



# EHS Compliance Update

Spring 2007

EHS Management Strategies, LLC

## Inside this Issue

<b>SPCC Rule Update</b>	<b>2</b>
<b>Hazardous Waste Training—EPA, DOT, OSHA</b>	<b>2</b>
<b>EHS Training Programs</b>	<b>3/4</b>
<b>EPA Proposed Revision to Definition of Solid Waste</b>	<b>5</b>
<b>EHS Compliance Programs</b>	<b>6</b>

## Managing EHS Training Programs

by James Charles, PE—EHS Management Strategies, LLC

When an EPA or OSHA inspector arrives at your facility one of the first areas they will inspect are your employee training records. Employee training can be costly and compliance difficult to track. A well managed training process can improve the performance of your workforce, minimize risk of fines/penalties, and reduce operational costs. The following are a few ideas on how to improve your EHS training programs.

**Needs Assessment:** Many times company training programs have evolved over time with many different managers. Programs designed by managers strong in safety may be missing environmental elements and programs developed by managers with strong environmental skills may be missing safety elements. The company should invest in a one-time assessment by a training professional to develop a comprehensive EHS training matrix. Many firms went through this process as part of their ISO14001 implementation process.

**Integration:** EHS training program should be fully integrated into to your company wide training programs and managed as an HR function. Keeping EHS programs separated only adds to inefficiency and costs. In addition, HR staff have a better understanding of people’s learning styles and can develop more effective programs.

**Initial Training vs Refresher:** EHS training is technical enough that it is recommended that initial training sessions should be conducted in a class room setting with an instructor. This allows the student to ask questions from the instructor and better learn the concepts. Upon completion of the initial training, companies may opt to use web or intranet based refresher training.

*(Continued on page 5)*

## Recently Completed Projects:

- ◆ DOT Training, Eaton Aerospace
- ◆ Compliance Audits, BEHR America
- ◆ SPCC Plans, American Axle
- ◆ ISO14001 Internal Auditor, Kent County DPW
- ◆ ISO14001 Certification, Gill Industries
- ◆ DOT Training, Gill Industries
- ◆ Legal & Other Requirements Review, Burke Porter
- ◆ 14001/18001 Benchmarking, Guardian Industries
- ◆ DOT/TDG Training, LEAR
- ◆ Compliance Audit, Pridgeon Clay
- ◆ EHS Benchmarking Study, Guardian Industries
- ◆ Compliance Audit, Dextech
- ◆ ISO 14001 Internal Audit, Dura Automotive
- ◆ ISO 14001 Internal Auditor Training, Meridian Automotive

## DIE CAST - Lock-Out/Tag-Out Interpretation

**Scenario:** A company operates its hydraulic power presses during normal production via redundant safeguards that include properly designed two-hand controls and presence-sensing devices. Both safeguarding devices are located a safe distance from the point-of-operation. The presses are run in single stroke with hands in the die area.

An additional safeguard includes automatic swing blocks that are cycled in and out of the die area on each single stroke. During die-setting, if the main disconnect is in the *on* position, the press cannot be operated unless the two-hand controls are actuated and

*(Continued on page 7)*

### What is Environmental Coaching?

Check out this website and find out:

<http://EnvironmentalCoaching.Zoomshare.com>

**EHS 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
- ◆ Honeywell
- ◆ Textron
- ◆ Barnes Aerospace
- ◆ BEHR America

**SPCC Rule Update (40 CFR 112)**

On May 10, 2007 EPA Administrator Steve Johnson signed a rule to extend the compliance dates for owners and operators of facilities preparing or amending and implementing Spill Prevention, Control, and Countermeasure (SPCC) Plans. This final rule extends the dates by which a facility must prepare or amend and implement its SPCC Plan until July 1, 2009. EPA expects to propose further revisions to the SPCC rule in 2007.

<i>facility (other than a farm) starting operation...</i>	<i>Must...</i>
On or before August 16, 2002	Maintain its existing Plan. Amend and implement the Plan no later than July 1, 2009.
After August 16, 2002 through July 1, 2009	Prepare and implement a Plan no later than July 1, 2009
After July 1, 2009	Prepare and implement a Plan before beginning operations

**Hazardous Waste Training—what is required?**

by James Charles, PE—EHS Management Strategies, LLC

Determining training requirements for companies that generate hazardous waste can be difficult. The result is that companies either provide too much or too little training and spend too much time training or being out of compliance with the regulations. This is not surprising since the training requirements that deal with hazardous waste management can be found in EPA, DOT, and OSHA regulations. The following is a summary of training requirements under each program.

