

RISK SERVICES

EMPLOYEE SAFETY UPDATE

Universal waste requirements

Universal waste is a hazardous waste that is determined to pose a lower immediate risk to people and the environment compared with other hazardous wastes. Universal waste regulations apply to five types of universal waste: batteries, pesticides, mercury-containing equipment, lamps and aerosol cans.

In general, materials managed as universal waste can be stored for a year and are not required to be shipped with a manifest or by a hazardous waste transporter. Under the universal waste requirements, materials must be managed in a way that prevents releases into the environment. The standards are specific to each kind of universal waste and are different depending on whether the generator is a small or a large quantity handler.



BATTERIES

The universal waste requirements define a battery as a device consisting of one or more electrically connected electrochemical cells that is designed to receive, store, and deliver electric energy. In this case, batteries also include intact, unbroken batteries from which the electrolyte has been removed.

Some batteries are not included in the universal waste standard, such as spent lead-acid batteries that are being managed under a different standard. Other exceptions include batteries that are not waste because they have not been discarded and batteries that are not hazardous waste.

STANDARDS FOR



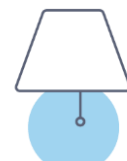
Batteries



Pesticides



Mercury-containing equipment



Lamps



Aerosol cans

PESTICIDES

A pesticide is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest or intended for use as a plant regulator, defoliant or desiccant with some exceptions. The universal waste regulations can be used to manage pesticides that have been recalled if there are either:

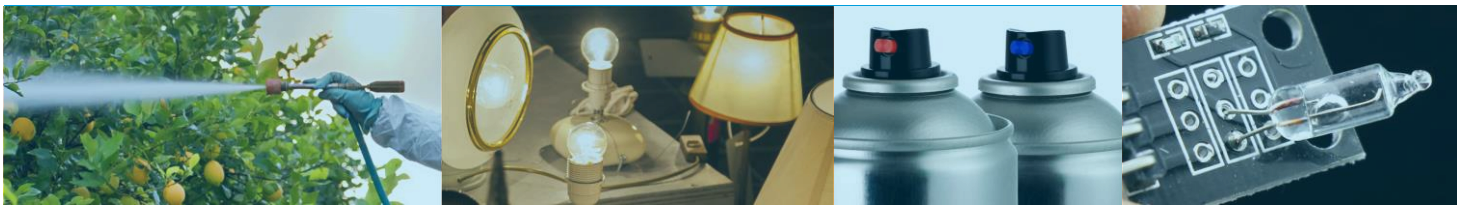
- Stocks of a suspended and canceled pesticide that are part of a voluntary or mandatory recall under Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) Section 19(b)
- Stocks of a suspended or canceled pesticide or a pesticide that is not in compliance with FIFRA that are part of a voluntary recall by the registrant

Universal waste can also be used to manage stocks of other unused pesticides that are collected and managed as part of a waste pesticide collection program.

AEROSOL CANS

Aerosol cans are defined as non-refillable receptacles containing a gas that has been compressed, liquified or dissolved under pressure, which are used to expel a liquid, paste or powder. Aerosol cans are also fitted with a self-closing release device, allowing the contents to be ejected by the gas.

Additionally, aerosol cans frequently contain flammable propellants, such as propane or butane, which can cause aerosol cans to demonstrate ignitability, which qualifies them as a hazardous waste. Aerosol cans that do not exhibit a hazardous characteristic or contain a hazardous waste substance are not hazardous waste and therefore not considered universal waste. Aerosol cans that are considered empty by the standard's definition are also not universal waste.



