

3.1.10

EMS Aspects: Maintenance and Operations - Remodeling Services, Painting, Air and Wastes

Aspect Ranking: 9

Painting services, a division of Remodeling Services, is an entity within the University of Texas Health Science Center at Houston (UTHSC-H) that is utilized to minimize costs and provide quick turnaround in remodeling of building spaces. Efforts are made to use environmentally friendly paints and stains and also to dispose of unwanted materials in an environmentally safe manner.

Painting Activities, Environmental Releases

Task/Activity Description:

Remodeling Services completes small scale projects and stores paint and solvent cleaners in the Operations Center Annex Building painting shop. A majority of painting projects are completed in the customer's space in a UTHSC-H owned building. Non-hazardous paints and stains from tools are washed in a sink that drains to the sanitary sewer. Oil based paint from paint brushes is cleaned and disposed of through the Environmental Protection Program (EPP). Paint that cannot be completely used is disposed of through the EPP for recycling or reuse.

The UTHSC-H Remodeling Service's unwanted paint and paint related materials are regulated under 30 TAC Chapter 335 Subchapter H §335.261, as Universal Wastes. The Environmental Protection Program manages used paint and paint related materials according to these regulations.

Key Control Points:

- Paint and paint related wastes are collected for reuse or recycling as a universal waste
- Remodeling services personnel utilize the hazardous waste line to request pickups of any unwanted paint.

Related Forms, Records, SOPs:

Chemlog - universal wastes

Personnel Responsible:

Remodeling Services Manager

- Dispose of unwanted paint/paint related material according to local, state, and federal regulations

Safety Specialists, EPP

- Assists with the collection of paint and paint related materials
- Perform annual survey

Safety Manager, EPP

- Oversee and conduct PTE evaluations, waste analysis and retain documented results

Director, EHS

- Liaison with the Construction Services Directors
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Environmental Compliance (Air and Water Releases) Program

Task/Activity Description:

Painting Services Air, Water, and Environmental Health & Safety Survey

Schedule: Semi-annually

To assist Remodeling Service employees, who use paint and paint related materials at the UTHSC-H comply with the requirements for management of wastes, and general safety, The Environmental Health & Safety Department's Environmental Protection Program conducts semi-annual surveys of painting services storage area and their waste handling practices.

Inspections are performed by the EPP manager or safety specialist utilizing a checklist survey form. Deficiencies are noted on the form by checking the "yes, no, or not applicable" boxes or by adding items to an additional comments section on the survey form. Once the survey is complete, a memo listing any noted deficiencies and corrective actions is sent to the Remodeling Services Director.

Deficiencies noted during the survey are tracked for resolution utilizing Environmental Health and Safety (EHS) Assistant database. As part of the deficiency tracking process, at least thirty days are given to correct any deficiencies, before potentially escalating enforcement actions.

Key Control Points:

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Owner: EH&S/EPP – JPJ

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- Identify sources of hazardous wastes and compare management practices to regulatory requirements
- Identify potential mismanagement, improper storage and disposal of hazardous and universal wastes
- Communicate environmental compliance requirements to personnel who generate hazardous and universal wastes

Related Forms, Records, SOPs:

- Painting Services Survey Form

Personnel Responsible:

Remodeling Services Manager

- Oversee operations and ensure materials are disposed properly

Manager/Safety Specialists, EPP

- Perform Remodeling Services survey
- Enter deficiencies into database and generate memo report
- Track appropriate response through deficiency database
- Monitor inspection schedule through the EPP compliance calendar
- Advise appropriate actions on the compliance process
- Retain inspection and air emission documentation for 3 years

Director, EHS

- Liaison with the VP of Facilities, Planning and Engineering

Annual Training – Environmental Management Systems and Environmental Awareness

Task/Activity Description:

For the communication of environmental programs and environmental management systems, the EPP provides training for Remodeling Services employees. This training introduces and reinforces environmental management system principles, air emission control practices specific to the painting service operations, and environmental concerns and compliance requirements for air emissions and hazardous materials management. The training is scheduled on an annual basis and lead by an instructor or administered during annual inspections.

Key Control Points:

- Communicate environmental compliance requirements and environmental management concepts to personnel
- Communicate environmental compliance requirements and environmental management concepts to personnel who dispose of hazardous and potentially hazardous and universal wastes

Related Forms, Records, SOPs:

- Environmental Awareness and Environmental Management Systems

Personnel Responsible:

Remodeling Services Manager

- Ensure staff attend training

Manager/Safety Specialists, EPP

- Develop training materials and submit updates for the web page
- Schedule training as appropriate
- Present training materials to Painting Services employees
- Document training by obtaining a sign in sheet with all participants listed, deliver sign in sheet to EH&S administrative assistant who will enter names of personnel trained into a training data base

Director, EHS

- Provide management review, liaison with Painting Services Directors if necessary
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