



CT ACHMM NEWSLETTER

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President's Message

Matthew J. Twerdy
CT ACHMM President



Greetings everyone! I hope you are all having an exceptional year. I am pleased to report that the CTACHMM is having another successful year!

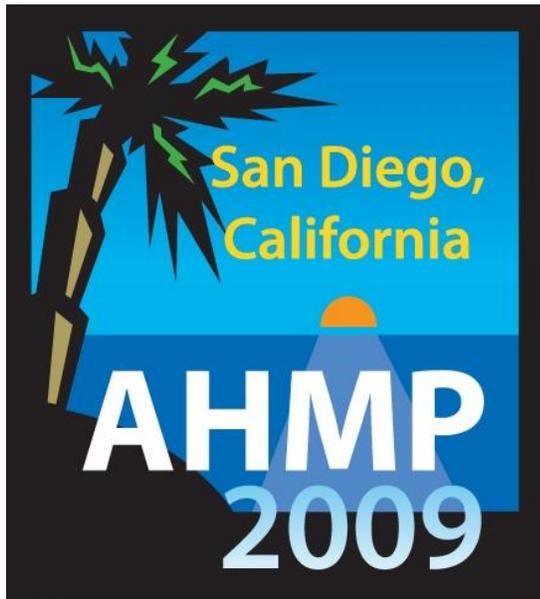
We recently had another well-attended General Membership Meeting at the Clean Harbors facility in Bristol, Connecticut on September 17th. The site visit included a demonstration by Clean Harbors staff of their internet-based online services system, which provides customers with instant access to key records related to transactions, shipment tracking and waste profiles. Clean Harbors customers can monitor every aspect of their waste streams and maintain drum inventory with this online system. Clean Harbors staff also gave us a tour of the Bristol facility. The Bristol facility offers chemical treatment of inorganic based non-hazardous and characteristic hazardous wastes, and stabilization/fixation of sludge/solids intended for land disposal. We appreciate the time Clean Harbors staff took to talk with us and organize this site visit.

At the end of August, I had a chance to attend the 2009 Alliance of Hazardous Materials Professionals (AHMP) National Conference in San Diego. It was my first national AHMP Conference event, and it was



an excellent conference. AHMP reported that there were as many AHMP members and stakeholders attending as were in Minneapolis last year. The conference theme was, "EHS&S — Steering a Course for Sustainability." The Conference included discussions regarding the most pressing issues facing EHS&S professionals today, presentations from top keynote speakers about the latest EHS&S strategies, and presentations from industry leaders about the newest EHS&S regulations. One of the most interesting keynote speakers was Michael D. Brown, Former Director, Federal Emergency Management Agency (FEMA). During his speech he focused on three primary themes: Communicating in a Crisis, Making Things Work When All the Wires are Cut, and Homeland Insecurity.

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He also discussed the role of AHMP members in preparing for and responding to natural and manmade disasters, including acts of terrorism; recognizing and acting on political, natural and terrorist vulnerabilities in the management of hazardous materials; working with federal, state and local officials before a disaster strikes; and assuming a position of leadership in community emergency preparedness planning. Following his speech, he fielded questions on Hurricane Katrina and other disaster preparation/management topics. He told the audience, before the question-and-answer period, to have at it. "I want no bashfulness," he said. But he got a pretty warm and gracious reception. One member thanked him for his service.



Lastly, I want to mention that serving our Connecticut Chapter offers a great look at the operation of a quality organization and has provided me with a good understanding of the workings of a non-profit organization. It is an honor and a pleasure to serve CTACHMM as President. I'm looking forward to seeing you at future meetings, and please don't hesitate to speak with me if you would like to participate further in the organization.

Thank you for your dedication to CTACHMM and for making the Connecticut Chapter a leader among all chapters nationally!

Matt



Using Databases for Managing Regulatory Compliance Requirements

Whyndam Abrams, CHMM

CHMMs involved in the environmental, health and safety field are challenged in managing the myriad of regulatory, compliance, and operating requirements in maintaining such programs. EPA, OSHA, DEP regulations, discharge permits, and local ordinances all have various sampling, testing, reporting, and recordkeeping requirements, as do maintenance of processes, equipment and buildings for safe and compliant operations. The requirements can range from one-time, continuous, daily, monthly, quarterly, to annual and biennial, and permit renewals that have a 5-year or longer cycle.

Among the many tasks involved are compliance sampling per individual or General Permits, submitting monitoring reports, tank inspections for SPCC programs and UST regulations, SPCC Plan reviews, Title V annual compliance and semi-annual monitoring reports, initial and periodic New Source Performance Standard reports to EPA, Continuous Emission Monitoring reports, EPCRA hazardous materials inventory submittals, RCRA biennial hazardous waste reports, PCB annual documents, annual OSHA-required training, respirator fit tests, audiometric examinations, DOT hazardous materials registrations, and many others.

This article will discuss the methods presently generally in use within most programs, the desired database system to replace these methods, issues with database vendor selection, and the technical specifications of an ideal database system.

Organizations presently not using a centralized database regulatory compliance system may use a variety of methods, even within the same department, to track due dates, prepare reports for upper management and manage regulatory information. These

systems are typically developed and managed by the users, and are essentially reminder systems based on due date. These may range from a Word table listing due dates, Excel spreadsheets that can be sorted by tasks, responsible party, and due date, and Access databases that use simple queries to generate reports on tasks that are due within certain time frames. Completion of tasks may or may not be recorded, and the information generally stays at the user level. Any e-mail notifications have to be done manually, and historical reports of activities are usually not available.

