



EHS Compliance Update

July 2005

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AIR—General Startup, Shutdown, and Malfunction Requirement Revisions

On April 5, 2002, EPA promulgated a final rule amending the “General Provisions,” which implement the CAA NESHAPs program. Among amendments to the General Provisions was language intended to clarify several issues related to startup, shutdown, and malfunction provisions. Presently, 40 CFR part 63, section 63.10(d)(5)(i) as amended requires that semi-annual startup, shutdown, and malfunction reports “must include the number, duration, and a brief description of each startup, shutdown, or malfunction.” The stated purpose of this revision is to provide enforcement authorities a mechanism for evaluating whether a facility's SSMP should be modified. However, the revision was to target the number of malfunction incidents, not startup and shutdown events. Industry's challenge includes an objection on the grounds that no notice or request for comment on this matter was provided in previous rulemaking proposals, as well as the argument that additional startup, shutdown, and malfunction reporting is unnecessary and unduly burdensome.

On December 9, 2003, EPA published a *Federal Register* notice addressing proposed amendments to the SSM requirements (**Continued on Page 7**)

EHS Management Strategies Management Systems

- ◆ Six Sigma Training
- ◆ OHSAS 18001
- ◆ ISO 14001
- ◆ IT Solutions/EMIS

EHS Training

- ◆ The “Complete” Waste Management Course
- ◆ Environmental Compliance for EHS Managers
- ◆ Hazwoper 8hr and 40hr
- ◆ Confined Space
- ◆ Site Supervisors

EHS Consulting

- ◆ IT/Web-based Compliance
- ◆ EHS Metrics & Reporting
- ◆ OSHA -VPP
- ◆ SPCC / SWPPP
- ◆ EHS Audits
- ◆ Air Quality
- ◆ RCRA Permitting
- ◆ Liability Assessment & Sarbanes Oxley Reporting
- ◆ Brownfield Development
- ◆ ASTM Phase I / BEA's

Enhancing EHS Performance with EMIS

A business's EHS performance is the overall costs associated with their operations impact on the environment and total impact to the environment. The companies employees are a significant component of the environment. There are three basic steps needed to enhance your EHS performance:

- I) Establish meaning full EHS metrics;
- II) Implementation of a management system based on continuous improvement; and,
- III) Optimization and improvement of the management system overtime.

Establish meaning full EHS metrics: This is a critical step and one many companies fail to implement appropriately. The key is to establish an appropriate

number of metrics that are appropriate to their operations that if improved with result in costs savings. These metrics must then be normalized to remove the fluctuations caused by non-environmental issues (production, expansions, etc.). These metrics can be established as part of your management system.

Management System: Many site have established EHS management systems using the ISO 14001 and/or OHSAS 18001 standards. This is not necessary to improve your EHS performance. The key is to establish a management system systematic and based on continuous improvement. This should include defined responsibilities, work instructions, (**continued on Page 2**)

FREE—SPCC Plan Amendments PowerPoint

EHS is pleased to offer a free PowerPoint overview of the new SPCC requirements. This is a good overview of the changes required for SPCC plan. Please contact us at:

JimCharlesPE@aol.com

For a free copy of this PowerPoint presentation. You can use this to update your SPCC training materials.



EHS Management Strategies

is pleased to announce our strategic partnership with **enviance**. The **Enviance System** is deployed at 750 facilities in over 55 companies and used by the most demanding Fortune 1000 companies and government organizations. Contact EHS for a demonstration of this powerful system free of charge at:

JimCharlesPE@aol.com

"The **Enviance System** is the only system we found that had the flexibility to do whatever we needed. With other software packages, we would have needed to change our processes or customize the software - neither of which was a good option for us. With Enviance, we just set it up the way we needed and it worked right away across all 21 of our facilities."

Celia Bayless
VP, Environment, Health and Safety
Fujicolor Processing

Enhancing EHS Performance with EMIS (Con't)

metrics and goals, internal auditing, and management review. The goal of your management system is to define your EHS risks and develop strategies for improvement in EHS performance. Many sites have established environmental management systems and the next logical step is to integrate there H&S programs.

