



NHC3UA

New Hampshire College and University
Compliance Assistance Cooperative Program

www.nhc3ua.org



MINUTES

October 20th, 2006

10:00 AM – 3:00 PM

Holloway Commons, Lamprey Room

Members Present

Brad Manning	University of New Hampshire -- Brad.Manning@unh.edu
John Tummino	Massachusetts College of Pharmacy and Health Sciences -- john.tummino@mcphs.edu
Bob Minicucci	NH Department of Environmental Services -- rminicucci@des.state.nh.us
Sylvie Rice	Keene State College -- srice2@keene.edu
Tammy Hill	Plymouth State University -- tjhill2@plymouth.edu
Michael Blayney	Dartmouth College -- Michael.B.Blayney@dartmouth.edu
John Weir	Franklin Pierce College -- weirj@fpc.edu
David Berard	OSHA – berard.david@dol.gov
Tony Guinta	NH Department of Environmental Services -- agiunta@des.state.nh.us
John Slater	Daniel Webster College -- jslater@dwc.edu
Geoff Wilson	Hubbard Brook Research Foundation -- gwilson@hbresearchfoundation.org
Loretta Barnett	Colby Sawyer College -- lbarnett@colby-sawyer.edu
David Gillum	University of New Hampshire -- David.Gillum@unh.edu
Elia Kopreski	University of New Hampshire -- Elia.Kopreski@unh.edu
Don Cloutier	Rivier College -- dcloutier@rivier.edu
Jonathan Woodcock	New Hampshire Institute of Art -- jwoodcock@nhia.edu
Erik Gross	New Hampshire Institute of Art -- egross@nhia.edu
Mike Cimis	Dartmouth College -- Michael.D.Cimis@dartmouth.edu
Robyn Saunders	GZA Environmental Services -- rsaunders@gza.com
Donald Moreau	Saint Anselm College -- dmoreau@anselm.edu
Don Davidson	Saint Anselm College -- ddavidson@anselm.edu
Paul Damour	Saint Anselm College -- pdamour@anselm.edu
Gina Snyder	US Environmental Protection Agency -- snyder.gina@epa.gov
Ken Brown	University of New Hampshire -- ken.brown@unh.edu

Members Absent

Southern New Hampshire University
 New England College
 Chester College
 Granite State College
 New Hampshire Community Technical College

Guests

Mark Tetreault Durham Fire Department

NHC3UA

11 Leavitt Lane | Perpetuity Hall | Durham | NH | 03824
 Telephone: 603-862-4041 | Facsimile: 603-862-0047

Introduction:

Brad Manning, the Director of Environmental Health and Safety at the University of New Hampshire, called the first New Hampshire College and University Compliance Assistance Cooperative (NHC3UA) meeting to order at 10:00 AM. Members were introduced individually. Eleven school representatives were present along with members from the New Hampshire Department of Environmental Services, OSHA, the Hubbard Brook Research Foundation, GZA Environmental Services, and the US EPA.

Special Thanks:

Brad Manning gave special thanks to NHDES for help with developing the NHC3UA, Bob Bishop, Tony Guinta, and Gina Snyder, for participating in the NHC3UA.

Background:

In May Michael Blayney and Brad Manning met with the Davis Foundation, to discuss the need for a grant to support the NHC3UA. The Davis Foundation was founded by retired chairman of Shaws Supermarkets and has supported grants for education and for environmental stewardship. Tom Horgan of the New Hampshire College and University Council put NHC3UA in touch with the Davis Foundation to look for financial support. Mr. Manning also gave thanks to Ken Brown for putting together the grant and for David Gillum for writing the technical details into the grant.

The grant was given to the NHC3UA for a total of \$113,000 to provide support for a 3-year period. Michael Blayney gave special appreciation to Dec-Tam and GZA for their generous sponsorship. He also mentioned the importance of the Assessment component to the success of this organization, which will be used to determine where each school falls in terms of environmental health and safety and regulatory compliance.

