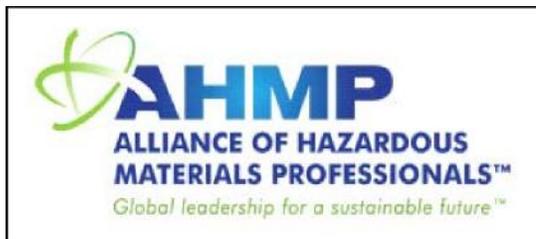


The HazMat Manager News

EASTERN WASHINGTON CHAPTER OF THE ACADEMY OF CERTIFIED HAZARDOUS MATERIALS MANAGERS NEWSLETTER



Eastern Washington Chapter of the Academy of Certified Hazardous Materials Managers

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PRESIDENT'S CORNER

From EWC's President Russ Johnson

Is it Spring yet? I don't know if the groundhog saw his shadow or not, but it was sure cold last week. I am really looking forward to warmer weather. One of the main things I want to see this year is expansion of our chapter into our communities. In the past, most of our membership has been associated with Hanford. With the impending layoffs and future down-sizing, we need to focus on what our Chapter can offer the Tri-Cities.

The networking potential we have is definitely under-utilized. As HAZMAT professionals, we have a lot of expertise to share. I have attended recent meetings for the Benton County Local Emergency Planning Committee (LEPC) and have been in contact with Franklin and Grant County LEPCs, as well. There are numerous people here in the Tri-Cities that work with hazardous materials that have nothing to do with Hanford. We need to actively recruit members beyond the Hanford boundary.

Our first general meeting was held on February 17th. We had an excellent presentation from Bob Spencer entitled *Overview of Emergency Management*. Bob is the Emergency Manager of Benton County. Several great topics are planned this year including an interesting tour or two and our annual wine tasting social. We recently met with the Pasco School District to explore ways to help with the chemistry labs. We will be involved with this year's Science Fair and will be offering the three-day overview course in September. By the way, although the course is considered preparation for the CHMM exam, we need to emphasize the other benefits this course provides. For example, this course will give newer employees an environmental management overview, whether or not they plan to take the CHMM exam.

Most of all, we need to consider why we are HAZMAT managers. What can we do to promote our profession, share our expertise, and serve our communities? Let me know what ideas you have and/or what activities you would like to see our Chapter do.

This looks like it will be a very busy year. I look forward to sharing it with you and serving as your 2011 President.



Regulatory News

OSHA Releases Updated Compliance Directive Addressing PPE

February 16, 2011

OSHA just released an updated compliance directive, CPL 02-01-050 Enforcement Guidance for Personal Protective Equipment in General Industry, which instructs enforcement personnel on both the agency's interpretations of PPE standards and the procedures for enforcing them.

Prompted by numerous revisions to the PPE standards including a final rule for employer payment for personal protective equipment and a final rule to revise the PPE standards based on National Consensus standards, this updated instruction makes the following changes, effective February 10, 2011:

- Clarification on what type of PPE employers must provide at no cost, when employers must pay for PPE, or for replacement PPE, and when employers are not required to pay for PPE.
- Clarification of the PPE payment requirements for PPE worn off the jobsite, for PPE that must remain at the jobsite, and for employee-owned PPE.
- Enforcement policies that reflect court and review commission decisions concerning PPE.
- Guidance that allows employers to use PPE constructed in accordance with the most recent national consensus standards.

Delegates Pass Measure Urging Congress to Stop EPA from Further Regulating Air Quality

Washington Post (02/23/11) Kunkle, Fredrick

Virginia's House has overwhelmingly endorsed a resolution urging Congress to prohibit the EPA from regulating greenhouse gases, and to impose a two-year moratorium on the agency from writing any new air-quality regulations except for in emergencies. Resolution sponsor James W. Morefield (R-Tazewell) cited a study by the Heritage Foundation stating that recently proposed greenhouse regulations would hurt the economy by imposing \$23 billion in new costs for energy producers. Critics in the House warned that if the effort is successful, it would gut EPA efforts to control ground-level ozone, smog, acid rain, and other airborne pollutants.



IHMM BOARD OF DIRECTORS ANNOUNCE ELECTION RESULTS

Michael Davidson, CHMM, and Robbie Tidwell, CHMM, have been elected to serve new four year terms on the IHMM Board of Directors.

