



THE SSE ELUCIDATOR

"Elucidate: to give clarity through explanation and analysis."

ASK FIRST CAMPAIGN

Not long ago, it was common practice to dispose of many laboratory wastes down the drain. Today, the indiscriminate disposal to the sanitary sewer of laboratory chemicals is not acceptable.

Most laboratory drain systems are connected to sanitary sewer systems, and their effluent will eventually go to a sewage treatment plant. Some chemicals can interfere with the proper functioning of sewage treatment facilities or affect particularly sensitive bodies of water into which the chemical is discharged. Inappropriate disposal of certain chemicals into the sanitary sewer system may create a variety of hazards including the following:

- ◆ Fire and/or explosion hazards within the drain system
- ◆ Inadvertent mixing, within the drain system, of incompatible chemicals from different laboratories
- ◆ Corrosion of drainpipes
- ◆ Chemical exposure hazards to plumbers
- ◆ Escape of volatile, toxic and/or malodorous substances
- ◆ Biocidal action on microorganisms that are necessary for the normal and effective operation of waste water treatment plants
- ◆ Addition of unacceptable amounts of toxic substances (e.g., certain heavy metals) to sewage sludge and effluent
- ◆ Addition of solid or viscous pollutants resulting in obstruction to the flow of the sewage treatment system

INSIDE THIS ISSUE

Ask First Campaign	1
Hazardous Waste Generator Regulations	3
Environmental Management Systems and the National Environmental Policy Act	4
Winter Driving Safety	6
Announcements	7

Understand the hazards and toxicity of the materials you work with by consulting your local Environmental Management Office before indiscriminate disposal of laboratory chemicals.





“Laboratory solutions are prohibited from sink disposal if they are defined hazardous by 40 CFR 261”

ASK FIRST CAMPAIGN

There are regulatory implications to any drain disposal of hazardous materials. The management of hazardous waste is regulated at the federal level by the United States Environmental Protection Agency (EPA) under the authority of the Resource Conservation and Recovery Act (RCRA). While RCRA regulations do exempt mixtures of hazardous waste and domestic sewage from hazardous waste regulation, local regulations of drain disposal are often more restrictive.

For example, Fort Detrick Regulation 200-7 prohibits disposal to the sanitary sewer all laboratory solutions that are defined as hazardous by Title 40, Code of Federal Regulations, Part 261 (40 CFR 261). This regulation also prohibits the drain disposal of formalin and requires all “biological contaminated materials” from Biosafety Level 1 through Biosafety Level 4 facilities to be decontaminated before disposal to the wastewater collection system and treatment facility.

While biologically benign solutions such as those containing sugars and salts and no other hazardous material may be disposed of down the sink drain, if there is any question, it



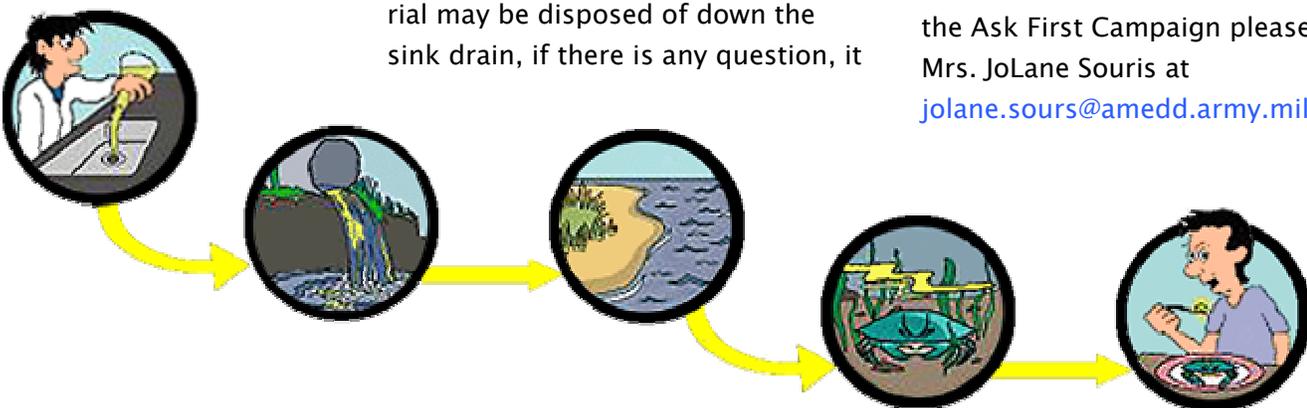
Display “Ask First” warning stickers near laboratory sinks to prevent discharge violations

is essential to “Ask First” before taking action.

