



# The Environmental 'Dirty 30'

- Critical Compliance in Schools -

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# Why should I comply with environmental & occupational regulations?

- Enforcing environmental laws is a central part of the EPA's Strategic Plan to protect human health and the environment.
- EPA enforcement works to find companies or persons responsible for contamination. They will negotiate and or order a clean-up and you will be responsible for all costs.
- Civil and criminal enforcements are both utilized when reviewing environmental non-compliance. You can be personally liable for flagrant non-compliance.
- Fees can be huge: e.g., The EPA's RCRA hazardous waste rules rose two years ago from \$35,500.00 per day, per violation to \$70,117.00 per day, per violation.

# healthAIR Team

- Asbestos (Required)
  - 6-Month Periodic Surveillances
  - 3-Year Reinspections
  - Annual Notification
  - Yearly Asbestos Awareness Training
  - Designated Person Properly Trained
- Lead Paint Day Care Inspections (Required)
- Lead Paint RRP, Renovation, Repair & Painting (Required)
- Radon Sampling (Recommended)
- Indoor Air Quality Responses (Recommended)
- Mold/Biological Responses (Recommended)
- Confined Space Program (Required)
  - Written Program
  - Confined Space Inventory
  - Confined Space Evaluations
- Lock-out/Tag-out Program (Required)
- Phase I-II Environmental Site Assessments (Recommended)
- Hazard Communication Program (Required)
  - Written Program
  - Chemical Inventories
  - MSDS Compliance (Hard Copy/On-line)

# cleanWATER Team

- Drinking Water Sampling, Well Water (Required)
- Drinking Water Sampling, City Water (Recommended)
- Underground Storage Tank Compliance (Required)
  - Assign A & B Operators
  - Train all C Operators
  - Annual & Triennial Testing (Depending on System)
  - Daily & Monthly Documented Tasks
  - Have Spill Kits Available
- Above Ground Storage Tanks (Required)
  - Spill Prevention, Control & Countermeasure (SPCC Plan)
- Sampling Well Closures (Required after 90 Days)
- Chemical Hygiene Plan (Required)
  - Written Plan
  - Chemical Inventories/Proper Storage
  - SOPs, Job Assignments & Training
  - Equipment Testing: Fume Hoods & Emerg Shower/Eyewash
- Stormwater Permit Compliance (Required in Urban Areas)
  - Tran/Maint Stormwater Pollution Prevention Plan (SWPPP)
  - 6-Month Inspections of SWPPP Facilities
  - 2-Year Progress Reports
  - Dry Weather Screening/Sampling
  - Total Maximum Daily Load Storm Event Sampling
  - Stormwater Education Website
  - Employee Training
- SARA Title III- Tier II Reporting

# safeEARTH Team

- Regulated Waste Disposal (Required)
  - Custodial/Maintenance Chemical Disposal
  - Chemistry/Science Chemical Disposal
  - Biological Specimen Disposal
- Regulated Waste Disposal (Required)
  - Custodial/Maintenance Chemical Disposal
- Proper Refrigerant Capture (Required)
- Mercury Disposal/Spill Clean-ups (Required)
- Proper Lab Pack Move/Storage (Recommended)
- Recycling Programs (Recommended)
  - Fluorescent Lamps
  - Batteries
  - E-Waste
- PCB Ballast Disposal (Required)
- Medical Waste Program (Required)
  - Must be Registered with State of Michigan
  - Must have Sharps Containers/Dispose Quarterly
  - Pharmaceutical Disposal (not part of med waste regs)
- Emergency Spill Response (Required)
  - Recommended Agreements and/or Contracts
  - Should have Spill Kits Available
- Catch Basin Cleaning & Disposal of LIW (Required)
- Hoist Pit/Bus Wash Cleaning & Disposal of LIW (Required)
- Oil/Water Separator Cleaning & Disposal of LIW (Required)
- Building Decommissioning for Regulated Materials (Required)

# Michigan School District Violations

## AHERA (Asbestos)

- Employee reported district to EPA Region V for “lack of compliance”.
- Resulted in ‘5-day audit’ of AHERA Management Plans and scheduled abatement activities.
- Findings: District found to be in compliance with some missing historical information.

## Confined Space

- Employee was injured while conducting work within a confined space.
- Findings: District was found to be in non-compliance with regulations and resulted in complete program development. Financial penalties unknown.



# Michigan School District Violations

## Stormwater (Audits):

- *“Based on the audit, X School District is satisfactorily implementing most of their MS4 permit requirements. However, as detailed in the enclosed audit report, WSD staff identified areas that require attention.”*
- The 14 page audit report detailed items that the WSD staff “recommended” improvement and items that the required “corrective action”.
- The MDEQ perform audits of each permit within each permit cycle. Permit cycles are five (5) years.
- Seven (7) of our school district clients have already been audited.
- Finding typically result in a letter (report) detailing what should be improved and what must be changed. The district must submit all changes made within a stipulated time period.

# Michigan School District Violations

## Regulated Waste

- Several of our district have received random inspections and multiple page citations for various waste generating violations.
- Multiple violations for lack of or improper waste characterizations.
- Almost always violations for broken fluorescent lamps and lack of identification as universal wastes.
- Lack of waste records for the past three (3) years is a typical violation.
- Proper labeling of wastes being generated.
- Proper spill containment/secondary containment for certain wastes being generated.
- Proper identification of generator status.
- Lack of emergency response plans detailing items detailing evacuations routes, fire department reviews and hospital locations, etc.
- Corrective actions and responses must typically be provided within 30 days.



# Michigan School District Violations

## Underground Storage Tanks

- Most registered tanks are inspected by LARA inspectors every three (3) years, but occasionally, they are more often. Examples of typical problems that have been found are:
- Missing documentation: testing results, Class B Operator inspection reports, leak test reports, tank monitoring report and Class C Training records.
- Ignored system alarms (nobody pays attention): All alarms are required to be addressed and recorded. Certain alarms may be investigated immediately and possibly reported to the State within 24 hours.
- No Class C Operator on site during fuel operations.
- Defective, leaking or inoperable equipment and components. These must all be repaired and or replaced upon finding.