LAMPS

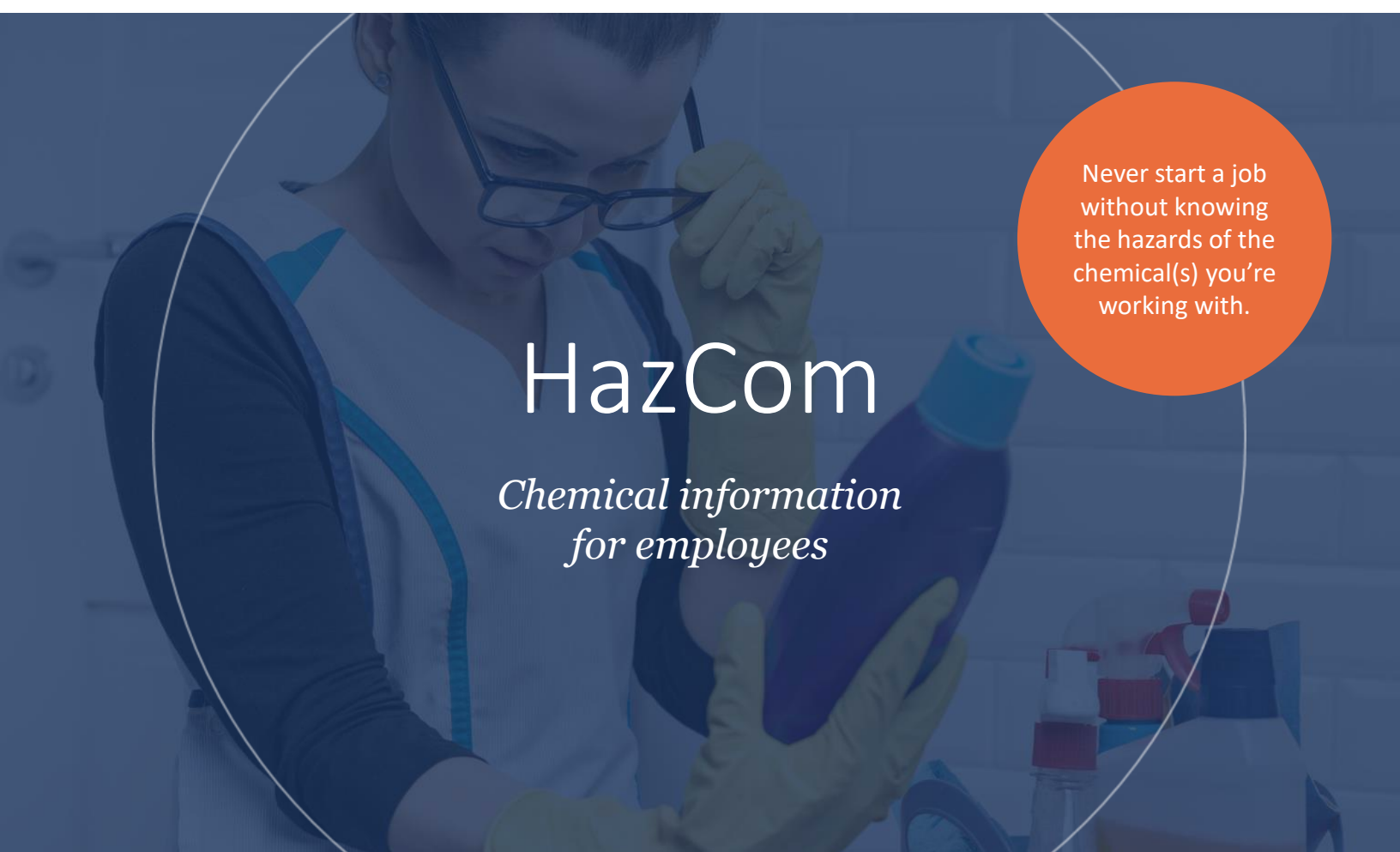
Lamps are considered by the universal waste requirements to be the bulb or tube portion of an electric lighting device that is designed to produce radiant energy in the ultraviolet, visible and infrared regions of the electromagnetic spectrum. Some of the common types of universal waste electric lamps include fluorescent, high-intensity discharge, neon, mercury vapor, high-pressure sodium and metal halide.

Lamps that are not waste because they have not been discarded or that are not hazardous waste are not considered to be universal wastes.

MERCURY-CONTAINING EQUIPMENT

The universal waste standard says mercury-containing equipment includes any device or parts of a device that contains elemental mercury that is integral to its function. These devices can include thermostats but not batteries or lamps.

Certain kinds of mercury-containing equipment meet this definition but are not considered to be universal waste. Examples of these are pieces of equipment or devices from which the mercury-containing components have been removed. This also applies to mercury-containing equipment that is not waste because it has not been discarded and mercury-containing equipment that is not hazardous waste.



Never start a job without knowing the hazards of the chemical(s) you're working with.

HazCom

Chemical information for employees

The Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard, which is often referred to as HazCom, requires that your company provide employees with detailed information about the chemicals used at their facility, including the names of the chemicals, the hazards associated with each chemical, precautions to take when using a specific chemical and what actions to take if exposed to a specific chemical.

The company provides this information to you in several ways:

- Labels on chemical containers that identify the chemical, chemical hazards and actions to take to deal with the hazards.
- Safety data sheets (SDSs) for each chemical that also provide information about the chemical and its

potential hazards, as well as information related to handling, storage, protective equipment and responding to releases.

- Training that teaches you about HazCom and tells you how to read and understand the information on SDSs and chemical labels. It also shows you ways you can protect yourself against possible hazards.

All the information you need to safely work with the chemicals at your facility is available, but it is only useful if you actually use it. It's up to you to seek out that information and use it for your own protection and for the protection of your coworkers. Never start a job without knowing the properties and hazards of the chemical(s) you're working with and using the appropriate personal protective equipment (PPE).

CRYSTALLINE SILICA

Controlling silica dust in construction

Many common construction work tasks generate harmful levels of crystalline silica dust if proper controls are not followed. When silica dust builds up in your lungs you are at risk of developing serious lung diseases. The more you know about silica dust, the better prepared you will be to adequately protect yourself and others near your work area.

