

ISO-14001: UPDATING YOUR ENVIRONMENTAL MANAGEMENT SYSTEM

By Josh Haar, EIT

The first International Standard Organization (ISO) 14001, Environmental Management System (EMS) document was published in 1996 to provide a standard basis for all voluntary EMS's to be certified as compliant systems by third party auditors. ISO14001 has since been revised twice, in 2004 and 2015, to make it more comprehensive and useful. In the newest revision, organizations and facilities can be certified under the 2004 standard for three years from the publication of the 2015 document. Therefore, organizations that wish to receive certification with ISO14001 have until **September 2018** to update their EMS's to be compliant with the 2015 revision.

The 2015 revision of ISO 14001 will alter the structure of every organization's EMS to conform to the framework across all of the ISO standards and management systems. This will allow for easier integration of multiple management systems. The new format at a basic level will require all users to update their EMS to reflect the new and updated clause numbers and create new documentation to meet some requirements. As part of the revision and new clauses there is an emphasis on the involvement of top management, understanding the needs and impacts of interested parties on the facility, and the plan-do-check-act continuum of process improvement. In the information below, I will discuss some of these changes.

The previous Clause 4 defined all of the items that were required in an EMS. These requirements have been broken into seven separate clauses with additions. The new Clause 4 lays out the foundation to create an effective EMS that conforms to your organizations values, process and regulatory requirements, and the relevant needs and expectations of interested parties. These interested parties can be community groups or non-governmental organizations, customers/suppliers, and industry groups among others. By defining the context of your organization you gain an understanding of how to define the scope of your EMS.

Clause 5 of the new standard creates a more defined and specific requirement that top management have a leadership role in the EMS and are dedicated to the success and continual improvement of the system. In general, this means that top management takes accountability for the effectiveness of the program, promotes the program, and ensures the system has the necessary resources. This is an effort to ensure that your organization's EMS can function properly and meet the values of the company and achieve your organization's goals.

The update of your system may warrant a reevaluation of your organizations environmental aspects and impacts, as Clause 6.1.2 has some new requirements. One of these is to use a life-cycle perspective in determining the aspects of the organizations activities, products, and services. This can lead to determining the aspects and impacts of the production of raw materials, such as the production of paint your facility uses, or the end of life disposal of your product. Additionally, there is an increased focus on documenting the criteria for determining significant environmental aspects and ensuring action is taken to address those aspects deemed significant.

In summary, there have been significant changes to the structure of the EMS, which will require an update of your organizations EMS. This will require most if not all of your documents to be updated to reflect the new clause numbers; however, many of the documents may need little to no substantive changes to meet the new requirements. Additionally, every organization should reevaluate the scope of the EMS to ensure that the needs and expectations of interested parties are at least understood. Among other changes organizations need to ensure that there is significant enthusiasm for the EMS from top managers and that they are involved to ensure the success of the system. Finally, the requirement to use a life-cycle perspective when determining aspects, can create a much more extensive list of aspects to consider, which will require a review of all of the facility's aspects and impacts. While these are not all of the changes that will need to be implemented when updating your organization's system to the new standard they should not be overlooked.

CTI is available to assist your organization make these changes in preparation of the 2018 deadline.



WHAT TO EXPECT FROM OSHA IN 2017

By Adam Haroz, EIT

With the end of 2016 came many things. Of course we say hello to 2017, but we also start this year with a new President of the United States and many new members of our government. Under President Obama, a number of regulatory initiatives were achieved, including a rule on crystalline silica, an electronic submission of injury/illness data, and an increase in penalties from OSHA citations. The election of now President Donald Trump brings questions of what 2017 will bring for industry, employers, and the occupational safety and health policies and regulations across the board. I will go over what OSHA has published as its plans going forward in 2017, without the unknowns of a new administration. Keep in mind that some items may be moved on aggressively by OSHA before the new administration has time to step in and negate them.



Revised Recordkeeping Regulation

The revised recordkeeping rule is merely an update of the recordkeeping requirements that have been in place for years, requiring employers to record injuries and illnesses and to notify OSHA based on the severity of the incident. The revision to this rule has a couple of parts. One aspect is a quicker reporting requirement to OSHA for fatalities (within 8 hours) and for any workplace incident that results in hospitalization, amputation, or loss of eye (within 24 hours). Along with these quicker reporting times for individual incidents, some industries and employers will be required to report their annual OSHA 300 forms directly to OSHA. This requirement is as follows:

Employer Size/Industry	Required Record	Date
250 or more employees	300, 300A, 301	July 1, 2017*
20-249 employees in specified industries	300A	July 1, 2017**

* Starting in 2019 these facilities will need to submit forms by March 2nd

** Starting in 2018 these facilities will need to submit forms by March 2nd

This rule not only impacts the reporting timeline for employers, it will also limit the abilities to implement employee safety incentive programs and post-accident drug testing. According to those whom compiled this rule, incentive programs are considered to curb employees

from reporting incidents if people think that they could lose potential bonuses. Also, the rule considers post-accident drug testing as a potential form of retaliation on the part of the employer. I am sure that many of you reading this have personal experience on the use of post-accident drug testing, both positive and negative. With this rule, the responsibility is put on the employer to show that the use of drugs or alcohol could be the reason for the accident before testing is conducted.

