

Is Your Town's DPW Facility in Compliance with Environmental Standards?

If not, inspections and penalties may be forthcoming.

The United States Environmental Protection Agency (EPA) recently mailed letters to New England municipalities as a follow-up to their 2001 initiative that focused on Departments of Public Works.

The 2001 initiative involved a partnership with the New England Chapter of the American Public Works Association and was implemented to enforce the same environmental compliance standards that apply to private companies. EPA New England offered assistance to municipalities by inviting them to utilize EPA's Self-Audit Policy to identify environmental violations, disclose them to EPA, and voluntarily correct them. More than 300 DPWs took advantage of the Audit Policy and subsequently avoided EPA inspections and fines.

Those that did not participate in the self-audit, however, were inspected and in some cases substantially penalized. Recent settlements were reached with three municipalities in New Hampshire, Vermont and Maine for a combined total of \$364,000 in fines.

Common Violations:

EPA inspectors have discovered the most common violations found at municipal DPW facilities include waste container labeling, waste container storage, floor drains, salt storage, spill cleanup, spill response, and Material Safety Data Sheets (MSDSs).

Although the DPW Audit Initiative has been completed,

compliance with applicable environmental regulations is still mandatory and should remain a priority for your DPW facility. EPA's self-audit policy remains in effect, and additional information about it can be found on their website.

Is Self-Disclosure Right for Your Facility?

If you are unsure of your current compliance status or have existing deficiencies, your municipality will probably benefit from the self-audit policy. By participating in this program, municipalities can gain time needed to correct compliance issues. While self-disclosure does not guarantee protection from all penalties, most large fines can be avoided.

We Can Help.

Environmental Compliance Services, Inc. (ECS) has been assisting municipalities and DPW facilities with environmental audit services since our incorporation in 1985. ECS also offers a variety of training services in OSHA health and safety and environmental regulations. Seminar topics include RCRA waste management, spill prevention and response, stormwater management, underground storage tank (UST) compliance, and state-specific air or waste regulations. ECS is headquartered in Agawam, Massachusetts and has six additional offices throughout New England.

For additional information, call (800) 789-3530 or visit www.ecsconsult.com.

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