



Beyond Compliance

Environmental, Safety, and Sustainability Issues

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Board of Regents of the University System of Georgia, Office of Environmental Affairs

Our Mission

We support the Board of Regents' mission of creating a more-educated Georgia through teaching, discovery, outreach and public service by providing leadership and services to promote environmental stewardship, safety and health at all University System institutions.

Our Values



- Stewardship
- Integrity
- Respect
- Service

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From the Director

As we begin the year 2002, we have much to reflect on. Looking at 2001 in the rear view mirror, we see the staggering image of several of our nation's most impressive landmarks left in ruins by suicide hijackers, film clips of empty buildings being swept for traces of anthrax spores and newspaper photos of our armed forces engaging in a war with a seemingly invisible enemy.



When 2001 began, none of us could have envisioned how things would unfold. Clearly, the events of the past year have caused us to refocus on campus security and emergency operations planning. I believe that the most important elements of emergency operations planning at University System of Georgia institutions are the following: 1. Visible Presidential commitment and support for the plan, including allocation of adequate resources. 2. Identifying potential high-risk areas or operations on campus and providing protective measures. 3. Maintaining an up-to-date communications plan, including a clear chain of command with

the authority to handle emergencies. 4. Maintaining solid relationships with local emergency responders (fire, police, ambulance). 5. Holding practice drills/simulations.

The Board of Regents and the University System Office is also very committed to emergency operations planning. We recently issued an updated Emergency Action Plan that outlines a communications

strategy to be used by institutions and the system office during emergencies. Also, in the near future we are planning to establish a system-wide contract with a firm to provide comprehensive disaster recovery services. This will essentially provide a "contractor on call", which we will hopefully never have to use. I will keep you posted on this as our USG Disaster Recovery Advisory Group works its way through the contractor selection process.

While we will never forget 2001, we look forward with great anticipation to the challenges that will come our way in 2002. We have a lot of work to do. But hey, that's what keeps us young.

See you around campus...

Mark L. Demyanek, CIH, CSP
Director of Environmental Affairs

Since the 1980's, the Environmental Protection Agency (EPA) has carried out an aggressive enforcement program designed to ensure that regulated entities are conducting their operations in compliance with environmental laws. Since 1998, EPA regional offices have expanded their enforcement focus from industry and manufacturing to include colleges and universities. In our state, EPA has been joined by the Georgia Environmental Protection Division (EPD) as a partner in these new enforcement efforts.

As a result of compliance inspections of colleges and universities over the past few years, enforcement has intensified and become an agency priority.

While each EPA region has taken a slightly different approach to enforcement, the message is the same across the board: comply with environmental regulations or pay penalties. Schools are learning that these penalties extend beyond the actual fines

Are you..... Next??

and cost of any follow-up environmental projects. Often, the larger cost is the damage to reputation, endowment and enrollment that can result from an EPA or EPD enforcement action and the negative publicity that follows.

The best way for a college or university to prepare for an EPA inspection is to gain an understanding of applicable laws and to periodically assess their compliance status with respect to these laws. The most effective way to get this understanding is by performing a multimedia Environmental and Chemical Safety Compliance Program Review.

When voluntary program reviews are done properly, they identify all compliance issues and provide a road map to correct situations before they cause problems or are discovered by a regulatory enforcement agency.

Environmental and Chemical Safety Program Reviews are a valuable tool for evaluating facility operations and safety performance. They also can identify ways to reduce compliance costs, help improve campus operations, and train staff in a hands-on environment.

The prevailing view among most college and university environmental, health and safety (EHS) professionals is that these targeted enforcement initiatives have had many positive effects.

Since a number of these inspections have uncovered significant environmental safety violations, EPA and EPD are unlikely to let up on enforcement. Colleges and universities that perform voluntary program reviews to identify and address compliance problems early on are more likely to avoid costly cleanup problems and significant penalties later.

Refer to the table on page 4 for a listing of the most common violations discovered during inspections of colleges and universities.

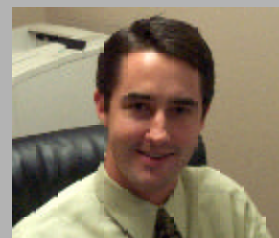
Excerpts from American School and University, Nov. 2001



What's New?

Our new website was launched last year and we have been receiving positive comments thus far. Make sure to check it often for the latest news and updates from the Board of Regents. (www.usg.edu/ehs)

In our last newsletter we announced a new face in the System Office. In this issue, we are announcing a new face at the helm of the Georgia Higher Education Network for Environmental Health and Safety (GHENEHS). Ms. Maria Kuhn from UGA has served superbly as the chairperson of GHENEHS for the past two years. After much discussion and deliberation, Ms. Kuhn graciously handed the position to Jeff Owens from the Board of Regents Office of Environmental Affairs.



Discussions have already begun on how to expand GHENEHS and make it better than ever. We welcome your input and ideas. More details will soon follow.

