



# COMPLIANCE & PREVENTION

## *quarterly*

Winter 2005

A Publication of Ohio EPA, Office of Compliance Assistance and Pollution Prevention

### Emergency Planning and Community Right-to-Know (EPCRA) Annual Reports Due March 1



Your company may be required to complete reports under EPCRA regulations. EPCRA reporting requirements apply to companies that are subject to OSHA's Hazard Communication Standard and that use, produce or store the following substances:

- 10,000 pounds or more of a hazardous chemical; or
- the reportable threshold (one to 500 pounds, depending on the substance) or more of an extremely hazardous substance.

A hazardous chemical is any chemical covered by OSHA's Hazard Communication Standard. While there isn't a specific listing of hazardous chemicals, they include any chemical or chemical mixture that exhibits hazardous characteristics. Hazardous characteristics include: health, fire, or reactivity hazards or the potential for a sudden release of pressure. Hazardous chemicals include gasoline, diesel fuel, paints, solvents and other chemicals.

An extremely hazardous substance is any one of 356 chemicals on a specific list in EPA's regulations. Examples of extremely hazardous substances include chlorine, ammonia and nitric acid.

If your company handles either hazardous chemicals or extremely hazardous substances in greater than threshold quantities, you must file a report to the State Emergency Response Commission



Welcome to the first issue of *Compliance and Prevention Quarterly*. As a result of the creation of the Office of Compliance Assistance and Pollution Prevention, the Office of Pollution Prevention's newsletter, *Prevention Quarterly*, and the Small Business Assistance Office's newsletter, *The Small Business Resource*, are being merged into a new newsletter, *Compliance and Prevention Quarterly*.

We hope you find this newsletter helpful. If you have any comments or suggestions, we'd like to hear from you. Please send any comments or suggestions to Ellen Miller at [Ellen.Miller@epa.state.oh.us](mailto:Ellen.Miller@epa.state.oh.us) or (614) 644-2817.

(SERC), your county's local emergency planning committee and your local fire department by March 1.

For more information on this reporting requirement, contact Ohio EPA's Right-to-Know Office at (614) 644-2260, or visit SERC's Web page at [www.epa.state.oh.us/dapc/serc/](http://www.epa.state.oh.us/dapc/serc/).

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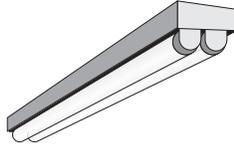
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## New Lamp Rules

Before December 7, 2004, Ohio EPA considered fluorescent and other mercury containing lamps (e.g., metal halide, high-pressure sodium and mercury vapor) that were being recycled to be a characteristic byproduct instead of a waste. Because they were not considered a waste, they were not considered a hazardous waste.



Now, hazardous fluorescent and other hazardous lamps are considered spent materials and a hazardous waste even when they are recycled. Hazardous waste lamp generators have the option of managing their lamps as either hazardous waste or universal waste. Managing lamps under the universal waste regulations eases certain regulations imposed on spent lamp generators.

If you choose to manage your hazardous waste lamps under the universal waste regulations, you will need to comply with packaging, labeling and storage limitation requirements. If you generate more than 5,000 kilograms (11,023 pounds) of universal waste in a year, you also need to notify

Ohio EPA, provide employee training on universal waste and keep records of your universal waste.

Universal waste lamp generators are not allowed to crush their lamps. If you want to crush your lamps, you will need to manage your lamps under the hazardous waste rules.

If you manage your lamps under the universal waste regulation, you will need to send your lamps to another universal waste handler or to a universal waste permitted destination facility. If you used a lamp recycler ([www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf](http://www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf)) in the past, you should ensure that they are a universal waste handler or a permitted destination facility before you send more lamps to them.

For more information on the universal waste lamp regulations, see Ohio EPA's Division of Hazardous Waste Management's *Universal Waste Rules for Handlers of Lamps* ([www.epa.state.oh.us/dhwm/pdf/Universal\\_Waste\\_Rules\\_for\\_Handlers\\_of\\_Lamps.pdf](http://www.epa.state.oh.us/dhwm/pdf/Universal_Waste_Rules_for_Handlers_of_Lamps.pdf)). You can also contact Ohio EPA's Division of Hazardous Waste Management's Regulatory Services Unit at (614) 644-2917 about how to properly manage your used lamps.

## New General Permits for Air Pollution Sources

The Division of Air Pollution Control (DAPC) has developed model general permits-to-install (GPTI) and model general permits-to-operate (GPTO) for select sources in Ohio. The regulations for general permits can be found in OAC rule 3745-31-29 (GPTI) and OAC rule 3745-35-08 (GPTO).

A general permit is the same as any permit-to-install or state permit-to-operate that DAPC issues except all the terms and conditions of the permit have been developed in advance. This is referred to as the "model general permit." A potential applicant can review the model general permit to see if their emissions sources meet the qualifying criteria and operating conditions of the model general permit. The applicant can then complete an application form. DAPC will review the application to confirm that general permit qualifications are met and then issue the model general permit to the applicant. At that point it becomes the applicant's general permit.