Discussion:

Bob Minicucci from NHDES will be talking to colleges around the state that have business schools and would like assistance in connecting him with the correct person to talk to. He provided a handout to share with members, which is posted on the NHC3UA website (<http://nhc3ua-preview.sr.unh.edu/>) under “News”.

Presentation of NHC3UA website - David Gillum:

Suggestions, Questions and Ideas for the website:

1. Add an “Ask the Expert” section where members of NHDES, EPA, etc. would be able answer the technical questions that member schools ask.
2. The possibility to capture training records, (e.g. waste management training) to become a training tool. Can the training tools be uploaded to blackboard if the school has the bb system?
3. Can the EPA “push” something highlighted on the website?
 - a. CSHEMA; Bruce Bakes, Washington will be involved
 - b. C2E2, compliance assistance centers
4. Can SPCC training made by Ken Brown be posted?
When will the participating institutions be able to start using the website? David said that hopefully in a few weeks everything will be finished.
5. Can there be some means of inputting the results of a training seminar for someone who is not equipped to take it online?
6. Set up a generic training member? Not likely.
7. Authentication of individuals/record keeping/verifying that a person has taken the test or not

Review Program of Self-Assessments - Brad Manning:

Brad explained that the assessment will be used as a communication tool to identify which topics are most important to address with each institute. The contact information is used to set up a visit. NHC3UA will be visiting each institute once a year.

1. Which department is responsible for safety and environmental compliance at your facility? (Check all that apply)
2. Has your facility used EPA or NHDES technical resources? (Check all that apply)

Questions #1 and #2 are used to get an idea of where the institute is in environmental compliance. Question #2 needs to specify a time frame of 2003-present. "Other" and "DES training site" need to be added. Specific questions about effort analysis were not asked, which will be addressed later in more detail.

SECTION #1 - RCRA/NH Hazardous Waste Rules

1. Do you generate RCRA regulated hazardous waste?
2. If yes to #1, what is your facility's generator status?
3. If your facility is a Small Quantity Generator, have you completed a Small Quantity Generator Self-Certification?
4. If your facility is a Large Quantity Generator, do you have at least one person on site who has completed the NHDES Hazardous Waste Coordinator training?
5. Do you have a formal written hazardous waste management plan outlining training requirements, standard procedures, inspection requirements and document retention?
6. If yes to #5, have you ever had this plan/program audited by a third party?
7. Have you ever been inspected, fined or received a notice of violation from the EPA, NHDES or local fire or compliance staff?

Section #1, RCRA: If less than 100kg/month check SQG. The state doesn't have anything for less than that at this point.

A guide to acronyms will be posted on the website to be referred to while filling out the assessment.

Sect. #1 Q#7: Differentiate who has inspected; EPA, NHDES, or local fire dep. (needs to be included in sub-question.)

SECTION #2 - Universal Waste

1. Does your facility handle Universal Waste separately from your other hazardous waste?
2. If yes to #1, is your facility a small, large, or very large handler? The key word is "accumulate"

Sect. #2, Universal Waste defined as mercury containing devices such as batteries and light bulbs.

SECTION #3 - Infectious Waste

1. Does your facility generate infectious waste?
2. How does your facility dispose of infectious waste?

Sect. #3, Infectious Waste. One concern involving diabetic sharps. Must be disposed of correctly, can stick housekeeping individuals. OSHA applies to how infectious waste is enforced and labeled.

SECTION #4 - Spill Prevention Control Countermeasure Plans

1. Does your facility have above ground storage tanks with a total aggregate capacity of over 1,320 gallons or oil?
2. Does your facility have any above ground storage tanks with a capacity greater than 10,000 gallons?
3. Does your facility have any single above ground storage tank with a capacity greater than 660 gallons?
4. Does your facility have any emergency generators fed by oil?

