

## Colleges and Universities Able to Take Advantage of Audit Policy

The United States Environmental Protection Agency (EPA) offers an incentive program for colleges and universities in the eight states of Region 4. This Audit Policy, entitled “Incentives for Self-Policing: Discovery, Disclosure, Correction, and Prevention of Violations,” enables colleges and universities to reduce or avoid environmental penalties by performing self-audits.

To take advantage of the Audit Policy, a college or university would first conduct a voluntary, documented, unbiased environmental audit of its processes. An audit that includes all relevant environmental statutes will have the best results of ensuring compliance, but it is acceptable to conduct an audit under the statutes that have the most impact on the college or university.

Once the audit is performed, a college or university would then identify and disclose in writing any possible areas of noncompliance. Any violations must be rectified within 60 days of the discovery. If, however, the college or university believes it will take longer than 60 days to correct a violation, a written explanation and estimated date can be submitted to the EPA for review. Incidents such as spills or leaks or hazardous materials must be reported immediately.

### Audit Protocols

The EPA has come up with audit protocols to assist regulated entities in the audit process. The protocols provide comprehensive checklists that colleges and universities can customize based on their own needs. The audit protocols consist of:

- > Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- > Clean Water Act (CWA)
- > Emergency Planning and Community Right-to-Know Act (EPCRA)

- > Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)
- > Resource Conservation and Recovery Act (RCRA)
- > Safe Drinking Water Act (SDWA)
- > Toxic Substance Control Act (TSCA)

A college or university should confer with Region 4 of the EPA and notify them in writing prior to taking advantage of the Audit Policy.

### Where to Turn for Assistance

While participation in the EPA Audit Policy is voluntary, compliance with all applicable Federal and State environmental laws is mandatory. Targeted inspections of Region 4 colleges and universities will carry on, and the EPA encourages performing institution-wide, thorough environmental audits at all facets of educational operations.

Environmental Compliance Services, Inc. (ECS) provides comprehensive services involving facilities at colleges and universities, such as laboratories, power generation units, storage tanks, maintenance garages, groundskeeping storage areas, and recreational facilities such as skating rinks and swimming pools, which may involve hazardous materials, waste and wastewater discharge, air pollution control, and water supply. Specifically, our environmental and OSHA compliance services include: Environmental Compliance Audits, RCRA Compliance/Minimization, SPCC Plans, SWPP Plans, Emergency Response Plans, Lead and Asbestos Testing and Analysis, OSHA Health and Safety Plans, OSHA Training, Radiation Protection, Water Supply Studies and Wastewater Compliance, Storage Tank Management, Indoor Air Quality Evaluations, and EPCRA Reporting.

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