ROCKVILLE, MD - The Institute of Hazardous Materials Management's (IHMM) Board of Directors announced at their annual meeting on December 10, 2010 in Baltimore, MD, the results of the recent election for open Board positions. There were two director positions representing the Certified Hazardous Materials Manager (CHMM®) open for election with four-year terms beginning on January 1, 2011.

Elected to the Board was Michael Davidson, CHMM, of Severn River, MD and EWC's Past President, Robbie Tidwell, CHMM of Richland, WA.

"We are pleased to welcome Michael and Robbie to the Board," stated Elizabeth Pfeiffer, CHMM, and Board Chair". The Institute will continue to face new challenges and be presented with new opportunities in the coming years so we are fortunate to have CHMM's and CHMP's willing to serve on the Board of Directors with the passion, commitment, and dedication required to ensure the long term success of the Institute and our accredited certification programs."

Sign up for AHMP Webinars!

AHMP Webinars are seminars or courses that you can take from any place where you can access a computer with an internet connection and a telephone. AHMP Webinars include a lecture portion via telephone, with slides presented on your computer, followed by a question and answer session with the instructor. The Webinar is presented live. All AHMP Webinar instructors are leaders in their subject fields.

- **Reverse Logistics: Where Customer Service and Compliance Collide**, Held 3/9 (Weds) from 4:00 – 5:00pm PST

Speaker: Deborah B. Gray, CHMM
Project Manager, Waste Management Upstream
Email: dgray4@wm.com

Description:

An increasing number of companies are engaging in reverse logistics. The decision to institute a reverse logistics program is often customer driven, some customers are simply seeking to better manage inventories or upgrade the consumer, while others demand a sustainable approach to managing product lifecycle. Sales managers will agree to do whatever it takes to make the customer happy. But when they agree to take back merchandise and give the customer credit, do they really understand the implications of their actions? Reverse logistics operations must comply with EPA, DOT, and other federal, state, and local regulations. This webinar gives an overview of the issues that should be considered and the members of the organization that need to be involved to ensure that customer service doesn't cause your company's reverse logistics program to collide with the regulations.

CMP: 1 CE credit hour

Cost: \$85 members/\$105 nonmembers

Other Upcoming Webinars!

- Techniques to Create a Positive Safety Culture, 3/23
- Proposed Lithium Battery Air Transportation Regulations, 4/6
- Success Secrets from a Nine Year Old ISO 14001 Environmental Management System, 4/20
- Complacency: The Silent, 5/4

Mark your Calendars!

- 4/21 State of Washington, Department of Health – Speaker
 - 5/19 Pacific Northwest National Laboratory – Speaker (Topic – Global Warming)
 - 6/24 Tour (Hanford Environmental Restoration and Disposal Facility)
 - 7/21 CHMM Certification and Recertification – Speaker
 - 8/18 Tour - Local Landfill
 - 9/15 Wine Social
 - 9/21 -23 CHMM Preparation Class (Overview of Environmental/Safety Requirements)
 - 12/8 Awards Banquet and Holiday Dinner
-



Recertifying Your Certified Hazardous Materials Manager (CHMM®) Credential

The Institute of Hazardous Materials Management (IHMM) developed the CHMM® Recertification Program to provide certificants with guidelines to help them retain professional currency in their field. Professional development experiences are valuable learning activities, and certificants may receive Certification Maintenance Points (CMPs) by engaging in qualifying programs. Recognizing that there are many different types of professional development activities that CHMMs can participate in to help them maintain that currency, the Recertification Program provides various options certificants may utilize in meeting recertification

requirements.

The IHMM requires that the CHMM certification be renewed every five (5) years to ensure that certificants retain their currency with the advancements in technology and changes in compliance requirements that occur frequently in hazardous materials management and related fields. To be an effective CHMM, you need to stay current on developments in the industry, and remain competent in the knowledge, skills and abilities you demonstrated by earning the CHMM designation. Maintaining the highest professional standards by continuing to uphold and abide by the Code of Ethics is also a requirement for recertification.

