	EHS Requirements for Purchased Materials 75B-07.0-05	**Revision: #7** **01/27/20**

1.0 Purpose:

To define the specifications for purchased or sample materials used at BEP.

2.0 Scope:

Applies to material procurement at the Bureau of Engraving and Printing (BEP).

3.0 Roles and Responsibility:

3.1 The **EMS Facility Management Representative** is responsible for:

3.1.1 Communicating with OEHS and WCF EHS Program Managers to assure that specifications are kept up to date.

3.2 Contracting Officer (CO)/Contracting Officer Representatives (CORs) are responsible for:

3.2.1 Communicating the specifications of this procedure to vendors/contractors (as applicable); and

3.2.2 Communicating with the EMS Facility Management Representative when these boilerplate requirements need to be changed.

3.3 Bureau Personnel (and **Contractor Personnel)** are responsible for:

3.3.1 Assuring that materials to be brought onto BEP property conform to these specifications; and

3.3.2 Communicating with OEHS or WCF EHS when there is uncertainty about these specifications.

4.0 Specifications:

4.1 ENVIRONMENTAL, HEALTH AND SAFETY REQUIREMENTS

All materials delivered to the BEP shall be designed to minimize all risks of injury and illness to BEP employees. All materials shall be in full compliance with government and commercial environment, safety, and health regulations and requirements. The following are specific safety, health, and environmental requirements for the acquisition, purchase, or samples of materials (e.g., paper, ink, rigging boards, chemicals, etc.) for the BEP.

4.2 GENERAL ENVIRONMENT, HEALTH & SAFETY

4.2.1 Materials shall be designed to prevent injury and illness to operation and maintenance personnel at all times.

4.2.2 All materials shall comply with the rules and regulations set forth by Occupational Health and Safety Administration (OSHA), Environmental Protection Agency (EPA), Department of Transportation (DOT), or any other applicable standards.

4.2.3 The BEP retains the right to reject any material that may potentially cause an injury or adverse health effect upon its employees. Health and injury effects include but are not limited to:

- headache;
- eye, dermal, nasal, or throat irritation;
- sensitization;
- nausea; and
- dizziness.

4.2.4 DCF and WCF maintain a list that identifies chemicals which are prohibited for use on BEP property and other chemicals which are targeted for reduction (Restricted Materials at DCF 75D-07.0-07 and Restricted Materials at WCF 75W-08.0-04). Prohibited chemicals are not allowed on-site under any circumstances and chemicals that have been targeted for reduction will only be allowed when no suitable alternative is available.

4.3 SAFETY DATA SHEET (SDS) (formerly MSDS)

4.3.1 The contractor (through the COR) or purchaser shall submit an up-to-date SDS for all chemicals and applicable materials to the OEHS and/or to the WCF EHS for review and approval (EHS Review 75D-07.0-01 for DCF and 75.00-SAF-001-FW Hazard Communication Program for WCF). In addition, the purchaser must submit a completed Chemical Questionnaire for each SDS submitted.

4.3.2 The SDS shall comply with the OSHA regulations set forth in 29 CFR 1910, Part 1200 Hazard Communication (HazCom).

4.3.3 The materials are ***not*** to be used until written approval is received from the OEHS and/or to the WCF EHS.

4.3.4 In accordance with industry standards, Safety Data Sheets for inks, coatings and solvents shall indicate the volatile organic compound (VOC) content of the material in Section 9: Physical and Chemical Properties.

4.4 ENVIRONMENTAL PROTECTION REQUIREMENTS

4.4.1 All materials and processes must meet or exceed standards in the regulations and executive orders listed below. Other environmental regulations, executive orders and guidance may also be applicable.

