

# ***LABORATORY & RADIATION SAFETY***

Cornell University Department of Environmental Health & Safety

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# ***NEWS***

***Winter 2001***

## **UPDATE ON EPA COMPLIANCE EFFORTS**

While the tone and content of this article may be similar to previous messages about the U.S. Environmental Protection Agency (EPA) initiative for Colleges and Universities, we do want to stress the following message: the changes we have made in how we handle chemicals on campus over the last two years have resulted in a much safer place for people to work, and we should continue these practices and make future changes as appropriate, not just to avoid fines from regulatory agencies, but because it is the right thing to do for our safety and for the environment.

### Where is the EPA / Where have they been?

The EPA initiative to inspect colleges and universities for compliance with their regulations has been going on for a couple of years now. We've listed some of the inspected schools below. Where we have actual inspection dates and/or fine information, we've included that data. To date, several of our fellow Ivy institutions have been inspected and a number have received significant fines. EPA is now inspecting schools in New York and New Jersey (EPA region 2). We have no way of knowing when or if the EPA will come to Cornell, but it seems likely that this will happen. The EPA rarely gives advanced notice.

### Region I inspections (New England)

- Yale - settled with EPA for \$348,000 in 1995
- Boston University - inspected in 1996; settled with EPA for \$753,000
- MIT - inspected in 1998; settled with EPA last April for \$550,000
- Harvard - inspected; have not settled with EPA
- University of New Hampshire - settled with EPA for \$229,000
- Brown - EPA has proposed fines of \$500,000
- University of Rhode Island - settled with EPA for \$800,000
- University of Massachusetts at Amherst – EPA proposed fines of \$262,700 on 10/16/01

### Region II inspections (since November 2000)

- Columbia University - Inspected ~March 2001
- Manhattan College
- New Jersey City University
- New York University (in Manhattan) - Inspected May 2001
- Pratt Institute
- Princeton - Inspected August 2001
- U.S. Merchant Marine Academy

The following is an update on what has been happening over the past several months with respect to Cornell's compliance with EPA requirements.

### Cornell's Self-Disclosure of Known Violations to the EPA

Last year, the University reported known violations of the RCRA (Resource Conservation and Recovery Act) and SPCC

(Spill Prevention Control and Countermeasure) regulations to the EPA under their Self-Reporting Policy. The follow-up to this self-disclosure of known violations has been ongoing. The University submitted supplemental information that the EPA requested. With respect to those violations for which the EPA has completed its review, the University was notified that all applicable fines have been waived, since appropriate corrective action was taken in a timely manner.

### Silver Reclamation Program

EH&S retained the services of a recycling company and equipped 32 photo darkroom facilities in both Ithaca and Geneva with silver reclaiming devices for photo darkroom waste, at no charge to the darkroom operator. *If you operate a darkroom that generates wastes containing silver and is not yet part of this program, please e-mail EH&S at [Chemwaste@cornell.edu](mailto:Chemwaste@cornell.edu) and request a consultation.*

### RCRA Compliance Activities

Nine new 90-day waste storage areas were established on campus. These facilities have the specific safety equipment and operating procedures that EPA requires if hazardous waste is collected in a location that is outside of the immediate area where it was generated. *Most waste generators have EH&S collect hazardous waste directly from the room in which it is generated. If you are unable to do this, contact EH&S via [Chemwaste@cornell.edu](mailto:Chemwaste@cornell.edu) and ask for help in making alternate arrangements.*

EH&S staff teamed up with college and department staff to complete room-by-room, drawer-by-drawer, inspections in many areas including the Division of Nutritional Sciences and the entire College of Engineering.

The process provided plenty of time for laboratory and shop workers to get answers to their questions about waste management. These inspections revealed a significantly heightened level of regulatory compliance compared to a year ago. *To request a review of your unit contact EH&S at 4-4693.*

In June, the New York State Department of Environmental Conservation (DEC) inspected several of the University's 90-day storage areas. Three minor violations were identified (for example, a no smoking sign was missing in one room). These were all corrected immediately and NYSDEC imposed no fines. RCRA training is on-going for faculty, staff and students.

Everyone who generates hazardous waste must be advised that strict federal regulations apply to this activity and must be shown how to manage waste properly. *If you or your staff would like to attend training provided by EH&S, call 4-4693 or go to our web site at <http://www.ehs.cornell.edu/lrs/chemical.waste.training.htm>*

#### SPCC (Spill Prevention Control & Countermeasure) Program Activities

ECO, working collaboratively with all units of the university, has completed an inventory of oils stored on campus and submitted that inventory to the EPA. During the next phase, ECO will develop SPCC plans and confirm appropriate secondary containment for these stored oils. Continued participation of all university units will be necessary.

