



West Central Florida Safety Alliance

MEETING NOTES

Friday, December 17, 2010

10:00am – Noon

Hillsborough County EPC

Roger P. Stewart Center

3629 Queen Palm Dr, Tampa, FL 33619-1309

I. TOUR:

- a. Hillsborough County Environmental Protection Commission Laboratory

II. ATTENDEES:

Jodie Ciccarello, Co-Chair/ Facilitator
Ernie Harben, Scribe
Joan Spenser (OSHA)
John Wells (Dale C. Rossman Inc.)
Coy Spivey (Dale C. Rossman Inc.)
Rene Salazar (Enviro Corp.)
James Harrison (HUG Safety)
Philip G. Skaff (HUG Safety)
Jim Ulseth (USF Safety Florida)

Mark Robbins (Summit)
Delores Westfall (Summit)
Justin Ellingburg (SPI Safety)
Joe Hale (Hillsborough County RM&S)
Todd Stetson (Tech Data)
Pam Cohen (Tech Data)
Steve Nunn (Hillsborough County)
Kathy Felsten (SPI Safety)
Mark Ligon (Polyglass)

III. MEETING NOTES:

a. Membership

- i. **SIGN-IN:** The Alliance agreed all future sign-in sheets need to include company affiliation so that companies can retain WCFSA membership through attendance by a company rep at 3 meetings.
- ii. **IMPORTANT NOTE:** Do not use the email distribution list with any old WCFSA emails. That list is solely for WCFSA use.
- iii. **WFLA BUSINESS CARDS:** Joan is looking for all the boxes of WCFSA business cards. If anyone has them please bring them to the next meeting.

b. Future Meeting Topics

- i. **Polk County Sheriff's Office and Polk County Emergency Response Center:** January, Ernie has made arrangements for a tour at the center at 1891 Jim Keen Blvd., Winter Lake Road (SR 540), Winter Haven, FL
- ii. **AED's:** TBD – Joe Hale thinks this would be a good topic.
 1. Hillsborough County requires private companies to register AED units with the local 9-1-1 (Hillsborough County is at 100% registration).
 2. There are many issues with the use AED's and groups that already meet and discuss them.
 3. Joe Hale recommends WCFSA have a presentation about them. Joe
- iii. **Global Harmonization:** Jodie is working with a presenter for February 2011 at Saddle Creek Corp.
- iv. **MRSA Infections:** March or April, Joan Spencer to arrange for a speaker at Saddle Creek Corp.

- v. **In-Cab Commercial Fleet Cameras** – March or April 2011, Luke Vaughn will make arrangements for Lanier Upshaw in Lakeland.
 - vi. **Fall Protection**: May 2011, Jodie to arrange
 - vii. **Drug Protection**: June 2011, John Wells to make arrangements
 - viii. **Combustible Dust**: July – Joan will try to find a speaker(s)
 - ix. **VPP Site Tour**: August – Joan will look for a business to tour
- c. Shingalia Infections are erupting in Central Florida. Joan Spenser will share a County publication with these notes.
 - d. EPA SARA Title III, Tier 2 reporting of sulfuric acid in lead-acid batteries. Any business with a total of 500 pounds of sulfuric acid total among all its batteries may have to report (depending on the state where you operate). Ernie will share the EPA's letter that announces the requirement.
 - e. Future Safety Presentations
 - i. Georgia Tech NFPA Seminars. Joan will share the information so it can be included with these minutes.
 - ii. SPI Safety will be doing "safety forums" at some of the main towns they serve. Jodie offered WCFSA an opportunity to participate and host a table with business cards.
- IV. NEXT MEETING: Friday, January 21, 2011. 10:00am tour of the Polk County Sheriff's Department and Polk County Emergency Operations Center. 11:00am hold the WCFSA business meeting. The Sheriff's Office is at 1891 Kim Keen Blvd (Winter Lake Road / SR 540), Winter Haven, FL.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 25 2007

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Lead Acid Battery Reporting Under EPCRA Sections 311 and 312 - REVISED
FROM: *Deborah Y. Dietrich*
Deborah Y. Dietrich, Director
Office of Emergency Management
TO: Regional Division Directors, Regions I-X

Questions have been raised recently about how to calculate the threshold and to report lead acid batteries under Sections 311 and 312 of the Emergency Planning and Community Right-to-Know Act (EPCRA). These batteries contain both an extremely hazardous substance (EHS) and other hazardous chemicals. The purpose of this memorandum is to provide guidance for the calculation of reporting thresholds under Sections 311 and 312 of EPCRA for non-consumer type lead acid batteries, such as those used in telephone switching stations or in forklifts

BACKGROUND

EPCRA sections 311 and 312 generally apply to the owner or operator of a facility that must prepare or have available a Material Safety Data Sheet (MSDS) for each "hazardous chemical" as required by the Occupational Safety and Health Act (OSHA) of 1970. EPA's regulations published in 40 CFR Part 370 establish minimum threshold levels that govern EPCRA reporting requirements for facilities covered by EPCRA sections 311 and 312. In addition, these regulations provide instructions on how to report if threshold levels are exceeded.