- Federal Regulation: Environmental Protection Agency, EPA Clean Air Act, as Amended
- 40 CFR 60 - Appendix A - Test Methods
- 40 CFR Part 247 - Comprehensive Guideline for Procurement of Products Containing Recovered Materials
- 40 CFR 261 – Identification and Listing of Hazardous Waste

- 40 CFR 355 --Requirements for Emergency Planning and Notification under CERCLA
- 40 CFR 370 --Hazardous Chemical Reporting and Community Right to Know Requirements
- 40 CFR 372 -- Toxic Chemical Release Reporting
- 40 CFR 403 - General Pretreatment Regulations for Existing and New Sources of Pollution
- 40 CFR 433.15 Pretreatment Standards for Existing Sources (PSES)
- 40 CFR 720 – Pre-manufacture Notification: Pre-manufacture Notice Requirements and Review Procedures
- 40 CFR 761 -- Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions
- P.L. 102-486, Energy Policy Act of 1992, October 24, 1992
- Superfund Amendments Reauthorization Act (SARA), Title III
- District of Columbia Municipal Regulations (DCMR), Title 20, Subtitle A, Air Quality Regulations
- District of Columbia Municipal Regulations (DCMR), Title 20, Subtitle E, Hazardous Waste Regulations
- District of Columbia Municipal Regulations (DCMR), Title 21, Water and Sanitation, Chapter 15, Discharges to Wastewater System Regulations
- Texas Administrative Code Title 30 Environmental Quality – Texas Commission on Environmental Quality (TCEQ) Regulations

4.5 Air Emissions

4.5.1 The Contractor shall identify all regulated air pollutants that are ingredients in the product(s) to be purchased by the BEP.

4.5.2 **VOC's** - All ink shall have a volatile organic compound (VOC) content by weight of less than or equal to the following ink/press type limits, when tested as specified by the DC Air Quality regulations and other EPA guidelines.

DDOE Ink VOC Content Limits

Ink/Press Type	Maximum VOC Concentration
Intaglio, non-heat set, cylinder wipe	12%
Intaglio, non-heat set, paper wipe	5%
Intaglio, heat set	30%
Offset Lithography, heat set	40%
Offset Lithography, non-heat set	35%
Letterset	40%
Letterpress	30%

- Safety Data Sheets for inks, coatings and solvents shall indicate the volatile organic compound (VOC) content of the material in Section 9: Physical and Chemical Properties.
- Inks may not exceed ink VOC limits.
- Cleaning materials must meet compliance requirements for the printing applications as specified by the DC Air Quality regulations, 20 DCMR Title A and in the TCEQ regulations in 30 TAC chapter 115 Subchapter E: Solvent Using Processes (except for Offset Lithographic Printing). These may include VOC content and/or vapor pressure limits. The VOC content and vapor pressure limits differ by press type.
- In the DFW ozone non-attainment area, the VOC limits for cleaning solutions for Offset Lithographic Printing for minor sources is either (a) 50% VOC or less, (b) 70% VOC or less if the facility has a towel handling program, or (c) a VOC composite partial vapor pressure of less than or equal to 100 mmHg if the facility has a towel handling program that ensures all waste ink, solvents, and cleanup rags are stored in closed containers until removed from the site by a licensed disposal or cleaning service.

4.5.3 Air Toxics - If the ink contains as an ingredient any of the chemicals identified as Air Toxics by the Clean Air Act Amendments of 1990, Section 112, the offeror shall provide a list of the names and quantities (concentrations) of any such chemicals. The ink shall not contain glycol ethers that are regulated as Air Toxics by the Clean Air Act Amendments of 1990, Section 112, in excess of 1.0 percent by weight. The WCF EHS will review the ingredients listed on the SDS and compare this to the EPA HAP (Hazardous Air Pollutant) List. If an ingredient is on the EPA HAP List, the WCF EHS will make a determination if the material will be accepted for use at the WCF.

4.6 Wastewater

4.6.1 Information shall be provided to the OEHS or the WCF EHS through the COR on the characteristics of all material/effluents (including pumped or gravity flow liquids) that will come from the equipment, either regularly or intermittently, including routine or scheduled maintenance work.

4.6.2 This information will be used to determine the feasibility and method of treating the effluents either in the Wastewater Pretreatment Plant or requiring that the materials be handled through the Solid/Hazardous Waste Program.