Management System Optimization and Continuous Improvement: The long term goal of your management system is improved EHS performance. One of the most expensive items associated with any management system is the labor costs required and this is often overlooked by senior management. Also, the overall efficiency of the management system is not always considered when establishing metric and goals. A good measure of system efficiency is to measure "**management system man-hours**". This is a simple tracking of all hours associated with management system activities. For those of you tasked with managing your management system this is critical so that you can justify the capital costs required to implement optimization tools.

Environmental Management Information Systems (EMIS) are one tool that optimize your EHS performance when implemented properly. EMIS are systems that can be used to implement and track environmental, H&S, and management system information. These systems can greatly enhance the effectiveness of our EHS performance systems and have a big impact on **management system man-hours**. Many facilities have separate systems for EMS, environmental (Continued on Page 6)

SPCC Corner—Under SPCC regulations, concerning secondary containment, are companies required to provide secondary containment for gearboxes if they contain more than 55 gallons?

Under the SPCC requirements (40 CFR 112), the 55-gallon minimum capacity also applies to oil-filled operating, manufacturing, or electrical equipment. Therefore, when determining if a facility meets the oil storage capacity threshold, an owner or operator must consider oil-filled operating equipment (gearboxes included) that can contain 55 gallons or more.

EPA also specifically addressed the secondary containment issue in its preamble to the updated SPCC rule in the *Federal Register* (67 FR 47091, July 17, 2002). Specifically, EPA's position is that a primary containment system is the container or equipment in which oil is stored or used. Under SPCC rules, secondary containment is a requirement for all bulk storage facilities, large or small, manned or unmanned, and for facilities that use oil-filled equipment whenever it is practicable. The containment must at least provide for the capacity of the largest single tank (with sufficient freeboard for precipitation where applicable).

Also, in cases when secondary containment is not practicable, the owner or operator of a facility may deviate from the secondary containment requirement under 40 CFR 112.7(d). However, they must explain the rationale in their SPCC Plan, provide a contingency plan following the provisions of the oil removal contingency plans under 40 CFR 109, and otherwise comply with 40 CFR 112.7(d).

In short, the secondary containment provisions do apply to equipment containing more than 55 gallons.

TRI Compliance—Is a facility which meets the employee and toxic chemical activity thresholds and is in a covered SIC code required to report if it had no releases of the toxic chemical during the reporting year?

Yes, even if it releases no toxic chemicals into the environment and does not conduct any other waste management activities involving the listed toxic chemical, the facility must submit either the Form R or Form A (Alternate Threshold Certification Statement). If the facility meets the employee and chemical activity thresholds and is in a covered SIC code, but its annual reportable amount of the toxic chemical does not exceed 500 pounds and the facility has not manufactured, processed, or otherwise used more than one million pounds of the toxic chemical, the facility may submit the Form A (a two-page certification statement) instead of the Form R. However, if the facility exceeds either the 500 or one million pound limits, it must report on the Form R.

EHS Partners with Rule Engineering in Denver, Colorado to delivery Environmental & Safety consulting services. Let us show you our solutions based service delivery.

DOT Clarifies Applicability of Regulations to Pre-transportation

In the April 15, 2005 [Federal Register](#), DOT described the pre-transportation functions that are subject to the hazardous materials regulations. These include:

- Determining the hazard class of a hazardous material
- Selecting a hazardous materials packaging
- Filling a hazardous materials packaging, including a bulk packaging
- Securing a closure on a filled or partially filled hazardous materials package or container or on a package or container containing a residue of a hazardous material
- Marking a package to indicate that it contains a hazardous material
- Labeling a package to indicate that it contains a hazardous material
- Preparing a shipping paper
- Providing and maintaining emergency response information.
- Reviewing a shipping paper to verify compliance with the HMR or international equivalents
- For each person importing a hazardous material into the United States, providing the shipper with timely and complete information as to the HMR requirements that will apply to the transportation of the material within the United States
- Certifying that a hazardous material is in proper condition for transportation in conformance with the requirements of the HMR.
- Loading, blocking, and bracing a hazardous materials package in a freight container or transport vehicle
- Segregating a hazardous materials package in a freight container or transport vehicle from incompatible cargo
- Selecting, providing, or affixing placards for a freight container or transport vehicle to indicate that it contains a hazardous material

Personnel that perform any of these functions must be trained and tested every three years.