Sect. #4, SPCC. Typo: "...of oil?" not "...or oil"

SECTION #5 - Integrated Contingency Plan

1. Has your facility consolidated your various emergency planning requirements into an Integrated Contingency Plan ("One Plan") which encompasses various planning requirements including but not limited to SPCC, RCRA Contingency Plan, OSHA HAZWOPER, etc.

Sect. #5, Int. Cont. Plan. Not specifically stated that the creation of a plan/response requires training. Note: EPA & OSHA have different requirement levels of trainings for capabilities for response. A space will be added for comments. Tony Guinta mentioned the importance of biofuels. When would a bio-fuel fall outside the regulations? We want to be progressive and encourage the use of biofuels. Currently it is not regulated but if one drop of petroleum is in the tank, it is regulated. Flammable vs. combustible.

SECTION #6 - Underground Storage Tanks

1. Does your facility store motor fuels or a regulated substance other than heating oil in an underground storage tank with a capacity greater than 110 gallons?
2. Does your facility store heating oil in an underground storage tank with a capacity of more than 1,100 gallons?

Sect. #6, no comments

SECTION #7 - Community Right to Know SARA Title III – EPCRA

1. Does your facility have any chemicals that are considered Extremely Hazardous Substances (EHS) by the EPA?
2. If yes to question #1, are any of the chemicals over the threshold reporting quantity?
3. If yes to question #2, has your facility submitted a notification letter identifying the EHS and facility emergency coordinator to the Local Emergency Planning Committee (LEPC)/State Emergency Response Committee (SERC)?
4. If yes to question # 1 or #2, have Tier II chemical inventory forms (Tier 2 Submit for electronic submissions) been filed annually with the local fire department, LEPC and SERC?

Sect. #7, Community Right to Know SARA Title III. For research institutions there are exemptions-would be obligated to file a Tier 2 report. It is important to establish a good relationship with the local town.

SECTION #8 - Clean Air Act

1. Does your facility have a Title V operating permit?
2. Has your facility demonstrated compliance with NHDES ENV-A 1400, Regulated Toxic Air Pollutants regulation?
3. Does your facility have boilers constructed (manufactured) or modified after June 9, 1989 with heat input between 10-100 MMBTU/hr or larger? (New Source Performance Standards - 40 CFR Part 60)
4. Does your facility have a refrigerant management program?
5. Does your facility have gasoline-dispensing units on-site?
6. Has the facility removed any asbestos from any facility components within the last 18 months? (Asbestos - 40 CFR Part 61)

Sect. #8, Clean Air Act. Title V?? Chlorine in drinking water? Facilities with HVAC equipment and vehicles with AC service don't need to worry about proper regulations if outsourced, but if the institution does their own service, they do need to worry about it.

SECTION #9 - Federal Insecticide, Fungicide & Rodenticide Act

1. Does your facility have an in-house Integrated Pest Management (IPM) or similar Pest Control program?
2. Are your facility pest control operators licensed/certified by the state to apply pesticides?

Sect. #9, no comments

SECTION #10 - Clean Water Act

1. Does your facility discharge wastewater into a municipal sewer system or Publicly Owned Treatment Works (POTW)?
2. Is your facility's wastewater directly discharged into surface water or groundwater?

Sect. #10, Clean Water Act. Question about storm water will be added. Wording of questions also need to be improved, e.g. specify "waste water", "storm water", differentiate between construction and general practice.

SECTION #11 - Toxic Substances Control Act (TSCA)

1. Does your facility generate any TSCA regulated waste, including Polychlorinated Biphenyls (PCBs)?
2. Has your facility sold or leased housing built before 1978 that may contain lead paint?

Sect. #11, Toxic Substances Control Act. involves PCBs, electrical transformers etc. Effects colleges who have leased properties to students (dormitories tend to be exempt from this). Mike points out the need for asbestos surveys.

