

# 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 draft 2006 IUR Instructions for Reporting have been made available on the EPA website: <http://www.epa.gov/opptintr/iur/>

See page 4 for updated information.

### **TRI UPDATE**

All facilities must determine their TRI reporting applicability on an annual basis. One hundred percent of Fisher Scientific facilities completed their applicability review using Fisher Scientific programs. Based on the completion of the applicability review, 15 Fisher Scientific facilities were required to submit Toxic Release Inventory (TRI) reports. These facilities submitted these reports on time, before July 1, 2006. These 15 facilities reported a grand total of 62 chemicals.

The ESH Group would like to thank you for your cooperation with the program.

### **NEW MANIFEST FORM INFORMATION**

Use of the Uniform Hazardous Waste Manifest is required starting September 5, 2006. State hazardous manifest forms will no longer be allowed.

Veolia Environmental Services (formally Onyx) will be preparing copies of manifests, but persons responsible for signing the manifest at the sites should be aware of the new format. As always, be sure the manifest has been prepared properly prior to signing.

Contact David McAdams if you have questions.

Inside this issue:	
2	Safety Committee  2006 Regulatory Affairs Conference Update
3	“General Duty Clause” of the Clean Air Act’s Risk Management Program
4	IUR update  Travel Safety Tips  Safe Lifting Tips
5	Easier Recycling of Cathode Ray Tubes
6	Regulatory Affairs Group Policy and Mission

## SAFETY COMMITTEES

Although safety committees vary in size, structure, and roles, they all have one thing in common —

*Employees and management working together to prevent accidents and injuries.*

In other words, they benefit everybody. Would you make an effective safety committee member? Take this quiz to find out:

1. Are you interested in workplace safety and health issues?
2. Do you believe that safe work habits are important?
3. Do you always follow safety rules and procedures?
4. Are you responsible and dependable?
5. Do you have time to attend meetings and follow through on assignments in addition to your regular work?
6. Are you a team player who works well with coworkers?
7. Are you willing to report unsafe conditions and speak to co-workers about unsafe acts?
8. Would you be willing to listen to co-workers' safety concerns, questions, and suggestions?
9. Would you be willing to take an active role in safety training?

If you answered **YES** to all these questions, you would make an excellent safety committee member. Why not volunteer the next time an opportunity arises? Contact your ESH Manager to find out how you can get involved.

Your ESH Managers are George Smith and Hardeo Lachhman

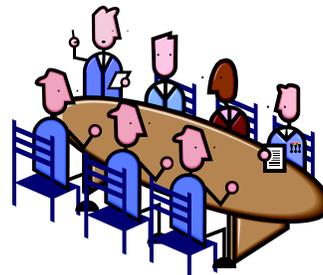
## 2006 REGULATORY AFFAIRS CONFERENCE UPDATE

**Mark your calendars!** The 2006 Regulatory Affairs conference will be held from September 12 through the morning of the 14 at the Westin in Pittsburgh, PA. There will be an evening welcome reception on September 11.

Due to the overwhelming success of the dual-track format at last year's conference, the Regulatory Affairs group is planning on expanding this to three ESH training tracks and two product training tracks.

Preliminary invitations of interest were sent the week of July 17. The invitation solicited: 1) a response for those that are interested in attending and 2) presentations of interest. Formal confirmation of attendance will be sent closer to the conference date. Please forward this invitation to anyone who was not included in this distribution and has interest in attending. We welcome all who share an interest in regulatory matters.

The Regulatory Affairs Group is looking forward to seeing you all at this year's conference.



## **“GENERAL DUTY CLAUSE” OF THE CLEAN AIR ACT’S RISK MANAGEMENT PROGRAM**

### **Examples of cases involving violations of “General Duty Clause”**

*EPA issued an administrative complaint against a bulk chemical delivery company, proposing a \$113,640 penalty for failure to employ adequate safeguards to prevent and mitigate two releases of acetone (one for 1,300 gallons, the other for 200 gallons) in 2005. Both spills allegedly occurred because of human error, and the company was cited for failing to follow accepted safe operating procedures.*

*A maker of glass and ceramic products agreed to pay \$14,000 to settle claims that it violated federal clean air and chemical release notification rules in 2003. This company was in violation by failing to have an adequate risk management plan for hydrofluoric acid processing at its facility and by failing to properly notify the National Response Center of an accidental release of hydrofluoric*

The General Duty Clause provides that **all facilities that produce, process, handle or store extremely hazardous substances [regardless of quantity stored onsite], have a general duty to identify potential hazards and to design and maintain safe facilities to minimize consequences of accidental releases.**

Facilities that do not meet these standards may expose people and property to extremely hazardous substances. All facilities should, at a minimum, implement a program that meets the General Duty requirement.

The cases noted to the left help to highlight these proper safety practices and “lessons learned.”

- ◆ Companies should work closely with Local Emergency Planning Committees (LEPCs) to make them aware of chemicals they use and store at their facilities.

- ◆ Be prudent about assessing the potential for chemical hazards, and take steps to prevent releases – add redundant controls where control failure results in significant risks.
- ◆ Report significant releases to emergency responders and the National Response Center immediately. Do not wait to calculate the amount of chemical released. You may be fined for late reporting if EPA determines that you should have known that the release exceeded reportable quantities of chemical before precise calculations are complete.
- ◆ Ensure that you have a system for ensuring compliance with EPCRA and other chemical safety laws, including the CAA and OSHA. The system should survive staff turnover.

