).

China's regulations are expected to include several labeling requirements including place-of-origin, material content, toxic-substance content and recyclability, packaging material-content, and safe-use labeling. Safe use labeling is intended to indicate the term during which toxic substances contained in electronic products will not leak out or cause environmental pollution.

Unlike the broad scope categories issued in the EU, China is expected to publish a catalogue specifying the products to be covered. Substance restrictions and pre-market certification requirements will be detailed in catalogues that are likely to be issued in batches. Because drafting of the first batch of catalogues has already begun, Chinese officials will not release any information regarding targeted products. China's Administration for Quality Supervision, Inspection and Quarantine will implement the pre-market certification regime intended to register specified products manufactured, sold, imported, or used in other products in China.

The China RoHS effective date will be approximately 3-6 months after the regulation is promulgated. This effective date will apply to all labeling requirements but not the substance restrictions and pre-market certifications. Substance restrictions and pre-market certification requirements will be effective on the dates specified in the catalogues.

EHS Management Strategies Clients include:

- ◆ Lear Corporation
- ◆ Alticor
- ◆ Delphi
- ◆ 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

Top 10 Injuries According to OHSAS

Consider these when you evaluate your site specific risks. The top ten workplace injuries in 2003, according to the Liberty Mutual Workplace Safety Index, were:

1. Overexertion, 26.4%
2. Falls on Same Level, 13.7%
3. Bodily Reaction, 10.2%
4. Falls to Lower Level, 9.0%
5. Struck by Object, 8.5%
6. Repetitive Motion, 5.9%
7. Highway Incidents, 5.8%
8. Struck against Object, 4.4%
9. Caught in or Compressed by, 3.9%
10. Assaults & Violent Acts, 0.8%

All other, 11.3%

Employers spent \$50.8 billion in 2003 on wage payments and medical care for workers hurt on the job. Overexertion led the way, employers \$13.4 billion.

EHS Partners with Rule Engineering in Denver, Colorado to delivery Environmental & Safety consulting services. This office has a strong construction safety group and OSHA VPP expertise. Let us show you our solutions based service delivery.

MANAGEMENT SYSTEMS

- ◆ Advanced EMS Auditing
- ◆ Environmental Performance and Sustainable Manufacturing Practices
- ◆ **ANSI Z10 OH&S Management System (new)**
- ◆ OHSAS 18001 OH&S Implementation
- ◆ ISO 14001 Internal Auditor
- ◆ ISO 14001 Implementation for New Managers
- ◆ Integrated Management System (9000/14001/18001)

EHS COMPLIANCE

- ◆ The “Complete” Waste Management Course
- ◆ Advanced RCRA Course
- ◆ OSHA Recordables and Loss Mitigation
- ◆ Air Emission Calculations and Inventories
- ◆ Design an Effective Safety Management Program
- ◆ Hazwoper 8hr and 40 hr Programs and Site Supervisor
- ◆ Confined Space Entry
- ◆ Hazard Communications (Site Specific)

Management Systems

Advanced EMS Auditing: 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 Implementation: 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—ISO 14001 or OHSAS 18001: 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 Implementation for Managers: 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. This program is for the new manager or manager getting ready to implement ISO 14001.

Environmental Performance, Sustainable Manufacturing Practices, and Environmental Reporting (NEW): This program provides an overview of strategic environmental management principles, how to measure performance, establishing effective metrics, and methods to improve your performance. We will also review the concept of environmental sustainability and how to integrate cost effective sustainable elements to your management systems.

Integrated Management Systems: This program is designed to show how to developed an integrated 9000, 14001 and 18001 management systems. This will include hands on exercises to demonstrate integration methods.

EHS 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, training, contingency planning, universal wastes, and biennial reporting. This training meets the annual RCRA training requirements.

Advanced RCRA Course: This is a must for all EHS managers. After a brief review of the RCRA regulations this course will get into LDR requirements, waste delisting, waste exemptions, TSD permitting and closures, and RCRA corrective action.

OSHA Recordables and Loss Mitigation (NEW) : This program will review the OSHA regulations and requirements for reporting. We will review typical injuries and strategies for mitigation of injuries and minimizing Recordables.

Air Calculations and Emission Inventories (NEW) : This program will provide a review of the Clean Air Action and general permitting requirements. The program will review general types of emission sources and methods for calculating emission. A summary air calculation and modeling tools will be provided.