All the terms and conditions of the model general permit remain the same when it is issued to the applicant. The general permit will include a cover page that identifies facility-specific and emission unit-specific information.

The benefits of the general permit include: 1) a quicker processing time of 45 days (upon receipt of a complete application); 2) the ability to see how the permit will look before it is issued; and 3) more consistent permits for similar emission sources. Permit fees remain the same as regular permits-to-install and operate.

Currently, model general permits are available for boilers and dry cleaners. DAPC also is developing model general permits for aggregate processing, concrete batch plants, asphalt plants, industrial painting operations, paved/unpaved roadways and storage piles. For more information, contact Jenny Nichols at (614) 644-3696 or visit the DAPC Web site at [www.epa.state.oh.us/dapc/genpermit/genpermits.html](http://www.epa.state.oh.us/dapc/genpermit/genpermits.html).

## Safer Cleaning Products: An Overview of Environmentally Preferable Purchasing

The catch phrase these days is “environmentally preferable purchasing” (EPP). What is it? Why is it important to the environment? What does EPP have to do with safer cleaning products? Why should businesses and individuals practice EPP?



EPP is the practice of purchasing products and services that “have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose.” “Environmentally preferable” products may include recycled content products, energy conserving products, less toxic products, or bio-based products. “Environmental purchasing” is incorporating environmental considerations along with traditional purchasing considerations such as price, performance and availability.

There is a five-step process to EPP. The first step is to establish desired goals. A variety of decisions may have to be made even before product specifications are determined. The second step is to design an effective bid process. The environmental specifications unique to a pollution prevention approach to procurement can be incorporated into the traditional bid process of an institution. The third step is to review and score vendor responses. The relative importance of various environmental criteria should be established before bids are received. Step four is to test product effectiveness. This is an essential step in purchasing environmentally preferable products. The final step, of course, is to select the product and vendor.

Why purchase less toxic cleaning products? These products reduce health risks to janitorial staff and building occupants while also protecting the environment. For example, in Santa Monica, CA, the city replaced traditional cleaners with less toxic alternatives in 15 of 17 product categories. Spending was cut by 5 percent and 3,200 pounds of hazardous materials were eliminated. Santa Monica involved the environmental, custodial and

purchasing departments. The city researched the less toxic products before switching. Custodians participating in the process were key to the successful transition in Santa Monica.

Using “green” cleaning chemicals can actually produce additional savings when other benefits are taken into account. Using safer cleaning products could improve worker productivity between 0.5 percent and 5 percent — an annual productivity gain of \$30 billion to \$150 billion. Switching to safer cleaners should help reduce the more than \$75 million a year U.S. institutions spend on medical expenses and lost time wages due to janitors’ chemical-related injuries. Safer cleaners match or exceed their traditional counterparts when it comes to performance.

### Sources and Additional Resources

[www.epa.gov/opptintr/epp/pubs/santa.pdf](http://www.epa.gov/opptintr/epp/pubs/santa.pdf)  
[www.p2.org/workgroup/epp/EPP2Web\\_files/frame.htm](http://www.p2.org/workgroup/epp/EPP2Web_files/frame.htm)  
[www.newdream.org/procure/Clean\\_Sweep\\_Oct\\_04.pdf](http://www.newdream.org/procure/Clean_Sweep_Oct_04.pdf)  
[www.informinc.org/PPRJanproducts.pdf](http://www.informinc.org/PPRJanproducts.pdf)

## Hospital Wins H2E’s Making Medicine Mercury-Free Award



St. Charles Mercy Hospital in Oregon, OH recently won Hospitals for a Healthy Environment’s (H2E) Making Medicine Mercury-Free Award. St. Charles Mercy replaced 100 percent of its sphygmomanometers, thermometers and most other mercury-containing devices. They have created a no-mercury purchasing policy, recycled batteries, inventoried and labeled any remaining mercury-containing thermostats, replaced B5/Zenkers in the laboratory and are working with their chemical representative to find alternatives to the seven reagents that use mercury as a preservative. They also are working with a pharmacy to find mercury-free pharmaceuticals, where mercury is used as a preservative. The hospital held a mercury thermometer exchange for employees this year, and an article about the

hazards of mercury was written. The hospital also had a display of mercury hazards at its employee benefits fair.

H2E is a joint project of the American Hospital Association, the U.S. Environmental Protection Agency, Health Care Without Harm and the American Nurses Association. In addition, various state and local resources, including the Ohio Hospital Association, have joined the effort to help health care facilities achieve the pollution prevention goals outlined in H2E. For more information, visit their Web site at [www.h2e-online.org](http://www.h2e-online.org).

### Need Help?

Ohio EPA's Office of Compliance Assistance and Pollution Prevention is a one-stop location for information about environmental requirements, compliance concerns and pollution prevention. Services are free and confidential. Contact us at (800) 329-7518 or (614) 644-3469.

### How You Can Make a Difference

You can make the publication of *Compliance and Prevention Quarterly* more environmentally friendly. E-mail the Office of Compliance Assistance and Pollution Prevention at [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us), and request that we send you an electronic copy, an Adobe Acrobat PDF file or a message that indicates the newest version is now available on our Web site. It's that easy to make a difference.

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