Volume 1, Issue 5

July 2006

Regulatory Affairs Newsletter

Supporting compliance in the areas of environmental, safety, health, and product stewardship

Fisher Scientific International
Regulatory Affairs Group

REPORTING DEADLINE

INVENTORY UPDATE RULE (IUR)

Due between Aug. 25 and Dec. 23

The Inventory Update Rule (IUR) was promulgated in 1986 for the partial updating of the Toxic Substances Control Act (TSCA) Chemical Inventory database. This reporting has historically been required every four years and 2006 is the current reporting year for chemicals manufactured or imported in 2005. Chemical manufacturers and importers are required to submit this report for imported chemicals, imported materials that contain chemicals, and chemicals manufactured in the United States.

See page 4 and the links below for additional information and changes for this reporting year. If you have any additional questions, contact Lisa.DuMars@fishersci.com.

- *http://64.233.161.104/search?q=cache:RrRsC8FOjqIJ:www.epa.gov/oppt/iur/pubs/factsheet.pdf+iur+reporting&hl=en&gl=us&ct=clnk&cd=2*
- *http://64.233.161.104/search?q=cache:4r2w3DEPQwYJ:www.advent-environ.com/img/media/TSCA_IUR_Alert_06.pdf+iur+reporting&hl=en&gl=us&ct=clnk&cd=6*
- *http://64.233.161.104/search?q=cache:QuP2BwUUHXQJ:www.americanchemistry.com/s_acc/bin.asp%3FCID%3D435%26DID%3D1497%26DOC%3DFILE.PDF+iur+reporting&hl=en&gl=us&ct=clnk&cd=9*
- *http://www.epa.gov/opptintr/iur/*

Inside this issue:

OSHA TARGETS HIGH-HAZARD WORK SITES

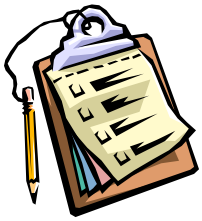
The Occupational, Safety and Health Administration (OSHA) 2006 target list includes those sites reporting 12 or more injuries or illnesses resulting in days away from work, restricted work activity, or job transfer for every 100 full-time workers (known as the DART rate). The primary list will also include sites with a "Days Away from Work Injury and Ill-ness" (DAFWII) rate of nine or higher (nine or more cases that involve days away from work per 100 full-time employees).

Employers not on the primary list who reported DART rates of between 7.0 and 12.0, or DAFWII rates of between 5.0 and 9.0, will be placed on a secondary list for possible inspection. The national incident DART rate in 2004 for private industry was 2.5, while the national incident DAFWII rate was 1.4.

The agency also will randomly select and inspect about 175 workplaces (with 75 or more employees) across the nation that reported low injury and illness rates for the purpose of reviewing the actual degree of compliance with OSHA requirements. These establishments are selected from those industries with above the national incident DART and DAFWII rates.

Finally, the agency will include on the primary list some establishments that did not respond to the 2005 data.

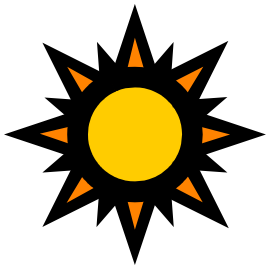
Visit www.osha.gov for additional information.



SUN PROTECTION

As the weather improves, we are all finding more reasons to be outdoors. Whether you are at a pool or beach, playing sports, or working in the yard, follow these tips to protect yourself from the sun.

- Generously apply sunscreen with a sun protection factor (SPF) of at least 15 that provides broad-spectrum protection from both ultraviolet A (UVA) and ultraviolet B (UVB) rays.
- Re-apply every two hours, even on cloudy days, and after swimming or sweating.
- Wear protective clothing, such as a long-sleeved shirt, pants, a wide-brimmed hat and sunglasses, where possible.
- Seek shade when appropriate, remembering that the sun's rays are strongest between 10 a.m. and 4 p.m.
- Use extra caution near water, snow and sand as they reflect the damaging rays of the sun which can increase your chance of sunburn.
- Protect children from sun exposure by applying sunscreen.
- Get vitamin D safely through a healthy diet that includes vitamin supplements. Don't seek the sun.



INFECTIOUS SUBSTANCE TRANSPORTATION REQUIREMENTS REVISED

The U. S. Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA) is revising the transportation requirements for infectious substances, including regulated medical waste. PHMSA adopted these changes in order to be consistent with revised International standards and to clarify existing requirements to promote compliance. Below are revisions to the current rule.

