

Employers Must Use New 2004 OSHA 300 Log Forms

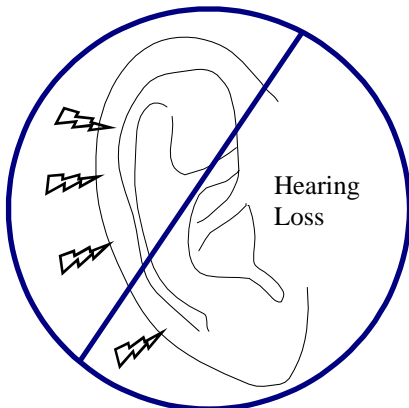
As of January 1, 2004, employers are *required* to use the updated versions of the OSHA 300 Log of Work-Related Injuries and Illnesses forms. If employers have recordkeeping software, you must upgrade to a version with the new forms.

Thanks to suggestions made from the public, these new forms are more user-friendly. OSHA has also revised these forms by adding an occupational hearing loss column (M)(5). Other changes include more descriptive and specific language to help employers fill out the forms with better accuracy.

The revisions to the forms will not change the employer's obligation to record work-related injuries or change the current way they are reported.

Keller's Industrial Safety Report, December 2003 outlines the following criteria, defined by OSHA, for recording a hearing loss on your OSHA 300 Log:

1. The employee experienced a standard threshold shift (STS) with



losses of 10 dB or more, relative to the most current baseline audiogram averaged at 2000, 3000, and 4000 Hz in one or both ears (according to the provisions of OSHA's noise standard at §1910.95).

2. The employee's overall hearing level is at 25 dB or more above audiometric zero averaged at 2000, 3000, and 4000 Hz in the affected ear.
3. The hearing loss is work-related. Work-relatedness should not be presumed in hearing loss cases of employees working in noisy environments, but rather should be determined on a case-by-case basis.

Whether hearing loss is work-related or an illness, employers must *record the hearing loss* in column (M)(5) on the 300 Log Form.

A few other changes that help make the forms easier to understand include:

- Column rearrangement: "Days away from work" column (K) now coming before the days "On the job transfer or restriction" column (L);
- More concise formulas used for calculating incidence rates;
- The "Classify the case" column stands out more. This helps employers understand that they should mark only one out of the four available columns;
- Changes on the 300A annual summary coincide with the 300 Log changes; and
- A new field added for NAICS classification information for the 300A form.

Finally, do you know the difference between the Form 300 and Form 300A? The Form 300 (Log of Work-Related

Injuries and Illnesses is the form used to record information regarding all work-related injuries and illnesses in their perspective categories. All information that is recorded on the Form 300 is then summarized at the end of the year and transferred onto Form 300A (Summary of Work Related Injuries and Illnesses). The Form 300A allows you to tally up the year's recordable cases in each category. Form 300A also requires you to identify your establishment, how many employees you have during the year on average, and the total hours worked by all employees. This form must be certified with a signature that it's accurate by a company executive.

Don't forget that Form 300A must be posted from February 1 to April 30 in a conspicuous place where all employees can notice it. If Form 300A is not posted in the facility, Cal/OSHA could give your facility a citation and an assessed penalty, even if there were no injuries or illnesses that occurred during the year.

Visit www.osha.gov for further information on

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Risk Group Update EPA Risk Management Program Facilities

For most, the count down has begun! Are you ready to update your Risk Management Program prevention programs, revalidate your technical studies, and re-submit your Risk Management Plan? EPA has prepared a new page on their web site "What's Next – RMP 2004". They are planning to provide industry with many guidance documents and tools to assist you with the five-year re-submittal process (www.yosemite.epa.gov/oswer/ceppoweb.nsf/content).

