



CT ACHMM NEWSLETTER

Volume 5, Issue 2 May 2007

CTACHMM P.O. Box 228 East Glastonbury, CT www.ctachmm.org

President's Message

Gene Metti

The CHMM---an accredited credential!

Did you know that while you can find over one hundred fifty (150) EHS related titles and credentials in the media, trade journals and on the web, only twelve (12) are accredited by the Council of Engineering and Scientific Specialty Boards (CESB) (www.cesb.org). Our CHMM credential is one of them.

The Council of Engineering and Scientific Specialty Boards is a self-sustaining, independent body which accredits certification programs organized and operated consistent with sound credentialing practices, tailored to the needs of engineering and technology specialties. Both the prestigious National Council of Examiners for Engineering and Surveying and the National Society of Professional Engineers are associate members of CESB. CESB has been providing accreditation for over 17 years to the engineering and technology community.

ASTM (American Society of Testing Materials) Standard Practice E 1929: Assessment of Certification Programs for Environmental Professions: Accreditation Criteria requires that environmental certification programs be accredited by an independent entity such as CESB. Some of the more well known CESB accredited credentials include the Qualified Environmental Professional (QEP), the Certified Industrial Hygienist (CIH), the Diplomate Environmental Engineer (DEE) and our own CHMM (www.ihmm.org). Accredited EHS related titles along with their respective credentialing organizations are summarized in the table below.

If I were to advise any recent EHS graduate or young professional on what certifications to go after, it would



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Building a Safety Program in Iraq

Hank Rominski

Give a man a fish; you have fed him for today. Teach a man to fish; and you have fed him for a lifetime. (author unknown) While this quotation hasn't been used for quite some time, it truly speaks volumes about our job in Iraq. I believe that of our many roles and responsibilities, helping our Iraqi colleagues to metaphorically fish for themselves is our primary goal.

I have the honor to attempt to describe the commencement of a Safety movement by one of our Iraqi associates. This particular story began a little over a year ago, when one of our Iraqi translators was selected to be a safety representative for the Gulf Region North District. He was selected since he had familiarity with the Corps, speaks and writes excellent English, Kurdish and Arabic, strives for excellence, and most of all is concerned for the well being of his fellow countrymen. These are all necessary ingredients to be on the Safety team.

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Hank Rominski and Dr. Rizgar promote Safety in Iraq

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be one of these accredited 12 and most definitely the CHMM. Hazardous materials are everywhere and require proper use, storage, transport and disposal to safeguard the environment and protect public health, safety and welfare. Understanding hazardous materials requires knowledge and experience which cuts across every major environmental law. EHS professionals with the CHMM credential are among the top experts in the country in the science of hazardous materials management.

The CHMM credential has been around since 1984 and continues to be one of the premier top- quality EHS certifications in the world. The non-profit credentialing organization Institute for Hazardous Materials Management (IHMM) which created the credential and the international membership organization, the Academy of Certified Hazardous Materials Managers pride themselves in being recognized leaders and resources for those in the practice of EHS management.

The table below lists the various EHS related CESB accredited programs and their respective certification organizations.

CTACHMM General Membership Meeting
Friday June 8, 2007
5:30 pm
Mohegan Sun
Demonstration Center
Uncasville , CT
Refreshments
“Presentation and Tour of Mohegan Sun Facilities”