EHS Management Strategies Clients include:

- ◆ Alticor
- ◆ Delphi
- ◆ Dana Corporation
- ◆ American Axle & Manufacturing
- ◆ General Motors
- ◆ Steel Case
- ◆ DTE Energy
- ◆ Pfizer
- ◆ Eaton Corporation
- ◆ Median Automotive
- ◆ Exelon Energy
- ◆ Cascade Engineering
- ◆ Gill Industries
- ◆ Herman Miller
- ◆ Hayworth
- ◆ SAIC
- ◆ Honeywell

FREE—OSHA Recordables Regulation Update PowerPoint Presentation
Just email us at JimCharlesPE@aol.com and ask for a copy.

Web Site of the Month:
<http://hazmat.dot.gov/training/HowToUse.pdf>
How to use the Hazardous Materials Regulations

MANAGEMENT SYSTEMS

- ◆ Six Sigma Programs
- ◆ OHSAS 18001 OH&S Implementation
- ◆ ISO 14001 Internal Auditor
- ◆ ISO 14001 for New Managers
- ◆ ISO 14001 Implementation
- ◆ ISO 14001:2004 Transition

ENVIRONMENTAL COMPLIANCE

- ◆ The “Complete” Waste Management Course
- ◆ Environmental Compliance for EHS Managers
- ◆ Advanced RCRA Course

OSHA COMPLIANCE

- ◆ Hazwoper 8hr and 40 hr Programs
 - ◆ Site Supervisor
 - ◆ Confined Space Entry
-
-

Management Systems

OHSAS 18001 Implementation (1 day): This course will provide a detailed overview of the OHSAS standard and how to implement an OHSAS Health & Safety management system. Each student will leave with a good working knowledge of the standard and the tools needed to develop an HSMS.

Internal Auditor Training—ISO 14001 or OHSAS 18001 (2 day): This program is for anyone who wants to conduct internal audits. It will provide a detailed overview of the ISO14001 or 18001 standards and auditing techniques. This is a very “hands on” program filled with exercises.

ISO 14001 for Managers (1 day): This is a one day program designed to teach new managers or supervisors the requirements of their environmental management systems. The course will focus on the standard and provide the new manager with a good understanding of the operating requirements and their responsibilities.

ISO 14001 Implementation (1 day): This is a one day program designed to train facilities how to implement an ISO 14001 compliant environmental EMS. You will get a good understanding of the ISO 14001 standard, how to plan an implementation, and development of major EMS components.

Six Sigma Programs: EHS offers the following Six Sigma training program; Executive Leadership (1 day), Champion (3 days), Green Belt (5 days) and specialized Black Belt training (24 days). Other programs include Six Sigma Lean Manufacturing, Transactional Lean, and other Six Sigma tools.

Environmental Compliance

The “Complete” Waste Management Course (1 day): This program provide the training required under DOT and RCRA for hazardous materials and waste management. The DOT training will cover the requirements of Subpart H, §172.700-172.704. The RCRA training includes waste characterization and management, manifesting, record keeping, training, contingency planning, universal wastes, and biennial reporting. This training meets the annual RCRA training requirements.

Environmental Compliance for EHS Managers (1 day): This program provides a good overview of the environmental regulations that apply to industrial and manufacturing operations. This course is ideal for the new EHS manager or anyone that needs a good understanding of environmental regulations. It will cover Waste Management (RCRA & non-hazardous), Water Discharge (NDPES & POTW), Emergency Preparedness (SPCC, Stormwater), and EHS Training requirements.