The Regulatory Affairs Manual, Environmental Program 100.04, in particular Appendix 2, 3, & 4, provides examples of General Duty programs for manufacturing and distribution sites. Any manufacturing site that exceeds thresholds of RMP chemicals must prepare a RMP submission to EPA prior to exceeding those thresholds following Program 100.04 Risk Management Program. Contact David McAdams with any questions.

## IUR UPDATE

All chemical manufacturers and importers are required to report as defined by the rule. Electronic reporting is also an option. Work on collecting volumetric information about chemical substances manufactured or imported should begin well in advance of the reporting due date as the assessment of these chemical substances goes to the component level. All Fisher Scientific-owned businesses that manufacture or import chemical substances must have objective evidence that evaluates volumes during 2005 to either support or refute reporting requirements. Also, communication to either confirm reporting was not required or that reporting was completed along with a copy of the reporting must be provided to Regulatory Affairs (Lisa DuMars).

If you have any questions regarding this reporting requirement, please contact Lisa DuMars.

## TRAVEL SAFETY TIPS

*Courtesy of the Illinois Department of Transportation*

As you head out to enjoy the last days of summer vacations, keep these travel tips in mind:

- ◆ Always “Buckle Up” -- this is the single most important precaution to keep anyone in the vehicle safe while on the road.
- ◆ Be sure to check tires, wiper blades, fluid levels, lights and air conditioning.
- ◆ Take along an emergency roadside kit (cell phone, flashlight and jumper cables) and a child safety seat.
- ◆ Stay focused and alert on the road -- avoid fatigue. Schedule breaks while traveling -- stop at a rest area to stretch or get a beverage.
- ◆ Do not exceed the posted speed limit.

## SAFE LIFTING TIPS

*Courtesy of the Texas Department*

No single lifting technique will apply to all situations, but the following tips will help avoid back injuries during any type of lift.

- ◆ Size up the load -- look it over and decide whether you can handle it alone or if you need help.
- ◆ Ask for help if you need it.
- ◆ Inspect your intended path of travel for obstacles or other possible hazards.
- ◆ Place your feet a shoulder’s width apart and wear well-supporting work shoes.
- ◆ Bend at your knees, not your waist. Leg muscles are stronger and more durable than back muscles. Let your leg muscles do the work.
- ◆ Grip your load firmly and use work gloves if necessary.
- ◆ Keep the load close to your body. For greater strength and stability, lift and carry the object near your waist.
- ◆ Move your feet when you change directions; do not twist your upper body while carrying your load.

## Easier Recycling of Cathode Ray Tubes

By streamlining the management of cathode ray tubes (CRTs), the Environmental Protection Agency is making it easier to collect and recycle CRTs. Safe recycling of CRTs saves energy and conserves resources, allows the recovered lead to be reused in other ways, and reduces the amount of lead in landfills.

### Background

CRTs are the video display components of televisions and computer monitors. The glass in CRTs typically contains enough lead to require managing it as hazardous waste under certain circumstances. Under the previous regulations, businesses and other organizations that recycle or dispose of CRTs were sometimes unclear about the proper way to recycle or dispose of this equipment. That uncertainty sometimes prevented CRTs from being recycled and reused. The EPA is changing CRT waste management requirements to promote additional safe recycling and reuse of CRTs. About 57 million computers and televisions are sold in the United States annually.

### Action

The EPA is providing conditional exclusions from the federal hazardous waste management standards for CRTs and CRT glass destined for recycling. These safe, yet simplified standards aim to increase the collection and recycling of CRTs, and to reduce the amount of lead in landfills by allowing the lead to be reused to make new CRT glass or sent to lead smelters.

Under these regulations, used, unbroken CRTs are not regulated as hazardous waste unless they are stored for more than a year. The EPA is setting simpler, more manageable standards for unbroken CRTs because the risk of lead releases from them is very low. Since the risk is so low, the storage limitation on unbroken CRTs applies only to collectors or recyclers.

Used, broken CRTs are not regulated as hazardous waste as long as the following conditions are met:

- ◆ CRT containers are clearly labeled regarding contents;
- ◆ CRTs are safely transported in containers designed to minimize releases;
- ◆ CRTs are stored in a building or container designed to minimize releases; and
- ◆ CRTs are stored on site less than one year before recycling them.

CRT glass that has been processed and sent to a CRT glass manufacturer or a lead smelter also is unregulated unless it is stored for more than one year (see above) or used in a manner constituting disposal (applied to the land). CRT glass going to any other kind of recycler may be eligible for exemption under existing regulations.

**For more information** about the Hazardous Waste CRT Rule: Contact a member of the Regulatory Affairs Group shown on page 6 and go to <http://www.epa.gov/epaoswer/hazwaste/recycle/electron/crt>.



Fisher Scientific International  
Regulatory Affairs Group

2000 Park Lane Drive  
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	<a href="mailto:jeff.felder@fishersci.com">jeff.felder@fishersci.com</a>	412-490-8941
Tom Tisa	<a href="mailto:tom.tisa@fishersci.com">tom.tisa@fishersci.com</a>	412-490-8138
Don Herbst	<a href="mailto:don.herbst@fishersci.com">don.herbst@fishersci.com</a>	412-490-8139
Lisa DuMars	<a href="mailto:lisa.dumars@fishersci.com">lisa.dumars@fishersci.com</a>	412-490-8425
David McAdams	<a href="mailto:david.mcadams@fishersci.com">david.mcadams@fishersci.com</a>	412-490-8144
Jennifer Hutchison	<a href="mailto:jennifer.hutchison@fishersci.com">jennifer.hutchison@fishersci.com</a>	412-490-8141
Jill Asti	<a href="mailto:jill.asti@fishersci.com">jill.asti@fishersci.com</a>	412-490-8929