OSHA has determined that lead acid batteries are hazardous chemicals under the OSHA definition since there are chemical and physical hazards associated with them. Lead acid batteries have the potential to emit hydrogen gas which, upon ignition, may result in a fire or explosion. Furthermore, OSHA's Directive on Inspection Procedures for the Hazard Communication Standard (CPL 02-02-038, March 20, 1998), states that lead acid batteries do not fall under the article exemption because they have the potential to leak, spill, or break during normal conditions of use, including foreseeable emergencies.

GUIDANCE

Under EPCRA sections 311 and 312, a lead acid battery would be considered a mixture, containing both sulfuric acid, an extremely hazardous substance (EHS), and other hazardous chemicals such as lead, lead oxide, and lead sulfate. Since a lead acid battery contains sulfuric acid, an EHS, the regulations at 40 CFR § 370.28 require an owner or operator of a facility to aggregate the sulfuric acid present in all lead acid batteries as well as in any other mixture or in pure form at the facility, in order to determine if the threshold has been met or exceeded. If the aggregated amount of sulfuric acid present at the facility equals or exceeds the minimum EHS reporting threshold of 500 pounds, the sulfuric acid is reportable (see 40 CFR §370.20(b)(1)).

With regard to the non-EHS chemicals, the owner or operator of the facility is not required to aggregate those chemicals to determine threshold and reporting. Instead, the facility has two options. In the first option, the owner or operator would add the total weight of the lead acid batteries and if the reporting threshold has been met (which is 10,000 pounds for non-EHS hazardous chemicals), would report the lead acid batteries. In the second option, the owner or operator would add the total weight of each of the individual hazardous chemicals in the lead acid batteries as well as the amount of those chemicals present throughout the facility to determine if the threshold has been met. The owner or operator would then report each of the individual chemicals which have met the threshold.

Once the facility determines it needs to report the batteries, it has two primary choices under the regulations regarding the manner in which it reports. The facility may either list the sulfuric acid separately on the Tier II form or it may list the lead acid batteries, indicating that sulfuric acid, an EHS, is a component of the mixture.

It should be noted that the regulations at 40 CFR § 370.28(a)(2) state that reporting a mixture, such as the batteries, under both sections 311 and 312 must occur in the same manner, where practicable. Since MSDSs are commonly published for the lead acid batteries and not the individual components of the batteries, we anticipate a facility would typically submit a copy of the MSDS for the batteries to meet the requirements of section 311 and list the batteries on the Tier II form to meet the requirements of section 312.

CONCLUSION

To the extent there could be confusion regarding the Agency's views on aggregation of the hazardous chemicals in lead acid batteries, I want to clarify that the aggregation of non-EHSs for threshold determination is not required under EPCRA sections 311 and 312. See 55 Fed. Reg 30,640 (July 26, 1990). Aggregating a chemical is required only for the EHSs present at the facility.

For any questions regarding this memo, please contact Sicy Jacob at (202) 564-8019.

cc: Earl Salo, OGC
Rosemarie Kelley, OECA
EPCRA Coordinators

Electrical Safety Training (No Cost for Attendees): **Arc Flash/Blast Injury Prevention for Maintenance Operations** **(Worker Course) Presented by:**



Do you know how to work safely around electrical components?

Do you have adequate knowledge of the electrical safety requirements in the workplace?

Confused about safe work practices to prevent injuries associated with arc flash/blast?

Learn how to prevent and/or reduce the potential for injuries associated with arc flash/blast injuries and the requirements for an electrical safety program at your facility:

**Come to Georgia Tech's Free Electrical Safety Course for Workers, Technicians, Contractors
With nationally recognized instructor Steven Owen**

Who: Workers on the frontline that may be exposed to arc flash hazards, such as, Supervisors (working leads), technicians, contractors, and mechanics

What: Full-day Electrical Safety Training for Workers

Topics: Overview, Electrical safety program, PPE, Best Practices, NFPA/OSHA standards

When: February 8, 2011, 8:00 a.m. to 4:30 p.m., Contact: Lisa Boyette 813-879-8064

Where: ABC Gulf, 2008 N. Himes Avenue, Tampa, FL 33607

How: **Reserve your spot by filling out the attached registration form and sending it to Carol York at carol.york@gtri.gatech.edu or fax to 404-407-9140**

Note: Private sector employers/employees are given first priority in enrollment.

This training course was developed under grant number SH-19492-09-60-F13 from OSHA . It does not necessarily reflect the views and policies of OSHA, nor does the mention of trade names, commercial products, or organizations imply endorsement by the U.S. Government.



Registration Form
Electrical Safety Training for Maintenance Operations
_____ Worker Course, February 8, 2011, Tampa, FL

Please complete the following and email to Carol.York@gtri.gatech.edu or fax to 404-407-9140:

Full Name: _____

Company: _____

Company's SIC or NAICS code:
(if available) _____

Job Title: _____

Responsibilities: _____

Work Address: _____

E-mail Address: _____

Phone Number: _____

Number where you can be reached in case of emergency: _____

Please note:

- Your registration is not confirmed until this form has been approved and a confirmation has been sent to you.
- Private sector employers/employees are given priority in the enrollment process.
- If you are unable to attend after receiving confirmation, please inform Carol York at carol.york@gtri.gatech.edu so that your space may be given to someone else.