Advanced RCRA Course (1 day): This is a must for all EHS managers. After a brief review of the RCRA regulations this course will get into LDR requirements, waste delisting, waste exemptions, TSD permitting and closures, and RCRA corrective action.

OSHA Compliance

Hazwoper 8hr, 24hr, and 40 hr Courses: These programs meet the requirements for 29 CFR1910.120 for initial and annual hazardous operations training.

Confined Space (1 day): This course fulfills the classroom requirements of 29 CFR 1910.146 for Confined Space Entry.

OSHA Site Supervisor (1 day): This course meets OSHA training requirements for supervisors and managers involved in the management and administration of hazardous waste site activities. Per 29 CFR 1910.120, each site must have a Supervisor who has received an additional 8 hours of training.

| Training Schedule Public Courses | | | | | |
|---|-------------|--|--|--|--|
| Course | Cost | June | July | August | September |
| ISO 14001 Internal Auditor | \$659 | Philadelphia, PA Milwaukee, WI Orlando, FL Minneapolis, MN | Grand Rapids, MI Indianapolis, IN Cleveland, OH Traverse City, MI | St. Louis, MO Kansas City, MO Louisville, KY Atlanta, GA Chicago, IL | Houston, TX Knoxville, TN Greenville, SC Pittsburg, PA Columbus, OH |
| ISO 14001:2004 Transition | \$399 | Edison, NJ | Chicago, IL Grand Rapids, MI Toledo, MI | Detroit, MI | St. Louis, MO Toledo, OH |
| ISO 14001 for Managers | \$459 | Grand Rapids, MI | Orlando, FL Indianapolis, IN | Grand Rapids, MI Minneapolis, MN Milwaukee, WI | Chicago, IL Detroit, MI St. Louis, MO |
| ISO 14001 Implementation | \$459 | Grand Rapids, MI | Orlando, FL Indianapolis, IN | Grand Rapids, MI Minneapolis, MN Milwaukee, WI | Chicago, IL Detroit, MI St. Louis, MO |
| OSHAS 18000 Overview and Implementation | \$459 | | Detroit, MI Atlanta, MI | Chicago, IL Boston, MA | St. Louis, MO Denver, CO |
| The "Complete" Waste Management Course | \$499 | Grand Rapids, MI | Detroit, MI Indianapolis, IN | Chicago, IL Grand Rapids, MI | |
| Environmental Compliance for EHS Managers | \$499 | | Chicago, IL | Lansing, MI | Atlanta, GA |
| Advanced RCRA Course | \$499 | | | Chicago, IL | Atlanta, GA |
| Six Sigma Executive Leadership Overview | \$750 | New York, NY | Chicago, IL | | |
| Six Sigma Champion Training | \$2,950 | | | Columbus, OH | |
| Six Sigma Green Belt | \$5,950 | Niagara Falls | | | Phoenix, AZ |
| Hazwoper Refresher (8 hr) (Many more locations and dates please contact EHS) | \$125 | Indianapolis, IN Detroit, MI Chicago, IL Lansing, MI Madison, WI Philadelphia, PA Denver, CO | Indianapolis, IN Detroit, MI Chicago, IL St. Louis, MO Cincinnati, OH Madison, WI Philadelphia, PA | Indianapolis, IN Detroit, MI Chicago, IL Lansing, MI Madison, WI Philadelphia, PA Denver, CO | Indianapolis, IN Detroit, MI Chicago, IL St. Louis, MO Cincinnati, OH Madison, WI Philadelphia, PA |
| Confined Space | \$299 | Indianapolis, IN | Chicago, IL | Detroit, MI | Hartford, CT |
| Site Supervisor | \$195 | | | Oakland, CA | Denver, CO |

To get specific dates and to register contact JimCharlesPE@aol.com

Don't see your location contact us!!! We can provide these programs at your location with as few as 6 people. See www.EHStraining.ZoomShare.com for current training schedule.

