



NEACHMM NEWS

July 2001

Safety Message

Safety Message will be a new section that will appear in future newsletters. If you have any suggestions please contact zehra@umb.edu

MARK YOUR CALENDARS!

**NEXT CHAPTER MEETING:
October 16, 2001**

Topic: TBD
**For more details or visit the NEACHMM
webpage at
www.neachmm.com**

Message from the President

With the heat of summer finally here, I wanted to share my thoughts for the coming year. First, I would like to thank John Mitchell for his guidance and direction in bringing this organization into the new millennium. With his tenacious personality, drive, and organization skills, he brought NEACHMM to a whole new level. Thank you John!

As I look forward to the many challenges ahead during the upcoming year, we should also be proud of the many accomplishments.

Web Site Management

- The Public Relations and Marketing Committee has taken over complete management and maintenance of our web site.

Review Course

- The CHMM review course sponsored by NEACHMM at Northeastern University was again a huge success. The CHMM exam took place in June 2001 and 74 percent passed.

Honor Roll of Champions Award

Our chapter received this prestigious award. In order to receive this award, we accomplished the following:

- Eleven members of NEACHMM received Champions of Excellence for the previous year.
- Sponsored the annual review course at Northeastern University
- Sponsored John Mitchell on the Awards Committee
- Promoted the HMM desk reference
- Assuring current members are Academy members

National Involvement

Supported John Mitchell on the National Awards and Chapter Development Committee.

Since January the Board of Directors, with the support of the Committee chairpersons, have been busy. Administratively, the organization is in line with the expectations of ACHMM. Financially we are sound. During the past several months we have accomplished the following.

- Nominated the Chapter for a national web site award
- Nominated five individuals for national Champions of Excellence awards
- Conducted a CHMM review course at Northeastern University
- Instituted a system to provide documentation of certification maintenance points at each meeting.

So, what can we expect for the balance of the year?

Our goal is to concentrate in three areas.

1) Membership Development

We will be implementing a member outreach structure to better and more efficiently communicate with members.

2) Professional Development

First, a steering committee has been developed to evaluate the possibility of hosting a national convention.

Second, a steering committee has been formed to evaluate the location and content of the annual review course.

3) Visibility

This month NEACHMM and the American Society of Safety Engineers will be hosting a joint meeting. NEACHMM plans to develop joint meetings with additional peer organizations in the future.

Next month, John Mitchell will begin the process of identifying potentially interested members for positions on the CY2002 BOD. Positions available are Vice President – Elect, Secretary, and Directors at Large (2). If you are interested or would like to nominate someone, please contact John. Ballots will be finalized by October 2001.

In closing, the role of NEACHMM's BOD is to assure that the organization is providing members with professional development and growth. We hope to achieve that goal during 2001.

Polaroid Hosts May 2001 Chapter Meeting

Speaker: Fred Mallaby, from the OSHA Region 1 Office

Topic: How OSHA Selects Companies for Inspection; Partnering with Industry

Fred gave a lively talk about the evolution of OSHA from the early days of performance measurement in numbers of inspections or citations per compliance officer to more recent cooperative efforts.

Fred also discussed the Voluntary Protection Program (VPP) and mentioned that there was a good reference for small businesses on the OSHA website titled: Handbook for Small Businesses that outlines all major components of a good OSHA program. The publication also includes checklists.

More recently, OSHA has developed a five-year strategic plan to improve workplace safety and health for all workers, as evidenced by fewer injuries, illnesses and fatalities. They are also trying to change workplace culture and secure public confidence in the agency. Their specific goals are as follows:

- **15% reduction in worker illness and injury (including amputations and silica and lead exposures)**
- **Reduce injuries 15% in the top five high-hazard industries: shipyards, food processing, nursing homes, logging and construction**
- **Decrease fatalities in construction by 15%. Target areas: falls, struck by, electrocution or caught in between.**

The four priorities to accomplish the agency's strategic objectives are: strong enforcement, creative partnerships, improved rulemaking and expanded education and outreach.