Design an Effective Safety Management Program (NEW) : This program will review the key elements of an effective safety program and how to establish meaningful safety metrics. Take your SAFETY performance to the next level.

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.

Training Schedule Public Courses					
Course	Cost	November	December	January	February
ANSI Z10 OH&S Management System Implementation (new)	\$499	Detroit, MI	Chicago, IL	Toledo, OH	Philadelphia, PA
ISO 14001 Internal Auditor	\$699 \$659	Indianapolis, IN Cincinnati, OH Traverse City, MI St. Louis, MO	Grand Rapids, MI Cleveland, OH Columbus, OH	Chicago, IL Saginaw, MI Toledo, OH	Pittsburg, PA Buffalo, NY Houston, TX Orlando, FL
Advanced EMS Auditing (ISO 14001:2004)	\$459 \$399	Indianapolis, IN Cleveland, OH	Chicago, IL Cleveland, OH Grand Rapids, MI	Detroit, MI Saginaw, MI	Pittsburg, PA Buffalo, NY Houston, TX
ISO 14001 Implementation for Managers	\$459	Cincinnati, OH	Grand Rapids, MI	Chicago, IL Saginaw, MI	Atlanta, GA
Environmental Performance, Sustainable Manufacturing Practices, and Environmental Reporting (NEW)	\$529		Detroit, MI	Chicago, IL St. Louis, MO C	Cincinnati, OH Orlando, FL Philadelphia, PA
OSHAS 18000 Overview and Implementation	\$499	Chicago, IL	Indianapolis, IN St. Louis, MO	Lansing, MI	Cleveland, OH Milwaukee, WI Houston, TX
The "Complete" Waste Management Course (DOT/RCRA)	\$499	Indianapolis, IN Fort Wayne, IN	Grand Rapids, MI	Detroit, MI Saginaw, MI	Cleveland, OH Columbus, OH
OSHA Recordables and Loss Mitigation (NEW)	\$459		Detroit, MI	St. Louis, MO	Columbus, OH
Advanced RCRA Course	\$499		Chicago, IL	Boston, MA	Orlando, FL
Air Calculations and Emission Inventories (NEW)	\$459	Detroit, MI	Chicago, IL		
Design an Effective Safety Management Program (NEW)	\$459		Detroit, MI	Denver, CO	Chicago, IL
Hazwoper Refresher (8 hr) (Many more locations and dates please contact EHS plus our 40 hr programs)	\$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	Indianapolis, IN Detroit, MI Chicago, IL St. Louis, MO Madison, WI Philadelphia, PA
Confined Space	\$299	Chicago, IL	Detroit, MI	Indianapolis, IN	Hartford, CT
Site Supervisor	\$195		Oakland, CA		Denver, CO



Any of these courses can be held at your location with 5 or more students

To get specific dates and to register contact JimCharlesPE@charter.net

Don't see your location contact us!!! See www.EHStraining.ZoomShare.com for current training schedule.

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

DEPARTMENT OF TRANSPORTATION—UPDATE

Pipeline and Hazardous Materials Safety Administration

49 CFR Part 171

[Docket No. PHMSA-04-19173 (HM-223A)]

RIN 2137-AE04

Applicability of the Hazardous Materials Regulations to a ``Person Who Offers'' a Hazardous Material for Transportation in Commerce

AGENCY: Pipeline and Hazardous Materials Safety Administration (PHMSA), DOT.

ACTION: **Final rule.**

In this final rule, we are making the following revisions to the Hazardous Material Regulations (HMR):

- We are defining ``person who offers or offeror" to mean any person who performs or is responsible for performing any pre-transportation function required by the HMR or who tenders or makes the hazardous material available to a carrier for transportation in commerce. A carrier is not an offeror when it performs a function as a condition of accepting a hazardous material for transportation in commerce or when it transfers a hazardous material to another carrier for continued transportation without performing a pre-transportation function.
- We are clarifying that there may be more than one offeror of a hazardous material and that each offeror is responsible only for the specific pre-transportation functions that it performs or is required to perform.
- We are clarifying that each offeror or carrier may rely on information provided by a previous offeror or carrier unless the offeror or carrier knows or, a reasonable person acting in the circumstances and exercising reasonable care, would have knowledge that the information provided is incorrect.