The Fort Detrick USAG Environmental Management Office has developed a new “Ask First Campaign” to remind laboratory staff to contact the Environmental Management Office before disposing of any questionable substance down the laboratory drain.

New stickers are being distributed to post laboratories, providing them with the appropriate number to call with specific questions about whether a chemical is suitable for sink disposal. Stickers should be placed at eye level near laboratory sinks. Remember to always “Ask First.”

If you are not located on Fort Detrick and would like more information on the Ask First Campaign please contact Mrs. JoLane Souris at jolane.sours@amedd.army.mil.



HAZARDOUS WASTE GENERATOR REGULATIONS

The USEPA has posted a web-based guidance document titled, *"Hazardous Waste Generator Regulations: A User-Friendly Reference Document"* to provide assistance in locating and understanding the current Resource Conservation and Recovery Act (RCRA) hazardous waste generator regulatory "requirements." The guidance organizes the requirements by hazardous waste generator classes:

- ◆ Conditionally Exempt Small Quantity Generators
- ◆ Small Quantity Generators
- ◆ Large Quantity Generators
- ◆ Miscellaneous Waste Sources

A table provided in the guide, summarizes regulatory requirements for each class of generator status. Throughout the guide are hyperlinks to the actual regulatory text, relevant USEPA letters, frequently asked questions and guidance documents provided to the public through the years to help hazardous waste generators interpret the existing hazardous waste regulations.

The document may be found at: http://www.epa.gov/epaoswer/osw/gen_trans/tool.pdf#.



The objective of the guide is to consolidate and streamline the generator regulatory requirements into a helpful reference tool that features a user-

friendly format. This document does not change any of the existing generator regulatory requirements. The guide is designed to be web-based, allowing the user to maximize its usefulness with links to regulations and other resources.

Note that this guide is not a substitute for the requirements contained in the Code of Federal Regulations (CFR). The guide is to be used as a reference. In addition, the guide addresses only federal regulations, and many States may have their own set of regulations that apply, possibly more stringent than the federal program.

The following website will help determine if the state regulatory program is different from the federal program:

<http://www.epa.gov/epaswer/osw/stateweb.htm>.



The USEPA will update this reference document periodically to remain up-to-date with the hazardous waste generator regulatory requirements.

Please contact EPA's Office of Solid Waste with questions or comments concerning the subject document:

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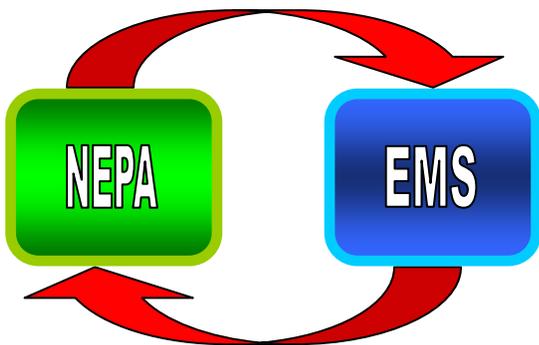


EMS & NEPA

The Council on Environmental Quality (CEQ) has released the draft guide, *Aligning the Complementary Processes of Environmental Management Systems (EMS) and the National Environmental Policy Act (NEPA)* [71 FR 40520, July 17, 2006]. The draft guide may be found at: http://ceq.eh.doe.gov/ntf/Proposed_NEPA_EMS_Guide_for_FR.pdf.

The guide aims to help federal agencies:

1. Recognize the complementary relationship of EMS and NEPA;
2. Align EMS elements with the NEPA statement of policy in Section 101 with the analysis and decision processes of Section 102; and
3. Incorporate the EMS approach into the NEPA process when establishing, implementing and maintaining their EMS.