Seating is limited

Only a few slots are left

RSVP Rose Coggeshall rosecog@sbcglobal.net



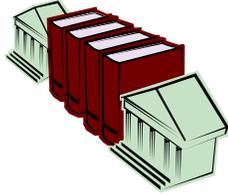
ACCREDITED EHS RELATED CERTIFICATIONS

American Academy of Environmental Engineers	<i>Diplomate Environmental Engineer (DEE)</i>
Council on Certification of Health, Environmental, and Safety Technologists	<i>Occupational Health & Safety Technologist Construction Health & Safety Technician</i>
Academy of Board Certified Environmental Professionals	<i>Certified Environmental Professional (CEP)</i>
American Indoor Air Quality Council	<i>Council-certified Indoor Environmental Consultant</i>
American Board of Health Physics	<i>Comprehensive Health Physicist</i>
American Board of Industrial Hygiene	<i>Certified Industrial Hygienist (CIH) Occupational Health and Safety Technologist</i>
Board of Environmental, Health & Safety Auditor Certification	<i>Certified Professional Environmental Auditor (CPEA)</i>
Certified Environmental, Safety and Health Trainer Board of Certification	<i>Certified Environmental, Safety and Health Trainer (CESHT)</i>
Institute of Hazardous Materials Management	<i>Certified Hazardous Materials Manager (CHMM)</i>
Institute of Professional Environmental Practice	<i>Qualified Environmental Professional (QEP)</i>

www.cesb.org

Regulatory Update

Matt Twerdy



Here is a good article from McCoy's RCRA Review, April 2007.

Changes to the Definition of "Solid Waste" Proposed

In terms of RCRA compliance, avoiding classification as a "solid waste" is huge because it means a material never enters the hazardous waste management universe. That's why EPA's March 26, 2007 [74 FR 14172] supplemental proposal excluding certain recycled materials from the definition of "solid waste" is important.

This proposal builds on an October 28, 2003 proposal [68 FR 61558] for changes to the definition of solid waste. The most important difference in this new proposal is that EPA has decided not to limit the exclusion to materials generated and reclaimed in a continuous process within the same industry.

The hazardous secondary materials to which the agency's proposal would apply are spent materials, listed sludges, and listed by-products that will be reclaimed. Such materials would not be solid or hazardous wastes if reclaimed and recycled in compliance with the proposed provisions. Under the current RCRA regulations (§261.2(c)(3) and associated Table 1), these hazardous materials are typically solid and hazardous wastes when reclaimed.

The basic idea of the proposal is that if hazardous secondary materials are not "discarded," they should not be regulated as wastes. The proposed exclusions would not apply to materials that are used in a manner constituting disposal, materials that are burned for energy recovery or used to produce a fuel or materials that are inherently waste-like.

The new proposed rule would codify exclusions from the definition of solid waste for materials that are reclaimed under the control of the generator, or are transferred by the generator to another company for the purpose of reclamation (EPA dubbed this the "transfer-based" exclusion).

The proposal also provides a case-specific petition process for obtaining "non-waste" determinations. The scope of the exclusion for materials "under the control of the generator" includes materials reclaimed within the United States, (1) by the generator at the generating

Great turnout marks First General Membership meeting of 2007!

A capacity crowd of over 35 chapter members and guests attended our first general membership meeting of the year at the Yankee Silversmith Inn in Wallingford, CT on March 7, 2007. This was one of the larger turnouts in recent years and it was great to see the interest and enthusiasm exhibited by all of the EHS professionals in attendance. Several presentations were made along with a Board of Directors meeting which was held after the general meeting.

Chapter Briefing

Gene Metti, Chapter President, provided a chapter briefing after the usual great Yankee Silversmith dinner. Gene mentioned that our chapter membership grew to 60 statewide with the majority in New Haven, Hartford and Fairfield Counties. There were 19 members who had requested inclusion on the DEP referral list willing to sign off and certify permits/applications, etc. Several members asked to be added to the list after the meeting. There are currently over 65 ACHMM chapters nationally with over 8200 members. Gene encouraged members to attend the National Conference in Arlington, Virginia on August 12-15, 2007 as a great way to obtain recertification points and to network with professionals from all EHS disciplines across the country.

Current UST Issues in CT

David Selger and **Rachel Rosen** of LFR, Inc gave an excellent presentation on current UST issues in CT including compliance assessment and the UST fund. As of fall 2006, Connecticut had over 11,400 active UST's located at 4600 sites. Provisions of the federal UST Compliance Act were reviewed including the requirement for state compliance inspections by August 2007 and every three years. CT Public Act 05-3, signed into law 7-1-05, mandates annual inspections for UST clean-up account submittals. Inspections can be performed by trained 3rd parties such as CHMM's. Inspection criteria were reviewed including spill and overflow protection, tank and piping release detection, piping slope, and recordkeeping. DEP has implemented red tagging (in the form of a notice placed on the tank) based on lack of overfill or spill protection, improper design or installation. Violations need to be remedied to

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facility; (2) by the generator at a different facility that the generator owns and operates; and (3) according to a "tolling" (i.e., contractual) arrangement.

