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Hazardous Waste Rules: Laundered Textile Exclusion

COLUMBUS, OH (May 30, 2018) – Ohio EPA’s hazardous waste program has developed draft rule language that will exclude contaminated textiles such as gloves, aprons, smocks and uniforms from needing to be managed as hazardous waste if they are laundered and intended for reuse.

Ohio currently has an exclusion that allows solvent contaminated wipes to be laundered without the need for the generator to manage them as hazardous waste or the laundry/cleaning facility to obtain a hazardous waste storage permit, however, this exclusion does not include other textiles such as gloves, aprons, and uniforms.

The new, proposed laundered textile exclusion expands the eligibility of materials to be excluded from hazardous waste rules if properly and responsibly managed through laundering and reuse. For more information, contact Karen Hale in Ohio EPA’s Division of Emergency Response and Revitalization at (614) 644-2927 or Karen.Hale@epa.ohio.gov.

Source:

<http://epa.ohio.gov/defa/>

“Once In, Always in” Maximum Changes and Your Title V Air Permit

COLUMBUS, OH (May 30, 2018) - On January 25, 2018, U.S. EPA issued a guidance memo regarding the applicability of U.S. EPA’s maximum achievable control technology (MACT) standards. This guidance supersedes the May 1995 Seitz Memorandum, and pursuant to the Federal Register notice, became effective on February 8, 2018.

Under the new guidance, if you historically reduced your emissions to below the major source MACT standard’s applicability thresholds, you are no longer required to comply with the major source MACT standard. Depending on your reduced emission levels, this means you can now comply with the less stringent area source MACT standard; or, in some cases, no MACT standard would apply.

The new guidance also means that facilities/sources that accepted operational restrictions to avoid being subject to a major source MACT standard may no longer be subject to Title V permitting or may be able to discontinue using MACT-required HAP controls.

More information:

<http://epa.ohio.gov/>

http://epa.ohio.gov/Portals/27/mact/OIAI_FactSheet.pdf

OSHA's Respirable Crystalline Silica Standard Becomes Enforceable on June 23, 2018

WASHINGTON D.C. (June 5, 2018) - OSHA's Respirable Crystalline Silica standard for general industry and maritime requires employers to limit worker exposures to respirable crystalline silica and to take other steps to protect workers. Among other things, the standard requires employers to:

- Assess employee exposures to silica if it may be at or above an action level of 25 µg/m³ (micrograms of silica per cubic meter of air), averaged over an 8-hour day;
- Protect workers from respirable crystalline silica exposures above the permissible exposure limit (PEL) of 50 µg/m³, averaged over an 8-hour day;
- Limit workers' access to areas where they could be exposed above the PEL;
- Use dust controls to protect workers from silica exposures above the PEL;
- Provide respirators to workers when dust controls cannot limit exposures to the PEL;
- Use housekeeping methods that do not create airborne dust, if feasible;
- Establish and implement a written exposure control plan that identifies tasks that involve exposure and methods used to protect workers;
- Offer medical exams - including chest X-rays and lung function tests - every three years for workers exposed at or above the action level for 30 or more days per year;
- Train workers on work operations that result in silica exposure and ways to limit exposure; and
- Keep records of exposure measurements, objective data, and medical exams.

General industry and maritime employers must comply with all requirements of the standard **by June 23, 2018**, except for the following:

- Medical surveillance must be offered to employees who will be exposed at or above the action level for 30 or more days a year starting on June 23, 2020. (Medical surveillance must be offered to employees who will be exposed above the PEL for 30 or more days a year starting on June 23, 2018.)
- Hydraulic fracturing operations in the oil and gas industry must implement engineering controls to limit exposures to the new PEL by June 23, 2021.

More Information:

<https://www.osha.gov/>

Electronic Submission of Injury and Illness Records to OSHA (Due July 1st)

WASHINGTON D.C. (May 31, 2018) - OSHA has provided a secure website that offers three options for data submission. First, users are able to manually enter data into a webform. Second, users are able to upload a CSV file to process single or multiple establishments at the same time. Last, users of automated recordkeeping systems will have the ability to transmit data electronically via an API (application programming interface). The Injury Tracking Application (ITA) is accessible from the [ITA launch page](#), where you are able to provide the Agency your 2017 OSHA Form 300A, 300 and 301 information.

Who Must Report?

- Establishments with 20-249 employees in [certain high-risk industries](#) must submit information from their 2017 Form 300A by **July 1, 2018**. Beginning in 2019 and every year thereafter, the information must be submitted by March 2.

- Establishments with 250 or more employees in industries covered by the recordkeeping regulation must submit information from all 2017 forms (300A, 300, and 301) by **July 1, 2018**. Beginning in 2019 and every year thereafter, the information must be submitted by March 2. However, OSHA recently made an [announcement](#) regarding submitting on Form 300 and 301 information for covered establishments with 250 or more employees. All covered establishments with 250 or more employees are only required to provide their 2017 Form 300A summary data by July 1, 2018. OSHA is not accepting Form 300 and 301 information at this time. OSHA announced that it will issue a notice of proposed rulemaking (NPRM) to reconsider, revise, or remove provisions of the "Improve Tracking of Workplace Injuries and Illnesses" final rule, including the collection of the Forms 300/301 data. The Agency is currently drafting that NPRM and will seek comment on those provisions.

More information:

<https://www.osha.gov/>