Enhancing EHS Performance with EMIS (Con't)

compliance, OSHA recordables, MSDS tracking, and other EHS systems. These systems have allowed facilities to optimize each individual element of their overall EHS management systems. Companies can use EMIS to further improve their EHS performance by:

- ◆ Integration of these multiple systems into a comprehensive EHS management system;
- ◆ Multi-site companies can further integrate these systems across multiple locations; and,
- ◆ Incorporation of EHS metrics and EHS performance reporting.

These systems can have a dramatic impact on the effectiveness and productivity of your EHS performance. A company with multiple sites can significantly improve their EHS performance by implementing a consistent EMS and EMIS tools across all locations. The improvement in EHS performance includes lower **management system man-hours**, lower EHS training costs, enhanced EHS compliance, consistency in EHS reporting, and many other benefits.

One barrier to these types of projects are because companies often fail to quantify the internal cost of the multiple systems and the potential for ineffectiveness to result in non-compliance or enforcement actions. This makes it difficult to demonstrate an accurate return on investment. Also, many of the EHS improvements are difficult to quantify and explain the value to senior management. The bottom line is that EMIS systems will enhance your overall EHS performance and ultimately result in reduced operational costs.

EHS Management Strategies can help you with an initial evaluation of your systems and development of a plan to enhance your EHS performance. We can help with the selection of the appropriate EMIS tools and develop a cost justification and ROI calculations. Please contact us at JimCharlesPE@aol.com.

Environmental Compliance University, Grand Rapids & Detroit, MI

EHS is pleased to announce its new “**Environmental Compliance University**” program designed for the new EHS professional both in industry and consulting positions. This will consist of a series of regulatory focused programs designed to provide an overview of the regulations and applicability to industry. These will be taught in 2-1/2 hour segments over a six week period.

The program is designed to give a good general understanding of the regulations and compliance strategies. This program will start October 10th 2005 from 5:00 to 7:30 PM. The cost for the program is \$999 for all six modules or each module is available for \$249. You may register by contact us at JimCharlesPE@aol.com. This program will be limited to 12 people so register early!!!!

| | |
|-----------------|--|
| Module 1 | Hazardous Waste Management (meets 40 CFR 264 and 265 requirements) |
| Module 2 | SPCC /PIPP/SWPP Regulations |
| Module 3 | Chemical Storage and Reporting (Sara Tier II, Toxic Release Inventory) |
| Module 4 | Storage Tank Management (UST and AST) |
| Module 5 | Waste Water Regulations (CWA, NPDES Permitting, Waste Water Reporting) |
| Module 6 | DOT Hazardous Materials Regulations (meets subpart H, 172 requirements) |

Satellite Accumulation Areas—Did you know?

Question : Do generators have to include the hazardous waste in SAAs in the monthly quantities for determining generator status (i.e., SQG or LQG)?

Answer : Yes. Generators must include all the hazardous waste in the various SAAs in their monthly quantities for determining generator status.¹¹ Sections 261.5(c) and (d) identify hazardous wastes that do not have to be counted when determining generator status. Hazardous waste stored in SAAs is not on this list; therefore, hazardous waste in SAAs must be included in the generator's monthly quantity determination

AIR—General Startup, Shutdown, and Malfunction Requirement Revisions (con't)

under 40 CFR part 63, subpart A. The statement clarifies that only "significant" SSM events would be subject to the new recordkeeping requirements. (The proposed amendments would also require affected sources to submit copies of SSMPs to permitting authorities at the time SSMPs are adopted and again when they are subsequently revised.)

In explaining the intent of the (to be amended) recordkeeping and reporting requirements, EPA emphasized that the requirement to periodically report malfunctions does not encompass minor problems that have no impact on emissions. Furthermore, EPA stated that the extension of the recordkeeping requirement to routine startups and shutdowns is unwarranted. Only in those instances where a startup and shutdown include actions that do not conform to the SSM plan — and the standard is thereby exceeded — is the facility required to report such deviations from the plan.

