

ownership changes within the past year

- If you use significant amounts of liquid fuel (i.e., no. 2 or no. 6 oil), a review of potential Persistent Bioaccumulative Toxic (PBT) emissions is warranted
- If you use greater than 40,000 gallons of propane on an annual basis, your facility should evaluate propylene reporting requirements.

Updates to TRI and TURA Reporting for Reporting Year 2012

The EPA and the MassDEP have collaborated to provide some program specific updates for the Toxic Release Inventory (TRI) and Toxics Use Reduction (TUR) programs for reporting year 2012. These changes include:

- Administrative stay lifted for TRI Hydrogen Sulfide (H2S) Reporting
- New Green Chemistry Source Reduction Codes that describe green chemistry practices have been added
- EPA has developed a new certification component within the TRI-MEweb application that allows a facility to prepare any reporting year TRI Form R/A, and transition directly into the certification process without leaving the TRI-MEweb application
- New real-time Electronic Signature Agreement (ESA) approval option for Certifying Officials
- TRI-MEweb Pollution Prevention Reporting Program upgrades
- Two substances have been added to the higher hazard list: formaldehyde and hexavalent chromium compounds
- The EPA had added 16 substances to the TRI reporting list, with 12 of these substances now being subject to TURA Reporting. Nine of the 16 are new individually listed chemicals, and four chemicals were added to the Polycyclic Aromatic Compounds (PACs) category.

Reminder: Both TRI and TUR Reports are due July 1, 2013.

Tighe and Bond can assist your facility with the reporting challenges associated with these EPA and MassDEP programs. If you have any questions about the about the TRI or TUR Program, and these new updates, please contact **Ted Karavedas at (413)-572-3282 or** <u>TMKaravedas@TigheBond.com</u>.

OSHA Safety Standards: Steps for Lockout/Tagout Compliance

The OSHA Control of Hazardous Energies standard in 29 CFR 1910.147 continues to be the #1 most cited general industry standard in manufacturing. This "lockout/tagout" standard was promulgated in 1989, but has its roots in the electrical safety standards of the 1970's.

Despite the maturity of this standard, OSHA had more than \$2.3M in lockout/tagout related penalties in fiscal year 2012. Improper or inadequate lockout/tagout procedures continue to result in countless serious injuries, amputations and fatalities each year.

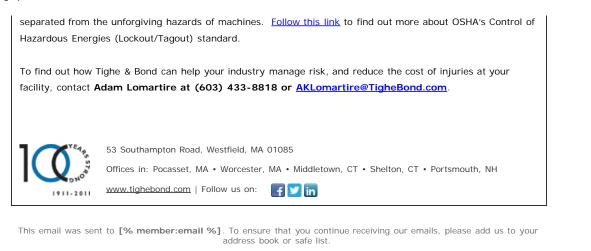
The OSHA lockout/tagout standard requires facilities to provide equipment and training to employees who may expose themselves to dangerous equipment parts during service, maintenance or setup activities. Hazardous energies include electrical, heat, pressure, chemicals, moving machinery or stored potential energy.

Facilities must also prepare documented equipment-specific lockout/tagout procedures for hazardous machines. These procedures must have enough detail for qualified employees to effectively isolate the machines and bring the equipment to zero energy state so that it is incapable of startup or releasing hazardous energy.

Common violations of the standard include:

- Failure to provide training to authorized employees
- Failure to provide sufficient equipment to effectively accomplish lockout / tagout
- Failure to develop equipment specific energy control procedures
- Failure to review the program on a periodic (at least annual) basis
- Failure to verify sources of hazardous energies are properly isolated
- No electrical testing or testing performed by personnel who are not qualified to work on live electrical circuits.

Equipment safety management and compliance requires a system wide approach to ensure that employees are



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