



## P2-PROGRESS

Pollution Prevention Progress



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### EHS Issues Facing Campuses Nationwide

Since the late 1990s the EPA and other regulatory agencies have been focusing on colleges and universities. In many instances, these institutions struggle to stay in compliance with environmental health and safety (EHS) regulations. Despite agency warnings of regulatory scrutiny many institutions still do not pass EHS inspections. Recent headlines illustrate this point:

- **November 5, 2003, EPA Fines Vassar College \$97,581 For Violating Hazardous Waste Regulations**
- **Oct. 19, 2004 -- Two Maine community colleges face combined fines of \$238,225 for alleged hazardous waste storage and handling violations**
- **Nov. 29, 2004 -- Wheaton College in Norton, Mass. agreed to pay a \$75,000 penalty and spend \$155,000 to make environmental improvements.**

[More Details page 2, Nationwide](#)



#### Newsletter Spotlight

### Ohio5 Roundtable Member Honored In Washington D.C.

Professor Jann Ichida of Ohio Wesleyan University (OWU) was recently chosen by the Association of Women in Science (AWIS) as a 2005 Fellow. She was recognized at the AWIS annual reception held in conjunction with the American Association for the Advancement of Science annual meeting on Feb. 20, 2005 in Washington D.C. Fellows are chosen on the basis of their significant contributions to the promotion of women in science and allied fields of study through scholarship, leadership, education, mentoring, advocacy or service. Mrs. Ichida also lends her expertise to the Ohio5's "EHS Roundtable" The Roundtable is comprised of Environmental Health and Safety experts from OWU, Kenyon, Denison, Wooster, and Oberlin. Professor Ichida is both Ohio Wesleyan's Chemical Hygiene & BioSafety Officer as well as a Professor of Botany/Microbiology.



Pictured above is Ohio5 "Roundtable" member, Professor Jann Ichida of OWU.

### Letter to College Presidents and Chancellors

On December 10, 2004 a letter was sent nationwide to college and university presidents and chancellors from Robert S. Benson of the U.S. EPA and Sheldon Elliott Steinbach of the American Council on Education (ACE) urging them to review their institution's current methods of environmental management. ACE is one of six college affiliated professional organizations, known as the Coordinating Committee, collaborating with the EPA in developing sector-specific approaches to assist colleges and universities in advancing their environmental management efforts (<http://www.epa.gov/sectors/colleges/index.html>). In a recent news release, ACE Vice President Steinbach wrote "They must look carefully at the planned programs, what the allocated resources are and how to monitor progress." Mr. Steinbach was emphasizing the need for college administrators to review and understand the environmental ramifications of the programs or courses of study their institutions provide. Many fields of study require increased environmental health and safety precautions in order to protect the employees

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**Nationwide (cont.)**

Public records reveal the U.S. EPA has issued over 8 million dollars in fines and other sanctions to colleges across the United States since 1999. While it is true the EPA’s coastal district offices have issued the most fines, no region has been ignored. For more information on the Mid-Atlantic EPA initiatives with colleges visit: [http://www.epa.gov/region03/compliance\\_assistance/press.htm](http://www.epa.gov/region03/compliance_assistance/press.htm). Figure 1. shows the number of inspections and fines in each EPA region. \*Ohio is part of EPA Region 5, with web information at <http://www.epa.gov/region5/>.

From an environmental management perspective, colleges and universities must handle many diverse activities. Much like a small city, college’s must deal with wastewater treatment, trash disposal and grounds maintenance. Perhaps the greatest environmental challenges posed at colleges are research and instructional laboratories because of the chemical nature of the materials used and their associated risks. The environmental, health and safety burden placed on campuses to support these activities is enormous due to the complexity and changing nature of regulatory requirements. In light of the EPA’s recent aggressive enforcement, both large and small institutions must have a strategy to respond to current and future environmental issues.

EPA REGION NUMBER	NUMBER OF COLLEGES INSPECTED	NUMBER OF COLLEGES SITED	AMOUNT FINED	SUPPLEMENTAL PROJECT FEES
Region 1	35	11	\$1,074,637	\$2.68 million
Region 3	14	6	\$171,622	\$53,780
Region 5*	18	5	\$38,678	none
Region 6	14	4	\$40,070	\$189,005
Region 7	66	4	\$290,143	none
Region 8	10	0	0	none
Region 10	26	1	\$9,350	none
Region 21	40	13	\$373,000	\$1.28 million
Region 42	93	2	\$50,349	none
Region 93	6	1	\$505,000	\$1.2 million

Table 1. EPA fines per region of the U. S. Since 1999 ( Source; The Chronicle of Higher Education, Volume 51).



**Letter (cont.)**

and students. These safety requirements are mandated by law and require additional monitoring, record keeping and training. All of these benefit from planning and, most significantly, more funding. In this case, “an ounce of prevention is worth a pound of cure.” A little environmental management and preparation can go a long way in preventing catastrophic accidents and regulatory fines. The letter to presidents also suggests two means to *improve* an institutions environmental compliance performance. The first is to develop a comprehensive Environmental Management System (EMS) and the second is to utilize the guidance tools developed through the new EPA office dedicated to the college and university sector. A third method to improve college compliance performance, is compliance auditing , mentioned on the [EPA’s Region 1 website](#). To view a sample of the letter to college presidents visit : [http://www.acenet.edu/hena/pdf/EPA\\_12\\_04.pdf](http://www.acenet.edu/hena/pdf/EPA_12_04.pdf)

**College Coordinating Committee is Assisting with Regulatory Changes**

The following is an excerpt from a publication by the National Association of College and University Business Officers (NACUBO). “ In response to the [2003 U.S. EPA Office of Solid Waste \(OSW\) Laboratory Initiative](#), the Colleges and Universities Sector Coordinating Committee is proposing specific regulatory language changes to the OSW. The purpose of the proposed regulatory language is to address the difficulties colleges and universities continue to experience in applying the industrial oriented RCRA regulations, promulgated in 1976, to the management of hazardous wastes generated on their campuses.” RCRA is the acronym for the Resource Conservation and Recovery Act. This article goes on to answer frequently asked questions regarding the proposed regulatory changes. This information can be viewed at: <http://www.nacubo.org/x4492.xml>. These proposed changes could prove beneficial in reducing the regulatory burden placed on colleges.