#### New EPA Compliance Program Positions Created

The position of Hazardous Materials Manager within EH&S has been filled by Michael Lonon, and the new EH&S RCRA inspection team is expected to be fully staffed by winter break. This inspection team will enable EH&S to respond in a more timely manner to requests for compliance assistance. In addition, the team will undertake a systematic compliance check of all areas of the campus. The results of this review will be provided to unit heads to help them understand and manage their compliance efforts.

The new position of ECO Program Team Leader within ECO has recently been filled by Paul Smart. In addition, a position for an EMS (Environmental Management System) manager is being developed.

#### Inspection Preparedness Plan

The university's Inspection Preparedness Plan is available on the web at <http://www.eco.pdc.cornell.edu/epa>. The objective of this plan is to communicate to designated unit contacts the information necessary to successfully complete an EPA and/or DEC inspection. Unit Contacts are listed under the 'Inspection Teams' link.

Thank you for your continued cooperation in trying to meet the compliance goals. While we have made substantial progress in the last two years, maintaining a safe and environmentally friendly workplace requires an ongoing commitment from everyone, not only because of the EPA's expectation of continuous compliance, but more importantly, because it is the right thing to do.

Adapted from a letter from the EPA Preparation Coordination Committee Comprised of membership from:  
Environmental Compliance Office, Environmental Health & Safety,  
University Audit, University Counsel, Utilities Department

#### **CHEMICAL SAFETY TRAINING**

The next ***new employee*** laboratory worker OSHA Laboratory Standard training program, "Chemical Safety for Laboratory Workers", will be held in 118 Humphreys Service Bldg on Wed., Dec. 5, 9 – 12 noon.

Please contact Agnes Morris by e-mail at [am28@cornell.edu](mailto:am28@cornell.edu) or by phone at 255-5600 to register, or register on our Website at <http://www.ehs.cornell.edu>.



## Radiation Safety Eagle Awards



We are pleased to recognize the following laboratories for receiving radiation safety awards:

#### September

**E. Alani**, Molec. Biology & Genetics, Biotech Bldg.  
**K. Kempfues**, Molec. Biol. & Genetics, Biotech Bldg.  
**S. McCouch**, Plant Breeding, Bradfield Hall  
**M. Milgroom**, Plant Pathology, Bradfield Hall  
**M. Sorrells**, Plant Breeding, Bradfield Hall  
\* **M. Shuler**, Chemical Engineering, Olin Hall  
**J. Gavalchin**, Microbiology, Stocking Hall  
**B. Baird**, Chemistry and Chemical Biology, S.T. Olin  
**T. Begley**, Chemistry and Chemical Biology, S.T. Olin  
**S. Gray**, Plant Pathology, VN Lab

#### October

**M. Hanson**, Molecular Biology & Genetics, Biotech Bldg.  
**E. Earle**, Plant Breeding, Bradfield Hall  
**R. Loria**, Plant Pathology, Bradfield Hall  
**D. Bauman**, Animal Science, Morrison Hall  
**W.R. Butler**, Animal Science, Morrison Hall  
**B. Currie**, Animal Science, Morrison Hall  
**P. Johnson**, Animal Science, Morrison Hall  
**X. Lei**, Animal Science, Morrison Hall  
\* **S. Quirk**, Animal Science, Morrison Hall  
**A. Bass**, Neurobiology & Behavior, Mudd Hall  
**S. Beer**, Plant Pathology, Plant Science Building  
**A. Collmer**, Plant Pathology, Plant Science Building  
**S. Lazarowitz**, Plant Pathology, Plant Science Building  
**A. Bensadoun**, Nutritional Sciences, Savage Hall  
**J. Helmann**, Microbiology, Wing Hall  
**J. Russell**, Microbiology, Wing Hall  
**S. Winans**, Microbiology, Wing Hall

\* Winner of Meal Deal from Pizza Hut



## RADIATION SAFETY TRAINING

Individuals must receive radiation safety training **prior** to starting work with radioactive materials. This training is required by law. The course is given in two separate presentations; both sessions must be attended. There is a short exam, which can be taken either at the end of the second day, or later at our office during normal business hours. *Prior registration for this course is necessary, as seating is assigned on a first come first served basis.*

The next Radiation Safety training programs will be held on December 11 and 13, from 1:00 – 4:00 p.m. To register please use the online form available on our EH&S Web site, or call the EH&S main desk, at 5-8200. For the online form go to <http://www.ehs.cornell.edu>, select "Training", then select the course under "Class Times & Registration". Please fill in all fields before you submit your registration.