<b>Generator Status</b>	<b>RCRA</b>	<b>DOT</b>	<b>OSHA</b>
Large Quantity (LQG)	40 CFR 262.34(a)(4) and 265.16	49 CFR 172 subpart H	29 CFR 1910.120(p)(8), 1910.120(q) and 1910.1200(h)
Small Quantity (SQG)	40 CFR 262.34(d)(5)	49 CFR 172 subpart H	29 CFR 1910.120(p)(8), 1910.120(q) and 1910.1200(h)
Conditionally Exempt Small Quantity (CESQG)	Not required	49 CFR 172 subpart H	29 CFR 1910.120(p)(8), 1910.120(q) and 1910.1200(h)

**RCRA:** The training requirements under the RCRA program depend on the generator status of the facility. LQG should have a formal and well documented hazardous waste training program that meet the requirements of 40 CFR 265.16. SQG's do not require annual training and only need to meet the requirements found at 40 CFR 262.34(d)(5). However, many SQG's do provide annual training as a best management practice to

(Continued on page 7)

For any special event please call my friend Sue at: [www.BalloonsByMail.com](http://www.BalloonsByMail.com) Easiest way to creatively show you care. Ps. She really is a friend and I get no commission.

EHS Management Strategies has developed these training programs to help our clients meet their business and regulatory compliance needs. Each program is designed to reinforce key concepts and considers each student's learning style. These programs consist of lecture and group exercises designed to keep the student interested.

---

### Management Systems

**NEW EMR Training (1-day):** New Environmental Management Representatives (EMRs) need a good understanding of their ISO14001 environmental management system to be effective. This program was designed to give the new manager a detailed understanding of the ISO14001 standard, key EMS elements, and their role in driving the continuous improvement process.

**Internal Auditor Training— TS16949, ISO 14001 or OHSAS 18001 (2 days):** This program is for anyone who wants to conduct internal audits. It will provide a detailed overview of the TS16949, ISO14001 or 18001 standards and auditing techniques. This is a very “hands on” program filled with exercises.

**ISO 14001 or RC14001 QuickStart© Implementation (2 days):** This is a two day program designed for anyone getting ready to implement an ISO14001 compliant EMS. The program will define Environmental Performance, detailed review of the ISO 14001 Standard, development of key EMS elements, and development of an implementation plan. The student will leave this class ready to begin implementing their EMS.

**Lead Auditor Programs—TS 16949, ISO900, ISO1400 (5 days):** These are 5-day RAB accredited lead auditor programs. Each program is 36 hours with a final exam, and qualifies the student to become accredited auditors.

**Auditor UPGRADE© (1-day):** This is a one day program designed for Quality Auditors that want to do EMS Auditing. The program will provide a good overview of the ISO14001 standard and auditing exercises designed to prepare someone with auditing skills to conduct EMS audits.

**ANSI Z10 Occupation Health & Safety Management System Implementation (1 day):** This course will provide a detailed overview of the Z10 standard and how to implement a Health & Safety management system. Each student will leave with a good working knowledge of the standard and the tools needed to develop an Z10 compliant H&S Management System. We will also cover the differences between Z10 and OHSAS 18001.

**OHSAS18001 Overview and Implementation (1 day):** This one day program will provide an overview of the OHSAS 18001 standard and how to implement a Health & Safety Management system. We will also map integration with the ISO14001 standard. The student will leave with the tools needed to plan their OHSAS 18001 certification.

**Process Mapping (2 days):** Process mapping is a simple way of rediscovering your core processes. Process maps enable you to peel away the complexity of your organizational structure and focus on the processes that are the core of your business. Process mapping allows you to analyze the way your organization really operates, identify opportunities for improvement, implement changes and increase customer satisfaction. This 2 day program will show you how to drive down costs.

