



BEYOND COMPLIANCE

Promoting Environmental Stewardship, Safety & Health at all
University System of Georgia (USG) Institutions

"Creating a More Educated Georgia"

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A Quick Look at What's Inside

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UPCOMING EVENTS:



- March 2 —USG Homeland Security Seminar, Macon State College, Macon
- March 16—GHENEHS meeting, University of Georgia, Athens
- March 22-23— CSHEMA Regional EHS Seminar, UNC Chapel Hill (see below)
- April 4—GA Environmental Information Association Meeting (Location TBD)
- April 18—GA ACHMM Meeting (Location TBD)
- April 30—Deadline for applications to P2AD Partnership Program (see article on p 2)

UNC-Chapel Hill to Host EHS Seminar

The University of North Carolina at Chapel Hill will host a one-day Regional Environmental Health & Safety Seminar on March 22, 2005.

This is the first in a series of these seminars to be offered in the southeast. The seminars are jointly presented by the Campus Safety, Health and Environmental Management Association (CSHEMA) and PRIZIM, an EH&S management consulting firm.

Among the agenda topics are Mold & IAQ, Lab Fume Hood Management, RCRA Rulemaking Perspectives for Academic Laboratories, and Biosafety Today. An additional half-day workshop on Emergency Planning and Response will also be held on March 23, 2005.

Registration fees are \$225 for the seminar and \$95 for the workshop, with an additional discount for small campuses with 1 full time equivalent EH&S staff or less.

For more information or to register, visit www.cshema.org or www.prizim-inc.com/Local/Local.htm.

Our Mission:

To Support the Board of Regents' mission of "Creating a More Educated Georgia" through teaching, discovery, outreach and public services by providing leadership and services to promote environmental stewardship, safety and health at all University System institutions.

HAZWOPER Applies to State Government

While most OSHA standards technically do not apply to state agencies in Georgia, one exception is the Hazardous Waste Operations and Emergency Response (HAZWOPER) standard at 29 CFR 1910.120.

In promulgating regulations under the Superfund Amendment and Reauthorization Act (SARA), EPA extended OSHA's HAZWOPER standard to "State and local government employees engaged in hazardous waste operations...in states that do not have a State plan approved under section 18 of the Occupational Safety and Health Act of 1970." (40 CFR 311.1)

Hazardous waste operations subject to HAZWOPER include operations at Treatment, Storage, and Disposal (TSD) facilities, at certain contaminated sites, and emergency response operations for releases of, or substantial threats of releases of, hazardous substances without regard to the location of the hazard.



But what constitutes an emergency response operation at a higher education institution, where most spills or releases occur in a laboratory setting and involve relatively small quantities of hazardous chemicals? A 1990 OSHA letter of interpretation helps clarify this issue (emphasis added):

If your "laboratory setting" is not within the confines of the

P²AD Accepting Partnership Applications Until 4/30

In October 2004, the Board of Regents became a charter "White Ribbon" partner in the Pollution Prevention Assistance Division (P²AD) Partnership Program. Through this commitment, the Board has agreed to support the goals of the program and to promote the program among the University System of Georgia Institutions.

The Partnership Program is a voluntary initiative, and is open to any organization that operates in Georgia. The Program includes four Partnership levels to fit the goals and efforts of the variety of organizations, including colleges and universities, that are interested in reducing pollution and saving money.

Through the Partnership Program, P²AD works directly with companies and organizations across a broad spectrum of industries, in both the public and private sectors, and with small and large workforces. The Partnership Program allows an organization wishing to engage in pollution prevention activities to tap into P²AD's expertise to develop an effective environmental program.

The Partnership Program entry level for each business or organization is different and based on activities already in place, as well as those to be completed during the term of Partnership (three years for White, Yellow and Red Ribbon; unlimited at the Blue Ribbon level):

White Ribbon Partner - Open to non-governmental agencies, environmental groups and others that provide services and support to the Partners.

Yellow Ribbon Partner – Organizations that are starting to

develop proactive environmental policies, management plans and educational efforts.

Red Ribbon Partner – Organizations that are proactively implementing pollution prevention and cost-saving strategies, while integrating environmental stewardship into daily business operations, all within the framework of an environmental management system.

Blue Ribbon Partner – Organizations that have reached the highest achievement level and are model environmental leaders. Blue Ribbon Partners commit to strengthen their environmental management systems over time through the use of pollution prevention, community outreach and other sustainability practices, and act as mentors for Red and Yellow Ribbon Partners. The Blue Ribbon level coincides with EPA's Performance Track recognition program.