To qualify for the exclusion, generators must meet these conditions:

- The secondary material must be legitimately recycled.
- No speculative accumulation is allowed.
- A one time notice must be sent from the generator to EPA or the state.
- Storage in land-based units at the generator site (or a site under the control of the generator) is allowed, provided the secondary material is contained and there is no release to the environment.

Alternatively, for materials covered by the transfer-based exclusion, the following conditions must be met:

- The generator must make "reasonable efforts" to ensure that the reclaimer will legitimately recycle the material. Reasonable efforts would mean conducting audits of potential reclaimers or other due diligence efforts. The generator and the reclaimer must keep records of each shipment of excluded material for three years. The material must be transferred directly from the generator to the reclaimer (i.e., no brokers may be involved).
- The reclaimer must manage the material in a manner that is at least as protective as that employed for the analogous raw material.
- The reclaimer must manage any residuals in a manner protective of human health and the environment. The reclaimer must comply with the financial assurance requirements for permitted treatment, storage, and disposal facilities in Part 264, Subpart H.

The proposal would also codify factors for determining whether materials are legitimately recycled. Currently, these determinations are made on a case-by-case basis by regulators using EPA's "sham" recycling guidance (January 4, 1985, 50 FR 638; and RO 11426]. The proposed factors for determining if recycling is "legitimate" are:

- The secondary material must provide a useful contribution to the recycling process or to a product of the recycling process.
- The recycling process must produce a valuable product or intermediate.
- The generator and reclaimer should manage the secondary material as a valuable commodity.
- The product from the recycling processes should not contain Part 261, Appendix VIII constituents in

elevated concentrations compared to analogous products.

According to EPA, the first two criteria above are mandatory; the second two are not mandatory, but should be considered in making the determination.

EPA is taking comments on the proposed rule until May 25, 2007. If EPA finalizes the proposed changes to the definition of solid waste, the changes will not be effective in RCRA-authorized states until the state adopts the rule. Because the proposed changes would make RCRA less stringent, authorized states would not be required to adopt them. The rule, along with fact sheets, FAQs, and related background documents, can be downloaded from EPA's "Revisions to the Definition of Solid Waste" web page.

Connecticut Department of Environmental Protection News (CTDEP Website)

Public Notices Proposed Actions:

- Tentative Determination to Reissue the General Permits for:
- Food Processing Wastewater
- Discharge of Minor Printing and Publishing Wastewater.
- Groundwater Remediation Wastewater to Sanitary Sewer

DID YOU KNOW?

Each month ACHMM members can recognize the hard work, extraordinary achievements and contributions of a peer or ACHMM chapter. You can submit your nomination via [e-mail](#) today. Nominees must be an ACHMM certified or affiliate member or an ACHMM local chapter.

When submitting a nomination be sure to include the name(s), contact information, and a brief description (250 words or less) of the deserving member's or chapter's accomplishments or contributions. The ACHMM Awards Committee will select an honoree to be featured in *ACHMM Manager* each month.

Honorees will be notified in advance and asked to provide a photo. **ACHMM of the Month** honorees will receive a special certificate of recognition.

Aerial view of the remediation at the former UCONN landfill site January 26, 2007.



UPDATE: Monthly Construction Activity Reports - Remedial Action Plan Implantation, Landfill and Former Chemical Pits, University of Connecticut, Project BI-900748

James Pietrzak, P.E., CHMM, Senior Project Manager, Architectural & Engineering Services

January 2007

During the month of January, R. Bates & Son's began the construction of the leachate interceptor trench (LIT) force main. This force main will transport the leachate collected in the LIT to the waste treatment plant. They began in the Northeast corner of the landfill, and worked to the West. By the end of January, they completed approximately 1500 feet of force main and about 1000 feet of piping from wells to the force main. This force main system also includes a galvanized airline to operate the pumps. Approximately 800 feet of airline has been installed.

