

## 10 Action Items to Conduct after Peer Auditor Training and before Your On-site Audit

**Please complete the following tasks before your on-site audit. The information is needed at the time of the audit to confirm whether your campus is in compliance. Please contact HRP Associates, if you have questions.**

1. Prepare an oil storage inventory (only containers or reservoirs greater than 55-gallons) including, but not limited to, tanks, 55-gallon drums, transformers, generators, and elevators. Please note the building, location within the building, department, date of installation and material of construction of the container, reservoir, or tank, and if sized secondary containment is provided. Also note if spill material supplies are located in close proximity.
2. Prepare a chemical inventory for each department on campus and include: the name of each chemical; quantity; and a reference to whether the inventoried chemical is an Extremely Hazardous Substance (EHS). Calculate the total quantity of each chemical campus-wide and verify, by notation, whether any are stored in quantities greater than 10,000 pounds, or above the lesser of 500 pounds or the Threshold Planning Quantities (TPQ) for an EHS. The EHS list of chemicals and their respective TPQ can found on the “List of Lists” at <http://yosemite.epa.gov/oswer/lol.nsf/homepage>.
3. Prepare an inventory of all transformers and potential PCB-containing equipment located on campus including any teaching equipment in the science departments. Determine the PCB content for each piece of equipment by reviewing nameplates, historic records, or by contacting your local utility company. The list should include: the type of equipment, location, serial #, volume of oil, PCB content in parts per million (ppm), indication if the content is known through testing or known through literature, and ownership of the equipment (i.e. college or local utility). Note: if your local utility owns transformers on your campus, then obtain documentation from the utility stating it owns those transformers and is responsible for their compliance with the applicable regulations.
4. Prepare an inventory of fuel burning equipment and include the rating of the equipment (i.e. Mbtu or KW), location, date of installation, type of fuel burned (i.e. diesel, natural gas, propane, #2 fuel oil, etc.), estimated hours of operation, and any air emissions permit(s) issued by the state or local environmental agency for such equipment. The inventory should include boilers, generators, kilns, paint booths, etc. Use this inventory to calculate facility-wide potential air emissions using EPA AP42 emission factors available at <http://www.epa.gov/ttn/chief/ap42/>.
5. Prepare an inventory of all waste streams generated on campus. The inventory should include the name of the building, department, and room where the waste is generated, the name of the waste generated, the method in which it is stored (i.e. satellite vs. central accumulation), and the approximate waste generation rate on a monthly basis. Determine or designate by notation if each waste stream is classified as a hazardous waste, a non-hazardous waste, a universal waste, a biohazard waste (red bag or sharp), or recyclable and indicate if you made this

determination using lab analyses or user knowledge (review of MSDS or discussion with generating department).

6. Obtain licenses and contracts from vendors who perform pesticide applications, pool maintenance, refrigerant recycling, biomedical waste disposal, universal waste disposal, and hazardous waste disposal. Make sure you have copies of all college employee licenses for boiler operation, pesticide application, pool operation, etc as well.
7. Determine the level of environmental training received by campus faculty and staff. Develop a list of the training courses completed, the dates of the training, and provide copies of any certificates or licenses issued as part of the training. Applicable training typically includes: RCRA Hazardous Waste, DOT Hazardous Materials, OSHA Emergency Action, Hazardous Communication and Oil Spill Control and Prevention (SPCC).
8. Organize and compile copies of off-site shipments of all wastes in the last three (3) years, including but not limited to hazardous wastes, universal wastes, recycled materials, low-level radioactive, used oil, kitchen grease, and biomedical waste. All copies (or the originals) should be filed in one location for easy access during the audit. Once all manifests are compiled, staple or clip the copies of the shipments together (i.e., one copy is signed by the generator for off-site shipment, another copy is returned by the disposal facility to say it has been received). For disposal of lab pack items, ensure that documentation of contents of the lab pack is maintained.
9. Organize and make copies of all environmental records completed for the campus. Review historical records for former underground storage tank closures, soil or ground water contamination investigation; dump site information, on site landfills, dry well investigations, asbestos abatement projects, PCB oil removals, historical lab clean-outs, etc.
10. Network with your fellow peer auditors and with your co-workers! The job of environmental compliance cannot be performed by any one individual and must have the cooperation of several people on campus. Typically one person from each department, or building, should be designated as the environmental liaison for that building. Share resources and environmental knowledge to keep your campus in compliance!

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