To qualify for recertification, each CHMM is responsible for:

- Seeking out activities that are relevant to the competency requirements of the *CHMM Examination Blueprint* (available online at the IHMM website (@ihmm.org)).
- Maintaining appropriate documentation of their participation in those activities;
- Submitting supporting documentation for claimed activities; and,
- Earning sufficient CMPs to recertify. *Much information is provided in the CHMM Recertification Handbook which is available online at the IHMM website (@ihmm.org).*

When an individual's CHMM certificate has expired or has been decertified after all extensions, grace periods, and/or appeal process deadlines have passed, the individual will need to reapply and take the certification examination again in order to regain the certification. Once an individual has been decertified, he/she must apply for the certification as a new candidate. The candidate must abide by all eligibility requirements in effect at the time his/her application is approved.

Green Building and Recycling Opportunities

If waste cannot be avoided, look for ways to recycle. Recycling, both on-site during construction and by selecting and installing recycled-content products, is one key to greening your building practices. Credits are offered in all green building certification systems for diverting construction waste from the landfill. Green building projects in Western Washington have achieved waste diversion rates as high as 98%, since the west side of the state has a fairly extensive recycling infrastructure to support diversion from landfills.

To find recycling opportunities near you, visit the 1-800-RECYCLE online database at <http://1800recycle.wa.gov> or earth 911 and search for construction waste.

Regulatory Corner

Below is the first in a series of questions and answers taken from Paul Martin's "Two Minute Trainings." If you have a question, please send it to Paul Martin (phone 509-376-6620 or email @Paul_W_Martin@rl.gov) and he will try to provide an answer.

SUBJECT: Satellite Accumulation and Process Location Changes

Q: A customer has a satellite accumulation area (SAA) and understands that the SAA must be at or near the point of generation where the waste initially accumulates and that the SAA must be under the control of the operator generating the waste. However, the customer needs to move the waste generating process to another location on the generator's site. If a process that generates waste is moved onsite, is it acceptable to move the associated SAA to the new process location, or must the SAA be moved directly to a less than 90-day hazardous waste accumulation area or a permitted treatment, storage or disposal facility (TSDF)?

A: Per WAC 173-303-200(a) [40 CFR 262.34(c)]:

A generator may accumulate as much as fifty-five gallons of dangerous waste or one quart of acutely hazardous waste per waste stream in containers at or near any point of generation where waste initially accumulates (defined as a satellite accumulation area in WAC 173-303-040). The satellite area must be under the control of the operator of the process generating the waste or secured at all times to prevent improper additions of wastes to a satellite container. Satellite accumulation is allowed without a permit provided the generator complies with WAC 173-303-630(2), (4), (5) (a) and (b), (8)(a), and (9)(a) and (b), and with subsection (1)(d) of this section. (See regulatory summaries of WAC 173-303-630, etc., attached.)

Since SAA waste may be accumulated at or near any point of generation where waste initially accumulates, the SAA cannot be moved from the process's original point of generation. If the process is moved, all SAA wastes would have to be transferred to a designated accumulation or storage area.

As confirmation, Mr. Tom Cusack of the Washington Department of Ecology answered the above question in an e-mail dated August 18, 2009 and stated:

"No. That would be a new point of generation and not "at or near" the original point of generation for the waste inside the drum. SAA sites are not mobile."

Therefore it is not acceptable to move the SAA to the new process location and the SAA must be moved to a less than 90-day hazardous waste accumulation area or a permitted TSDF.

SUMMARY:

- Satellite accumulation may occur at or near the initial point of generation.
- If the process and SAA are moved, the SAA is no longer at or near the initial point of generation.
- SAA sites are not mobile and cannot be moved with a process to a new location.



Mistakes of the Past (And How Not to Repeat Them!)

By Harold Tilden

Author's Note: This article is intended to take a look at past activities in the light of how to learn from them. No accusations of impropriety on anyone's part are intended; usually the actions taken were "state of the art" at the time.

In the late 1970s, a train derailment caused a spill of a chemical used to make hexachlorophene, at the time a common skin cleanser. The chemical was being shipped from the manufacturing plant to a second plant for purification and subsequent packaging into consumer products. The "crude" form being shipped contained a number of manufacturing impurities.

