



**Top 5 (or 6)
Compliance Tips**
Regform 2017
Block Andrews, P.E..



Headlines to Avoid

“FBI joins probe of Flint, Michigan's lead contaminated water,” *Reuters Feb. 2, 2016*

“BP May Be Fined Up to \$18 Billion for Spill in Gulf,” *NY Times, Sept. 4, 2014*

“EPA spill: 'The magnitude of it, you can't even describe it,'” *CNN, Aug. 10, 2015*



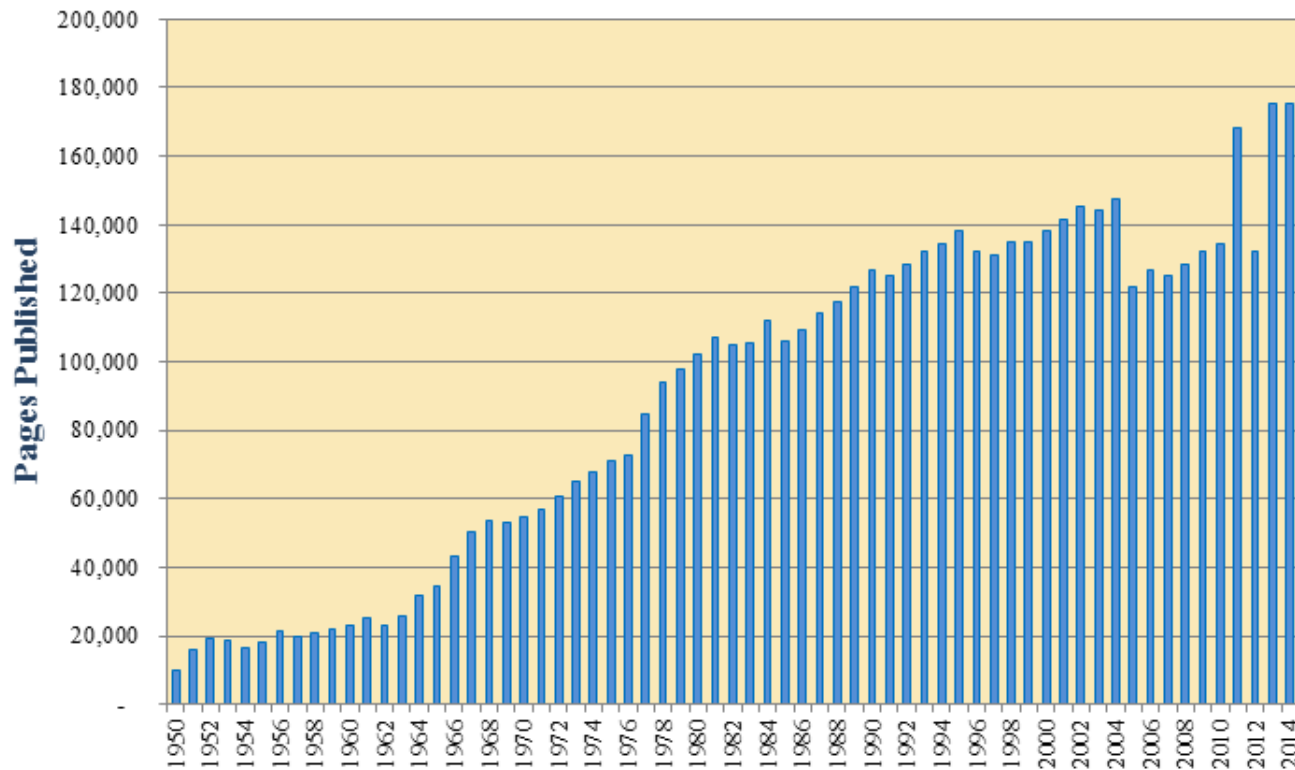
Headlines You Want



“Engineers Do It Again by Providing Safe and Environmentally Compliant Products”



Pages of Regulations by Year

Total Pages, Code of Federal Regulations (1950 - 2014)



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How Do I Reduce Probability of Major Event?

One Way: Environmental Management Systems

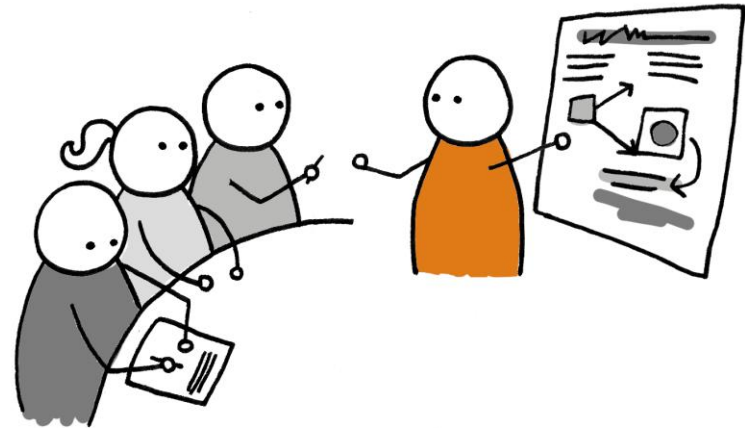
- Develop **Procedures**
- **Train** Applicable Personnel
- Put **Job Descriptions** in for “Doer” AND Manager
- **Audit**
- Provide **Feedback**
- **Change/Modify** Procedures

