1. Florida Tech Chemical Inventory

Our first EPCRA report must be completed by February 28, 2013. All faculty and staff must return all their inventories by February 14, 2013. Chemical inventory is being done to comply with the following Federal, State & City regulations:

⇒ Federal Emergency Management (FEMA) regulations
⇒ Department of Homeland Security (DHS)
⇒ City of Melbourne Fire Department
⇒ City of Melbourne Zoning Commission

More on page 4

2. Annual Florida Tech Hazardous Waste Training

This training must be completed by March 29, 2013

⇒ Internal training for Florida Tech Faculty, Students & Staff
⇒ Developed by ERC with oversight from the FDEP

More on page 5

Announcement

a) Biomedical Waste Management

After back to back inspections by the DOH inspector, the university is finally in compliance with Chapter 64E-16 (F.A.C.) and will eventually be permitted to generate more than 25 pounds per 30 days of biomedical waste.

More on page 2

b) Spill Prevention, Control, and Countermeasure (SPCC) Plan

Our monthly SPCC inspection was performed on the main campus on the transformers, elevator oil reservoirs, and aboveground storage tanks (waste grease containers and generators). Brian, our student IT specialist is currently working on making the inspection computerized on the iPad. The campus SPCC plan has been edited and forwarded to HRP Associates to hopefully get the final copy for the campus. HRP Associates are scheduled to visit the main campus and FAM on February 12th!

c) Farewell to Gideon!!!

The ERC is losing one of its core team members. In May of 2013 Gideon Hengari, a Fulbright Scholar, will return to Namibia after working with us for 2 years (since August of 2011). He has been instrumental in helping us pull our Radiation Program together and managing the hordes of student workers that we heavily depend on. Occasionally he acts as our “enforcer,” but his ready smile disarms any intimidation his presence can often command. We wish him the best as he returns to his home country. Fortunately, to balance this sad news – we are able to announce that the ERC will be hiring one full-time and one part-time staff additions to our team. These new resources will greatly help us expand our programs of assistance to our campuses, particularly in the areas of life sciences and biomedical engineering. When you read this, the job postings will have already happened & with a little luck we will be well into interviewing candidates.
Biomedical Waste Management
by Colleen Lindler

As per Florida Administrative Code (FAC) 64E-16 Biomedical Waste, all facilities that generate BMW must ensure proper disposal and handling of the waste to eliminate employee, and the general public exposure to disease-causing agents.

To ensure compliance with all Federal and/or State laws, as well as Chapter 64E-16, Florida Administrative Code (F.A.C), we filed for a permit to allow for the generation of more than 25 pounds per 30 days of biomedical waste due to the expanded athletics program, and increased research projects.

Before a permit would be granted, a comprehensive inspection by the State of Florida, Department of Health, Brevard County Health Department took place on November 20, 2012 on the main campus. The inspector reviewed all aspects of our biomedical waste program, and visited several sites including laboratories in OLS, OPS, OEC, and the athletic training department.

There were four areas where we were in non-compliance and violations were issued.

1.) FIT needed to make an application for a regular permit and remit the fee.
2.) FIT did not have a written plan to manage biomedical waste.
3.) Staff training had not been completed.
4.) Two small sharps containers were filled past the fill line.

By the re-inspection date of 11/25/12, we completed the application and paid the permit fee of $95, completed a 19 page Biomedical Waste Plan, and had the sharps containers picked up by our BMW contractor Advanced Biotech Solutions. We only had 21 staff trained at that time and an extension was granted until January 25, 2013.

On January 24th we submitted training records for 54 out of 55 impacted personnel. One professor was on travel and is expected to complete the required training by the end of January. The letter with attached training records was accepted on 1/25/13 and Florida Tech is now in compliance and expecting our permit within the next two weeks. See Letter of Compliance below.
This year brings with it a few new changes to the Radiation Safety Program. Late last year we were inspected by the Department of Health – Bureau of Radiation Control, which lasted a very comprehensive 6 hours. Overall we did very well, however we fell short in two important areas, the first being calibration of survey meters, and the second storage and quantity of sealed radioactive sources.

We rectified the situation of the survey meters by ordering six new survey meters and probe attachments. This step will allow us to have calibrated meters on hand at all times avoiding the possible situation of having a meter failure in a lab that is actively working with isotope and a backup meter not available because it is out for calibration.