### 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. *Available DOT or RCRA only.*

**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.

---

<b>Training Schedule Public Courses</b>				
<b>Course</b>	<b>Cost</b>	<b>July</b>	<b>August</b>	<b>September</b>
<b>EMR Training NEW (1-day)</b>	<b>\$495</b>	Cincinnati, OH Saginaw, MI	Grand Rapids, MI Indianapolis, IN	Detroit, MI Chicago, IL Toledo, OH
<b>ISO 14001 Internal Auditor (2-days)</b>	\$695	Buffalo, NY Cleveland, OH	St. Louis, MO Detroit, MI Toledo, OH	Cincinnati, OH Grand Rapids, MI Indianapolis, IN
<b>TS16949 Internal Auditor (3-day)</b>	\$1,195*	Rochester, NY	Traverse City, MI Atlanta, GA	Indianapolis, In Milwaukee, WI
<b>ISO 14001 QuickStart™ Implementation (2-days)</b>	\$695	Orlando, FL Chicago, IL	Indianapolis, IN Chicago, IL	Detroit, MI Grand Rapids, MI
<b>ISO14001 Lead Auditor Training (5-days)</b>	\$1,575*	Anaheim, Ca	Indianapolis, IN Cincinnati, OH Buffalo, NY	Lansing, MI
<b>ISO14001 Auditor UPGRADE (1-day)</b>	\$495	Seattle, WA Toledo, OH	Detroit, MI Grand Rapids, MI	Chicago, IL Indianapolis, IN
<b>ANSI Z10 OH&amp;S Management System Implementation (new)</b>	\$655	Denver, Co		Detroit, MI Chicago, IL
<b>OSHAS 18000 Overview and Implementation (1-day)</b>	\$495	Orlando, FL	Detroit, MI	Chicago, IL Atlanta, GA
<b>Processing Mapping (2-days)</b>	\$895	Atlanta, GA Woodlands, TX	Marietta, GA	Atlanta, GA Indianapolis, IN
<b>TOTAL Waste Program (DOT &amp; RCRA)</b>	\$425/both \$225/ea	Grand Rapids, MI Detroit, MI	Traverse City, MI Toledo, OH	Grand Rapids, MI Chicago, IL
<b>Hazwoper Refresher 8 hr, 24 hr, and 40 hr (Many more locations and dates please contact us)</b>	\$125 \$425 \$525	Chicago, IL Indianapolis, IN Cleveland, OH St. Louis, MO Atlanta, GA	Detroit, MI Indianapolis, IN Cleveland, OH Atlanta, GA	Detroit, MI Chicago, IL Lansing, MI Indianapolis, IN Cleveland, OH Atlanta, GA
<b>OSHA Site Supervisors Training</b>	\$235	Atlanta, GA Milwaukee, WI	Detroit, MI Denver, CO	
<b>OSHA Confined Space</b>	\$235	Indianapolis, IN Philadelphia, PA	Baltimore, MD Orlando, FL	Atlanta, GA Milwaukee, WI

To get specific dates and to register contact Jim Charles at [JimCharlesPE@Charter.net](mailto:JimCharlesPE@Charter.net). (\*) 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

## Managing EHS Training Programs (continued)

(Continued from page 1)

**Web/Intranet Based Programs:** Automated web based training is an excellent approach to delivering routine training programs. The systems can range from simple to complex programs that will develop training schedules and track training records. This is probably one of the best tools that companies can implement that will reduce costs and the likelihood of violations.

The first step will be to complete the needs assessment then the development of a written EHS training program. Once implemented, a facility can begin the integration process and then consider web-based training tools. The key is to quickly get started and then look for opportunities to improve your programs and reduce costs. One pit fall to avoid is trying to do every thing at one time. This will cause you to expend too much effort and money at one time and may stall your progress.

---

---

## EPA's PROPOSED REVISION TO DEFINITION OF SOLID WASTE

EPA's proposed changes could allow companies to significantly reduce their waste disposal costs. In an effort to promote greater recycling, the United States Environmental Protection Agency (USEPA) on March 15, 2007 proposed an amendment to its hazardous waste rules changing the definition of solid waste. This proposed amendment in large part was a result of several legal decisions which have recognized that recycled materials are not necessarily solid waste, even though broad definitions of solid waste permitted such materials to be regulated as hazardous waste.

