



P2-PROGRESS

Pollution Prevention Progress



What is P2 and Why Is It Important ?

P2 is acronym used for Pollution Prevention. For many years, regulatory agencies, such as the EPA, have focused resources on establishing P2 programs within commercial industries. Recently, when several high profile universities were found in non-compliance with environmental regulations, the EPA began to focus on colleges and universities as significant sources of pollution. To emphasize the seriousness of the matter the EPA sent letters to many university presidents across the country explaining that senior officials at academic institutions are legally responsible for violations of the law and can be personally held liable. Fortunately, it is this same agency, the EPA, that provides guidance and funding for P2 education at academic institutions. The Five Colleges of Ohio (OH5) consortium is fortunate to have been selected for funding by the EPA's Ohio Environmental Education Fund (OEEF). With grant funds the OH5 will provide P2 education and training for all five colleges.

Ohio 5 Selects New Employee

Kristine R. Pohlman has joined The Five Colleges of Ohio as Environmental Education Specialist. Her responsibilities are to coordinate the grant awarded to the consortium by the Ohio EPA's Office of Environmental Education. The goal of the grant is to initiate a training and education program in hazardous waste management and pollution prevention for faculty and staff in science, art, and theater departments. Ms. Pohlman will be assisted by an EHS Roundtable composed of personnel from each college.

[More Details page 2 , OH 5](#)

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Newsletter Spotlight

EHS Incident Response Study

A University of Missouri-Columbia study finds that the academic calendar positively correlates with increases in EHS incidents. For the purposes of the study "incidents" were defined as unplanned events that have the potential to adversely impact health or the environment. "Not surprisingly incidents involving [More Details page 2, Study](#)

EPA'S Twenty Questions for College and University Presidents



Pictured above is new Ohio Five employee Kris Pohlman in the EH&S office at OWU.

The following is an excerpt from a U. S. Environmental Protection Agency publication entitled "Twenty Questions for College and University Presidents."

Is your college or university in compliance? If your key environmental expert left suddenly, would your campus be safe tomorrow? Would you be ready for an inspection? At the request of a number of leaders in the higher education field, EPA, Mid-Atlantic Region, has developed the following list of questions to help you to determine if your college or university is meeting its legal and leadership obligations in the environmental realm. As part of the regulated community, it is important that colleges and universities are aware that EPA holds educational institutions to the same high environmental compliance standards expected of private industry. In fact, EPA expects colleges and universities to be role models for environmental behavior. Many of the following questions relate to an Environmental Management System , [More Details page 2, Twenty Questions](#)

Questions about the Five Colleges of Ohio Consortium? Please contact Susan Palmer, Executive Director at: email-palmers@kenyon.edu or phone 740-427-5234. For questions regarding this newsletter please contact Kris Pohlman, EE Specialist at: email-krpohlma@owu.edu or phone 740-368-3502.

Twenty Questions (cont.)

or EMS. An EMS includes such elements as policies, procedures, tracking, and auditing. This framework helps to provide a systematic approach to managing environmental compliance and improving environmental programs. While having a good system doesn't guarantee compliance, if your environmental expert suddenly leaves it greatly increases the chances that your college or university will not falter in meeting its environmental obligations. It does this by integrating environmental compliance activities into routine campus operations.

Some questions to consider:

1. Does the school have a written policy on protecting public health and the environment through compliance with applicable requirements and conservation programs?
2. How are policy and other environmental information communicated on a regular basis to others including campus administration, facility management, faculty, students and their parents, alumni, and the neighboring community?
3. Is there an Environmental Management System, or EMS, in place to help the school maintain compliance and operate in an environmentally responsible manner through policies, training, tracking, procedures, and organizational structures that support compliance?
4. Does the EMS track campus operations which are covered by environmental regulations, including state and Federal regulations?
5. Is the EMS updated on a regular basis to cover new, expanded or changed operations?
6. Who is responsible for ensuring that each operation is in compliance and has all the required approvals, licenses, and permits?
7. Do all persons responsible for and working on environmental matters have adequate training, required certifications, resources, and authority to perform their jobs?
8. Does the school's website link to EPA and other web sites that provide access to on-line regulations, guidance, and other environmental information?
9. Do contracts require that all outside lessees, facility users, and contractors are properly trained and certified and comply with all applicable environmental regulations?
10. Where are documents kept such as required permits, plans, chemical toxicity sheets and monitoring reports which can help prevent illegal releases, address problems in a timely fashion, provide quick access on proper handling and disposal as well as respond to questions during inspections?

The full document can be viewed at this web address: www.epa.gov/region03/compliance_assistance/questpres.htm

OH5 (cont.)

Ms. Pohlman is scheduled to work for The Five Colleges of Ohio on Monday, Wednesday, and Friday; her primary office is at Ohio Wesleyan University. To contact her: Kristine R. Pohlman
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Study (cont.)

Hazardous (chemical) materials accounted for over half the incidents.” The study found that most spills and other reported incidents were during the winter months. The data also suggested a positive correlation with the beginning and ending of semesters. Some theories as to why the incident numbers increased at these times are: the students and staff are less experienced at the start of the semester; staff and students at the end of the semester are in a rush to finish research and other work such that careless mistakes occur; and poor winter weather and/or shorter days could increase the chances of incidents. The data also indicated that 72% of the incidents occurred between the hours of 7:00a.m. and 4:00p.m.. This study was summarized in the March/April edition of the journal of “Chemical Health & Safety.” To see the article in its entirety please direct request to: krpohlma@owu.edu.

Special points of interest:

Issue 2 of “P2 Progress” will feature recent regulatory enforcement actions taken at colleges and universities and tips on how to avoid these consequences.