Going forward, employers may have to consider altering incentive programs to lean toward compliance with policies and training programs, instead of rewarding the idea of days without a reported injury. Employers may also need to change the reporting policies to allow for the employee to report without the fear of retaliation and to have post-accident drug testing to not be mandatory.

Increased Penalty Fines

As I mentioned earlier in this article, we have a new President, and a new presidential administration will mean some new directions for OSHA. The increase penalties and fines could soon be on the chopping block. For now, the increase in penalties and fines are laid out as follows:

Violation Type	Previous \$/ violation	Current \$/ violation
Serious	\$7,000	\$12,471
Willful	\$70,000	\$124,709
Repeat	\$70,000	\$124,709
Failure to Abate	\$7,000	\$12,471

This fine increase has been labeled a "one-time catch up" to adjust for inflation since 1990, which was the last time the penalty amounts were increased.

Slip, Trip, and Fall

An update to the regulations governing fall protection and walking & working surfaces has been in OSHA's radar since the 1990's. The regulation sets new specifications for portable and fixed ladders, scaffolds, and personal fall arrest systems. It specifies requirements for the use of this equipment, guarding around roofs and ladders, and how to establish designated work areas when working on a roof. There are several different deadlines over two decades for employers to meet in order to be in compliance with the regulation. The first deadline is for the training of employees to be completed by May 17, 2017. The last deadline is for full compliance with all fixed ladder construction (both bought and fabricated in-house) and personal fall arrest system integration by November 18, 2036. **(Continued on page 3)**

DO MY EMPLOYEES NEED DOT HAZMAT TRAINING?

By Chris Frendahl

Many employers are aware that the U.S. Department of Transportation (DOT) requires hazardous materials (hazmat) training for “hazmat employees” who are involved with the transportation of hazardous chemicals and materials. But which employees are considered to be “hazmat employees?”

First, let me define “Hazardous Material”. Hazardous material is any item or agent (biological, chemical, radiological, and/or physical), which has the potential to cause harm to humans, animals, or the environment, either by itself or through interaction with other factors. Employers may assume that only those employees directly handling the shipping, receiving, and transport of hazardous chemicals are required to receive hazmat training. However, 49 CFR 172, Subpart H specifies that employees who perform the following tasks must receive Hazardous Materials Regulations (HMR) training:

- Loading, unloading, or handling hazardous materials;
- Designing, manufacturing, inspecting, marking, testing, or reconditioning of containers
- Preparing hazardous materials for transportation
- Operating transport vehicles

For example, if the only hazardous material that is handled by a facility is hazardous waste that is generated by the facility and disposed of through a third party, the



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Looking Forward

Despite the changes in administration, there are still a number of other action items on the agenda and other emphasis programs in OSHA's crosshairs. Some of these include combustible dust, modifications to PSM requirements, injury and illness prevention programs, etc. My prediction on how OSHA will move forward under a Trump Whitehouse is with an expansion of state OSHA plans. The development of state OSHA plans gives the state the power to control how the OSH Act is enforced with industries and private employers.

Feel free and contact CTI if you have any questions regarding the updated OSHA standards or if you would like to discuss how to get your facility into compliance with OSHA standards and beyond.

employer may believe that no employees are required to receive hazmat training because a third party handles the transport of the hazardous waste. However, the HMR specifies that employees who prepare hazardous materials for transportation (In this case, the employees who prepare the hazardous waste drum to be taken by the third party) must receive hazmat training.

Hazmat training must include general awareness training to familiarize employees with the HMR, function-specific training that is tailored to the employees' responsibilities, and safety training that includes emergency response information and measures that can be taken by the employees to protect themselves from the hazards associated with the hazardous materials. Initial training must be completed within 90 days of hazmat employment and refresher training is required at least every 3 years.

Are all your facility's hazmat employees receiving HMR training? For more information or help in ensuring that your hazmat employees are properly trained, please contact CTI at (770) 263-6330 or visit our website, www.conversiontechnology.com.

Hazardous Materials Information Center:

<http://www.phmsa.dot.gov/hazmat/standards-rulemaking/hmic>

News You Can Use

- Deadline for updating your Stormwater Plan is **August 30, 2017**
- CTI's Brian Edwards will be speaking at the Atlanta Bar Association on **March 1** about the new Georgia Industrial Stormwater NPDES Permit.
- Brian will also be speaking at the International Biomass Conference on **April 11** about combustible dust hazards and safety.
- Take a look at one of our collaborative partners, InnovaNet, to see how they can help your company with business operations, supply chain and network planning, product and material innovations, and much more. <http://www.innovanet.com/>

Look for more info for these stories on our news blog, conversiontechnology.com/blog



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The Deadline for Conducting Smoke and Dye Testing as Required by the GA Stormwater Permit is May 31, 2017

The services provided by CTI to fulfill the GA Industrial Stormwater General Permit No. GAR050000 Requirements include:

- ◆ Locate potential connections to your stormwater system
- ◆ Verify floor drains and connections to sewer
- ◆ Prepare reports showing compliance with the Permit



Dye Test



Smoke Test

Feel free to contact us to ensure that your facility is in compliance with this requirement.