Because of those cases, the USEPA originally proposed changes in its regulations in 2003 to encourage further recycling and to recognize that recycled materials if handled in a certain way would not be hazardous. The 2003 proposed regulation proposed to exclude materials that were generated and reclaimed in a continuous process within the same industry from the definition of solid waste.

The USEPA has now elected to reexamine its proposal and to develop a somewhat different definition of solid waste. The new proposal would provide (1) an exclusion for materials that were reclaimed under the control of the generator, (2) an exclusion for materials that are transferred by the generator to another company for purposes of reclamation, and (3) an exclusion based on a case-specific petition process for obtaining a non-waste determination.

The first proposed exclusion is intended to apply to materials that are reclaimed by a generator at the generating facility, by a generator at a different facility that the generator owns or operates and as part of certain types of tolling arrangements. Reliance on this exclusion would be dependent on the generator engaging in legitimate recycling and providing a notification to the USEPA and/ or authorized state agency (MDEQ) identifying the name, address, and USEPA ID number of the generator, the name and phone number of a contact person, the type of material that will be managed according to the exclusion and the date when the material will be managed in accordance with the exclusion.

(Continued on page 8)



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. [JimCharlesPE@charter.net](mailto:JimCharlesPE@charter.net) or (616) 389-9949.

---

<p align="center"><b>EHS Compliance Programs Summer 2007 Rates</b></p>	<p align="center"><b>Cost</b></p>
<p><b>Environmental Compliance Assessment:</b> EHS-MS has developed a risk based approach to conducting environmental compliance assessments 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 day 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>\$1,775 (1-day) \$2,250 (2-day)</b></p>
<p><b>In Plant Services:</b> Many times an EHS manager needs temporary help to get a project completed or EHS expertise to help resolve a compliance issue. EHS-MS will provide a professional to support your projects – permitting, EHS reporting, waste water optimization, EHS audits, site remediation, or any others. Rate does not include travel expenses.</p>	<p><b>\$480/day</b></p>
<p><b>DOT Training:</b> EHS-MS 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). Additional students \$125/each.</p>	<p><b>\$1,550</b></p>
<p><b>Hazard Communications and RCRA Training Program Development:</b> EHS-MS 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 \$975 (training)</b></p>
<p><b>Waste Management Plan:</b> EHS-MS 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-MS 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-MS 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) Additional students \$250/each. Does not include travel expenses.</p>	<p><b>\$2,950 (2-day)</b></p>
<p><b>Internal EMS Audits:</b> EHS-MS help the facility to plan and perform ISO14001 internal audits of their environmental management system (EMS). This can include audit planning, records review, and completion of internal Audit. EHS-MS staff can provide checklist/audit plan templates or use the facility's.</p>	<p><b>\$480/day</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. This is a 3-day process. Day 1 will review the facilities operations, meet with plant management, and assess existing EMS programs. Day 2 will be a 1/2 training program for the implementation team and development of a detailed implementation plan. Day 3 includes a 2 hour leadership training for plant management, presentation of the implementation plan, and facilitation of the first implementation team meeting.</p>	<p><b>\$2,900</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 will be discussed and PE will complete a final review and issue certification of your plan once the plan has been updated.</p>	<p><b>\$850</b></p>

---

## DIE CAST - Lock-Out/Tag-Out Interpretation (Continued)

*(Continued from page 1)*

the presence-sensing device is unobstructed. The customer cannot recall a catastrophic failure of the hydraulic system and in the extremely unlikely situation of a catastrophic hydraulic failure, locking the main disconnect would not prevent the upper slide from descending.

Additionally, when dies are changed, the upper slide is in its lowest position so as to safely remove the die. When a die-setter is working on the dies while the dies are installed in the press, the automatic swing blocks are in place between the upper slide and the press's bolster plate.

**Question:** Under the conditions described above, does OSHA's Lockout/Tagout Standard, 29 CFR 1910.147, apply?

**OSHA's Reply:** Yes. Die-setting activities constitute servicing activities and are covered by the LOTO standard — i.e., pursuant to the definitions for *Setting up* and *Servicing and/or maintenance* contained in §1910.147(b). Also, the *General requirement for all machines* requirements, contained in §1910.212, apply with respect to the hydraulic power press operation during normal production operations.

