

USSC Meeting

March 1, 2018

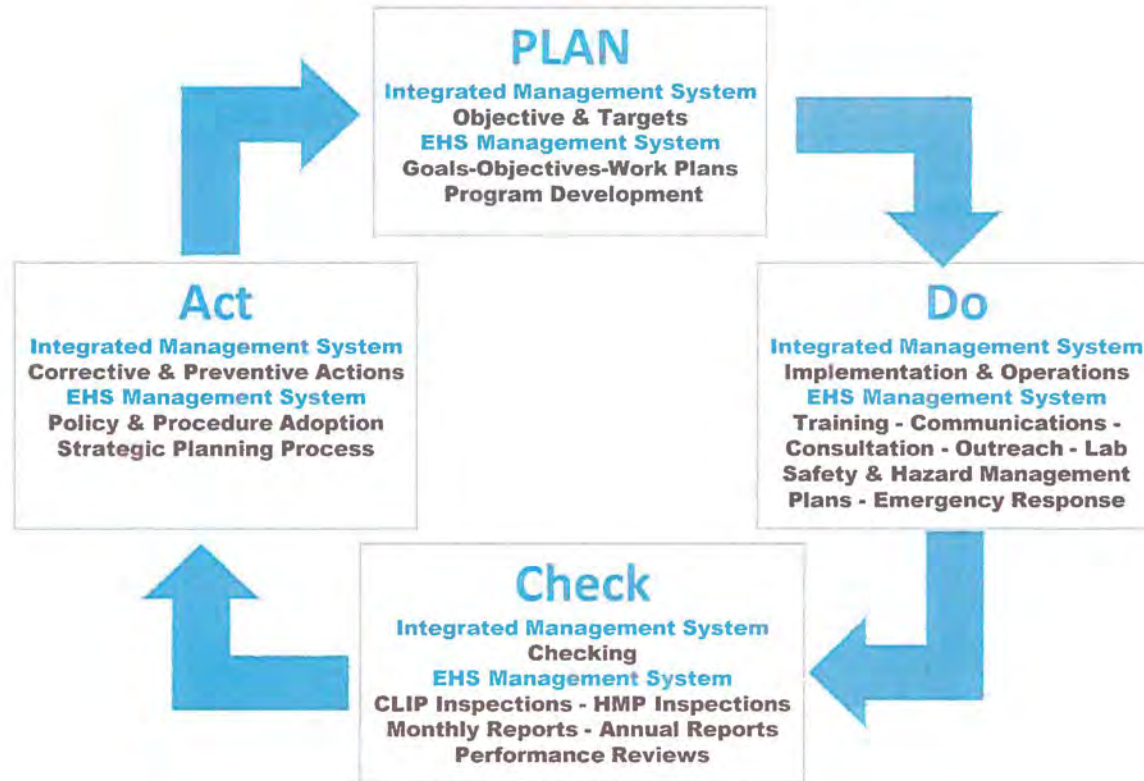
Agenda

1. Introductions
2. 2018 EHS Goals
3. **RCRA HW Generator Rules**
4. **UNC POLICY ON OSHA'S CRYSTALLINE SILICA STANDARD**
5. **UNC-CH STANDARD ON CRYSTALLINE SILICA**
6. University's response to potential threats
7. A&S Classroom Emergency Preparedness Script

All
Mary Beth Koza
Cathy Brennen
Mary Crabtree
Mary Crabtree
Derek Kemp & Jeff McCracken
Derek Kemp & Jeff McCracken

Items in Bold need to be voted upon

UNC-CH EHS Management System



FINANCE AND OPERATIONS

Environment, Health and Safety

EHS 2017 Goals Status

	Completed	Continued into 2018	Stopped
Intrapreneurship	6	2	
Education	2	1	
Compliance	4	7	1
Growth	2	1	

Communication + Collaboration + Customer Service = The Path to Compliance



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EHS 2018 Goals Status

	New	Continued into 2018
Intrapreneurship	6	2
Education	7	1
Compliance	7	7
Growth	4	1

Communication + Collaboration + Customer Service = The Path to Compliance



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EHS 2018 Goals

- Intrapreneurship
- Education
- Compliance
- Growth

New Hazardous Waste Generator Rules

Cathy Brennan



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HazWaste Generator Rule Improvements

- EPA originally promulgated RCRA rule in 1980
- EPA recently revised regulatory requirements
 - HW Determination – must be made at point of generation by generator (whether shop or lab)
 - Container Labeling – must be labeled as “Hazardous Waste” and indicate hazards of contents (currently no hazard communication)
 - Contingency plan for every satellite accumulation area (SAA)
- EPA effective date May 30, 2017
- State Department of Environmental Quality (DEQ) issued temporary rule to delay implementation until **March 1, 2018**
- Based on changes, University investigated Subpart K – Academic Lab Rule (would only apply to labs)