If you are involved in any of the following activities, you are at risk of breathing silica dust:

- Chipping, sawing, grinding, hammering and drilling of rock, concrete or masonry
- Crushing, loading, hauling and dumping of rock
- Sawing, hammering, drilling, grinding and chipping of concrete
- Demolition of concrete or masonry structures
- Power cutting stone
- Façade renovation including tuckpoint work
- Abrasive blasting of concrete
- Cleanup activities such as dry sweeping or pressurized air blowing of concrete or sand dust
- Tunneling, excavation and earth moving of soils with high silica content

The key to preventing health problems is to stop the dust from traveling through the air, where workers can breathe it in. Sometimes the solution is simple, such as wetting down dust at the point of generation or using water during drilling and sawing. There are also a variety of collection systems for dust-generating tasks and ventilation filtering systems to keep dust from being released into the workplace air.

Wet cutting is the most effective method for controlling silica dust generated during sawing and drilling because it controls the exposure at its source. Dust that is wet is less able to become or remain airborne.

To minimize dust emissions from equipment fitted for wet cutting, keep pumps, hoses and nozzles in excellent operating condition. Regular equipment maintenance reduces silica exposures and ensures ideal operation of the equipment.

Also, freezing temperatures can complicate the use of water. You should make sure your local work area is heated to prevent ice from forming in the water feed system and you should drain the system when not in use. There are large portable heating units available for this purpose.

QUICK TIPS

If wet methods cannot be used, operate vacuum dust collection systems. These are utilized with stationary masonry saws. Here are some tips for operating a vacuum dust collection system:

- Make sure that all hoses are clean and free of cracks.
- Ensure that appropriate filters and dust bags are in good condition and changed or emptied as needed. This may be necessary several times per shift.
- Check the entire system daily for signs of poor dust capture or dust leaks.
- Use high-efficiency particulate air (HEPA) filters for maximum dust control.
- Erect baffles on either side of the saw to improve dust capture by rear-mounted dust collection devices (or the exterior hoods).
- Review manufacturers' operating specifications and recommendations for your equipment.

While dust control using vacuum dust collection may be an attractive option in some circumstances, it is not as effective as wet cutting for controlling respirable dust. As such, respiratory protection may still be needed to reduce your exposure to silica respirable dust and must be provided before work begins.

CHEMICAL SPOTLIGHT

Diethyl sulfate

Diethyl sulfate is a clear, colorless, oily liquid with a mint or an ether-like odor. It is used as an intermediate in making dyes, pigments and textile chemicals, as well as a textile finishing agent. Diethyl sulfate is not compatible with strong acids, strong bases and nitrates.

Store diethyl sulfate in tightly closed containers in a cool, well-ventilated area away from metals and moisture.

Sources of ignition are prohibited where diethyl sulfate is used, handled or stored.

If diethyl sulfate is spilled or leaked, avoid breathing vapors, mist or gas and ensure adequate ventilation.

Remove all sources of ignition and evacuate personnel to safe areas. Use personal protective equipment (PPE), including goggles or safety glasses, gloves, flame-retardant protective clothing and respiratory protection.

Prevent further leakage or spillage if safe to do so and do not let the product enter drains, sewers, underground or confined spaces, groundwater or waterways or discharge into the environment. Absorb liquids in dry sand, earth or a similar material and deposit in sealed containers. Ventilate and wash the area after cleanup is complete. It may be necessary to contain and dispose of diethyl sulfate as a hazardous waste. Contact the federal and local Environmental Protection Agency (EPA) for specific recommendations.

HOTEL HOUSEKEEPING ERGONOMICS: HOUSEKEEPING CART BEST PRACTICES



- Store the heaviest items in your cart at a level that is between your hips and your chest. Generally, this area is toward the top of the cart.
- Keep your cart organized. If you know where every item is at all times you will have better access to equipment and amenities without having to hunch over to search.
- Empty your cart often. Remove bags of soiled linens at least once or twice during the shift to reduce the cart's weight. Empty the trash from your cart as often as possible.
- Inspect your cart. Check that your cart's tires are not flat and that the casters (the metal part that connects the wheel to the cart) are not bent, broken or damaged.
- Be careful when driving over uneven surfaces, such as elevators, thresholds, or torn carpeting.
- Tell your supervisor if your cart is having trouble going over carpets.



- Pull your housekeeping cart. Push it instead and use both hands when pushing.
- Stack items too high on your cart. Not only does this make your cart heavier, but it also will block your view of the path in front of you.
- Leave any of your items hanging over the edge of the cart. These items can get caught in your cart's wheels.
- Add hotel room amenity replenishments to your cart all at once during your shift. Adding smaller stacks of new supplies to your cart several times throughout your shift will keep your cart lighter.