



# The Wire

The Newsletter of  
the EHSCP

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## Chairman’s Corner

By: Mike Minerva

As the current Chair of the EHSCP, it is an honor to have the lead article in our inaugural newsletter. We hope to be issuing these newsletters several times per year to keep you informed of activities in our organization.

For those of you that do not know me, I am the Senior Director of EHS for Comcast’s West Division. I have been at Comcast for over 6 years, and have represented Comcast as the voting representative for most of that time. Prior to Comcast, I spent most of my career working in EHS and engineering in the pharmaceutical industry at Merck and Schering-Plough. I will be serving as EHSCP’s Chair, along with Don Snyder from Crown Castle as Vice-Chair for the 2019-2020 term.

Last year was very productive for EHSCP, and I would like to extend my appreciation for the outgoing Chair Bryan Stolte for the terrific job he did leading this organization in 2017-2018. We capped off last year with a very well attended and highly regarded annual conference in Arlington, Texas sponsored by AT&T. Pertinent topics covered at the conference included responding to natural disasters, monitoring lone workers, ISO 45001 and 5G RF safety, among others.

This coming year promises to be very exciting for EHSCP. We are welcoming four new member companies to the organization – Lumos Networks, SBA Communications, SAC Wireless and American Tower. Cincinnati Bell is also returning as a participating member after a two-year absence. In addition, we are developing a partnership with the Cable Industry’s Health & Safety Group that is part of the National Cable & Telecommunications Association (NCTA). Invitations to attend our annual conference will be extended and possibly membership in EHSCP.

Activities we are planning this year include providing webinars on critical EHS issues to our members, sponsoring scholarships at one or more university safety and health programs and conducting an annual members’ conference. SAC Wireless is hosting this year’s annual conference in Chicago in September. More information on the conference will be forthcoming soon.

## MEETINGS & EVENTS

IH Committee Meeting – June 4, 2019, 1:30 CT. Contact John Malone for information

Environmental Committee Meeting – next meeting May 10, 2019, 11:00am E T - Contact Greg Myka for more information

Safety Committee Meeting – next meeting is May 2 at 7 AM PST - contact Jay Weir for more information.

More information on the EHSCP is located at: <http://www.ehscp.org/>

-----2019 Annual Symposium-----  
 hosted by SAC Wireless  
 Preferred Hotel – Crown Plaza West  
 Loop  
 Chicago, IL

September 17-19, 2019 registration information will be available soon

# EHSCP MISSION STATEMENT

The Environmental, Health & Safety Communications Panel (EHSCP) is a consortium of communications safety, health and environmental professionals dedicated to promoting the environment, employee safety and health while preventing accidents throughout the communications industry. The Panel strives to provide a united voice and constructive input in the development and promulgation of environmental, health & safety standards and guidelines that affect the varied businesses within the communications industry. The Panel encourages and appreciates cooperation, correspondence and interaction from all companies that fall under the umbrella of the Communications Industry.

In addition to learning and networking opportunities, the EHSCP offers members the following benefits:

**Publications:** To help promote safe workplaces, the EHSCP develops "Best Practices" documents pertaining to the Communications Industry.

The Environmental, Health & Safety Communications Panel strives to provide a united voice and constructive input in the development and promulgation of safety standards and guidelines that affect the varied businesses within the Communications Industry.

The Panel encourages and appreciates cooperation, correspondence and interaction from all companies that fall under the umbrella of the "Communications Industry".

**Advocacy:** The panel maintains an active advocacy role, providing comments and recommendations to federal and state agencies where issues concern the Communications Industry.

**Policies:** in order to clarify activities, programs, and responsibilities among panel members, the panel develops Policies which serve as a guideline for some activities.

For information about becoming a member, visit our [Membership page](#).

## Committee News

### Industrial Hygiene Committee

The Industrial Hygiene Committee held its first meeting of 2019 on February 5. Topics the IH committee are following closely are:

## Executive Board & Committee Chairs

Chair- Michael Minerva, Comcast - [email](#)

Vice Chair - Don Snyder, Crown Castle - [email](#)

Past Chair - Bryan Stolte

Environmental Committee Co-Chairs - Bob Gurdikian, CenturyLink [email](#); Greg Myka, Verizon - [email](#)

IH Committee Chair – John Malone, AT&T - [email](#)

Safety Committee Chair - Jay Weir, AT&T - [email](#)

1. Application of the new OSHA Silica Standard to telecommunications work
2. Roll out of 5G antenna systems and potential RF exposure to technicians working near them.
3. Lead - lower PELs being considered in several states. Washington, Michigan, Oregon and California have announced they are considering lower PELs for lead. NIOSH recently announced they are going to collect information on lead exposures.
4. Respiratory Protection and wildfire smoke. California recently announced its intention to create regulations around respiratory protection and wildfire smoke. Details not yet known. The committee will continue to follow this proposal.

### Environmental Committee

The Environmental Committee has been working on:

1. CA Utility Companies given authority to shut down power grid if there is a threat of wildfires, and the impact on Telcos being required to run emergency generators.