See—<http://www.epa.gov/fedrgstr/EPA-WASTE/2005/July/Day-28/fl4912.htm>

Environmental Compliance University, Grand Rapids & Detroit, MI

EHS is pleased to announce its new “**Environmental Compliance University**” program designed for the new EHS professional both in industry and consulting positions. This will consist of a series of regulatory focused programs designed to provide an overview of the regulations and applicability to industry. These will be taught in 2-1/2 hour segments over a six week period.

The program is designed to give a good general understanding of the regulations and compliance strategies. This program will start **November 15th** 2005 from 5:00 to 7:30 PM. The cost for the program is \$999 for all six modules or each module is available for \$249. You may register by contact us at JimCharlesPE@charter.net. This program will be limited to 12 people so register early!!!!

Module 1	Hazardous Waste Management (meets 40 CFR 264 and 265 requirements)
Module 2	SPCC /PIPP/SWPP Regulations
Module 3	Chemical Storage and Reporting (Sara Tier II, Toxic Release Inventory)
Module 4	Storage Tank Management (UST and AST)
Module 5	Waste Water Regulations (CWA, NPDES Permitting, Waste Water Reporting)
Module 6	DOT Hazardous Materials Regulations (meets subpart H, 172 requirements)

Brain Gym® for Professionals

Would you enjoy having greater enjoyment, efficiency and success in the workplace? Do you every feel tired after lunch or have trouble paying attention during meetings? If so, this article may provide some helpful ways to improve your PERFORMANCE!

With Brain Gym® exercises people report heightened energy and vitality in their jobs. They claim improved concentration and productivity with the use of computers, machines, development, management and increased sales. Reports indicate improvement in the ability to communicate and support teamwork. They feel they are more organized and have better comprehension of concepts and reading materials. Brian Gym is exercises that help optimize the performance of your brain.

The work environment presents challenges to the worker such as: fluorescent lights, computer screen emanations and work-flow overloads. Some individuals are extremely sensitive to these influences. Each year, billions of dollars are spent by industry on ergonomics to design workplaces that are safe from work-related injuries and to make them conducive to fast, economical production. But technology can address only a portion of the problem, because health, safety and productivity ultimately depend upon the individual. We can minimize stress in the work environment and gain a sense of personal pride by raising the quality of our achievements.

First of all, we need to replenish our bodies daily with water. Next, Brain Gym movements serve as the kind of easy and effective tools to optimize our performance and on-the-job satisfaction. So try these exercises first thing in the morning, after lunch or any time you are feeling unfocused. They are surprisingly simple, but very effective!

- **Drink Water**

As Carla Hannaford says, "Water comprises more of the brain (with estimates of 90%) than of any other organ of the body." Having students drink some water before and during class can help "grease the wheel". Drinking water is very important before any stressful situation - tests! - as we tend to perspire under stress, and de-hydration can effect our concentration negatively.

- **"Brain Buttons"**

This exercise helps improve blood flow to the brain to "switch on" the entire brain before a lesson begins. The increased blood flow helps improve concentration skills required for reading, writing, etc.

- o Put one hand so that there is as wide a space as possible between the thumb and index finger.
- o Place your index and thumb into the slight indentations below the collar bone on each side of the sternum. Press lightly in a pulsing manner.
- o At the same time put the other hand over the navel area of the stomach. Gently press on these points for about 2 minutes.

(Continued on Page 8)

Brian Gym® for Professionals.

Step 1—Drink Water

Step 2—Brain Buttons



Step 3—Cross Crawl



Step 4—Hook-ups



Brain Gym® for Professionals

"Cross Crawl"

This exercise helps coordinate right and left brain by exercising the information flow between the two hemispheres. It is useful for spelling, writing, listening, reading and comprehension.

- o Stand or sit. Put the right hand across the body to the left knee as you raise it, and then do the same thing for the left hand on the right knee just as if you were marching.
- o Just do this either sitting or standing for about 2 minutes.

"Hook Ups"

This works well for nerves before a test or special event such as making a speech. Any situation which will cause nervousness calls for a few "hook ups" to calm the mind and improve concentration.

- o Stand or sit. Cross the right leg over the left at the ankles.
- o Take your right wrist and cross it over the left wrist and link up the fingers so that the right wrist is on top.
- o Bend the elbows out and gently turn the fingers in towards the body until they rest on the sternum (breast bone) in the center of the chest. Stay in this position.
- o Keep the ankles crossed and the wrists crossed and then breathe evenly in this position for a few minutes. You will be noticeably calmer after that time.