- **Adopt a new two-tiered classification system for Division 6.2 materials designating them as either Category A, or Category B.**
  Category A infectious substances pose a higher degree of risk than Category B infectious substances. A Category A material is defined as an infectious substance transported in a form capable of causing permanent disability or life-threatening or fatal disease to otherwise healthy humans or animals when exposure occurs.
- **Replace both proper shipping names "Diagnostic specimens" and "Clinical Specimen" with "Biological substance, Category B" (UN 3373).**
  Shippers have the option of using the new proper shipping name or the existing proper shipping name of Diagnostic Specimen or Clinical Specimen until Jan. 1, 2007, after which the new name must be used.
- **Adopt packaging requirements for Category A and Category B infectious substances consistent with those in the UN Recommendations and ICAO Technical Instructions.**
- **Require new hazard communication for Category B infectious substances.**
  Because Category B infectious substances are excepted from shipping paper requirements, the new rules require that the proper shipping name, UN number, name and telephone number of a person knowledgeable about the material be provided on a written document, such as an air way bill. This document must accompany a Category B infectious substance shipment or be placed on the package itself.
- **Expand the packaging exceptions to Category B infectious substances transported for research, diagnosis, investigational activities, or disease treatment or prevention.**
- **Revise the definition of "Regulated Medical Waste."**
- **Add clarification to the packaging standards for sharps.**

On May 26th, Chuck Raba and Don Collins presented Doug Rue, Assistant Fire Chief of the Country Hills Fire Department (CHFD), with a donation check of $2,500. CHFD is designated as the first fire department to respond to an emergency at the Somerville facility.

The money will be used to upgrade communications equipment and other critical systems. This is the third consecutive year that Fisher has provided this type of support.

From left to right— Don Collins, Chuck Raba, and Asst. Fire Chief Rue

MSDS/LABEL AND REGULATORY DATABASE PROJECT

Project Update

Since the initial meeting on April 27 the MSDS/Label and Regulatory Database Project Team (MLR Team), moved us into the vendor evaluation/ selection mode of the project. The response to this meeting was very positive with over 35 participants from various Fisher businesses represented. All team members focused their efforts to improve current systems in order to provide the best regulatory compliant MSDSs and Labels possible for our customers. In May, the Regulatory Data Dictionary, Vendor RFI Software Checklist, and Product Technical Concerns RFI were tallied and provided to the Vendors as a guide for what Fisher is looking for in the new compliance tools and database system. Thank you for your input on these documents.

Vendor Software Presentations

The team selected the top four vendor candidates for further product examination:

- ProSteward by 3E, CGI-AMS
- THE WERCS*
- MSDgen *Product by HSE Systems
- Hazox Chemical Reporting Systems

During the week of June 12, these four vendors participated in LIVE demonstrations in Pittsburgh. Many MLR Project team members participated in these meetings either by a visit to Pittsburgh, or simultaneous Web cast. All participants were asked to complete Vendor Evaluation Forms following each presentation.

Evaluations

Following a review of the Vendor Evaluation Forms by the NPI Team and other MLR participants, we will select the top two or three candidates. These vendors will be asked to submit a proposal and bid on the new Fisher system.

Questions

If you have any question regarding participating on the MLR Team or this project, contact Lisa DuMars (412) 490-8425 or Patty Kott (412)-490-4460.

INVENTORY UPDATE RULE (IUR)

Chemical manufacturers and importers will be required to submit data between Aug. 25 and Dec. 23. Below are the requirements for the current reporting year. Some of the requirements have changed from previous years.

* **Companies will need to report each chemical substance manufactured and/or imported in an amount greater than 25,000 pounds during the most recently completed calendar year prior to the reporting year.** Until now the threshold was 10,000 pounds.

* **In previous years, the threshold was based on the amount manufactured during the most recently completed corporate fiscal year but is now based on the calendar year.**

* **Chemical specific exposure information is now required:**
  - Number of employees reasonably exposed to the chemical at manufacturing site
  - Physical forms and percentages of each form of the chemical shipped off site
  - Maximum concentration of the chemical substance when it is shipped off site
  - Maximum concentration of the chemical substance when reacted on site to produce a different chemical substance

* **Companies manufacturing or importing greater than 300,000 pounds of a chemical substance must also report exposure information regarding the chemical substance's processing and use.**

* **Need to keep copies of the inventory update reports for five years instead of four.**
  This means the 2006 report will need to be kept for at least one year after the next report in 2010.

* **Under the new rule manufacturers and importers will submit the information every five years.**
  The 2010 information will have to be submitted to EPA between June 1 and Sept. 30, 2011.

Fisher Scientific

Fisher Scientific International
Regulatory Affairs Group

2000 Park Lane
Pittsburgh PA, 15275

Phone: 412-490-8929
Fax: 412-490-8930
Email: regulatory.affairs@fishersci.com

We provide effective low-cost solutions to environmental, safety, health and product-stewardship problems

WE'RE ON THE WEB!
http://www.fsrqa.com/
AND INTRANET
http://10.0.29.7/esh/

- *Our policy is to conduct business worldwide **in compliance** with all applicable laws and regulations*
- *Fisher Scientific's Regulatory Affairs Department is responsible for monitoring the company's progress and reporting to management the overall Regulatory Affairs goals and our success in achieving them.*
- *For more information about the Regulatory Affairs Group, please contact one of the individuals below.*

Regulatory Affairs Contact Information

Jeff Felder	**jeff.felder@fishersci.com**	**412-490-8941**
Tom Tisa	**tom.tisa@fishersci.com**	**412-490-8138**
Don Herbst	**don.herbst@fishersci.com**	**412-490-8139**
Lisa DuMars	**lisa.dumars@fishersci.com**	**412-490-8425**
David McAdams	**david.mcadams@fishersci.com**	**412-490-8144**
Jennifer Hutchison	**jennifer.hutchison@fishersci.com**	**412-490-8141**
Jill Asti	**jill.asti@fishersci.com**	**412-490-8929**