

3.1.7

EMS Aspects: Maintenance and Operations, Wood Working, Air

Aspect Ranking: 12

Carpentry and wood working projects are performed by Remodeling Services, a division of Facility Operations at the University of Texas Health Science Center-Houston (UTHSC-H). Remodeling Services purpose is to provide cabinetry and other furnishings for small construction jobs, providing a quick turnaround for UTHSC-H remodeling projects.

Wood Working Environmental Releases (Air & Waste)

Task/Activity Description:

Remodeling Services is located at UTHSC-H Operation Center Building Annex. Their warehouse contains a sawdust collector, power and table saws, paint and chemical stripping agents.

The waste products generated consist of sawdust, scrap wood, and used towels. Water based low VOC paint from brush cleaning is discharged to the sanitary sewer and any expired or unwanted paint is reused for its original intended use. Paint not suitable for reuse is bulked into 55 gallon drums and is managed as a universal waste by the Environmental Protection Program.

Remodeling Services' wood working is authorized by Permit by Rule, 30 TAC Chapter 106 Subchapter I §106.231, which applies to manufacturing, refinishing, and restoring wood products.

Key Control Points:

The permit by rule is reviewed by the Environmental Protection Program (EPP) utilizing purchase records and when significant changes are made in their processes, equipment, or facilities.

Related Forms, Records, SOPs:

- [30 TAC Chapter 106 Subchapter I §106.231](#)

Personnel Responsible:

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Reviewed: 7/30/2007 AWL; CSC pending

Remodeling Services Manager

- Maintain purchase records of coatings, solvents, and stripping agents
- Ensure employees practice proper waste disposal procedures, operate machinery to reduce particulate releases, and minimize VOC emissions.

Safety Specialists, EPP

- Assists with the collection of waste paint
- Evaluate wood working activities to assure applicability of permit by rule conditions
- Provide training to Remodeling Services employees covering air emissions and waste disposal

Safety Manager, EPP

- Ensure wastes from wood working activities and shop are managed in a cost effective and environmentally, compliant, and friendly manner.
- Review wood working activities to assure applicability of permit by rule conditions.
- Communicate environmental objectives to Construction Services Director

Director, EHS

- Provide program oversight and liaison with VP of Facility Operations.

Environmental Compliance (Wood Working) Program

Task/Activity Description:

Wood Workings Permit by Rule and Environmental Health & Safety Survey

Schedule: Annual

To assist Construction Services Wood Working in complying with the requirements for Permit by Rule and management of hazardous wastes, The Environmental Health & Safety Department's EPP conducts annual inspections of Wood Working equipment and practices, as well as hazardous waste management. This review is included in the July facility survey.

Inspections are performed by the EPP manager or safety specialist utilizing a checklist survey form. Currently, 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 Construction Services Director. The memo is also copied to EPP's file for future reference.

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Deficiencies noted during the survey are tracked for resolution utilizing an Access database or EHS Assistant. 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:

- Identify potential mismanagement of hazardous materials and improper storage and disposal
- Communicate environmental compliance requirements to personnel who operate offset sheet feed lithographic presses, and generate hazardous wastes

Related Forms, Records, SOPs:

- NA

Personnel Responsible:

Remodeling Services Manager

- Correct any noted deficiencies during the EH&S review

Manager/Safety Specialists, EPP

- Perform facility survey
- Enter deficiencies into database and generate memo report
- Track appropriate response through deficiency database
- Advise appropriate actions on the compliance process

Director, EHS

- Provides oversight and appropriate actions on the compliance process
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Annual Training – Environmental Management Systems and Environmental Awareness

Task/Activity Description:

For the communication of environmental programs and environmental management systems, the EPP provides Spill Prevention Control Countermeasures (SPCC)/Facilities Waste training on an annual basis for facilities staff. This training introduces and reinforces environmental management system principles, air emission control practices, and environmental concerns and compliance requirements for hazardous materials

management. The training is lead by an instructor on an annual basis, and the training materials are available on the EH&S web page.

Key Control Points:

- Communicate environmental compliance requirements and environmental management concepts to personnel who operate, clean, and maintain equipment used for wood working.

Related Forms, Records, SOPs:

- NA

Personnel Responsible:

Remodeling Services Manager

- Ensure employees receive proper training for the jobs they perform

Manager/Safety Specialists, EPP

- Develop training materials and submit updates to for web page
- Schedule training time, place, and date (annually)
- Present training materials to facilities staff
- 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