The safety blocks (or as you call them *swing blocks*) described in your scenario appear to be used to protect employees from hazardous energy (e.g., unexpected drift or movement of the slide due to gravity) during the die-setting procedure. Safety blocks, as well as electric disconnect switches are energy isolating devices if they physically prevent the transmission or release of energy. See the §1910.147(b) definition of *Energy isolating device*.

Although the safety blocks described may provide some protection, the reliance on control circuit devices (i.e., two-hand controls and/or a light curtain) alone or together may not protect employees from other types of hazards because neither safeguarding device physically prevents the transmission or release of hazardous energy. For example, the use of control circuitry alone does not prevent employee exposure to hazardous energy that may result from unexpected ram movement caused by potential mechanical energy (resultant from the ram/slide position and associated gravitational force), press component or control system malfunction, or press activation by others.

---

## Hazardous Waste Training (continued)

*(Continued from page 2)*

minimize risk. CESQG have no training obligations under the regulations, however, facility personnel must manage the wastes appropriately and able to respond to a spill.

**DOT:** Hazardous waste meets the DOT definition of a hazardous materials and are subject to the DOT regulations. The need for DOT training **does NOT** depend on the generator status of the facility. All employees responsible for packaging, labeling, and signing waste manifest require the DOT training described at 49 CFR Part 172. This training is required within 90 days for new (or transferred) employees and must be updated every 3 years.

**OSHA:** 29 CFR 1910.120 requires that employees responsible for spill response be adequately trained on the hazards, PPE, and spill response procedures. Most facilities will train a select group of employees designated as spill responders. These employees are required to have annual refresher training. 29 CFR 1910.1200 requires that all employees received training on the hazardous substances in the work place. This training needs to include the identification and risks associated hazardous waste.

To ensure compliance with all training requirements, an employer that generates hazardous waste should develop a written training program. Many of the above training programs can be integrated to reduce the time and costs associated with training. The plan should include new employee orientation and define the job titles that describe each type of training. This program should be integrated into your HR training function used to track all facility training and not a stand alone system. Please contact [JimCharlesPE@charter.net](mailto:JimCharlesPE@charter.net) with any question on how these regulations apply to your facility or help preparing a formal training plan.

---

## EPA's PROPOSED REVISION TO DEFINITION OF SOLID WASTE

*(Continued from page 5)*

This proposed exclusion, as noted, could apply in situations where a tolling company contracts with a manufacturer to produce a product and that manufacturing process generates a residual product that can be recycled by the tolling company. As long as the contract specifies that the tolling company owns and has responsibility for the recyclable material once it is generated, the material when returned to the tolling company for reclamation can be excluded from the definition of solid waste. The agency has reasoned that the recycling of the material is in essence done under the control of the tolling company even though the material is generated by another company.

In addition, the proposed second exclusion is intended to apply to materials that are generated and then transferred to another company for purposes of reclamation. Under this draft exclusion, materials generated by one company and then transferred to another company would be excluded from "solid waste" designation, as long as both parties comply with certain conditions. Generators, for example, would need to maintain records of material shipments for 3 years, contain materials if managed in land-based units in those units, submit a one-time notice to the USEPA and/or authorized state agency notifying the agency that they intend to manage the materials under the terms of the exclusion, agree to comply with restrictions on speculative accumulation and insure that the material is not handled by anyone other than the generator, the transporter and reclamation facility.

Generators also would have to use reasonable efforts to ensure that the materials are safely and legitimately recycled. In other words, generators would have to show that they used due diligence to assure that materials can be properly reclaimed. In turn, reclamation facilities would have to maintain shipping records for excluded materials for at least 3 years, manage excluded materials in a manner that is at least as protective as that employed for analogous raw materials, manage recycling materials in a manner that protects human health and the environment, and comply with certain financial assurance requirements that apply to permitted hazardous waste facilities. Reclamation facilities also would be required to submit a one-time notice to the appropriate agency or agencies as required for generators, comply with "speculative accumulation" restrictions and ensure that the excluded materials are legitimately recycled.

A third exclusion would apply based on a petition that shows that a hazardous secondary material is not a solid waste because it is recycled in a continuous industrial process, is comparable to a product or intermediate product or is recycled pursuant to certain contractual arrangements.