4.7 Energy/Water/Recovered Materials Usage Policy

The Contractor shall make every reasonable effort to provide the most environmentally friendly materials to the Bureau. The Contractor shall comply with:

- 40 CFR Part 247, Comprehensive Guideline for Procurement of Products Containing Recovered Materials; May 1, 1996.

4.8 Solid/Hazardous Waste

4.8.1 Material that results in solid/hazardous wastes (wastes which cannot be pumped or which do not flow by gravity) either continuously or intermittently, including scheduled or routine maintenance work, in addition to normal operation must be designed to allow for removal of the waste in an ergonomic manner and to allow the operator to transfer the waste into a 55 gallon drum – 1A1, 1A2, or other appropriate container, as needed.

4.8.2 Information shall be provided as to the specific quantity, nature and characteristics of the waste generated so that a waste determination may be performed by OEHS or the WCF EHS in accordance with 40 CFR 261 – Identification and Listing of Hazardous Waste.

4.9 Polychlorinated Biphenyls

The materials shall comply with the regulations set forth with the requirements in 40 CFR 761.30 and shall not contain polychlorinated biphenyls (PCBs) in excess of 1 ppb as required in Title 21, DCMR, Chapter 15, Section 1501.4 and 30 TAC 324.16.

4.10 Identification and Listing of Hazardous Waste

Materials shall not contain contaminants in excess of those listed in Table I, 40 CFR Part 261.24, for the Toxicity Characteristic Leaching Procedure (TCLP). The WCF EHS will review the ingredients listed on the SDS and compare this to the TCLP list. If an ingredient is on the TCLP list, the BEP will make a determination if the material will be accepted for use.

4.11 Pre-manufacture Notification

The contractor shall comply with the regulations set forth in 40 CFR Part 720 Pre-manufacture Notification.

All suppliers, foreign and domestic, shall certify that the pre-manufacture

notification requirements are met for ingredients used in manufacturing the product.

4.12 Proposition 65

No substance listed by California's "Safe Drinking Water and Toxic Enforcement Act of 1986" (Proposition 65) shall be used as an ingredient in the manufacture of the product. If any listed substance is present as a trace, (i.e., not an ingredient) the contractor shall provide a list of such substances with their respective amounts (concentrations).

4.13 Superfund Amendments Reauthorization Act (SARA)

The contractor shall provide a list of the chemicals and their quantities in the materials which are reportable under the Superfund Amendments Reauthorization Act (SARA) Title III of 1986.

4.14 Total Toxic Organics

The material shall not contain, as an ingredient, any of the total toxic organic chemicals listed in DCMR Title 21, Chapter 15, and Section1501.4. This section is not applicable to the WCF.

4.15 Recycled Materials

- The BEP recommends the use of the highest percentage of Post-consumer recovered material practicable in the manufacture of the finished material.
- The Federal government has a target to use paper of at least 30 percent post-consumer fiber content.

NOTE: The Environmental Protection Agency (EPA) defines Post-consumer recovered paper in 40 CFR 247.3.

5.0 Related Documents:

5.1 EHS Review 75D-07.0-01

5.2 WCF EHS Review Procedure 75W-08.0-02

5.3 Restricted Materials at DCF 75D-07.0-07

5.4 Restricted Materials at WCF 75W-08.0-04

5.5 Operational Control 75D-00.0-08

5.6 Operational Controls 75W-00.0-11

REVISION	PURPOSE OF REVISION	EFFECTIVE DATE	Approved By
1	Changed Document numbers	4/18/14	Neal Mohlmann
2	Changed scope to include all of BEP	7/17/15	Neal Mohlmann
3	Updated Executive Orders, Air Toxics and some language changes	7/17/15	Neal Mohlmann
4	Edited solvent vapor pressure limits and SDS content requirements.	5/10/16	Neal Mohlmann
5	Merging of WCF and DCF requirements into one document.	2/8/18	Virginia Baldwin/Virginie Antoine-Pompey
6	Corrected footer and a typo	3/26/19	Virginie Antoine-Pompey
7	Removed obsolete E.O.	1/27/20	Virginie Antoine-Pompey