R. Bates and Sons continued the consolidation of trash within the landfill site in January. There are only a few small areas in the North of the landfill to test to assure all trash is consolidated.

Bates also continued the construction of the Southern and Northern storm water ponds. This work has been halted due to the below zero temperatures.

The foundations for the two compressor buildings have been excavated and poured. The buildings are scheduled to arrive in February.

Other work performed in January was the shaping of the landfill on the North and East slopes, screening of onsite material for liner installation at a later date, continued excavation and placement of organic mix in the wetland "C" creation area and installation of a storm water structure and a section of electrical duct bank coming down the access road.

February 2007

During the month of February, R. Bates & Son's and MJ Daly continued the construction of the LIT force main. They have completed the force main around the landfill to the South stormwater pond and from the South Compressor building to the manhole where we tie in. With the ground frozen, the remainder of this work will be completed after the ground thaws.

The M J Daly company has delivered and installed the two Compressor Buildings on foundations built by R. Bates & Sons. These two buildings are pre-cast concrete, and weigh approximately 13 tons each. Walker Crane and Rigging placed them on their foundations with an 80-ton crane.

R. Bates & Sons has begun the installation of monitoring wells. Two water monitoring wells and two gas-monitoring wells have been completely installed.

Other work performed in February was screening of onsite material for liner installation at a later date, placement of boulders and woody debris in the wetland creation area and cutting down the LIT platform to contract grade.

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CALENDAR OF EVENTS

DURING NORTH AMERICAN OCCUPATIONAL SAFETY AND HEALTH (NAOSH) WEEK MAY 6 TO 12.

THE ACADEMY OF CERTIFIED HAZARDOUS MATERIALS MANAGERS (ACHMM) IS TEAMING UP WITH THE OCCUPATIONAL SAFE AND HEALTH ADMINISTRATION (OSHA) AND OTHER PRIVATE ORGANIZATIONS TO PROMOTE WORKPLACE SAFETY

FOR MORE INFO: WWW.ACHMMM.ORG

CTACHMM GENERAL MEMBERSHIP MEETING AND TOUR

JUNE 8, 2007
MOHEGAN SUN CASINO
UNCASVILLE, CT

FOR MORE INFO: WWW.CTACHMM.ORG

CHMP CREDENTIAL AVAILABLE (TENTATIVE)

JULY 2007

FOR MORE INFO: WWW.ACHMMM.ORG

ACHMM NATIONAL ELECTION NOMINATION DEADLINE

JULY 1, 2007

FOR MORE INFO: WWW.ACHMMM.ORG

ACHMM NATIONAL CONFERENCE

AUGUST 12-15, 2007

ARLINGTON, VA

FOR MORE INFO: WWW.ACHMMM.ORG

.....Great Turnout from page 3

re-use the tank.

Business Meeting

Minutes of the General Membership Business meeting held after the March 7 evening presentations are being posted on the chapter website. Topics discussed included filings to the Secretary of State for Incorporation, to the IRS for Tax Exempt Status, and to the national ACHMM office for an updated Charter, along with the 2007 operating plan, website web-host transition, and the next general membership meeting.



Wetlands Area – January 26, 2007

.....Update from page 5

R. Bates & Sons received delivery of some of the geocomposite material that will cover the landfill.

March 2007

March was a slow month for the project. This was due to the thick frost in the ground and very cold temperatures. Although work continued, it was performed by a smaller crew of workers all from R. Bates & Sons.

During the month of March, R. Bates & Son's continued and completed cutting down the LIT trenches to contract grade.

R. Bates & Sons has continued the installation of monitoring wells. All of the gas and water monitoring wells are now complete. Two of the six piezometers have been installed.

Other work performed in March was screening of onsite material for liner installation at a later date, continued contouring of the wetland creation area, and burying of boulders.

R. Bates & Sons built and delivered the boardwalks that will be used on the pathways in and around the wetlands.

CT ACHMM Chapter hosts Booth at the CT Emergency Management Symposium

Our chapter was represented among the over fifty exhibition booths and several hundred visitors who attended the Connecticut Emergency Management Symposium from throughout the northeast on May 1 in Cromwell, CT. The Symposium was sponsored by the Connecticut Conference of Municipalities.