Thus, facility managers should focus SSM recordkeeping and reporting efforts on significant source operations, i.e., operations with the potential to impact emissions of regulated HAP emissions. Pending finalization of the proposed amendments, however, facility managers are encouraged to work out compliance and documentation approaches (and SSMP submittal procedures) in advance with a CAA Title V permitting

BLS Publishes Report on 2003 Lost-Worktime Injuries and Illnesses

The Bureau of Labor Statistics (BLS) [reported March 30, 2005](#) that a total of 1.3 million injuries and illnesses in private industry required recuperation away from work during 2003. The three occupations with the greatest number of injuries and illnesses were laborers and material movers, truckers, and nursing aides, orderlies and attendants. Acting Assistant Secretary of Labor for OSHA Jonathan L. Share said in a [statement](#) that the report provides important information that will "assist OSHA in its ongoing effort to target our resources in the way that has the most positive impact on workplace safety and health..." The 2003 data was compiled for the first time using the North American Industry Classification System (NAICS) and the Standard Occupational Classification Manual.

This 30 page report can be found at <http://www.bls.gov/news.release/pdf/osh2.pdf>.

OSHA Voluntary Protection Programs (VPP) Activity

The following companies were approved last month for new or continued participation in OSHA's Voluntary Protection Programs (VPP): **Region IV:** Milliken & Company, Elm City Plant, LaGrange, Ga. (Cont. Star); Kimberly Clark Corp., Corinth Mill, Corinth, Miss. (New Star); Covanta Pasco, Inc., a Covanta Energy Co., Spring Hill, Fla. (New Star) **Region V:** International Paper, Menomonee Falls, Wisc. (New Star); NIBCO, Inc., Orbetz, Ohio (New Star) **Region VI:** Monsanto Co., Stuttgart Facility, Stuttgart, Ark. (New Star); Entergy Operation Reserve Service Center, Reserve, La. (New Star); Warehouse Specialists, Inc., St. Gabriel, La. (New Star); Zachry Construction Corp., (SA) Equipment Maintenance Yard, San Antonio, Texas (New Star); GE Healthcare Information Technology, El Paso, Tex. (New Star); Muniz Engineering Inc., Safety Fire Services Contract at NASA-JSC, Houston, Tex. **Is your site in the VPP program? Contact EHS to discuss how to leverage this program.**

CASE STUDY— EHS Performance Improvement

Georgia Power T&D uses Enviance to save time and money while assuring compliance.

Georgia Power, the largest of Southern Company's five electric utilities, has been providing electricity to residents of Georgia for more than 100 years and has about 8,800 employees to keep things running smoothly. All of Southern Company's subsidiaries, including Georgia Power, place environmental compliance as a top priority; and recently the Enviance System was implemented to fill in the gaps within Georgia Power's environmental management system.

With **six employees responsible for environmental compliance oversight at 90 transmission and distribution (T&D) service and maintenance centers**, Georgia Power decided that they needed to provide tools for these employees to manage their workload more efficiently. They received positive feedback from another Southern Company affiliate using the Enviance System to track compliance through tasking, reminders, reports, and calculations. And, in 2004, Enviance was selected as Georgia Power's environmental information management system.

“At Georgia Power, our T & D organization is only beginning to ‘scratch the surface’ of all the potential applications of Enviance,” said Carolyn Kennedy, Environmental Services Manager, Georgia Power. “We are planning to use the system to track findings from our facility compliance self-assessments as well as findings from formal internal audits. One of the most exciting opportunities is the ability to integrate our laboratory information management system (LIMS) with Enviance; so, our laboratory data will automatically be added to reports such as NPDES discharge monitoring reports. This will significantly speed the process of report completion, eliminate transcription errors, and save manpower.”

Georgia Power had many different systems for managing compliance, like all companies that have been in operation for more than a century. Ranging from paper checklists to desktop computers and internal networks – the older systems worked but did not provide a central compliance system like Enviance offers.

