

Environmental Compliance Systems For Maine's College Campuses



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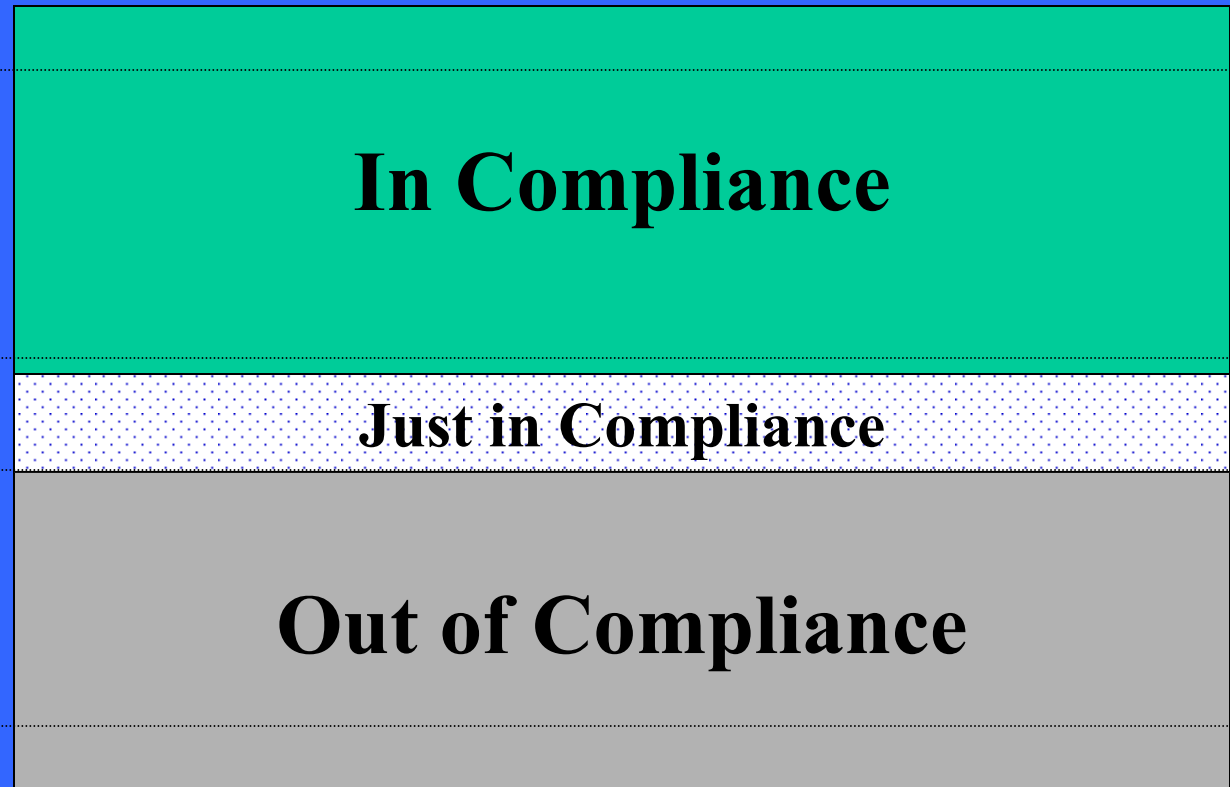
Four Styles of Compliance

Ignorant, fearful,
and broke

Proactive

Warm & fuzzy

Ostrich



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Four Steps to Compliance

- 1) Identify compliance items
- 2) Achieve compliance
- 3) Systemize - develop and implement a system to maintain compliance
- 4) Optimize - make the system as efficient and cost effective as possible

1) Identify Compliance Items

- Self Audit (proactive, friendly, independent, confidential review)
- Maine DEP / EPA Inspection (NOV letter, fines, negative press, detrimental to funding of grants)

Recent EPA Fines to Universities

- January 2000, UNH paid a \$49,000 penalty; \$180,000 in environmental improvements
- In 1999, University of Hawaii was assessed a \$1,000,000 penalty
- October 1997, BU paid a \$253,000 penalty and \$500,000 in environmental projects
- In 1995, Yale University was assessed a \$69,500 penalty and committed to invest \$279,000 in environmental projects

Compliance Audit

- Top management support and commitment to follow up on findings
- Elements of an audit
 - ✓ Determine scope of audit
 - ✓ Records review
 - ✓ Detailed facility inspection
 - ✓ Interview personnel
 - ✓ Exit meeting and outstanding issues
 - ✓ Draft and final audit report
 - ✓ Tracking and closing audit findings

There are many different classifications of chemicals

Toxic Chemicals

Hazardous Substances

Hazardous Wastes

Hazardous Chemicals

Special Waste

Hazardous Materials

Solid Waste

Extremely Hazardous Substances

2) Achieve Compliance

- Act on recommendations from audit or from consent agreement stemming from EPA / Maine DEP compliance inspection
 - ✓ Labeling
 - ✓ Performing and documenting daily inspections
 - ✓ Characterizing waste streams
 - ✓ Training employees
 - ✓ Writing Integrated Contingency Plan

3) Systemize - develop and implement a system to maintain compliance

- Develop an Environmental Compliance Calendar
- Limit access to hazardous waste containers and storage room
- Hold assigned persons responsible for maintaining compliance
- Raised the level of awareness of employees by providing limited training
- Hold monthly meetings with supervisors to correct recurring non compliant situations

Environmental Compliance Calendar

Notification and requirements for:

- Environmental reporting
- Record keeping; VOC & HAP Inventories
- Training
- Update Integrated Contingency Plans
- Renew Emergency Response Arrangements
- Environmental sampling and monitoring

4) Optimize - make the system as efficient and cost effective as possible

- The College's commitment towards maintaining compliance must come from the President and conveyed clearly to all departments
- There should be a direct line of communication between the President and the compliance manager
- Relate consistency in compliance to yearly supervisor's evaluation

4) Optimize (continue)

- Perform periodic mock DEP inspections, evaluate, and correct deficiencies in the system
- Charge waste disposal costs to each department's budget to minimize over ordering of chemicals and waste generation

ABC Company, Inc.

Environmental Compliance Calendar

CODE	COMPLIANCE ITEMS	CONTENTS AND REPORTING THRESHOLDS	DUE DATE	SUBMIT TO	ADDRESS
A	Maine Chemical Inventory Report and include material safety data sheets of reported EHS and hazardous chemicals	Reporting of EHS and Hazardous Chemicals on site at any one time in excess of the reporting thresholds. The EHS reporting threshold is 500 pounds or the TPQ, whichever is less. The reporting threshold for hazardous chemicals is 10,000 pounds. For reportin	March 1 st of each year	Maine Emergency Management Agency; York County EMA; and Saco Fire Department	MEMA; Attn: HAZMAT Planner, 72 State House Station; Augusta, ME 04333-0072; York County EMA; P.O. Box 399; Alfred, Maine 04002; Saco Fire Dept. 14 Thornton Avenue Saco,