Attendees and exhibitors included municipal officials, first responders, CT DEP's Spill Response and Radiation protection divisions, the CT Departments of Homeland Security and Public Health, Hartford and Yale New Haven hospital bioterrorism units and various police and fire departments.

The keynote address was given by the mayor of the city of Danvers, MA regarding the events and response to the chemical factory explosion in Danvers, MA last November. The Symposium was a great opportunity to increase the exposure of our CHMM credential and professional skills within the public and municipal sector.

Our thanks go to **Elsa Payne, Whyndam Abrams, Stuart Manley, Nick Zackeo** and **Gene Metti** who set up and manned the booth.



Whyndam Abrams has a serious discussion with a visitor to the CTACHMM booth.



Stuart Manley addresses interested CT Emergency Management Symposium attendees.

.....Iraq Safety from page 1

In January 06, ten students (8 of whom were Iraqi) attended a two day class on Safety and Health. The topic was a yawner to most laymen, "USAEUR 10 hr Construction Course". The Safety topics included:

Fall Protection, Excavation, Electrical and Power Tool Safety. The basic tenet is that there are proven methods to complete the work while maintaining a safe workplace and accidents are rare. All it takes is a little thought before beginning the project. Unfortunately, in Iraq, this idea is not common. Even in the U.S., (God Bless America) Safety is a word always referenced, but not usually discussed and not always practiced. For example, safety is not routinely discussed around the dinner table. (When I bring it up, my son usually falls asleep in his mashed potatoes.) So, last January, one of those students was provided with the tools, the promise of a certificate and the directive to go out and build a safety culture and may Allah have mercy on your soul. He took his mission seriously, because he cared.

Rizgar A. Mohammed, a.k.a. Dr. Rizgar, has aggressively pushed forward the noodle of safety in his life, on his projects, and in his community. A few weeks ago, I was finally able to shake his hand and thank him for his efforts in the field of safety and health. I was immediately struck by the smile and optimism that he displays. We only had short time to visit, so we immediately began to discuss the things necessary to help him continue to develop a self-sufficient Safety Culture. What impressed me the most was his efforts off the construction sites. He had been

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dialoguing with members of the Kurdish Provincial Government to adopt Safety and Health Requirements to protect all the workers. He wants to see an end to the number of accidents and deaths on all construction projects in his community, not just Corps projects.

I asked him to give some suggestions to improve the Safety on jobsites. He quickly answered that “We need to require a certain percentage of the contracts in Iraq to be dedicated to Safety. When safety isn’t put up front in the contract, the contractor may not dedicate sufficient resources.” The safety budget will be limited and contractor will purchase a lesser quality of safety equipment (scaffolding, hardhats and other PPE) or none at all. With the next breath, he immediately added “we need to have safety officers for each project site. These Safety Officers can be on a site every day to observe work practices and train the different crews each day when they show up for work.” He said that was his goal to have trained individuals dedicated to be safety officers on each job.

He explained that in addition to offering the on-site training, he wanted to formally present the 10-hr Construction Course to contractor’s representatives. He asked if I would approve his course and provide his students with signed certificates of achievement to students that he taught. We discussed the curriculum and some of the specifics. He began by using the materials from his class a year ago and added a few topics. It was easy to agree to his request since he had prepared so well. I told him that it’s a great start, and asked when would he begin his first class? He said that he already had one going and scheduled another for the middle of December. “Who do have for students and where did find them?” I asked. He said that he told some contractors at a Pre-Construction meeting that the contract required that they provide Safety Officers for their projects. Their responded that they would like to hire some and asked, “where can we find Safety Officers in Iraq?” He responded. “Not to worry, I’ll train them for you. You must hire people proficient in English with a technical Engineering or health degree”. To complete the deal he needed for me to approve the course and provide validation to his students for their efforts.

Last December in the Buhar Hotel, located in Dohuk in Kurdistan, Dr. Rizgar presented the 10-hr Construction Safety class to 15 Iraqi contractors. The topics were presented in PowerPoint combined with discussion and mini exercises to solve common problems that they will find on a project site. The subjects were presented in sessions that were limited to 45 minutes with a 10-15

minute break between sessions to ensure comprehension, avoid death by power point and to keep them alert. (be a “lert”, the world needs more “lerts”).

