



Proper Training is Essential for HAZMAT Compliance

Understandably, training is the most important aspect of success in any job. However, the magnitude of importance is compounded when dealing with hazardous materials and their associated dangers as evidenced by potential fines, including civil fines, for those persons and businesses subject to training requirements.

More than one-third of the Department of Transportation's enforcement actions pertaining to violations of the hazardous materials transportation regulations involve the failure of hazmat employers to provide training or maintain test records. In most cases violations are attributed to failure to provide function specific training.

As a reminder, each hazmat employee must receive general awareness, function specific, and relevant safety training before working unsupervised and within 90 days of employment. Recurrent training is required at a minimum of every three years.

Note that everyone exposed to the hazards of hazardous materials should receive general awareness training. The appropriate function specific and safety training should be given to each hazmat employee based upon the activities required to perform their job. Therefore, the function specific and safety training that is appropriate to each job position should be determined. For example, the safety training provided a driver who unloads cargo tanks might be quite different from the safety training given transportation workers who handle infectious medical wastes.

If you have any questions regarding specific training requirements or their applicability, please feel free to contact RCS, Inc. at (614) 552-8530.

RCS Provides Thanksgiving Meal for Local Families

Remember how great it was when you were a child to wake up on Thanksgiving morning to the smell of a freshly baked pumpkin pie, and a turkey cooking in the oven? Remember eating leftovers for days after the holiday was over? Remember having the whole family together for that one special meal?

Ten local families were able to create these same memories this past Thanksgiving thanks to RCS.

John Howard of St. Matthew's Catholic Church in Gahanna provided the names of special families that might not have been able to celebrate the holiday otherwise. RCS purchased every item they would need for the complete holiday meal, including food for breakfast, lunch, and dinner on Thanksgiving, as well as leftovers the next day.

This event was meaningful and special for the RCS associates as well as the families that were served.

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EPA News

Did your facility store Environmental Hazardous Substances (EHSs) at quantities that meet or exceed minimum thresholds at any one time during 2002?

If so you are required to submit The Community Right to Know (RTK) survey for your facility under 40 CFR 355. This survey is an annual inventory of environmental hazardous substances, which are stored, produced, or used at a facility. The Community Right to Know Survey is required by state and federal laws and provides information to the public and to emergency responders such as police and fire departments. It is also used to supplement other regulatory programs within the states and to facilitate proper planning for a response to an emergency at a facility, which may threaten the surrounding community or environment.

The first step in determining if your facility must submit the RTK survey is to define the governing body for the facility. RTK reporting is governed federally by the Environmental Protection Agency (EPA), but may be enforced by state environmental governments. Refer to the federal or state issued chemical lists and compare identified substances, and their threshold quantities, with those stored at your facility. If your facility had, at any one time in 2002, a quantity exceeding the threshold limits, you must submit a RTK survey. The deadline for submittal of Right to Know surveys is **March 1, 2003**.

Public Relations

Public relations is the ongoing effort to create and maintain a positive image of your organization in the eyes of the public. It is important that the public thinks about you in a positive way because all organizations need to be trusted and supported by their target group, constituency and/or members.

People who use your services will expect you to be helpful, friendly, efficient and professional. Most people will contact you by visiting your office or by phoning you. This means that the phone and office are two of the most important areas where you should create a positive image.

If your interaction with the public is bad, it can have a devastating effect on your organization's reputation. It is much easier to build a good public relations culture in your organization, than it is to reverse a bad image once it exists.

Every person in your organization should understand the importance of good public relations and know what role they should play in promoting a positive image.

For more information, please visit the following website:
<http://www.etu.org.za/toolbox/docs/admin/webpr.html>

Child Safety Seat Registration

The US Department of Transportation's National Highway Traffic Safety Administration (NHTSA) recently reported that nine times more child safety seats are now being registered than were a decade ago. Expanded registration of child safety seats makes it easier to notify owners of safety-related recalls, such as faulty handles or harnesses, the NHTSA report indicates.

The NHTSA regulation requires child seat manufacturers to provide postage paid cards to consumers. However, it does not permit marketing material or questions to be included on these cards.

Consumers who are unable to locate their child safety seat registration cards may register their seats through NHTSA. They can obtain a registration form by visiting the NHTSA website: www.nhtsa.dot.gov. (First select "Recalls," and then "Child Safety Seat Recalls.") Alternatively, a form can be ordered by calling NHTSA's Auto Safety Hotline: 888-327-4236. Consumers should mail the signed form to NHTSA, which will forward it to the manufacturer for registration.

NHTSA's report, used to evaluate the impact of the 1993 regulation on child safety seat registration, has been published in the Federal Register and can also be viewed on the NHTSA website at: <http://www.nhtsa.dot.gov/cars/rules/regrev/evaluate/809518.html>.