HazWaste in Labs

- ~360 PIs, ~4500 lab personnel on campus in ~3000 lab rooms that could generate HW
- Each room where waste is stored is considered a SAA
- Concerns
 - Contingency plan for that many rooms would be burdensome
 - Training of lab personnel to make HazWaste determination and properly label
- Decided to opt into Subpart K – Academic Lab Rule



Subpart K

- Only for research labs, teaching labs, art labs, photo labs and hospital diagnostic labs (NOT SHOPS)
- Required Lab Waste Management Plan
- Labels must have accumulation start date and “Unwanted Material” to clarify that waste determination has not been made
- Waste container must be removed prior to 12 month accumulation start date on label



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Shops

- HazWaste generator rule still applies to shops
- Shops don't generate as much HazWaste and always generating same stream (unlike labs)
- EHS will pre-label waste containers for each shop to ensure correct waste determination
- Used GIS to make map book of SAAs around campus

EHS Implementation

- New short required training for labs and shops
- Modified existing orientation, HW online trainings
- Updated inspection citations
- Trained EHS inspection teams
- Modified existing manuals (LWMP)
- Generated new labels, uploaded templates to website
- Generated internal EHS reports to help with compliance

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Unwanted Material

Accumulation Start Date: _____

Used Unused

Chemical(s) Name	Est. %
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Contact EHS at 919.962.5509 Total Percentage 100%

Policy and Standard on Crystalline Silica

- OSHA 29 CFR 1926.1153 and 1910.1053 Standards
effective date 6/2016
- Crystalline Silica is a naturally occurring mineral found in products like sand, concrete, brick, mortar, and stone
- An inhalation hazard
- Applies to UNC employees, students, volunteers, contractors, etc. disturbing materials containing crystalline silica (making airborne)
 - Sawing, sanding, drilling, demolition, etc.



Policy and Standard on Crystalline Silica

- Lower permissible exposure limit (PEL)
 - OSHA had not changed this PEL since 1971
- New rules for equipment/tools used to work with crystalline silica
 - Engineering and administrative controls
 - Respiratory protection
- Provide training and medical surveillance
- Compliance dates:
 - Construction- September 23, 2017
 - General Industry- June 23, 2018



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Who does this cover?

- Applies to all Faculty, Staff and Students and contractors working on behalf of the University.
- Types of work activities
 - Demolition, construction and renovation
 - Dental application

USSC Meeting

March 01, 2018

Attendees: Derek Kemp, Linc Butler, Chris Payne, Doug Cyr, Beverly Errede, Judy Faubert, Matthew Hawkins, David Kaufman, Mary Beth Koza, Jeff McCracken, Michael Rolleri, Dalton Sawyer, Anna Wu

Guests: Darrell Jeter, Garry Coulson, Cory Kirkland

Minutes:

2018 EHS Goals – Mary Beth Koza gave an overview on status of the EHS 2017 goals and reviewed new 2018 goals which are based on the Plan Do Check Act (PDCA) model; Goals cover 4 areas: Intrapreneurship, Education, Compliance and Growth. The Committee approved the 2018 goals by unanimous decision.

Updated EPA Regulations – Mary Beth Koza provided an update on new hazardous waste generator rules in compliance with recent changes to the Resource Conservation and Recovery Act (RCRA) laws. Based on the changes which will be effective on March 1, 2018, the University decided to opt into Subpart K for research labs, teaching labs, art labs and hospital diagnostic labs requiring these labs to modify existing Lab Waste Management Plan and implement changes related to labeling and storage of hazardous waste. The Committee approved by unanimous decision.

UNC Policy and UNC Standard on Crystalline Silica – Mary Beth Koza provided a summary on these two documents in relation to the OSHA 29 CFR 1926.1153 and 1910.1053 Standards to lower exposure of UNC faculty, staff, students and contractors to crystalline silica. The Committee approved by unanimous decision. Next step is review and approval by the UNC Policy Committee.

Campus Safety & Security – Derek Kemp and Jeff McCracken spoke about the recent protests centered around the “Silent Sam” monument on UNC-CH campus. UNC Police have been monitoring the protests and are prepared to respond if needed. Derek discussed an Emergency Preparedness script that has been used for classroom instruction and training in School of Arts and Sciences to educate faculty, staff and students on responses to emergency events such as an active shooter. Other Schools at UNC are looking to incorporate this training in their classrooms.