Excluding the breaks the total time in the sessions was over the 10 hours because Dr. Rizgar covered additional material to include: an introduction to OSHA, Stairs, Ladders, Hazards of Drunk Driving and my favorite, “Safety Starts With YOU.”

At the completion of the course the attendees received the contact information of each attendee. This is the initial step to building a Safety Community. They were also provided CDs with all sorts of valuable Safety and Health information in both Arabic and English. He also presented a Certificate of Completion, signed by *moi*.

My last tasking was to design and complete a certificate, sign it and forward it to Mosul for the Commander’s signature. He had to send them up to Dohuk. A few things had to be precisely coordinated to have them there in time. These individuals were the first Safety Officers on construction projects in Kurdistan. They are expected to go forth and be the initiators of a safety culture with their companies and on their projects. They have many uphill battles in their future.

In addition to these 15 newly trained Safety Officers, Dr. Rizgar has seven other students in a class that is meeting once a week for about two hours. The information is the same, but he is adding field trips to projects to show the hazards first hand. If I was the contractor on that site I would have a little bit of angst. Imagine a team of 8 Safety Evangelists “here to help”.

So by the end of January, there were 22 new safety representatives. I asked Rizgar if he thinks that some of his students be teachers of safety to others. He said that there were three or four that have asked many additional questions and were spending a lot of time reading the manual. “Teach a man to fish.....”

YOU TOO CAN GET PUBLISHED IN THIS NEWSLETTER....

- WRITE ABOUT A TRIP OR SPECIAL EVENT YOU ATTENDED
- INTERVIEW A COLLEAGUE
- CRITIQUE A NEW PRODUCT

NEWSLETTER SUBMISSION DEADLINES FOR 2007

SUMMER ISSUE: JULY 20

PLEASE SEND NEWSLETTER SUBMISSIONS TO ELSA PAYNE AT tpayne@snet.net

Editorial

Elsa Payne

I recently received one of those mass-distribution chain emails that call everyone to refrain from buying gasoline on May 15 to express displeasure with current gasoline prices. The message claims that if every internet user (estimated at 73 million) complies, the industry will be deprived of more than \$2 billion. Apparently there was a similar event in 1997 that resulted in an immediate 30 cents per gallon reduction in the price of gasoline.

I don't know anyone besides oil producers who may be happy about the current gasoline prices. But I'm not sure that not buying gasoline for one day makes any real impact on the industry that is more than temporary. I'm sure the 30 cents reduction in 1997 was only temporary. Those that did not fill up on the "gas out" day, filled up on another day, although perhaps with lower priced fuel. I suspect that by the time that they needed the next tankful, the price had recovered.

So how else can we protest the high cost of gasoline? I suggest that on May 15, everyone should refrain from driving, especially alone. Using less gasoline is the only way to keep the money in your pocket instead of the oil producers. Think about carpooling, using mass transit, walking, or riding a bicycle on May 15....and then make it a habit.

New Homeland Security Requirements Likely to Affect RMP Regulated Facilities

Paul Simonetta, CHMM

Vice President

Triton Environmental, Inc.

The Department of Homeland Security (DHS) has recently published an interim final rule that will require facilities with certain hazardous materials above specified thresholds to complete a screening process to determine whether they are at high-risk for terrorist attacks. Upon receipt and review of information collected from the screening process, DHS will require facilities determined to be at high-risk to develop and implement security plans. The new program is titled "Chemical Facility Anti-Terrorism Standards" (6 CFR Part 27).

DHS intends to complete this process by first addressing facilities with a perceived higher risk (tiered approach). Companies required to complete the screening process in the first part of the program (Phase 1) will likely include at least facilities subject to the EPA's Risk Management Program (RMP) requirements. Subsequently, facilities considered with lower risk (Phase 2 and 3) would be evaluated following the higher risk facilities.

At this time, a schedule for finalizing and implementing the interim final rule is not known.