Lithium Battery Regulations Changed

The International Civil Aviation Organization's Technical Instructions for the Safe Transport of Dangerous Goods (ICAO) and the International Maritime Dangerous Goods Code (IMDG) have implemented changes to the regulations for transportation of Lithium Batteries. The Research and Special Programs Administration (RSPA), the organization responsible for Hazardous Materials Regulations in the United States, has proposed changes to the current regulations, regarding Lithium Batteries, to be consistent with IATA and IMDG regulations.

The regulation changes are a result of incidents involving Lithium Batteries that caused damage and/or injury during transportation activities. On April 28, 1999, at Los Angeles International Airport a shipment of two pallets of Lithium Batteries that were exempted from the HMR caught fire and burned after being off-loaded from an airliner. While the pallets were being handled by cargo handling personnel, the packages were damaged, which caused a subsequent fire. The fire was fought by airliner personnel with fire extinguishers and hoses, and each time the fire was thought to be extinguished, it flared up again. The two pallets involved in the fire contained 120,000 non-rechargeable Lithium Batteries. Because of exceptions to the HMR for Lithium Batteries, the packages were not required to be tested, marked, labeled, or be accompanied by shipping papers. An additional incident occurred on November 7, 2000, involving Lithium Sulfur Dioxide batteries. In this instance, a battery short-circuited causing small fire and rupture of the battery. The battery burned through its inner packaging and charred an adjoining package.

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Changes in Requirements for Tracking Shipments

As a result of 9-11, there has been an increase in the precautions taken to track shipments of all type. Effective February 1, 2003, U.S. Customs will implement the new 24-hour vessel manifest rule. This rule requires electronic recording of the container seal data, consignee and shipper information for ocean container freight of foreign origin with a destination in the United States. This data must be electronically transmitted to U.S. Customs 24 hours BEFORE the freight is initially loaded on ship in the foreign port. Any changes to the documentation accompanying the container will likely result in a delay at port of discharge. These new rules may cause costly delays at port of entry if the shipper and / or carrier has not anticipated these changes. For companies that are still using a manual material tracking system, this will require an upgrade to an electronically compatible system.

OSHA NEWS: Ergonomics

OSHA aims to increase awareness of ergonomics issues in 2003 through investigation and inspection of industries and employers with known high injury and illness rates related to ergonomic hazards. OSHA coordinates inspections with a legal strategy designed to target prosecutable ergonomic violations. Serious ergonomics hazards will be addressed using Section 5(a)(1) of the OSH Act often referred to as the General Duty Clause. The General Duty Clause describes the employer's obligation to "furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees." This clause from the OSH Act is utilized to cite serious hazards where no specific OSHA standard exists to address the hazard, as is the case with ergonomic stressors.

There are several states that operate their own occupational safety and health programs, and some of them have adopted ergonomic standards, which are enforceable. If you live in one of a State Plan States, you should contact that program administrator for further information.

When OSHA uses the General Duty Clause to cite an employer, OSHA must demonstrate that:

1. The employer failed to keep the workplace free of a hazard to which employees were exposed.
2. The hazard was causing or likely to cause death or serious physical harm.
3. The hazard was recognized.
4. A feasible means of abatement for that hazard exists.

If your facility poses ergonomic hazards to employees, an action plan should be formulated to effectively eliminate injury and illness relating to ergonomic stressors. One recommendation is to analyze your OSHA 300 logs and determine areas of your facility where injuries take place and perform a hazard assessment of the area. Identify safeguards in place to prevent injuries from occurring and determine if additional measures are to be taken to eliminate future ergonomic issues.



A Note From the President

"Tentative efforts lead to tentative outcomes. Therefore, give yourself fully to your endeavors. Decide to construct your character through excellent actions and determine to pay the price for a worthy goal. The trials you encounter will introduce you to your strengths. Remain steadfast... and one day you will build something that endures; something worthy of your potential."

Epictetus, Roman Teacher and Philosopher 55-135 A.D.

What is Quality?

Quality according to Webster's New World Dictionary: **1: a:** peculiar and essential character > **2: a:** degree of excellence > **b:** superiority in kind > **3: a:** social status: RANK

RCS was founded in 1992, since its inception quality is not only an internal focus as a group of companies it is what we are, what we do and is the greatest contribution we can we can offer.

Quality is the result of caring more, risking more, dreaming more, and expecting more than others think is possible. It is the commitment to high quality performance that produces the outstanding results of lasting value. Quality is believing in continuous improvement and never being satisfied with anything being less than it can be. Quality is a way of life, not just some written plan/program that one needs to follow in order to keep one's job. When quality is adopted into the core being of the individual the group will not fail when given productive objectives.