The National Environmental Policy Act of 1969 (NEPA) requires that prior to taking any “major” or “significant” action that the agency must consider the potential environmental impacts of that action, and of alternatives. These requirements are known as the “NEPA process.” Within that process, impacts of an action (and alternatives) are predicted and mitigation measures are identified prior to making a

decision and taking action. The analyses are documented and made available to the public in NEPA environmental documents such as Environmental Assessments (EAs) and Environmental Impact Statements (EISs).

An Environmental Management System (EMS) for a federal agency or organization is a structure of procedures and policies used to identify, evaluate, and manage environmental impacts. An EMS for a Federal agency is intended to ensure that environmental issues are considered in day-to-day decision-making and long-term planning processes. EMS is continually seeking improvement of environmental performance.

“The guide created by the CEQ should be used by agencies in their efforts to implement complementary EMS and NEPA processes”

The guide created by the CEQ should be used by agencies in their efforts to implement complementary EMS and NEPA processes. Examples given in the guide include:

- ◆ Incorporating the NEPA process or process milestones into EMS objectives and targets.
- ◆ Identifying the NEPA process as a key element of the EMS, thereby requiring various requirements of the NEPA process be incorporated into the appropriate elements of the EMS.
- ◆ Identifying NEPA expertise as a competency required for an agency’s practices.

EMS & NEPA

- ◆ Maintaining appropriate NEPA documents as EMS procedures and records.
- ◆ Incorporating NEPA impact analyses into the EMS aspects identification process.
- ◆ Considering EMS aspects in NEPA impact analyses.
- ◆ Incorporating mitigation commitments from the EIS record of decision (ROD) or EA finding of no significant impact (FONSI) into the EMS legal and other requirements, objectives and targets, environmental management program(s) and operational controls.
- ◆ Incorporating metrics for desired conditions into monitoring and measurement procedures.
- ◆ Encouraging EMS and NEPA practitioners to work together in developing EMS and NEPA procedures and processes.

The guide created by the CEQ outlines the commonalities between the EMS element's procedures or information requirements and the NEPA elements for the following categories:

- ◆ Policy
- ◆ Environmental Aspects
- ◆ Legal and Other Requirements
- ◆ Objectives, Targets, and Environmental Management Programs
- ◆ Resources, Roles, Responsibility and Authority
- ◆ Competence, Training and Awareness
- ◆ Communication
- ◆ Documentation
- ◆ Control of Documents



The NEPA practitioner will find the guide useful for the identification of information and procedures associated with EMS elements that may support the various phases of the NEPA review process and information requirements. For example, those who develop NEPA analyses for Federal actions may be called on to help characterize an agency's environmental aspects and impacts for their EMS. The EMS specialist will find the guide useful for identifying NEPA review procedures and analyses that can support the development or implementation of EMS procedures and processes.

Additional information may be found at:
<http://www.nepa.gov>.

Both NEPA practitioners and EMS specialists will find the guide useful for identifying information and procedures that can complement both elements.

WINTER DRIVING – BE PREPARED, BE SAFE!



To keep those emergency rooms less busy this winter, follow these tips for safe winter driving.

Be Prepared! What's the difference between an ordinary driver and an excellent one? An ordinary

driver reacts to the road conditions. An excellent driver anticipates severe weather and prepares to avoid crisis. Keeping your vehicle in good repair reduces your overall chances for accidents and mishaps. Make sure that the following components of your car are in good technical condition:

- ◆ Electrical system (battery, ignition and lights)
- ◆ Tires and brakes
- ◆ Exhaust and heating/cooling systems
- ◆ Windshield wipers

Keep a well stocked winter emergency kit in your vehicle. If you become stranded, having essential supplies can provide some comfort and safety. Recommended items include:

- ◆ Ice scraper, shovel, sand, tow rope and chain
- ◆ Booster cables, road flares, tool kit
- ◆ Flashlight, extra batteries and matches
- ◆ First aid kit and fire extinguisher
- ◆ Extra clothing and blankets
- ◆ Non-perishable energy foods
 - ~ Chocolate, granola bars and soup
 - ~ Instant coffee, juice and bottled water

Before you set out, check the current road conditions either online or through your local news channels. Keep your gas tank full to minimize condensation, and provide an extra margin of comfort

and safety in case of delays. Before driving, always clear snow and ice from all windows, lights and mirrors, as well as the hood and roof. After starting your vehicle, wait for the fog to clear from the interior of the windows so you will have good visibility all around.