During train derailments, the primary concern is generally returning the tracks to service; shipments tend to "pile up" behind closed tracks. In order to expedite the cleanup and return the tracks to service, the contractor hired to clean up the spilled material hired several local laborers. These workers were given field training on the use of protective clothing and subsequently deployed in the field to dig up visibly contaminated soil with shovels. The workers were told not to contact or ingest the chemical, and were briefed on the hazard of the chemical involved. They were not, however, briefed on the hazards of the impurities in the "crude" mixture – which included dioxins and dibenzofurans at very low levels. One of the local laborers later alleged illnesses caused by exposure to the dioxins.

Lessons Learned:

- **Training.** EPA and OSHA regulations now require comprehensive training for anyone entering a permitted waste facility or a release site. Short-term workers need the same training as permanent employees.
- **Communication.** Workers need to be apprised of all potential hazards of the material they are handling, not just the primary one. Mixtures and manufacturing intermediates need particular attention, since multiple hazardous substances may be present (albeit at low levels).
- **Protection.** Selection of protective wear, respiratory protection, and decontamination steps need to consider all hazards present at the site to correctly evaluate their adequacy.

Clarification on Hazardous Materials Shipment

March 11, 2011 The American Trucking Associations (ATA) asked the Obama administration to prevent the opening and inspection of hazardous materials shipments along the roadside, unless it is believed the shipment poses an imminent danger or does not comply with the hazardous materials regulations. In a petition filed March 7 with the Pipeline and Hazardous Materials Safety Administration (PHMSA), ATA asked the agency to "clarify" its rules regarding the opening and inspecting of hazmat packages by state law enforcement officers. "ATA supports PHMSA's existing authority to require motor carriers to make records, equipment, packagings and containers available for inspection," ATA Vice President and Regulatory Counsel Rich Moskowitz wrote. "Unfortunately, [that authority] is being interpreted in a manner that frustrates the safe and efficient transportation of hazardous materials."

By specifying that most package inspections should occur at the point of loading or unloading, ATA said PHMSA could "improve the roadside inspection procedures, and avoid unnecessary delays and the additional handling of hazardous materials packages . . . while assuring the preservation of a robust hazardous materials transportation inspection authority."



February 17th Presentation on Emergency Management

Mr. Robert Spencer (Bob), Emergency Management Manager, provided an overview of emergency management activities in Benton County. Bob graduated from the University of Alaska Fairbanks as a wildlife science major and received a Bachelor of Science degree in emergency preparedness. He has attended numerous emergency management training sessions at the National Emergency Management Institute at Emmitsburg, Maryland. He has participated in terrorism response training at the Federal Emergency Management Agency's training facility in Mt. Weather, Virginia, and in the domestic preparedness terrorism response training provided by the Department of Justice in the cities of Phoenix, Mesa, and Glendale, Arizona.

Previously, Bob served as the Director of the Maricopa County, Arizona Department of Emergency Management for eight years before moving to Washington. In his current duties in Richland, Bob is in charge of responses to numerous declared disasters and incidents.

Bob discussed how emergency response (ER) plans are developed for both natural and man-made disasters and emergencies. He said that Benton County plans for incidents such as wildfires, floods (from the Yakima River), earthquakes and weather-related emergencies. He said that small earthquakes have been more common in the last few years and there have been a few minor tornadoes. He said this area also has problems from high winds and hail. Fines from incidents have helped to fund needed ER systems in the county.

He described the emergency operations centers (EOC) at Hanford, Franklin County and Benton County and how people get involved during emergencies. He provided an overview of the emergency operations capabilities in the local area which include emergency service radios, telephones, ham radios and alerting systems. He said that extensive mapping has been done by plotters to identify locations and that they have ongoing weather report interface. Staff at the EOCs include emergency management personnel, law enforcement, fire agencies, the American Red Cross, Site representatives, the Department of Agriculture, Department of Energy, the Department of Transportation, etc. He also said the County Board of Supervisors is involved.

The EOC will mobilize for Hanford incidents, Columbia Generation Station incidents, Umatilla Chemical Depot incidents, amber alerts and other major disasters, such as fires, in the county. Other groups get involved depending upon the incident support needed, e.g., whether it is a wildfire, storm response (like lightning), search and rescue coordination, chemicals/haz mat coordination, etc. They often do drills and exercises and have done them at schools (for possible shootings) and in conjunction with FEMA. The exercises include haz mat field exercises with decon trailers, PPE, nuclear plant exercises, special weapons and tactics exercises (aka SWAT), etc.

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