In the following issues, I will relate some of the philosophies that have shaped my vision of an effective quality model. Please keep in mind that this is my vision and in no way tries to reflect the end all be all for all business applications. For the sake of simplicity and continuity the articles will be issued into three periods:

1. The early Americans who took the messages of quality to the Japanese (early 1950s)
2. The Japanese response to the quality initiative (late 1950s onwards)
3. The new American and European wave concentrating on Quality Awareness (1970s - 80s).

The Quality "Gurus" included in this series of articles cover the historical period from World War II. Their emergence as experts largely represents responses to changes in the American, Japanese and European markets and the need to adapt to survive. They cover both the developments of philosophy and tools used to achieve a standard of quality. These standards include tools to control design and production offered by Shingo, Ishikawa and Taguchi. Also presented are management tools, such as the Zero Defect approach of Philip Crosby (my foray into this existence), and the concepts of company wide and total quality associated with Ishikawa and Feigenbaum.

Part One: The Early Americans

The Americans were primarily responsible for making it possible for the Japanese to take on the role of an economic world power. They led the way for Japan to write the book on the success of the quality business model.

This transformation was associated with the introduction of statistical quality control into Japan by the US Army over the period 1946 to 1950 and the work of three key American Quality Gurus in the early 1950s. These were:

W Edwards Deming
Joseph M Juran
Armand V Feigenbaum

A handwritten signature in black ink that reads "J. Anthony Daniels".

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Lithium Battery Regulations Changed

Because of these incidents, IATA regulations have been revised in regards to Special Provisions for Lithium Batteries. Special Provision A45, under IATA, now states that some Lithium cells and batteries offered for transport are not subject to other provisions of IATA regulations. Batteries excepted from the regulations must conform to revised Lithium quantity restrictions, be tested and approved under UN Testing Criteria, and be packaged to prevent short-circuits. Packages containing more than 24 lithium cells or 12 lithium batteries must be marked, be accompanied by a document indicating that the package contains lithium batteries, and is capable of withstanding a 1.2 meter drop test. RSPA has proposed to revise the Department of Transportation hazardous materials regulations to reflect the changes above.

The regulation revisions identified above will serve to increase safety and awareness of the potential dangers of lithium batteries in transportation. It is recommended that you or your organization analyze lithium battery products to determine if these regulation changes will apply to shipments of your product. Evaluate changes that will have to be implemented to provide for a seamless transition when lithium battery regulations become effective.

PERSONAL PAGE

Buckeyes Conclude Miraculous Season

Anything less than a double-overtime contest between the Ohio State Buckeyes and Miami Hurricanes in the College Football National Title Fiesta Bowl game would not have fit the script composed by this year's Buckeyes team. In a stunning finish to a perfect season, the underdog Buckeyes shocked every college football fan outside of Columbus, Ohio by snapping the Hurricane's 34-game winning streak. Being the first Division 1-A championship decided in overtime has already led some media to call this game one of the most, if not *the* most, thrilling national championship game ever. Ohio State continued its strong defensive play to disrupt the potent Miami offense and force an uncharacteristic five turnovers en route to a 31-24 victory and school's first National Title in 34 years.

Did you know?

The failure of a Montana employer to protect employees working on a conveyor system has resulted in \$169,000 in proposed fines by the Occupational Safety and Health Administration. OSHA's area office issued one willful, eight serious, two repeat, and one failure-to-correct citation following an investigation into a fatal accident at the plant.

The Montana company was cited for one willful violation for equipment lock out hazards, including failure to de-energize equipment before employees worked on it, not locking equipment out of service and not having authorized employees perform machinery lock outs. A \$70,000 fine is proposed for this violation.

OSHA also found two alleged repeat violations for failure to protect employees from hazardous parts on conveyors and unguarded chains and sprockets and assessed penalties of \$37,500 for those violations.

Eight alleged serious violations address the company's failure to:

- provide emergency stops on conveyors and alarms for conveyors that start automatically;
- provide fall protection for employees working above dangerous equipment;
- provide identifiable locks used for lockouts along with lockout training;
- verify that equipment was de-energized before working on it;
- provide guarded projecting shaft ends, belts and pulleys;
- and using compressed air for cleaning purposes in excess of safe pressure.

The penalty for the serious violations totaled \$31,500.

A total of \$30,000 in penalties was proposed for the company's failure to correct a previous citation that required the company to prepare written machinery lockout procedures.

A fatal injury may seem unlikely in many workplaces. However, not complying with essential regulations, such as lockout tagout procedures, may result in serious injury or death. With the start of a new year, it is a good time to review vital procedures and workplace standards to ensure compliance with health and safety regulations. It is always wiser to be preventative rather than reactive when it comes to the health and safety of your employees.

Contact RCS today for additional information!

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