

**DATE:** July 27, 2007

**RE: TEN (10) ACTION ITEMS TO ADDRESS FOLLOWING ENVIRONMENTAL COMPLIANCE PEER AUDIT TRAINING**

**QUESTION:**

Now that I have had the peer audit training, how can I go back to my college and start getting us into compliance and preparing for our audit??

**GUIDANCE:**

*The following items can all be completed or started prior to your peer audit. However, if you choose to complete any of the listed corrective actions, you should make sure to keep track and record when these tasks are completed, so they can be disclosed to the EPA and covered by the audit.*

1. **Prepare an oil inventory (containers greater than 55-gallon):**  
Prepare an Excel table with the column headings labeled: location of oil storage, tank or container size, type of fuel stored, date of tank installation, material of construction of the tank or container, and description of secondary containment, if any. Don't forget to include transformers and elevators.
2. **Prepare a chemical inventory:**  
Prepare an Excel table with the following column headings for each department on campus: chemical name, department, building name, room #, hazardous constituents, Extremely Hazardous Substance - EHS (yes/no), size of container, date purchased, and type of container. Determine which chemicals (including oils and gasoline) are stored on-site in quantities greater than the Threshold Planning Quantity (TPQ). The EHS list of chemical and their respective TPQ can be found on the "List of Lists" at <http://yosemite.epa.gov/oswer/CeppoWeb.nsf/content/chemicals.htm>
3. **Prepare a PCB equipment inventory:**  
Contact your local utility company and request information on utility owned transformers located at your campus. This request may need to be in writing and include the serial numbers or markings on the units located on campus. Prepare an Excel table for the campus which has the following column headings: type of equipment, location, serial #, volume of oil, PCB content in parts per million (ppm), knowledge through testing (yes/no); knowledge through literature (yes/no), ownership (i.e. college or local utility).
4. **Prepare an inventory of fuel burning equipment:**  
Prepare an Excel Table for all fuel burning equipment with the column headings labeled: fuel burning source, location, type of fuel burned, rating of burning equipment (Btu/hr for boilers and kW for generators), date of installation, known air permit ID # or registration #'s.

**5. Prepare an inventory of waste streams generated on campus:**

Prepare an Excel Table with the column headings labeled: department, classroom/location, waste generated, storage container, amount generated per month, hazardous waste (yes/no), non-hazardous waste (yes/no), recyclable (yes/no) lab results for waste stream determination (yes/no), user knowledge for waste stream determination (yes/no).

**6. Obtain Licenses and Contracts:**

For subcontractors who service the on site pool or apply pesticides, request a copy of their current operating licenses as well as logs or records of chemical applications. Also review contracts to ensure environmental liability is with the contractor not the college.

**7. Investigate the level of environmental training:**

Send out a campus email to facilities, operations, and science departments to determine the level of EPA and OSHA training the campus staff has historically had, and currently perform or receives. This will allow the college to determine resources and areas of strength and weakness. Courses typically required for a college campus are: RCRA hazardous waste, DOT Hazardous Materials, OSHA Emergency Action, Hazard Communication, and Oil Spill Control and Prevention (SPCC).

**8. Off site shipments of materials:**

Send out a campus email or have direct contact with those individuals (i.e. usually science, art, operations, or physical plant) who may have records of historical manifests in their files. These manifests or shipping papers include hazardous wastes, non hazardous wastes, recyclables, medical waste, asbestos, lead paint and universal waste. Once determined where all the manifests are located, a copy (or the original) of these manifests (from at least the last 3 years) should be filed in one location for easy access during any impending audit. Once all manifests are organized, staple the copies of the shipments together (i.e. one copy is signed by the generator for off-site shipment, another copy is returned signed by facility to say it has been received).

**9. Record keeping:**

Determine on site where environmental records (plans, inspections, licenses, registrations, training, manifests, etc.) are maintained on campus, and identify a system where the records are to be maintained and controlled in the future. Designate one individual who is the "campus champion", and who will have ultimate control of documents. Develop a bibliography of your historical and current environmental documents.

**10. Networking:**

Develop a network or organizational chart of individuals at the college who will ultimately have responsibilities associated with Environmental Compliance. The job of environmental compliance cannot be performed by any one individual, and must have the cooperation of several. Typically one person from each department, or building, should be designated as the environmental liaison for that building. The organizational chart should also include an authority figure on campus.