NEACHMM is now providing *Meeting Attendance Certificates* to attendees of chapter meetings. It is your responsibility to keep the Attendance Certificates in your Recertification File. Remember to take your certificate at the end of the chapter meeting!

How to Use the Materials of Trade (MOT) Exemption

Small amounts of hazardous materials can be transported without shipping papers, emergency response information, placarding, or formal training or recordkeeping under certain conditions regulated by 49 CFR 173.6. The purposes for transporting the hazmat must be for

1. the health and safety of the driver or passengers such as Scabs or fire extinguishers,
2. supporting the operation or maintenance of the vehicle such as engine fluids, spare batteries or fuel, or
3. direct support of the principal business when transported by private carrier. The principal business cannot be transportation and the

transporter must know the materials are hazardous and have knowledge of all the regulations that apply and the exemptions.

This exception does not apply to materials that are explosive, self-reactive, poisonous by inhalation, spontaneously combustible (division 4.3, PG I), an organic peroxide, infectious substance, radioactive, or a hazardous waste.

The total weight in single packages of the Materials of Trade allowed on a vehicle is 440 pounds.

The materials of trade (MOT) exemption applies to the following classes (3, 8, 9 or ORM-D) and divisions (2.1, 2.2, 4.1, 4.3, 5.1, 5.2, 6.1) at the maximum specified amounts described and with a gross mass or capacity of:

- no more than one ounce of a Division 4.3, Packing Group (PG) II or III, Dangerous When Wet Material
- no more than 220 pounds for a cylinder of Division 2.1 or 2.2 compressed gas material
- no more than one pound or one pint of a PG I material
- no more than 66 pounds or 8 gallons for a PG II, PG III, or ORM-D material.

Bulk packages of a diluted ($\leq 2\%$ concentration) mixture of a Class 9 material may be transported in a tank having a capacity of up to 400 gallons. The tank must be marked on two opposite sides with the UN or NA identification number in accordance with 172.332(b) and (c). The identification number must be on a placard, orange panel, or similar white diamond label with the same dimensions of a placard.

The packaging must be either the manufacturer's original packaging or a package of equal or greater strength and integrity that is leak proof for liquids or sift proof for solids. The packages must be tightly closed, secured against movement, and protected from getting damaged from other items in the vehicle. Although cylinders do not require outer packaging they must be marked with the proper shipping name, identification number and hazard class labels. Non-bulk packages must be marked with a common name such as spray paint or gas or the proper shipping name to identify the material. Gasoline must be in a DOT or OSHA approved container. Packages containing an "RQ" amount of hazardous substances must be marked as such.

The first two purposes allowed under the MOT exemption are somewhat straight-forward. The third reason listed in the regulations is allowed when using a private carrier, such as a company's own private vehicles or personal vehicles. Commercial transporters or companies who routinely ship hazardous materials to customers as part of their

principal business cannot take advantage of the MOT exemption. Other than that, just about anybody else can use this MOT exemption such as when transporting samples to laboratories, bringing materials to a forwarding company for DOT or IATA appropriate packages, labeling, paperwork, picking up materials needed at one company location to another, transporting cylinders needed for field work, and fertilizers and pesticides transported for use in the field.

Transporting hazardous materials by an employee in his/her private vehicle may pose insurance problems if an accident were to occur. Many personal car insurance policies state that they are void if hazardous materials are being transported. Also some corporations have company policies prohibiting employees from transporting chemicals in their personal cars. These things should be considered when transporting the MOTs.

The U. S. DOT has adopted a wide range of interpretation on this as discussed above. For more information the DOT has a good website at www.dot.gov. or [HTTP:// hazmat.dot.gov](http://hazmat.dot.gov) for a fact sheet. The DOT also includes access to its letter of interpretation by section.

