

10 Things You Can Do 10 years After Your EPA Peer Audit

21st Annual Office of Real Estate and Facilities Conference



MOVE YOUR ENVIRONMENT FORWARD

Agenda

- Peer Audit Program Review
- 10 Things You Should be Doing
- Resources, Questions and Answers



PEER AUDIT REVIEW

Peer Audit Program Review

- Arose from EPA's College and University Enforcement Initiative in 2007
- Georgia Board of Regents signed a Peer Audit Agreement with EPA which included the following key elements:
 - Audit each campus with a team of trained peers
 - Receive an audit report identifying gaps in compliance
 - Disclose violations to EPA within 21 days of audit report
 - Correct violations within 60 days of discovery
 - Submit a final compliance report to the EPA
 - Enact routine audits or implement an Environmental Management System (EMS)
- Key Benefit of the program
 - Gravity based penalty relief if comply with the agreement
 - Pave the way for continued compliance



10 THINGS...

10 Things You Should be Doing

1. Locate and read your audit report
2. Locate and read your final compliance report
3. Identify status of EMS/Audits

10 Things You Should be Doing

4. Conduct an Oil Capacity Inventory
5. Complete a chemical inventory
6. Identify Air Emission Sources
7. Identify Waste Streams
8. Identify Drain Discharges
9. Organize all Environmental Documents
10. Determine Environmental Training Needs

1. Locate and Read your Audit Report

- Your audit report identified (at the time of the audit)
 - What regulations applied to the campus
 - Why other regulations did not apply to the campus
 - Opportunities for improvement with your compliance on campus
 - Who was involved in your audit
- Where to look
 - Director of Facilities
 - CFO Office
 - EHS Office

2. Locate and Read your Final Compliance Report

- Final Compliance Report was submitted to the EPA to close your audit
- Your final compliance report stated
 - Corrective actions taken
 - Preventive actions to ensure similar violations do not recur on campus
 - Your dedication and intentions for to either implementing an EMS or conducting recurring audits
- Ensure you are following these protocols

3. Identify status of EMS vs. Audits

- If you selected audits
 - What frequency are you completing audits (should be at least every 2 years)
 - How are you completing and documenting these audits
 - Are you addressing the findings from these audits
- If you selected EMS
 - Is it documented
 - Is it measured
 - Is it recorded
 - Is there action
- If you can find no evidence of either, recommend you conduct a compliance audit as soon as possible

3. Identify status of EMS/Audits

- What is an EMS?
 - a set of interrelated or interacting elements of an organization to establish policies and objectives and processes to achieve those objectives
 - Plan – Do – Check – Act
- What does an EMS look like?
 - A Set of documented policies, procedures, defined roles and responsibilities, checklists, audits, corrective actions, upper administration review and overall continuous improvement



4. Conduct an Oil Capacity Inventory

- During your audit, this inventory was used to identify if Spill, Prevention, Control and Countermeasures (SPCC) Plans applied to your campus
 - Your campus has changed since your audit!
- “Oil” includes
 - Petroleum oils
 - Synthetic oils
 - Mineral oils
 - Fuel oils
 - Oil sludges and refuse
 - Used oil
 - Animal, vegetable, seed oils



4. Conduct an Oil Capacity Inventory

- If you have an SPCC Plan
 - Has it been reviewed/updated within 5 years?
 - Does it include all oil on site?
 - Are you following it?
 - Procedures, containment, monthly inspections, annual training, spill response, reporting, etc.
- If you do not have an SPCC Plan
 - Do you need one? Compare your inventory to the 1,320 gallon above ground capacity threshold



5. Complete a Chemical Inventory

- Chemical inventories are used to determine applicability with numerous programs:
 - EPCRA Emergency Planning
 - EPCRA Tier II/SDS Reporting
 - Department of Homeland Security Chemicals of Interest Program
 - Drug Enforcement Agency
 - Federal Bureau of Investigation
 - Alcohol Tobacco and Firearms
- Are you keeping these inventories up to date at least annually?
- Are you completing the necessary reports?



6. Identify Air Emissions Sources

- An air inventory and emission calculations were likely used to determine what air permits were required for your campus
- AIR REGULATIONS KEEP CHANGING
- Have you added new sources?
 - Boilers
 - Emergency Generators
 - Paint Booths
- Just because you didn't need an air permit 10 years ago, doesn't mean you don't need one NOW!
- Just because you don't have an air permit, does mean you don't have requirements to follow
 - for example, emergency generator run logs



8. Identify Drain Discharges

- What relationship did you establish with the sanitary sewer district leading up to and following your audit
- Are you maintaining that dialogue of what is going down the drain
- Are you ensuring **ONLY** rainwater is going down storm drains – not like what we see in this photo!

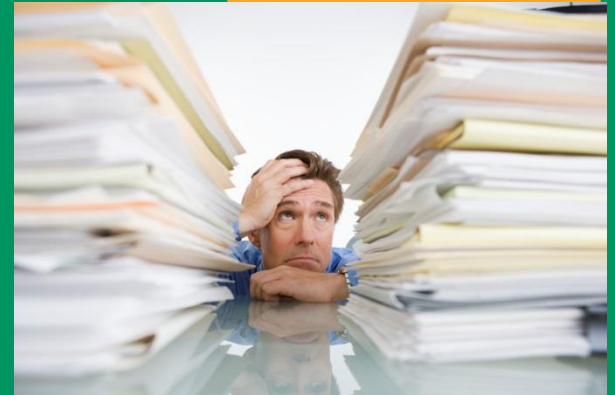


9. Organize All Environmental Documents

- Documentation (or lack thereof) is always an issue in audits!
- Identify what documents/records are needed
- Identify where documents/records are located on campus
- Identify record retention of these documents

9. Organize All Environmental Documents

- Examples
 - Items from our 10 tasks list
 - Permits and records that prove you are complying with permits
 - Plans/procedures and records that prove you are conforming
 - Employee licenses (refrigerant, pesticide, UST operator, etc.)
 - Emergency generator run logs
 - Asbestos abatement records
 - Refrigerant logs, including leak rate calculations
 - EPCRA II Reports
 - Environmental Site Assessments
 - Waste disposal records
 - Waste inspections
 - UST installation, maintenance, or closure records
 - Lead based paint disclosure



10. Determine Environmental Training Needs

- What training was completed prior to and following your audit?
- Are you following the required training schedule (or what you said in your FCR)?
 - RCRA Hazardous Waste (potentially annually, depending on your generator category)
 - DOT Hazardous Materials (every 3 years)
 - SPCC Plan (annually)
 - Universal Waste (awareness)



WRAP UP

Wrap Up

- We understand many colleges suffer turnover of staff and administration
- But:
 - Your college signed an agreement with EPA to meet the conditions of the Audit Policy
 - The program was not a “one and done”
- Your campus is dynamic therefore your environmental compliance program must be dynamic

Resources

- SPCC Plans
 - <https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations>
- EPCRA Reporting
 - <https://www.epa.gov/epcra>
- Air Permits
 - <https://epd.georgia.gov/air/air-permitting>
- Waste Management
 - <https://www.epa.gov/hwgenerators>



QUESTIONS

THANK YOU.

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