Using a centralized Regulatory Compliance database allows all scheduling functions, assignment of task responsibilities, e-mail notifications, generation of look-ahead and historical activities reports, ad hoc reporting capability, linking of shared and prerequisite tasks, and linking to regulatory citations and documentations to be managed within one system, for use by responsible parties, supervisors and managers, and upper management. Essential components of the system include multiple views of tasks, such as by due date, by responsible party, unit, or department, automated e-mail notifications with increased distribution for due and overdue tasks, calendar function including monthly task summaries, varying levels of permissions from read only, read and task completion documentation, new and edit task function, and system administrator. Tracking of incidents such as spills, injuries, or regulatory inspection findings can be incorporated within the system as well. The database should allow for data loading from existing spreadsheet or database tables, and automated data updates from personnel tables or building and equipment lists, which are constantly changing. Forms, preferably with drop down menus, should be provided for ease of entry of new tasks. Links to regulations or documentation such as permits should be available. Other useful functions are automated status or historical reports available to upper management, Help menus, and tracking of entry information. A training

program should be available for new users.

It is assumed most programs will use an outside vendor to develop this type of database, or purchase a vendor's existing compliance software suite. Issues to consider when selecting a vendor include vendor's ability to address the critical requirements of the compliance program, the ease of implementation and use of the system, level of vendor support available, initial and on-going support cost, and strength of references. Decisions have to be made between using a local or national company, selecting a "software" company or an environmental compliance consultant with software development capability, using a vendor with experience within one's industrial sector, and using off-the-shelf compliance software or having a custom built system. Users may decide to use a vendor who has worked for them before with EHS programs, and is familiar with their processes and people.

Technical issues include choosing full web-based, VPN (Virtual Private Network) or local intranet hosted. An application format (such as Microsoft ASP) for the graphic user interface needs to be selected, as well as layout and

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menu options. Users have to decide whether to self-host the database on their own server, or use the vendor's server. If it is decided to use vendor hosting, it is recommended that the vendor provide dedicated customer database versus having your information in a shared database. If a web-based application is chosen, browser capability (Internet Explorer vs. Mozilla or Netscape), Central Authentication Service sign-on capability, firewall security and/or SSL encryption, and back-up services issues need to be considered.

A robust Regulatory Compliance database should provide the framework for managing all EHS regulatory requirements and can be used as part of an overall Environmental Management System (EMS) for continual improvement of EHS programs.



Can you guess where this traveler went on her summer vacation?

Send your answers to
tpayne@snet.net

First correct answer will win a special prize.

Connecticut Department of Environmental Protection DEP Fees for Recreational Activities and Commercial Licenses and Permits Increase as of October 1 Under New State Budget

The new state budget increases fees charged by state agencies for various programs and services effective October 1, 2009. These increases apply to many of the fees charged by the Department of Environmental Protection (DEP) for outdoor recreational activities as well as for licenses and permits necessary for environmental protection. While there are some exceptions, in general the new budget requires DEP to increase fees in the following manner:

- _ Fees less than \$150 will be doubled
- _ Fees \$150 to \$1000 will increase by 25%
- _ Fees greater than \$1000 will increase by \$250

Following is a brief look at how fees charged by DEP will change as a result of these requirements. Please note that information concerning fees on the agency's web site, and on various forms and applications, is currently being updated and may not yet reflect the new fee structure. DEP will also update information on fees if actions of the General Assembly result in any additional changes.

Recreational fees and Sportsmen Licenses

Generally speaking, fees for recreational activities will double. This includes state park fees for parking, reserving a campsite, rental of facilities and admission to state park museums; fees for boating certificates; and the cost of hunting and fishing licenses.

Sportsmen licenses and permits are sold through authorized agents or [on-line](#).

Campground reservations for all state campgrounds are available on-line at [Reserve America](#). Other recreational fees are collected at the point of entry or through existing program offices. On and after October 1, 2009 all of these systems will reflect the new fee for sportsmen licenses and recreational fees.

For further information concerning fees for recreational activities and sportsmen licenses, please contact:

- _ State Parks: Parking Fees, Museum Fees, Facility Rentals – 860-424-3200
- _ Camping Fees – 860-424-3200
- _ Hunting Licenses – 860-424-3011
- _ Fishing Licenses – Inland – 860-424-3474
- _ Fishing Licenses – Marine – 860-434-6043
- _ Boating Certificates – 860-434-8638

Environmental Quality permitting, licensing and annual registration and compliance fees

There are permit, license, application, registration and annual fees associated with many activities the DEP regulates to assure environmental protection. These fees vary depending on the nature of the activity, the degree of review and oversight necessary. Many of these fees have been increased by the budget based on the formula described above, although others have not. All application materials will be updated to reflect the new fees. In addition, some professional and occupational licenses have been affected by the fee increase.

Questions related to specific permit or licensing programs should be directed to those [programs](#).

For further information concerning the DEP fee structure for permitting, licensing and annual registration and compliance fees, please contact the Permit Assistance Office at 860-424-3003.

Source: <http://www.ct.gov/dep/cwp/>