You will be surprised at how effective these exercises will improve your performance. Try doing these at your next business meeting.

This article was written by Kelley Charles a Health Kinesiologist specializing in the use of natural therapies that promote good health and well being. She provides group training sessions and consults with patients in her office in Rockford, Michigan. For any information on her services and programs contact her at Jimprjayp@chatermi.net or (616) 866-8787.

(Brain Gym® is a registered trademark of Brain Gym® International / Educational Kinesiology Foundation)

Lock Out / Tag Out—Die Machines (continued)

with press component motion during testing or positioning activities. However, an inch mechanism does not protect this or other employees from the hazardous energy exposure while performing other servicing and/or maintenance activities. Prior to placing hands or other body parts in a potentially hazardous machine area (e.g., to install, remove, adjust, clean, or repair dies), LOTO must be used to protect employees from hazardous motion of the slide and other related energy hazards.

Virtual EHS Manager

Nobody can know every aspect of EHS regulations and available technologies. Additionally, small to medium sized firms can not afford to hire full time EHS managers. With the **Virtual EHS Manager** you have access to experts in:

- ◆ Waste Management
- ◆ Air Quality
- ◆ Water Treatment and Permitting
- ◆ MSDS Preparation
- ◆ Indoor Air Quality
- ◆ OSHA Recordables
- ◆ Ergonomics
- ◆ Job Hazard Analysis
- ◆ EHS Training
- ◆ ISO 14001
- ◆ OHSAS 18001
- ◆ Site Remediation
- ◆ SPCC / SWPPP
- ◆ Process Safety Management

You be assigned a fulltime EHS professional who will become familiar with your operations and be able to these and other EHS issues. EHS provides the support through our network of senior level EHS experts/

For \$99/month you could hire an EHS manager and tap the expertise of a full EHS staff.

Satellite Accumulation Areas—did you know?

Question: If a facility has multiple SAAs, can hazardous waste be moved from one SAA to another?

Answer: No. Generators may not move hazardous wastes between SAA. Once a hazardous waste leaves an SAA, it must be destined for a central accumulation area that is regulated under 262.34(a) or (d) or for final treatment or disposal at a facility with a permit or interim status.

However, a single SAA may have multiple points of generation. Movement or consolidation of hazardous waste within an SAA is permissible, as long as it remains "at or near" the "point of generation" and "under the control of the operator of the process generating the waste." In addition, a generator may have more than one 90-day or 180-day central accumulation area, and the regulations do not prohibit the movement of hazardous waste from one fully regulated central accumulation area to another, as long as the hazardous waste remains on-site. However, the 90-day or 180-day "clock" for accumulation does not restart if the hazardous waste is moved to another central accumulation area.

Question: SOGs must conduct training in accordance with 262.34(d)(5)(iii) and LQGs must conduct training in accordance with 265.16. Do the RCRA regulations require training of personnel working in SAAs?

Answer: 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.

EHS Consulting Services

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
- ◆ *Safety Management, Workman's Comp and Insurance Optimization*
- ◆ EHS Auditing
- ◆ EHS Compliance Planning and Training Development
- ◆ Sustainability Planning
- ◆ Environmental liability assessments and financial reporting
- ◆ Site remediation technology and closure evaluations
- ◆ Integrated Contingency Planning—SPCC, Stormwater, RCRA
- ◆ Hazardous Waste Management and Cost Minimization
- ◆ ISO 14001 / OHSAS 18001 Management Systems / OSHA VPP
- ◆ ASTM Phase I/ BEA / Due Diligence

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.**

What is covered by the RoHS Directive?

- ◆ Lead
- ◆ Mercury
- ◆ Cadmium
- ◆ Hex Chromium
- ◆ Polybrominated Biphenyls
- ◆ Polybrominated Diphenyl Ethers

Effective July 1, 2006.

Try Balloons by mail:

www.ballonsbymail.com

These are great for any occasion. Tell Sue EHS sent you.

FREE Training PowerPoint

EHS has PowerPoint presentations on the new SPCC rules and OSHA 300 logs available for FREE. Email your request to: JimCharlesPE@charter.net

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

EHS Management Strategies
Suite 100
5605 Kies St
Rockford, MI 49341
(616) 866-9152
JimCharlesPE@charter.net

RCRA Corner

How do the RCRA land disposal restrictions define wastewater and nonwastewater?