By now, you are probably aware that we have a new Chancellor. Dr. Thomas Meredith began his appointment as the 10th Chancellor of the University System of Georgia on January 1, 2002. He is responsible for the state's 34 public colleges and universities. The University System has more than 217,000 students, 35,000 faculty and staff and an annual budget of \$4.5 billion. For more information about Dr. Meredith, visit www.usg.edu/admin/oc/bio.html.



Another new face in the System Office, albeit a temporary one, is Dr. George Wingblade. Dr. Wingblade, Director of Plant Operations at South Georgia College, has stepped into the role of interim Vice Chancellor for Facilities during the search for a permanent replacement for Bill Chattham, who retired at the end of last year.



Dr. Wingblade will be a valuable asset to our office during this period of transition.

Please join us in welcoming these new faces to our office.

Terror Strikes



Images like the one above are forever ingrained in our minds, and life in America will never be the same. The far reaching impacts of September 11 will be felt for a very long time.

Life will not be the same for environmental health and safety professionals either. The events of that fateful day have given new meaning to our work and has changed our jobs forever.

Questions, confusion and fear permeate our great nation and colleges and universities are no exception.

Campuses across America are struggling with questions regarding emergency preparedness, crisis management, and the safety of faculty, staff, and students. No one has all the answers but there are steps we can take.

One of the most important steps is being prepared. Emergency preparedness and disaster planning have become the focus at many colleges and universities over the past several months, including the institutions in the University System of Georgia.

An Emergency Action Plan (EAP) for the System Office was recently developed and distributed to all institutions in the System. The central component of the EAP was a streamlined communications plan. The EAP was designed to tie directly into each individual campus EAP.

Intentional acts of destruction

using biological, chemical, or explosive weapons are not the only emergencies we need to prepare for. Natural disasters such as floods, hurricanes, and tornadoes and even virtual attacks on information technology infrastructure must also be considered.

We at the System Office have taken on the initiative with the development and implementation of the new EAP and we have been proactively interacting with other state agencies in preparing our campuses, our System, and our State for an emergency.

Additionally, as mentioned by Mark in his "From the Director" section, we are taking steps towards selecting a firm to provide system-wide disaster recovery services. This process is in the very early stages, but we will keep everyone updated on our progress.

We have been forced to re-examine our safety, health and security procedures and we continue to work towards better disaster planning and emergency preparedness with the hopes that the plans will never have to be called upon. I think Camilo Garcia of the University of Los Andes in Bogota, Columbia said it best: "May this be the last time we see acts of such nature anywhere in the world, and may the many lives lost contribute to the construction of a new, more peaceful and tolerant international order."

-Jeff Owens, USG Safety and Energy Program Manager



Lessons Learned

Manhattan campuses share what they learned from September 11.

Crisis Management

- *Do not totally abandon buildings unless they pose an immediate health risk. Keep core staff available in the event the building is put to use, even if not by you.*
- *If at all possible, contain outside emergency services to specific areas of your physical plant.*
- *Maintain, in an off-site location, hard copies of important information.*
- *Do not expect higher education institutions to receive top priority in the renewal of services such as electricity, access, and telecommunications.*

Future Planning

- *Avoid the cookie-cutter approach to emergency management planning. Begin with an open paradigm and then prepare alternate sets of specific responses, depending upon the nature of the disaster.*
- *Join in planning with other local higher education institutions in your area so you reinforce each other's efforts.*
- *Proactively seek out a place at the table with local, state, and federal agencies that respond to emergencies and disasters. Higher education institutions have a lot to offer during emergencies.*

Most Common Violations

(from page 2)

Hazardous Waste - Resource Conservation and Recovery Act (RCRA):

- Failure to make hazardous waste determinations.
- Failure to properly label containers holding hazardous waste.
- Failure to identify the accumulation start date.
- Failure to provide and/or document hazardous waste training.
- Failure to accumulate hazardous waste in a closed container.
- Storing hazardous waste for longer than 90 days without a permit.
- Failure to inspect hazardous waste containers in storage on a weekly basis.
- Failure to have an adequate contingency plan.
- Failure to separate containers holding incompatible wastes.

Oil Spill Prevention, Control and Countermeasures (SPCC) Planning:

- Failure to prepare and implement an oil SPCC Plan.
- Failure to address all required elements, including:
 - SPCC plan not certified by a professional engineer.
 - SPCC plan not reviewed/updated every three years.
- Failure to include all bulk oil stored at the facility (i.e. transformers, hydraulic systems, emergency generators, drum storage, etc.).

- Failure to identify specific spill pathways from each individual oil storage location.

Clean Air Act:

- Failure to submit appropriate permit application.
- Failure to include all emission sources on permit application.
- Failure to submit appropriate reports.
- Failure to keep fuel and solvent-usage records.
- Failure to comply with permit conditions.
- Failure to install or maintain opacity monitors.
- Failure to monitor fuel for nitrogen and sulfur content.

Oil Storage:

- Failure to provide adequate secondary containment.
- Underground Storage Tanks (USTs) without (or with malfunctioning) leak-detection systems.
- Incomplete UST removal - contaminated soils left on site.
- Failure to register USTs.

Inspiring Quote

Every violation of truth is not only a sort of suicide in the liar, but is a stab at the health of human society.

-Ralph Waldo Emerson



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