2. -There CA CUPA Conference Feb 25-28, 2019 in Anaheim, CA
3. CUPAs trying to stay gain consistency while remaining 'local' with their EHS rules and regulations.
4. CA Battery recycling
5. CA Pollution-disadvantaged communities looking for relief are seeking more stringent regulations
6. National eWaste rules - tracking inconsistencies
7. Rhode Island - proposing rules that would prohibit emergency generators from participating in Demand Response programs
8. WA air quality fee rule, we submitted comments to the agency in October 2018, but have not seen a response or revised proposal
9. Federal Aerosol Can Disposal rule - we submitted comments in May 2018, they were supposed to have proposed revised regulations, but have not
10. Continue to monitor petroleum storage tank regulations for variations from the federal rules by the various states
11. RCRA -monitoring electronic Tier II submittals to the various states
12. Massachusetts State Emergency Response Commission has had meeting in which they have recommended regulations to require site plans and locations of hazardous materials (tanks and fuel) to be provided with annual Tier II reports.
13. The International Fire Code is considering adding a section of standards for lithium battery collection, storage and shipping - nothing at this time, we are monitoring this



*Conference Facilities at SAC Wireless*

### Safety Committee

There are currently 31 members on the committee and we have worked on various safety issues. The latest one includes updating the EHSCP document on Fall Protection in the Telecommunications industry. We also discuss regulatory changes that may have an effect on our industry, such as the proposed California regulation change to remove the ability to free climb on wood poles.

### Regulatory Update Courtesy of Heidi Anderson, Leidos

#### ENVIRONMENTAL PROTECTION AGENCY

**Waters of the United States:** The EPA issued a [new proposed definition](#) of Waters of the United States (WOTUS) late last year that would eliminate the time-consuming and uncertain process of determining whether a "significant nexus" exists between a water and a downstream traditional navigable water as directed under the agencies' 2008 *Rapanos* Guidance or whether a water has a significant nexus to a traditional navigable water, interstate water or territorial sea as codified in the agencies' 2015 Rule defining "waters of the United States." The agencies propose as a baseline concept that "waters of the United States" are waters within the ordinary meaning of the term, such as oceans, rivers, streams, lakes, ponds, and wetlands, and that not all waters are "waters of the United States." The agencies propose to interpret the term "waters of the United States" to encompass: traditional navigable waters, including the territorial seas; tributaries that

### Save the Date

**We are working hard to put together another excellent conference. This year's will be in Chicago, September 17-19. Stay tuned for details**

contribute perennial or intermittent flow to such waters; certain ditches; certain lakes and ponds; impoundments of otherwise jurisdictional waters; and wetlands adjacent to other jurisdictional waters. Hearings were held in February and comments are due by April 15.

**Underground Storage Tanks:** The EPA has recently issued a Compliance Advisory which alerts owners and operators to the testing and inspection requirements in 40 CFR Part 280.35 for USTs. The focus of this advisory is for UST owners and operators in states without state program approval (SPA) and in Indian Country. For more information about the status of states with and without SPA, see EPA's website [www.epa.gov/ust/state-underground-storage-tank-ust-programs#which](http://www.epa.gov/ust/state-underground-storage-tank-ust-programs#which). Note: Owners and operators in states both with and without SPA must meet their state UST regulatory requirements.

**"280.35 – Periodic testing spill prevention equipment and containment sumps used for interstitial monitoring of piping and periodic inspection of overfill prevention equipment.**

UST owners and operators must test their spill prevention equipment every three years to ensure it works as intended and is able to hold liquid. In addition, UST owners and operators who use interstitial monitoring must test their containment sumps every three years to ensure the release detection is working and will contain product that escapes their USTs. Finally, this requirement includes inspecting overfill equipment every three years to ensure it is working as intended."

## OSHA

**Recordkeeping:** On January 24, the Occupational Safety and Health Administration (OSHA) issued a [final rule](#) that eliminates the requirement for establishments with 250 or more employees to electronically submit information from OSHA Form 300 (Log of Work-Related Injuries and Illnesses) and OSHA Form 301 (Injury and Illness Incident Report) to OSHA each year. These establishments are still required to electronically submit information from OSHA Form 300A (Summary of Work-Related Injuries and Illnesses). The final rule also amends the recordkeeping regulation to require covered employers to electronically submit their Employer Identification Number with their information from Form 300A. The final rule's requirement for employers to submit their EIN to OSHA electronically along with their information from OSHA Form 300A will make the data more useful for OSHA and BLS, and could reduce duplicative reporting burdens on employers in the future. According to OSHA, "this rule will better protect personally identifiable

information or data that could be re-identified with a particular worker by removing the requirement for covered employers to submit their information from Forms 300 and 301. The final rule does not alter an employer's duty to maintain OSHA Forms 300 and 301 on-site, and OSHA will continue to obtain these forms as needed through inspections and enforcement actions."

**Powered Industrial Trucks:** On March 10, the OSHA issued a [Request for Information](#) to help determine whether or not to initiate a rulemaking to revise the powered industrial truck standards for general, maritime and construction industries. The term "powered industrial truck" includes what are commonly termed forklifts, but the term also includes all fork trucks, tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks powered by an electric motor or an internal combustion engine. The standards, first promulgated in 1971, and updated in 1998 are intended to protect operators of these trucks as well as their coworkers. The aim of the RFI is to seek public comment on what aspects of the powered industrial trucks standards are effective as well as those that may be outdated, inefficient, unnecessary, or overly burdensome, and how those provisions might be repealed, replaced, or modified while maintaining or improving worker safety. Comments are due June 10.