Georgia Power needed a system to assure compliance. The Enviance System immediately addressed two needs: replacement of a legacy system for reporting of oil spills which was no longer supported by IT, and tracking tasks and data related to underground storage tank compliance across the entire state.

Georgia Power selected Enviance because of its powerful functionality.

Many of Georgia Power's service centers have underground storage tanks for vehicle fuel storage. Monthly tank volume reconciliation reports are required to verify that a tank is not leaking. This involves Enviance users at 50 sites entering data from tank monitors; several data points are collected on a daily basis and also when fuel deliveries are made. All of this data is entered into the Enviance System, where at the end of a calendar month, the system then performs the required calculations to determine if the tank is operating in compliance or if a discrepancy is noted.

The Enviance System allows mobility - with access anywhere there is an internet connection - to those users who are responsible for regulatory compliance. Enviance users at the 90 service centers enter data when there is an oil or hazardous material spill or release. The System triggers certain tasks for events that exceed a reportable quantity or for oil spills that enter a waterway. **(Continued on Page 9)**

Virtual EHS Manager

Nobody can know every aspect of EHS regulations and available technologies. Additionally, small to medium sized firms can not afford to hire full time EHS managers. With the **Virtual EHS Manager** you have access to experts in:

- ◆ Waste Management
- ◆ Air Quality
- ◆ Water Treatment and Permitting
- ◆ MSDS Preparation
- ◆ Indoor Air Quality
- ◆ OSHA Recordables
- ◆ Ergonomics
- ◆ Job Hazard Analysis
- ◆ EHS Training
- ◆ ISO 14001
- ◆ OHSAS 18001
- ◆ Site Remediation
- ◆ SPCC / SWPPP
- ◆ Process Safety Management

You be assigned a fulltime EHS professional who will become familiar with your operations and be able to these and other EHS issues. EHS provides the support through our network of senior level EHS experts/

For \$99/month you could hire an EHS manager and tap the expertise of a full EHS staff.

CASE STUDY—Here's how EMIS Enhances EHS Performance

The Enviance System reminds users to take necessary readings at the beginning and end of the month, notifies users and compliance personnel when a discrepancy is noted, and notifies compliance personnel if data has not been entered within a week. With the assistance of Enviance, the six compliance personnel can now remotely monitor the compliance status at these distant facilities.

Georgia Power faced another obstacle – having more than one-half of all employees eligible to retire within the next 10 years. Those employees with compliance responsibilities had, for the most part, managed their responsibilities by what has worked best for them individually. Georgia Power was concerned about the loss of institutional knowledge with so many people retiring. Now, Enviance is helping to bridge the potential gap that exists when an experienced employee leaves and the result is a seamless transition.

Georgia Power assures compliance faster and more cost effectively than ever before.

Operating a large electrical utility comes with demands from all ends of the spectrum: a corporate parent, customers, and regulatory agencies. Having an environmental management system with the ability to save time and money, all while assuring compliance, eases those demands. The corporate parent can rest assured that subsidiaries have all of the tools necessary to remain in compliance. Customers benefit by having a utility that is not subjected to large fines. And regulatory agencies appreciate all information in one central location, making reporting and auditing much easier.

Georgia Power has many employees but only a few are environmental professionals. The intuitive System provides a compliance overview that keeps the environmental management system working efficiently.

EHS Consulting Services

EHS offers high quality cost effective consulting services in the following areas (Nationwide):

- ◆ SPCC Certification and Planning
- ◆ Environmental Management Information Systems (EMIS) implementation and training
- ◆ RCRA Permitting and Corrective Action
- ◆ EHS Auditing
- ◆ EHS Compliance Planning and Training Development
- ◆ Sustainability Planning
- ◆ Environmental liability assessments and financial reporting
- ◆ Site remediation technology and closure evaluations
- ◆ Integrated Contingency Planning—SPCC, Stormwater, RCRA
- ◆ Hazardous Waste Management and Cost Minimization
- ◆ ISO 14001 / OHSAS 18001 Management Systems
- ◆ ASTM Phase I/ BEA / Due Diligence