Here are some of the highlights from EPA's web page:

- Document: "A Checklist for Your Risk Management Plan (RMP) Re-Submission" due out February 2004
- Risk Management Program Amendments Final Rule due out March 2004
- Fact Sheet on Risk Management Program Amendments Final Rule due out March 2004 (immediately after final rule notification)
- Frequently Asked Questions regarding the 5-year RMP Update due out March 2004 (immediately after final rule notification)
- RMP*Submit 2004 Software due out March 2004 (immediately after final rule publication)
- Fact Sheet about new RMP*Submit 2004 Software due out March 2004 (immediately after final rule publication)
- Process Hazard Analysis Guidance due out June 2004
- RMP Web Registration Correction due out May 2004*

* *The RMP Web RC will be a web-based tool for RMP filers to use to correct their RMP submittal if they have updated and re-submitted their RMP prior to the availability of RMP*Submit 2004.*

California facilities should check with their local Certified Unified Program Agency (CUPA) to review their requirements for re-submitting the Risk Management Plan.

Generic Scope of Work

Tracer ES&T proposes the following tasks as a suggestion for conducting the Revalidation / Update for compliance with the PSM/RMP/CalARP Program regulations:

Tracer ES&Times
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1. Revalidate Process Hazard Analysis (Hazard and Operability (HAZOP) Study);
2. Revalidate Seismic Assessment;
3. Provide addendum to existing Off-Site Consequence Analysis (Hazard Assessment) to satisfy the new CalARP Program requirements;
4. Review existing prevention programs included in the PSM/RMP/CalARP Program documentation and update as necessary;
5. Update the *Risk Management Plan* document based on the CUPA guidance for CalARP submittal;
6. Include recommendations from the PSM/RMP Three-Year Compliance Audit.

If you require further assistance with the preparation of your five-year re-submittal, please contact Tracer ES&T. ✓

Canada's Environmental Emergency Plans

Effective November 18, 2003, the Environmental Emergency (E2) Regulations under Part 8 of the Canadian Environmental Protection Act (CEPA), 1999, requires anyone storing or using a listed substance above a specified threshold amount in containers whose capacity exceeds the specified quantities to notify Environment Canada and to prepare and implement an environmental emergency plan. The primary objective of requiring environmental emergency plans is to ensure that appropriate risk management measures are adopted and implemented to prevent, prepare for, respond to, and recover from environmental emergencies caused by the manufacture, storage and use of hazardous substances in Canada.

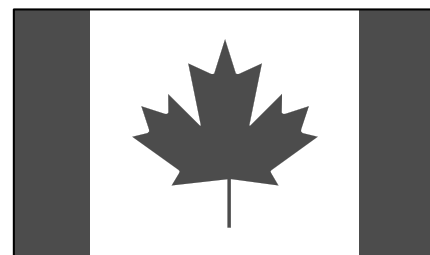
Facilities required to prepare and implement an environmental emergency plan are required to submit three types of notices/declarations to Environment Canada.

There are many similarities between the E2 Regulations and EPA/OSHA regulations. A list of regulated substances and threshold quantities has been developed. Currently, 174 substances are covered by the E2 Regulations, including anhydrous ammonia in excess of 9,000 pounds and chlorine in excess of 2,260 pounds. The complete list

of chemicals can be found in Schedule 1 of the E2 Regulations at www.ec.gc.ca/ee-ue/. Although environmental emergency reporting thresholds have not been established by the E2 Regulation, environmental emergencies are to be reported as soon as possible, followed by a written report.

Existing emergency plans required under other statutes or regulations are acceptable as long as the E2 Regulations primary objective are met. From "Implementation Guidelines for Part 8 of the Canadian Environmental Protection Act, 1999 - Environmental Emergency Plans," **prevention** is addressed by including key elements of process safety management. To meet the **preparedness** requirement, facilities must "identify potential risks, document alternative scenarios and potential consequences, develop environmental emergency plans to address the risks, train personnel to apply the environmental emergency plans, and regularly review and practice these strategies." **Response** includes all aspects of managing an emergency situation for the duration of the emergency, such as maintaining communication systems, alerting personnel, evacuation and accounting for personnel in the event of an evacuation. **Recovery** includes activities and programs to restore the facility and surrounding community following an environmental emergency to a safe and acceptable condition.