Our second area of non-compliance was the continued use of the “tikki hut” for long-term radioactive material and generally licensed storage facility and Radiation Safety Office. To resolve this long-standing issue with the DOH, an area in Quad 407 has been designed that meets the radioactive materials storage regulations. We move into this new area on February 26th.

All other aspects of our program were rated very high, including safety, training, auditing, inspections, dosimetry, and recordkeeping. With a new lab beginning use of radioactive materials we look forward to a busy 2013 and perhaps a repeat inspection in six months.

Florida Tech’s Radioactive Materials License is issued by the State of Florida Department of Health, Bureau of Radiation Control, and we are subject to all applicable rules, regulations and orders of the State of Florida, Department of Health, and are bound to any conditions specified on our license. Failure to comply with the provisions of this license is a felony of the third degree pursuant to section 404.161, Florida Statutes. Also, violations may warrant an administrative fine up to $1,000.00 per violation, per day. It is the policy of Florida Tech to minimize the exposure of personnel and the public to radiation hazards, and to assure that occupational exposures to ionizing radiation are kept below the permissible limits established for employees. Florida Administrative Code requires us to use procedures and engineering controls to achieve occupational and public doses that are As Low As Reasonably Achievable (ALARA).
Student Project Safety

by Greg H. Peebles, Director: ERC

It's Spring and major project work is in full bloom at Florida Tech. Senior Design is in full swing along with other independent work. Over 20 different project teams are working with our office on their fabrication safety plans to ensure their work meets the needed safety awareness.

They also learn about the regulatory agencies that will regulate them in the “real world” and are held to the same standards. Of special note this year are: the Chemical Engineering Project to engineer and build a metal hydride hydrogen storage unit from scratch; the Mechanical Engineering project, “Grover,” to engineer, build and test a “hull bug” for cleaning navy ship hulls; and the Aerospace Engineering project, “Enhanced Roller Coaster Vehicle,” to engineer and build a coaster vehicle that will create a virtual environment to surround the passengers as they travel along a track.

Finally, the Student Rocket Society is engineering and building a significant enhancement to our existing rocket motor thrust stand that will support a current senior design project and possible research with new space companies such as Rocket Crafters and their latest generation of Hybrid Rocket Motors.

EPCRA Tier II Reporting

by Gideon Hengari & Colleen Lindler

ERC is busy preparing the Emergency Planning and Community Right-to-Know Act (EPCRA) Tier II, which has a deadline of February 28, 2013. This report requires Florida Tech to annually report the quantities of certain types and amounts of hazardous and toxic chemicals.

The purpose of this law is to encourage emergency planning efforts at the state and local levels and to increase the public’s access to information about the potential chemical hazards that may exist in their communities.

The data collected is used by 11 Local Emergency Planning Committees (LEPCs) to develop hazardous materials emergency plans to use in responding to and recovering from a release or spill of hazardous or toxic substances. These plans are reviewed by the Commission. All the data collected are available for the general public to view upon request.

Controlled Substances Policy

by Colleen Lindler

The Office of Environmental & Regulatory Compliance has completed the University’s Controlled Substances Policy. The objective of this policy is to ensure compliance with state and federal regulations governing the use of Drug Enforcement Agency (DEA) controlled substances.

Florida Tech requires that all individuals conducting activities with DEA controlled substances be registered with the DEA and comply with state and federal regulations regarding the acquisition, storage, use and disposal of those substances.

Each principal investigator or faculty conducting research and/or instructional activities with DEA controlled substances will be responsible for notifying the Environmental & Regulatory Compliance Office, registering with the DEA and for assuring compliance with applicable state and federal regulations. The registrant may not allow the permit to lapse until all controlled substances are spent, disposed of, or transferred to another registered person. Every person conducting research activities with a controlled substance is required to register with the Drug Enforcement Agency (21 CFR 1301.11). Re-registration is required annually.

Colleen Lindler is responsible for assisting individuals in complying with applicable rules and regulations. This includes educating researchers about the requirements, assisting them as necessary during implementation, and providing regular oversight to insure compliance is being maintained.
More on Hazardous Waste Training

by Elizabeth Pam: Course Coordinator

The primary purpose of the Hazardous Waste Training course (RCRA) is to educate faculty, staff and students on how to properly handle hazardous wastes without harming yourself, co-workers, or the environment with these wastes. The training is mandatory according to the Resource Conservation and Recovery Act (RCRA) It requires all who handle or are near hazardous wastes at Florida Tech to be trained in order to respond to emergencies involving these wastes (40 CFR 265.16). Documentation of your name, title, hazardous waste duties, and a description of your training will remain on record for your duration at Florida Tech. Since personnel training is a part of the mandatory RCRA compliance, failing to do so could result in fines (over $2500 per person per year) for Florida Tech, which is highly undesirable.