*“Stay alert, slow down
and stay in control”*

On the Road There are three key elements that will keep you safe during winter road conditions: stay alert, slow down and stay in control. Drive with your low beams on and your cruise control off. Allow for extra driving time. Posted speed limits are for ideal driving conditions. Driving at reduced speeds is the best precaution a driver can take against accidents. Maintain a safe distance between you and the vehicle ahead. Leave room for maintenance vehicles and plows by staying at least 15 car lengths back and don't pass on the right. Watch out for shaded areas that may be covered in black ice and take special care when approaching bridges and overpasses. Don't be over confident with four-wheel drive because it will not allow you to brake any faster than an ordinary vehicle.

Sliding and Skidding In this situation, it's important not to panic. Regain control of your vehicle. Look where you want your vehicle to go and steer in that direction. Do not accelerate and if you are using automatic transmission try to immediately shift to neutral, if you are using manual transmission, declutch. Do not slam on the brakes, rather squeeze braking (or threshold braking) is more effective. Use a heel-



WINTER DRIVING – BE PREPARED, BE SAFE!

and-toe breaking method by keeping your heel on the floor and pressing the brake pedal firmly with your toes just short of locking up the wheels. Don't pump anti-lock brakes. The right way is to apply firm steady pressure to the brake pedal.

Stranded If you become stuck or stranded, again, don't panic. Stay with your vehicle for safety and warmth and wait for help to arrive. If you attempt to free your vehicle from the snow, exercise extreme caution. Dress warmly, shovel slowly and do not overexert yourself. In blizzard conditions, stay in

the car. Do not attempt to look for assistance unless help is visible within 100 yards. Turn on flashing lights and flares to attract attention. To conserve fuel, once an hour run the car engine for 10 minutes for warmth. Bundle up in a blanket for warmth, but do not fall asleep. Keep alert for traffic or rescuers. Don't stay in one position too long. To keep your blood circulating do some exercises—move arms and legs, clap your hands, etc. Monitor for any signs of frostbite or hypothermia.



UPCOMING COURSES AND SEMINARS

- Title:** Introduction to Mold and Mold Remediation Environmental and Public Health Professionals
- Location:** Web-based **Date:** Any Time
- Description:** Designed primarily for environmental and public health professionals, this web course contains information on mold prevention and remediation. It is based on EPA's voluntary guidance document "Mold Remediation in Schools and Commercial Buildings." The course covers such topics as mold growth, locating mold, remediation, and prevention. Each chapter concludes with a voluntary quiz to test your comprehension of the material covered.
- Web:** <http://www.epa.gov/mold/moldcourse/index.html>. For general information on mold, flooding, EPA mold brochures, and other mold and moisture control related resources see www.epa.gov/mold.

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- Title:** Historic Preservation Law and Section 106 Compliance
- Location:** Tampa, FL **Date:** 2/13/2007–2/15/2007
- Location:** Tucson, AZ **Date:** 4/17/2007–4/19/2007
- Description:** Emphasizing legal compliance with the National Historic Preservation Act, this course should be taken after taking "Introduction to Cultural Resource Management Laws and Regulations". Through the use of actual case studies, it addresses legislation and the process to meet the requirements of the law to help the student support their installation's mission. The course covers: communications with related oversight agencies (e.g., State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation); standards for rehabilitation; use of historic properties; defining historic fabric; maintenance and repair of historic buildings; archeological resources; Native American issues.
- Web:** For more information or to register, please go to <https://www.cecos.navy.mil>.

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Visit us at:

<http://mrmc-www.army.mil>

Reminder

*For all accidents, no matter how minor,
 specific forms documenting the incident must be submitted to your Safety Office.*

Military: DA Form 285-AB-4

Civilian: DOL Claims Forms CA-1 or CA-2

All employees requiring medical attention must visit your local Occupation Health Clinic as soon as possible post mishap.