Wastewater is defined as hazardous waste that contains less than one percent by weight total organic carbon and less than one percent by weight total suspended solids. Non-wastewater is any hazardous waste that does not meet the criteria for wastewater. These definitions are essential for determining which hazardous waste treatability group and treatment standards are applicable in 40 CFR 268.40. For wastewaters, concentration-based treatment standards are typically higher for non-wastewaters than for wastewaters.

OSHA Issues Record-Setting Fine against BP Products North America

An explosion at a Texas refinery last March that claimed the lives of 15 workers and injured more than 170 others has resulted in a [penalty](#) of more than \$21 million against BP Products North America Inc. In a settlement agreement announced Sept. 22, the company announced it would pay the fine, abate hazards, and make necessary safety and health upgrades throughout its Texas City refinery, BP's largest oil refinery covering more than 1,200 acres and employing 1,600 permanent workers. *(The \$21 million penalty is the largest ever assessed by OSHA, surpassing an \$11.2 million fine levied against IMC Fertilizer Inc. in 1991 as a result of an explosion that killed eight workers at its Sterlington, La., plant.)*

**EHS Partners with
AMERICAN REMEDIATION**
Through this partnership
we can bring you
innovative and patented
REMEDIATION
Technologies and Site
Closure Services.

- ◆ Product Recovery
[\(MAV Systems™\)](#)
- ◆ Soil Remediation
[PER-PETUAL System™](#)
- ◆ Groundwater Cleanup
[\(E-DOT™\)](#)

Contact us at
JimCharlesPE@charet.net
to find out how these
systems can save
significant costs for
site clean-up.

Remediation using good old American ingenuity, new ideas, and experience.
Three Highly Effective & Low Cost Remediation Technologies

PER-PETUAL SYSTEMS
Patent # 6,517,388

MAV SYSTEMS
Patent # 6,517,388

E-DOT SYSTEMS
Patent # 6,517,388

How Cost Effective are these systems?

	Average Installation Capital Cost	Time Average Operational Cost	Estimated Average Clean-up
E-DOT System	\$ 25,000 - \$ 35,000	\$ 250 / month	2 years
PER-PETUAL System	\$ 28,000 - \$ 38,000	\$ 1,000 / month	1.5 years
MAV System	\$ 28,000 - \$ 38,000	\$ 180 / hour	100 - 150 hours

Compliance Programs	Cost ⁽¹⁾
DOT Training ⁽²⁾: 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.	\$1,599
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.	\$1,599
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. A draft assessment report will be issued with a detailed list of findings and finalized upon approval from the client.	\$3,400 (1-day) \$4,600 (2-day)
IT EHS Compliance Assessment: EHS has developed this program for companies looking for ways to stream line their EHS compliance systems using IT Tools. This program includes an initial review of your EHS programs to determine data flow and reporting needs. We will then meet to review options for optimizing your systems and reducing the man-hours needed to maintain compliance and develop recommendations for your site.	\$1,699
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	\$3,500 \$3,200
ISO 14001:2004 JumpStart: This is a one day program design for those that need to upgrade their EMS to meet the ISO 14001:2004 standard. This program includes 2-hour training sessions for the plant's EMS team on the revised standard, review of the EMS, and development of detailed action plan. The action plan will	\$1,599
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 imple-	\$3,500 \$2,900
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	\$3,450 \$3,200
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 senior level professional to support your projects – permitting, EHS reporting, waste water optimization, site remediation, or any others.	\$599/day \$499/day
SPCC Upgrade Program: This is a two day program designed to update and certify your existing SPCC plan to meet the requirements under the revised regulations. A professional engineer will spend two days at your location to complete the following tasks – review your existing SPCC Plan, verify current oil/chemical management procedures, identify plan updates, development of a detailed action plan, and presentation of needed changes to plant staff. This program includes a 1-1/2 hour presentation to plant personnel on the regulation changes and certification of the updated plan. The second day will be spent developing a detailed action plan that includes all changes needed, assigning responsibility, and a schedule for completion.	\$2,400 \$1,799
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.	\$1,199

(1) The above pricing is all inclusive plus travel costs. Travel time is billed one-way at \$40/hour plus expenses. Pricing is based on pre-payment of services and can be made using a procurement or credit card, or check.

(2) Training courses provide training materials and documentation for up to 8 people. Additional students billed at \$200.

(3) **DISCOUNTED** pricing for work booked in November, and December 2005.