The course was previously administered using the online system called Angel. However, as of 2013, Continuing Education is the forum being used to administer the training. This change was put in place to ensure maximum efficiency in the completion of the program by everyone involved.

The process for using Continuing Education to complete the course is as follows:

- Continuing Education will send you an email containing a short description of the course and how to register for it (including a link).
- Once you have registered for the course, it will take 24 hours for this to be processed. After it has been processed, you will receive another link where you’ll be able to login with a new username and password you created, and complete the course.
- You will be able to download all the content of the course, read and complete the quizzes offline, and come back online to input the answers or you can just complete everything online.
- At the end of the course, you will get a certificate of completion for the course.

This course will need to be completed every year as long as you still handle hazardous waste or work close to hazardous waste. Also, all new faculty, staff and students handling hazardous waste must complete the training. The deadline for completion of the 2013 session is March 29th, 2013.

If you have any questions or remarks about the training course, please send an email to epam2009@my.fit.edu
Office of Environmental and Regulatory Compliance

ERC is committed to ensuring the University’s compliance with EPA laws

What we do:

a) Hazardous Waste Management

Florida Tech must follow the Resource Conservation and Recovery Act (RCRA) procedures and rules because it generates and accumulates hazardous wastes. Places that treat, store, dispose, and transport hazardous wastes are also required to comply with RCRA (40 CFR 260.10). Federal Department of Environmental Protection (FDEP) inspections are given annually and are unscheduled. Lack of RCRA compliance can lead to three kinds of enforcement options. These are administrative orders, civil penalties, and criminal offenses. The Office of ERC has taken the lead in ensuring the University compliance with Federal EPA laws by regularly carrying out the following activities:

⇒ Hazardous waste pickup & storage
⇒ Inspect and service labs with appropriate hazardous waste containers
⇒ Audit labs and make on-the-spot modifications
⇒ Instant notifications to lab managers or responsible personnel
⇒ Weekly inspection of hazardous waste accumulation area as per DEP requirement
⇒ Weekly staff meetings to review issues and provide training to student assistants.

We have an excellent ongoing relationship with all local, state and Federal environmental regulatory agencies.

b) Laboratories inspections

Laboratories at Florida Tech are equipped with various safety equipment such as eye wash stations and safety showers as per Occupational Safety & Health Administration (OSHA) regulations. The ERC department is committed to the weekly required inspections of this equipment to ensure proper functioning.

Our inspections include the following:

⇒ Assess proper flow from the safety showers and eye wash station
⇒ Accessibility to the safety equipment

The following activities are also performed by the ERC Office:

⇒ Radiation Safety Program Audit
⇒ Control Substances Program Audit
⇒ BMW Program Audit
⇒ Tech Writers Updating the Emergency Management Plan
⇒ Tech Writers Updating the Annual Hazardous Waste training course
⇒ Research and Develop Procedures for the EMS
⇒ Laser Safety Training Program
⇒ Respirator Training Program
⇒ Senior Design Safety Plan Evaluation
Environmental Policy

Policy

Protecting our shared environment is of fundamental importance to the Florida Institute of Technology. To support this goal, we will strive to provide leadership, resources, and services to assure a safe and healthful environment for all members of the University community.

As stewards of the University’s human, physical and environmental resources, the President and the Board of Trustees place high emphasis on:

- implementing programs that prevent accidents and minimize human exposure to hazardous agents, conditions and diseases;
- preventing degradation of the environment through responsible waste management, active waste reduction and recycling;
- promoting responsible purchasing and use of assets.

In partnership with the both the business and academic administrators, their departments and respective personnel Florida Institute of Technology will strive to:

- develop and implement cooperative services and programs that ensure adequate employee and student training in environmental and regulatory compliance;
- promote awareness and respect of inherently hazardous conditions throughout the university;
- provide necessary health and safety resources and timely assistance;
- implement management and minimization of wastes and facilitate regulatory compliance.

Florida Institute of Technology will make every effort to ensure that environmental compliance is an integral part of our operations. To this end, we will measure and periodically report on our progress in realizing these goals.

For more information contact:
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