Facilities required to prepare and implement an environmental emergency plan are



required to submit three types of notices/declarations to Environment Canada. The first notice/declaration must identify the location, properties and quantity of the substance, and the size of the largest container. This must be filed within 90 days after the latter of: the date on which the E2 Regulations came into force (November 18, 2003) or the day the quantity or capacity of the largest container exceeded the threshold quantity. The second required notice/declaration states that an environmental emergency plan has been prepared. This must be filed within 6 months after the latter of: November 18, 2003; or the day on which a facility is first required to prepare an environmental emergency plan. The third notice/declaration must state that the environmental emergency plan has been implemented and tested. This must be filed with 12 months after the latter of: November 18, 2003 or the day on which a facility is first required to prepare an environmental emergency plan.

If your company has facilities in Canada, Tracer can assist facilities to comply with Canada's Environmental Emergency Regulations. ✓

Dear Tracer ES&T:

*When do I need to send in copies of my 300 Log and 300A summary to OSHA?
~Troubled with Injury & Illness Data Reporting*

Dear Troubled with Injury & Illness Data Reporting,

First of all, employers aren't required to send OSHA their copies of the 300 forms. A letter and a form requesting the particular information will be sent out to the employer if OSHA does want an establishment's injury and illness data. This occurs as part of the agency's annual data initiative in identifying workplaces with high incident rates for the site-specific targeted inspection program. "*Q&A*", *Keller's Industrial Safety Report, J.J. Keller & Associates, Inc., page 16, January 2004.* ✓

Recent Changes in Southern California Air Quality Rules

Air quality in California is regulated by the California Air Resources Board at the state level and by 35 air districts at the local level. The following summarizes the Southern California air quality rules that have changed since August 1, 2003. Tracer ES&T offers a comprehensive set of permitting services including New Source Review, RECLAIM, Title V, and air toxic risk assessments. If you need assistance with air quality permits, please contact Mr. Greg Hauser at (760) 744-9611 x106.

Antelope Valley Air Quality Management District (AVAQMD)

- No changes

Imperial County Air Pollution Control District (ICAPCD)

- No changes

Kern County Air Pollution Control District (KCAPCD)

- No changes

Mojave Desert Air Quality Management District (MDAQMD)

- No changes

San Diego County Air Pollution Control District (SDAPCD)

- Rule 60.1 - Limiting Potential to Emit at Small Sources (Adopted 8/13/2003)
- Rule 60.2 - Limiting Potential to Emit - Synthetic Minor Sources (Adopted 8/13/2003)

San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD)

- Rule 4305 - Boilers, Steam Generators and Process Heaters - Phase 2 (Amended 8/21/2003)
- Rule 4306 - Boilers, Steam Generators and Process Heaters - Phase 3 (Adopted 9/18/2003)
- Rule 4351 - Boilers, Steam Generators and Process Heaters - Phase 1 (Amended 8/21/2003)
- Rule 4701 - Internal Combustion Engines - Phase 1 (Amended 8/21/2003)
- Rule 4702 - Internal Combustion Engines - Phase 2 (Adopted 8/21/2003)

San Luis Obispo County Air Pollution Control District (SLOAPCD)

- Rule 201 - Equipment Not Requiring a Permit (Amended 11/12/2003)

Santa Barbara County Air Pollution Control District (SBAPCD)

- No changes

South Coast Air Quality Management District (SCAQMD)

- Rule 1105.1 - Reduction of PM10 and Ammonia Emissions from Fluid Catalytic Cracking Units (Adopted 11/7/2003)
- Rule 1168 - Adhesive and Sealant Applications (Amended 10/3/2003)
- Rule 1171 - Solvent Cleaning Operations (Amended 11/7/2003)

Ventura County Air Pollution Control District (VCAPCD)

