

HSE Bulletin

Department of Health, Safety & Environment 2010 Compliance Reminder

June 2010

June 30: DOT Hazmat Registrations due for those who offer or transport hazardous materials (or wastes) that require placarding. More information at <http://hazmat.dot.gov/regs/register/register.htm>

July 1: EPA Section 313 (Form R) reports are due.

Some Annual Training Requirements for Safety Meetings: Hearing Conservation (and annual audiograms); Fire Extinguisher Training; Review of Lockout Procedures and/or Electrical Safety; Employee Rights to Exposure and Medical Records Review; Annual Respirator Fit Testing; HAZWOPER Emergency Responder Training; EPA Hazardous Waste Handlers Training.

ENVIRONMENTAL UPDATES

Form R Software*

EPA has released the latest version of the *TRI-MEweb* software that will be used to meet RY2009 TRI reporting requirements, due on July 1, 2010. *TRI-MEweb* is the EPA's only web-based tool for electronic reporting of toxic chemical activities under the EPCRA Section 313. This second version improves the internal administrative functions of *TRI-MEweb*, such as providing quick lists for parent company names in a standardized format; the ability to delete users that no longer work at a facility; providing quicker access to chemical reports for all facilities on a single web page listed under a single CDX preparer account; and the ability to sort data tables.

Revised Texas Proposal for Standard Permit Disregards Industry Comment**

A revised draft of the Thermoset Resin Standard Permit, issued April 2 by the Texas Commission on Environmental Quality, does not reflect the changes recommended by composite manufacturers and ACMA (American Composites Manufacturers Association) following a December 7 industry meeting with state regulators. The Standard Permit, offered by TCEQ as an administratively less burdensome and less uncertain alternative to case-by-case review of permits for new and modified facilities, is designed to prevent exceedances of the state's odor-based styrene screening level. ACMA has long argued that the TCEQ styrene screening level is unfeasibly low for compliance by all but the smallest 20% of composite plants, is based on poor science, and is not needed to protect against nuisance odor problems.

OSHA UPDATES

OSHA's Combustible Dust Program Manager Invites Plant Tour Suggestions**

In a recent update provided to the American Composites Manufacturers Association (ACMA), OSHA combustible dust rulemaking project manager Mat Chibbaro invited the industry to suggest locations for OSHA plant tours. The tours are being conducted as part of OSHA's fact-finding in preparation for development of a proposed regulation for combustible dust hazards.

While OSHA works to develop a proposed rule, composites manufacturers and other employers with dust generating operations are required under OSHA's Combustible Dust National Emphasis Program ([NEP](#)) to comply with the applicable provisions of [NFPA 654](#), the standard for prevention of fires and explosions from combustible particulate solids.

OSHA has identified composites manufacturing as a "dusty industry", and has inspected and fined several composite manufacturers for problems with dust management practices. Chibbaro also reported that the OSHA is planning a small business (SBREFA) review of the proposed rule, in Spring 2011 and that the agency is working with NFPA on an update to the 654 standard.

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Review of OSHA's Methylene Chloride Standard Shows Value to Worker Protection***

OSHA's recent review of the agency's Methylene Chloride standard indicates the standard is succeeding in protecting workers from the effects of Methylene Chloride exposure such as respiratory and central nervous system failure and cancer.

The review clearly showed that the standard has been effective in saving lives. The study estimates that each year the standard protects as many as 30,000 to 54,000 workers from damage to their respiratory and nervous systems and prevents approximately 34 deaths from cancer and other illnesses caused by Methylene Chloride exposure. The agency concluded that these estimates resulted from the lowered permissible exposure limit required in the final Methylene Chloride standard published in January 1997. This standard's success reflects the overall importance of OSHA standards in protecting workers' safety and health. Visit OSHA's Safety and Health Topics Page on Methylene Chloride for more information on reducing Methylene Chloride exposure.

OSHA Hosts Web Chat on Six-Year Strategic Plan****

As part of a series of Web chats the Department of Labor agencies hosted to seek input from stakeholders on its six-year strategic plan, OSHA administrator David Michaels and other agency officials on April 7 shared details of the agency's plans for the future. Officials highlighted the role enforcement plays in protecting workers. "We are committed to putting more emphasis and [resources] into enforcement to focus on businesses that continue to violate the law," said assistant OSHA administrator Jordan Barab during the web chat. Among other details of the plan:

- A change in the penalty calculation method resulting in higher penalties.
- A greater emphasis on Industrial Hygiene.
- Increased use of the General Duty Clause to cite ergonomics hazards.
- Expanding outreach efforts to workers in high-risk industries.
- Continued use of National Emphasis Programs.

OSHA Sends Letters to 15,000 High-Injury Worksites****

About 15,000 employers recently were sent letters from OSHA informing them their workplaces had a higher-than average injury rate. Based on results from a 2009 survey sent to 100,000 worksites, OSHA identified the organizations with the highest DART rates. The DART rate stands for "Days Away, Restrictions and Transfers". This number is also based on trending over 200,000 hours but its not based on total injuries. Its based only on those injuries and illnesses severe enough to warrant "Days Away, Restrictions and Transfers". The employers who received letters had a DART rate of 4.5 per 100 full-time workers. According to OSHA, the national average is 2.0.

Being Green...Tips for Your Business

Being green isn't just good for the environment, it's also good for your bottom line. Have you looked at the price of energy lately? You don't have to be a tree-hugging environmentalist to want to find ways to save money by using less gas, electricity, and heating oil. Here are a few easy ways to save both money and the environment:

Replace high-energy-use light bulbs, fixtures, and equipment. The quickest thing you can do is to switch to low-energy use light bulbs. Next, if you have old equipment, it may be time to upgrade. And there may be money available to help. Check with your local utility company for rebates, loans, or grants to enable you to transition to energy-efficient equipment.

Buy recycled products. Look for "post-consumer waste" products, including stationery, packaging materials, paper towels and other kitchen and bathroom supplies. This keeps waste from ending up in landfills.

Buy environmentally-friendly products. The market for non-toxic supplies has exploded, giving you more affordable choices in items such as cleaning supplies, inks, and other materials.

Use recycled and non-toxic materials for production. If you're a manufacturer, ask suppliers for environmentally-friendly materials. They may be less expensive than the raw materials you're currently using.

Also, keep up to date on other practices and environmental initiatives that might effect your business by signing up for the EPA's new consumer newsletter, **Go Green** at <http://www.epa.gov/newsroom/gogreen/> .

* The information below is made available by the Environmental Resource Center.

** The information below is made available by the American Composites Manufacturers Association (ACMA).

*** The information below is made available by the Occupational Safety and Health Administration (OSHA).

**** The information below is made available by the National Safety Council (NSC).