MaryEllen Doherty is the Environmental Manager for Polaroid's Cambridge, Bedford, Boston, and Wayland facilities and the Co-Chair for the NEACHMM Review Course. She can be reached at (781)386-8216 or by e-mail: DOHERTM@polaroid.com

New Monitoring Requirements for MA Gasoline Dispensing Facilities.

Effective for the 2001 calendar year, the Massachusetts Department of Environmental Protection (DEP) has issued new requirements for gasoline dispensing facilities utilizing Stage II Vapor

Recovery. The following types of gasoline dispensing facilities are subject to the new regulations:

- Any new motor vehicle fuel dispensing facility;
- Any existing motor vehicle fuel dispensing facility that dispenses, or has dispensed, 10,000 gallons or more gasoline in any one calendar month since January 1, 1998;
- Any motor vehicle dispensing facility that was substantially modified after November 1, 1989; and
- Any tank truck that dispenses gasoline directly to motor vehicles or portable containers.

Several types of facilities are exempt:

- Marinas that dispense gasoline exclusively to boats;
- Diesel fuel dispensing facilities;
- Farms that dispense gasoline exclusively to farm equipment, with tanks that are less than 550 gallons; and
- Motor vehicle dispensing facilities that currently dispense less than 10,000 gallons in any one calendar month, and who installed their fuel dispensing facilities prior to November 1, 1989.

The following are the new requirements:

- Perform weekly visual inspections if the Stage II system;
- Maintain a log of the weekly inspections including components that were repaired and/or replaced, and record signature of the individual who performed the required inspection;
- Perform and pass annual compliance tests;
- Repair and replace non-functioning or broken components within 14 days; and
- Submit annually a fully completed Stage II In-Use Compliance Certification to the DEP attesting that all of the applicable requirements have been met.

Annual compliance testing costs range from \$300-760 per facility, with the annual DEP Stage II fee remaining \$50.

Zehra Schneider Graham is the Environmental Manager at the University of MA Boston. She can be reached at (617)287-5445 or by e-mail: zehra@umb.edu

NEACHMM Committee Updates

NEACHMM Government Affairs

Melissa McCullough is the Environmental, Health and Safety Officer at Harvard University's Dana Farber Cancer Institute. She chairs NEACHMM's Government Affairs Committee, and may be reached by e-mail at melissa_mccullough@dfci.harvard.edu

Final Rule of Consultation Procedures Published

Under the Changes to Consultation Procedures, employers must post a list of the serious hazards identified by consultants and the dates for completing the corrective action. The list must be posted in a prominent place, easily observed by all affected employees for three days or until the hazards are corrected, whichever is later. The final rule, "Consultation Agreement: Changes to Consultation Procedures is available at

http://www.oshaslc.gov/FedReg_oseha_data/FED20001026.html. 29 CFR Part 1908 became effective on December 26, 2000.

Testing Questioned

The U.S. Department of Transportation's Research and Special Programs Administration is investigating allegations that high pressure compressed gas cylinders sold by Eddma Fire Services and dated between June 1996 and July 1998 may not have been hydrostatically re-tested, as required by federal hazardous materials regulations. The affected cylinders are stamped with RIN A307. For more information go to http://WWW.PRQ0.COM/apps/redirect.asp?link=VbbbdaG_YdggahggeDI

Stormwater General Permit Issued

EPA is reissuing the Multi-sector Storm Water General Permit (MSWGP). Issued under the Clean Water Act's National Pollution Discharge Elimination System (NPDES), the MSWGP controls storm water discharges within eight EPA regions (1, 2, 3, 4, 6, 8, 9,10). The new permit was published in the Federal Register on Oct. 30, 2000. Copies of the permit and additional information on the NPDES storm water program are available at: <http://www.epa.gov/owm/sw/industry/msgp/index.htm>

Water Quality Criteria Methodology

On Nov. 3, 2000, EPA revised its methodology for developing water quality criteria. The availability of the revised "Methodology for Deriving Ambient Water Quality Criteria for the Protection of Human Health," was announced in the Nov. 3, Federal Register. The methodology, and a fact sheet are available on EPA's Office of Water web site at <http://www.epa.gov/ost/humanhealth/method/>

Emission Factor Database Updated

The Factor Information REtrieval (FIRE) Data System is a database containing EPA's recommended emission estimation factors for criteria and hazardous air pollutants. FIRE 6.23 can be downloaded at <http://www.epa.gov/ttn/chief/software/fire/index.html>.