- Rule 23 - Exemptions from Permits (Amended 11/11/2003)
- Rule 56 - Open Burning (Amended 11/11/2003)
- Rule 70 - Storage and Transfer of Gasoline (Amended 11/11/2003)
- Rule 74.6 - Surface Cleaning and Degreasing (Amended 11/11/2003)
- Rule 74.6.1 - Batch Loaded Vapor Degreasers (Amended 11/11/2003)
- Rule 74.12 - Surface Coating of Metal Parts and Products (Amended 11/11/2003)
- Rule 74.13 - Aerospace Assembly and Component Manufacturing (Amended 11/11/2003)
- Rule 74.19 - Graphic Arts (Amended 11/11/2003)
- Rule 74.19.1 - Screen Printing Operations (Amended 11/11/2003)
- Rule 74.20 - Adhesives and Sealants (Amended 9/9/2003)
- Rule 74.24 - Marine Coating Operations (Amended 11/11/2003)
- Rule 74.30 - Wood Product Coatings (Amended 11/11/2003) ✓

**Tracer ES&T
Anniversaries**

Some of the Tracer ES&T staff have been together through several name changes: Tracer Technologies, Team Environmental Services, and now, Tracer ES&T. Our staff is the foundation for this company and we appreciate their effort and dedication.

16 Years	Charles Barney	(2/1/88)
2 Years	Jeanna Emmons	(1/23/02)
1 Year	Graham Cadena	(1/6/03)

Review of Corporate Capabilities

Many of you may not be aware of Tracer ES&T's diverse capabilities. Tracer ES&T is a comprehensive provider of environmental engineering, consulting, and monitoring services. The following services are rendered through Tracer ES&T's headquarters in San Marcos, California (northeast San Diego County) as well as its branch operation in Santa Maria, California:

- Ambient Air Monitoring;
- Environmental Construction;
- Permitting and Compliance;
- Risk Management and Safety; and
- Tracer Sciences.

To meet the needs of our clients, Tracer ES&T maintains a staff of highly trained, highly motivated professionals who utilize state-of-the-art proprietary and regulatory developed techniques to solve complex problems.

Tracer ES&T's philosophy is to provide maximum value to each client by translating its experience into practical, cost effective solutions. ✓



Happy
St. Patty's Day
on
March 17th!!

	Refineries/Oil & Gas	Aerospace	Manufacturing	Utility/Co-gen	Water/Wastewater	Food Storage/Processing	Other
AMBIENT AIR MONITORING							
Network Design	•		•	•			•
Station Operation	•		•	•			•
Air Toxics	•		•				•
QA/QC	•	•	•				•
Data Reporting	•	•	•	•			•
ENVIRONMENTAL CONSTRUCTION							
Permitting							
Project Management							
Demolition	•	•	•			•	•
Remediation	•	•	•				•
Plant Closure		•	•				
Backfilling, Grading, Landscaping	•	•	•				•
PERMITTING AND COMPLIANCE							
Permitting	•	•	•	•			
Compliance Audits	•		•	•			
Dispersion Modeling Studies	•	•	•		•		•
Emission Inventories	•	•	•	•			•
Health Risk Assessments	•	•	•				•
Monitoring, Recordkeeping, and Reporting (MRR) Systems	•	•	•	•			•
Permit Appeals and Variances	•			•			
Pollutants Credit Allocations and Transactions				•			
Special Studies		•			•		
Spill Plans (SPCCs)				•	•	•	
Storm Water (SWPPPs)					•	•	
RISK MANAGEMENT AND SAFETY							
Compliance Audits						•	
Dispersion Modeling Studies	•	•	•	•	•	•	•
Environmental Advisory Services					•	•	•
Hazard and Operability Studies / Process Hazard Analyses	•	•	•	•	•	•	•
Piping and Instrumentation Diagrams		•	•	•	•	•	
Process Safety Management Programs (OSHA)					•	•	
Risk Management Plans (EPA)					•	•	
CalARP / RMPP (California)	•	•	•	•	•	•	•
TRACER SCIENCES							
Tracer Studies	•			•	•		•
DRE Testing				•			•
Ventilation Studies	•	•	•				
Leak Testing	•				•		•
Low Flow Measurements	•			•			

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News Flash...

*OSHA 300A Summary of
Work-Related Injuries and Illnesses form
is REQUIRED to be posted from February 1 through April 30
- in a location where you normally place employee information.*

*Come visit Tracer ES&T's booth in Orlando, Florida
at the
2004 International Institute of Ammonia Refrigeration
Conference & Trade Show,
February 29 - March 3, 2004.*