EH&S Monthly News - May

Edit | Preview | Proof | Send

About this mailing

Campaign name	EH&S Monthly News - May
Subject Line	Regulatory News – Top TRI Reporting Tips & Reporting Updates, OSHA Standards & More

Your email | HTML | Plaintext | Printer-friendly view

Share This:

Tighe&Bond

Consulting Engineers / Environmental Specialists

Regulatory News

Top TRI Reporting Tips

The Environmental Protection Agency's (EPA) Toxics Release Inventory (TRI) and the Massachusetts Department of Environmental Protection (MassDEP) Toxics Use Reduction Act (TURA) require facilities in certain industries – which manufacture, process, or use toxic chemicals above specified amounts – to report annually on disposal or other releases and other waste management activities related to these chemicals. **This July 1, 2013 deadline for calendar year 2012 is fast approaching.**

Here are the Top TRI Tips to keep in mind during your reporting this year:

- Facilities that have stormwater sampling data for reportable EPCRA chemicals must include discharge to stormwater for those chemicals in Section 5.3.2
- Verify correct NAICS codes in TRI & Tier II data, and confirm consistency between the two reports
- Production ratio and/or activity index should not generally be reported as '1'. Manufacturing data changes from year to year, and typically the ratio and/or indices will reflect those changes. Also, rounding to a whole number is not required for this section
- Decimals for non-PBT toxic chemicals (i.e., lead compounds and mercury compounds) are not allowed in section 8.1 through 8.7 of the Form Rs
- Update any facility names, email addresses & contact information if your company has undergone any

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 TMKaravedas@TigheBond.com**.

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

separated from the unforgiving hazards of machines. Follow this link to find out more about OSHA's Control of Hazardous Energies (Lockout/Tagout) standard.

To find out how Tighe & Bond can help your industry manage risk, and reduce the cost of injuries at your facility, contact **Adam Lomartire at (603) 433-8818 or AKLomartire@TigheBond.com**.

53 Southampton Road, Westfield, MA 01085

Offices in: Pocasset, MA • Worcester, MA • Middletown, CT • Shelton, CT • Portsmouth, NH

www.tighebond.com | Follow us on:

This email was sent to **[% member:email %]**. To ensure that you continue receiving our emails, please add us to your address book or safe list.

manage your preferences | **opt out** using **TrueRemove®**.

Got this as a forward? **Sign up** to receive our future emails.

POWERED BY emma