New SCC Codes List Available

New list of SCC codes can be downloaded at <http://www.epa.gov/ttn/chief/codes/index.html>.

Changes To IATA and IMDG Requirements

IATA (International Air Transport Association) and IMO (International Maritime Organization) have completely updated their regulations on the transportation of dangerous goods via air and water for 2001. For 2001, IATA has implemented many changes for dangerous goods transported by air, including the following:

1. Changes to subsidiary risk labels
2. Replacement of the word "inhibited" in proper shipping names

3. Changes in the packing instructions, many of which limit the quantities permitted in packagings
4. Extension of the requirements to attach additional documentation when necessary
5. The addition of a new appendix with information on radioactive material regulations
6. A new packaging code for drums made of materials other than steel or aluminum

For more information go to www.imo.org and www.iata.org

NEACHMM Membership Update

OUR CHAPTER NEEDS MORE ACTIVE MEMBERS!

If you would like to help organize the annual membership drive, please contact John Mitchell by e-mail at jmitchell@theitgroup.com or by telephone at (781)769-7600 x366.

NEACHMM Professional Development Committee Update

If you have **suggestions for upcoming meetings** or would like to help plan upcoming meetings please contact Harry Swift by e-mail at hswift@rouxinc.com, or by phone at (781) 270-6600.

NEACHMM Public Relations and Marketing Committee Update

If you would like to contribute to the chapter newsletter, or with other public relations and marketing issues please contact Zehra Schneider Graham by e-mail at zehra@umb.edu, or by telephone at (617) 287-5444.

DOES YOUR EMPLOYER HAVE JOBS THAT NEED TO BE FILLED?

If so, we would like to post them in our newsletter and on the NEACHMM webpage. Please send postings to zehra@umb.edu be sure to include any closing date information.

An Exploratory Committee has been formed to determine the amount of work that would be required and possibly develop a proposal, to host the ACHMM National Conference. The Committee will collect data from past National Conference hosts and come up with an informal recommendation to the Board of Directors and the general membership. Hugh Willis has agreed to serve as the Chairperson for this committee. If you are interested in assisting Hugh, or have ideas, please call him at (781) 545-7840.

ACHMM Desk Reference Sold to NEACHMM Members at Discount

NEACHMM has purchased ACHMM *Hazardous Materials Management Desk References* and is offering the books to NEACHMM members at the Chapter-discounted rate (\$50). If you would like a copy, please contact Gretchen Franzheim at gmfchmm@hotmail.com or (603) 425-1799.

WHAT IS NEACHMM?

NEACHMM is affiliated with the national Academy of Certified Hazardous Materials Managers (ACHMM). Our chapter operates independently (both administratively and financially) from the ACHMM. Our chapter's activities, policies, and treasury are set and administered by the NEACHMM Board of Directors.

REMAINING NEACHMM Year 2001 EVENTS	
August 18-22	ACHMM National Conference – Chicago, Illinois
September 19	Board of Directors Meeting
October 1	Nominations for Board of Directors
October 16	General Membership Meeting/BoD Elections
November 14	Board of Directors Meeting
December 5	General Membership Social

The Next NEACHMM Newsletter will be published in October, 2001

WILL THE ACHMM NATIONAL CONFERENCE COME TO BOSTON?

NEACHMM Exploratory Committee Investigating Options

c/o Franzheim
4 Olde Coach Road
Derry, NH 03038

Address Correction Requested

Find Us On The Web At www.neachmm.com

Year 2001 NEACHMM Board of Directors

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