SECTION #12 - Safety Programs (OSHA compliance)

1. Do you have a hazard communication program in place? (29 CFR 1910.1200)
2. Do you have a confined space entry program in place? (29 CFR 1910.146)
3. Do you have an electrical safety work practices program in place? (29 CFR 1910)
4. Do you have a powered industrial truck program in place? (29 CFR 1910.178)
5. Do you have a respiratory protection program in place? (29 CFR 1910.134)

6. Do you have a Chemical Hygiene Plan or Program in place? (29 CFR 1910.1450)
7. Do you have a personal protective equipment program in place? (29 CFR 1910 Subpart I)
8. Do you have a lock out – tag out program in place? (29 CFR 1910.147)
9. Do you have a welding safety program in place? (29 CFR 1910.252)

Sect. #12, OSHA. Question #9; look at welding for purposes of personal protection, often required by insurance providers. Be considerate of air contaminants, and conscious of ventilation. Electrical workers in facilities need to have protective clothing. UNH recently added an electrical safety program with the chemical hygiene plan. Applied to class 3 or above lasers. The leading causes of laboratory fires are electrical related.

SECTION #13 – Purchasing

1. Has your facility instituted “green” purchasing policies or practices?
2. Does your facility purchase non-toxic/less toxic cleaning products (“green cleaners”)?
3. Does your facility have a central system in place for tracking and quantifying the amount of chemicals purchased, dispensed and disposed of?

Sect. #13, Purchasing. Green cleaners will help in the reduction of hazardous materials storage and exposure to toxic chemicals in cleaning products to housekeepers. Products that enhance energy conservation in vehicles for example (Also related to Sect. #14). There is an initiative in getting people at secondary education institutions to buy green and locally as much as possible.

SECTION #15 - Topics for future NHC3UA meetings

1. What environmental topics would you like more information about?

Sect. #15, Topics for Future meetings – waiting for suggestions.

Other Topics:

Michael Blayney said that on March 9th, Dartmouth College will give safety training to Performing Arts Schools, and a staging and rigging presentation.

OSHA Voluntary Compliance Program - David Berard:

A 3 page handout of free trainings was given to everyone. David will be conducting respirator training next week (week of October 23, for more information contact David Berard). Another training will be given in Kitchen and Cafeteria Safety. David would be happy to conduct trainings at NHC3UA participating institutions. These courses would be 10 hour trainings. Resources on www.osha.gov ; “e-tools” in upper top right tool bar can be used for many applications. Free CD for schools specifically made by NIOSH, go to www.cdc.gov/niosh , a link will be posted on the website.

To get a comprehensive list of all the training dates get on David’s mailing list, email him at berard.david@dol.gov and he will add you to his list. David’s schedule will also be posted on the NHC3UA website.

Michael Blayney will send David Berard a check list to get folks to think about regulations etc.

Emergency Operations Plans- Brad Manning:

Emergency Preparedness Trainings; the interest of having a Flu Pandemic Seminar some time in the near future was expressed. David B. said this is a possibility, Greg Chaplin of the Bureau of Emergency Management would be the possible person to conduct or contact for something of this nature.

Michael Blayney asked if there would be any interest in working together on this training and getting something together. Overall the whole group thought it was a good idea.

A question was asked in regards to a continuity plan that might be used as a template for participating institutions. Brad Manning stated that UNH has a continuity plan that can be shared with other institutions.

Mark Tetreault, the Durham Fire Marshall, was able to attend to answer questions related to the interpretation of a change in New Hampshire fire laws that occurred after the Rhode Island nightclub fire. Silvie Rice asked a question regarding licensing for use of matches or cigarettes during stage performances. Mark said that his interpretation of the law was to consider cigarettes or candles as open flames, and requires someone nearby trained in the use of a fire extinguisher. He said that he interprets the law about incendiary devices to exclude these common items. It was suggested that the state or local Fire Marshall would need more time to investigate the situation to allow licensing.

Assessment completion will be due by the end of November.