EHS specializes in delivering these services in a manner that integrates compliance into your business operations. Our compliance assessment services focus on best management practices as well as regulatory compliance. **Please consider us for your next consulting assignment.**

Legal Corner

How many times have you allowed a business to take advantage of you because it would have cost more to hire an attorney than it was worth? How about points you got on your driving record for your last speeding ticket. How would you like to have an attorney on "retainer" to help you with the following:

- ◆ Answer Legal Questions
- ◆ Will Preparation
- ◆ Contract Review
- ◆ Traffic Court Disputes
- ◆ Legal Disputes
- ◆ Civil Litigation
- ◆ Credit Fraud & Identity Theft Issues

For **\$25/month** you can have full access to these and other legal services. You can literally have a full time attorney on retainer to assist you AND your family with these matters. You will never need to pay \$200/hour again nor need to come up with \$1000 retainer.

If you would like to find out about this cost savings program contact **Kelley** at **Jimprjapp@aol.com**.

To subscribe to this newsletter or information on any of these services contact:

**EHS Management Strategies
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5605 Kies St
Rockford, MI 49341
(616) 866-9152
JimCharlesPE@aol.com**

Remediation at Active Manufacturing Facilities

Many active manufacturing facilities face the challenge of reporting releases or have been thrown into the RCRA corrective process by state or federal regulations. The challenge is that once you have evaluated the risks and minimized the areas that require active remediation “how do I get these areas cleaned up most effectively”. Most consulting firms do a decent job getting through site characterization (i.e. figuring out the size of the problem) and risk assessment (minimizing the areas requiring active remediation). However, when it comes to **active site remediation** many firms let their engineers “run wild” and many practical solutions can be over looked.

One major item that may be overlooked or under designed is “**Source Removal**”. Source removal is the most effective way to get contaminates out of the environmental and get a site to closure the quickest. Source removal can include tank removal, saturated or “highly” impacted soils, and free product recovery. One of the most common errors that cost owner time and money is improper product recovery strategies and system installations. Take time to make sure that any remedial strategy you under take has a well designed source removal strategies. Keep it simple and well thought out.

Once you have completed a well design source removal hopefully the next stage is a short term monitoring program. However, in the event you need to implement active soil or groundwater remediation programs, the practicality of the equipment design is as important as selecting the right remediation technology. Often time, remedial engineers select the right technology for the site but completely over design the process and equipment selected which ultimately increases capital costs and operation and maintenance costs.

The key to getting you site to closure for the least amount of money and time is a well thought out source removal strategy and selection of the right technology and equipment.

**EHS Partners with
AMERICAN REMEDIATION**
Through this partnership
we can bring you
innovative and patented
REMEDICATION
Technologies and Site
Closure Services.

- ◆ **Product Recovery**
[\(MAV Systems™\)](#)
- ◆ **Soil Remediation**
[PER-PETUAL System™](#)
- ◆ **Groundwater Cleanup**
[\(E-DOT™\)](#)

Contact us at
JimCharlesPE@aol.com
to find out how these
systems can save
significant costs for
site clean-up.

Remediation using good old American ingenuity, new ideas, and experience.
Three Highly Effective & Low Cost Remediation Technologies

PER-PETUAL SYSTEMS
Patent # 6,517,388

MAV SYSTEMS
Patent # 6,517,388

E-DOT SYSTEMS
Patent # 6,517,388

How Cost Effective are these systems?

| | Average Installation Capital Cost | Time Average Operational Cost | Estimated Average Clean-up |
|--------------------------|-----------------------------------|-------------------------------|----------------------------|
| E-DOT System | \$ 25,000 - \$ 35,000 | \$ 250 / month | 2 years |
| PER-PETUAL System | \$ 28,000 - \$ 38,000 | \$ 1,000 / month | 1.5 years |
| MAV System | \$ 28,000 - \$ 38,000 | \$ 180 / hour | 100 - 150 hours |