All P²AD Partners become part of a cohesive network of organizations that share a common goal – to prevent pollution at the source and create and maintain sustainable business practices. Benefits to Partners increase as they move through the ribbon levels. Becoming a P²AD Partner also enables organizations to more easily meet the requirements for national and international recognition programs, such as the U.S. EPA's National Environmental Performance Track.

The P²AD Partnership Program is accepting applications for new partners now through April 30. For more information on the program and how to apply, visit P²AD's website at <http://www.p2ad.org/ppl.html>.

After 20 Years, A Truly "Uniform" Uniform Hazardous Waste Manifest

The U.S. Environmental Protection Agency (EPA) has issued a final rule that standardizes the Uniform Hazardous Waste Manifest Form.

This action finalizes part of a comprehensive hazardous waste manifest system reform that EPA originally proposed in May 2001. The proposed rule included the following revisions:

- the adoption of a standardized manifest form with fewer optional data fields;
- a new approach for distributing and acquiring the form; and
- a system to allow the manifest to be completed, signed, transmitted, and stored electronically (e-manifesting).

Based on extensive comments received on the e-manifesting portion of the proposed rule, EPA has decided to further analyze the technological challenges of e-manifesting and to move ahead with a separate final rule for e-manifesting at a later date. In the meantime, EPA has proceeded with efforts to streamline the manifest via form revisions.

Evolution of the Manifest

The use of the Manifest form is central to the concept of "cradle to grave" liability for hazardous waste established by the Resource Conservation and Recovery Act (RCRA). The Manifest provides a complete paper trail of a hazardous waste's progress from a generator through treatment, storage, and disposal. Additionally, the Manifest serves as a shipping paper for compliance with the Hazardous Materials Regulations issued by the Department of Transportation.

EPA adopted the original Uniform Hazardous Waste Manifest in 1984, in an attempt to eliminate inconsistencies in the Manifest forms required by various states and waste handlers. This form included eleven optional data fields. In the 20 years since, many states with authorized hazardous waste programs have developed state-specific formats to make use of these optional data fields. In addition, authorized states have developed different copy distribution systems and submission requirements. The result has been a significant paperwork burden on waste handlers and generators as they strive to comply with varying state requirements.

Key Revisions in New Manifest Form

One of the most significant changes resulting from this new rule is the elimination of separate state-specific versions of the Manifest form. The new Manifest forms will be printed according to precise federal printing specification, and all jurisdictions will use the same Manifest form. In addition, each manifest will have a unique, pre-printed Manifest Tracking Number. This number replaces the State Manifest Number on the current form, and provides a unique identifier to facilitate database tracking of manifests.

Other key revisions to the form include:

- Most of the original 11 optional data fields have been eliminated; a couple have been consolidated into mandatory data items.
- Additional space has been provided in Item 9b of the new form to enter up to six RCRA waste codes for each waste stream. EPA has also clarified that no more than six waste codes may be entered for each waste stream.
- A field for Generator's Site Address has been added. The site address is to be provided only if different from the generator's mailing address.
- A field for the Emergency Response Number has been added to meet DOT requirements.
- An International Shipment field has been added to denote exports of hazardous waste.
- Item 19, Hazardous Waste Report Management Method Codes, has been added and EPA has clarified that this code should be entered by the TSD and correspond with the final disposition of the waste by the designated facility on the manifest. The TSD is not expected to enter an "ultimate disposition" code reflecting how the waste was to be processed at another facility. These codes are available on EPA's web site at www.epa.gov/epaoswer/hazwaste/data/index.htm#br.

Availability and Distribution of the New Manifest

The new Manifest form will become effective in August 2006. Printers will be able to obtain authority to print manifests by registering with

After 20 Years, A Truly "Uniform" Uniform Hazardous Waste Manifest (cont.)

EPA under the Registry process and adhering to the federal printing specification for the manifest.

The new form will consist of 6 copies, with each copy to be distributed consistently as follows:

- Page 1 (top copy): "Designated facility to destination State (if required)"
- Page 2: "Designated facility to generator State (if required)"
- Page 3: "Designated facility to generator"
- Page 4: "Designated facility copy"

- Page 5: "Transporter copy"
- Page 6 (bottom copy): "Generator's initial copy"

In sum, EPA anticipates that this rule will provide regulatory relief for over 139,000 businesses that collectively ship approximately 12 million tons of hazardous wastes on between 2 and 5 million Hazardous Waste Manifests each year. The overall annual savings to states and industries as a result of this rule is estimated at between \$12 and \$20 million.