All of the proposed exclusions require that legitimate recycling be observed. Under the newly proposed regulation, "legitimate recycling" means that the recycling material must provide a useful contribution to the recycling process and that the recycling must yield a valuable product or intermediate product. The draft regulations suggest that consideration should be given to whether the recycled material is managed as a valuable commodity and whether the recycled product is free of constituents that contain different or significantly greater levels of toxic constituents than a non-recycled product.

This proposed regulation is open for public comment through June 25, 2007. States do not appear to be required to incorporate the proposed amendment, if adopted by the USEPA, into their regulatory program. Although states can be no more stringent in their regulations than the federal regulations, they are not required to adopt proposed regulations that are less stringent. The USEPA is strongly encouraging, however, that the Federal regulations if and as amended be adopted by the states. Do not miss your opportunity to submit comments to EPA if this will impact your operations.

**Web Site of  
the Month**

**Need an MSDS? Check out this site:**

<http://www.ilpi.com/msds/>

## EHS Management Strategies, LLC

### Contact:

James Charles, PE, CPG  
Senior Consultant  
(616) 389-9949—Office  
(616) 866-9152—HQ  
JimCharlesPE@charter.net

## 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

## EHS Management Strategies, LLC

EHS 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

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.**

### Lead Auditor Training

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

### Internal Auditor Training

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

**Ask about  
Discounted  
Summer 2007  
Rates**



# EHS

Management Strategies  
Environmental • Health • Safety Solutions

## EHS Compliance Services

EHS Management Strategies, LLC (EHS-MS) is an environmental, health & safety (EHS) management consulting firm. Our goal is to minimize our client's environmental risks and operating costs through innovative compliance strategies, management systems, and IT solutions.

EHS-MS compliance services include:

- ◆ Management Systems Consulting
  - ⇒ ISO14001
  - ⇒ OHSAS18001
- ◆ Environmental and Safety Compliance Auditing
- ◆ EHS Performance Metrics and Reporting
- ◆ EHS Liability Assessments
- ◆ EHS Reporting
  - ⇒ MAERS Reporting
  - ⇒ SARA Tier II
  - ⇒ Toxic Release Inventory
  - ⇒ OSHA Injury/Illness
- ◆ Emergency Preparedness Planning
  - ⇒ SPCC/PIPP Plans
  - ⇒ SWPPP
  - ⇒ Facility Response Plans
  - ⇒ Integrated Contingency Plans
  - ⇒ Risk Management Plans
- ◆ Chemical Management and Inventory
- ◆ EHS Training
  - ⇒ DOT Hazardous Materials
  - ⇒ Hazardous Waste
  - ⇒ Hazardous Communication
- ◆ EHS Permitting
  - ⇒ Air Quality
  - ⇒ NPDES/POTW
  - ⇒ RCRA Permitting & Closures
- ◆ Indoor Air Quality and Noise Assessments
- ◆ NPDES Sampling and DMR Reporting
- ◆ Groundwater Sampling and Site Remediation
- ◆ Drinking Water Sampling and Reporting
- ◆ MDEQ/EPA Enforcement Actions
- ◆ Industrial Cleaning
- ◆ In-Plant Construction/Management



**EHS-MS can help clients develop metrics designed to improve their EHS performance**

### EHS's Clients Include:

- LEAR Corporation
- Gill Industries
- Pridgeon & Clay
- Eaton Aerospace
- DANA Corporation
- Burke Porter
- DURA Automotive
- Delphi
- Steelcase
- Herman Miller
- Kent County DPW



**EHS-MS can assist with development of emergency preparedness plans including SPCC, SWPPP, PIPP, and RCRA contingency plans**

***“Low Cost Environmental Solutions”***

### **EHS Management Strategies**

#### Michigan

5605 Kies Street, Suite 100  
Rockford, Michigan  
JimCharlesPE@charter.net

[EnvironmentalCoaching.Zoomshare.com](http://EnvironmentalCoaching.Zoomshare.com)

To get EHS-MS's free quarterly regulatory updates e-mail your request to: [JimCharlesPE@Charter.net](mailto:JimCharlesPE@Charter.net)