This is an example of the first page of the newly revised Uniform Hazardous Waste Manifest form

For more information on the modification of the Uniform Hazardous Waste Manifest form, see www.epa.gov/epaoswer/hazwaste/gener/manifest/mods.htm

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)			
Generator's Phone		6. Transporter 1 Company Name		U.S. EPA ID Number	
		7. Transporter 2 Company Name		U.S. EPA ID Number	
8. Designated Facility Name and Site Address		U.S. EPA ID Number			
Facility's Phone					
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
1					
2					
3					
4					
14. Special Handling Instructions and Additional Information					
15. GENERATOR/SOFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator/Officer's Printed/Typed Name		Signature		Month	Day Year
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
17. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name		Signature		Month	Day Year
Transporter 2 Printed/Typed Name		Signature		Month	Day Year
18. Discrepancy					
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
				Manifest Reference Number	
18b. Alternate Facility (or Generator)		U.S. EPA ID Number			
Facility's Phone					
18c. Signature of Alternate Facility (or Generator)		Signature		Month	Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1	2	3	4		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a					
Printed/Typed Name		Signature		Month	Day Year

EPA Form 8700-22 (Rev. 1-04) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

HAZWOPER, Cont

treatment, storage and disposal (TSD) operations and deals with incidental release of hazardous substances, it is not considered to be an emergency response within the scope of 29 CFR 1910.120. ...If the release poses an emergency then you must comply with the training provision of the standard (29 CFR 1910.120(q)). When determining whether a situation constitutes an emergency the key factor which must be considered on a case-by-case basis is the actual or estimated exposure or degree of danger to responders, other workers, neighbors, etc. In order to determine this, other factors such as the size of the spill, the material spilled, and the location of the incident (e.g., confined space) play a significant role."

If an institution uses its personnel to respond to chemical emergencies, the specific level of HAZWOPER training required for such personnel depends on the duties they are expected to perform during an emergency. For example, the function of the First Responder Operations Level, which requires 8 hours of training, is to take defensive action to contain a release at a safe distance from the point of release. Defensive activities include such activities as placing sorbent, shutting off valves outside the danger area, or activating emergency control systems. Under HAZWOPER, Operations Level First Responders may not actually enter the danger area to attempt to stop a release.

An institution should carefully consider what responsibilities its employees have during chemical emergencies, and arrange in advance to call in an outside HAZMAT team if needed.

Coming Soon to an Electronics Store Near You: ENERGY STAR® Power Adapters

How many external power adapters are in your home or office?

Chances are you own about five power adapters, also called external power supplies.



These devices recharge or power your PDA, cell phone, MP3 player, digital camera, and other electronic products.

Approximately 1.5 billion power adapters —an average of five for every American — are currently in use in the US. Collectively, these adapters use about \$17 billion in electricity, or 6% of the national power bill annually.

These adapters, which convert AC (alternating current) power from a wall outlet into DC (direct current)

power, are crucial to the operation of small electronic products. Unfortunately, they also tend to be inefficient.

And the use of power adapters is growing. By 2010, small appliances and consumer electronics are estimated to contribute up to 30% of the average household electricity bill.

In a big step towards reducing energy consumption from power adapters, EPA has finalized guidelines for the ENERGY STAR® label for power adapters.

ENERGY STAR® adapters will be approximately 35% more efficient, meaning they have the potential to save up to 5 billion kilowatt hours per year (the equivalent of taking 800,000 cars off the road.)

Products with qualified adapters will be identified by the ENERGY STAR® label on product packaging.

For more information, check out www.energystar.gov.

Relamping Contractor Is Cogenerator

Q. An elementary school is in the process of remodeling and is replacing its light fixtures with more energy-efficient lamps. This process will generate more than 5,000 kg of spent hazardous waste lamps that will be subject to the universal waste management standards in 40 CFR Part 273. If the school hires a contractor to remove the spent hazardous lamps, who is required to comply with the universal waste standards in Part 273?

A. Both the school and the contractor will be subject to the universal waste handler standards in Part 273 because they would both be considered universal waste handlers. A universal waste handler is defined as a generator of universal waste or the owner or operator of a facility that receives universal waste from other universal waste handlers (Section 273.9). A generator is any person, by site, whose act or process produces hazardous waste or whose act first

causes a hazardous waste to become subject to regulation (Section 273.9).



In this case, the school used the lamps and made the determination to discard them and is thus a generator. The contractor that actually removes the universal waste lamps from service is considered a handler and generator of the waste making the school and the contractor cogenerators (64 FR 36466, 36474; July 6, 1999). As cogenerators, both the school and the contractor will be jointly and severally liable as universal waste handlers. EPA recommends that when two or more parties meet the definition of generator they should mutually agree to have one party perform the generator duties (45 FR 72024, 72026; October 30, 1980). The generator duties in this case are those required of a large quantity handler of universal waste in Part 273, Subpart C, which apply to universal waste handlers accumulating 5,000 kilograms or more universal waste at any time (Section 273.9).

Source: RCRA Monthly Call Center Report, June 2004.