Procedures:

- ▶ Disorganization does not instill confidence
- ▶ Writing down procedures is organization!
- ▶ Have documents in binders or on computer files for easy access
- ▶ Several people should know the procedures, not just the environmental person
- ▶ Procedures should contain records requirements
 - Typically 5 years of records required

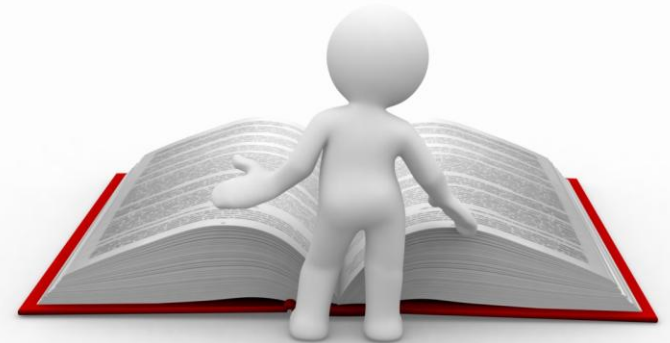
Train Your Personnel

- ▶ Environmental folks should know their permit requirements
- ▶ Operational personnel should know their specific responsibilities
 - Quick Reference Guide
 - Calendar of reporting dates
 - Compliance manual



Job Descriptions

- ▶ Accountability for both the doer and his/her manager by putting specific environmental tasks in job descriptions
- ▶ Can protect company if compliance issue arises

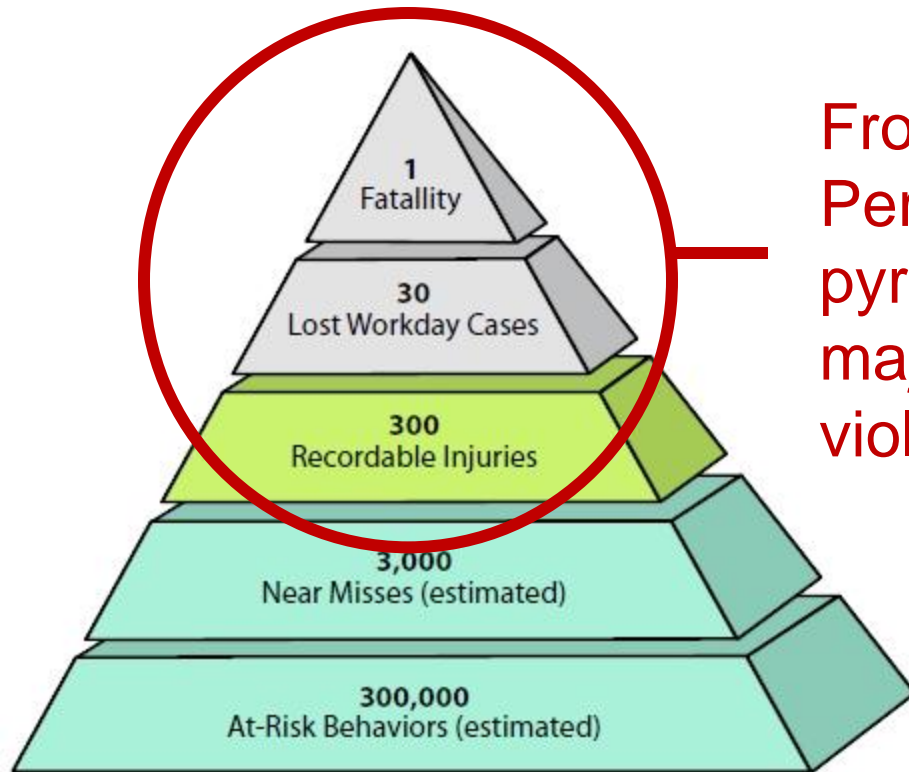


Self Audits

- ▶ Have others not in day to day compliance review facilities
- ▶ Note “near misses” as well as any potential compliance issues



Safety Pyramid



From an Environmental Perspective the top of the pyramid could be considered a major release of toxins or major violation of the law.

Provide Feedback

- ▶ Audits may show ways to do things better
- ▶ Make sure the folks are re-directed constructively



Modify Procedures

- ▶ Audits may identify holes in procedures
- ▶ Modify procedures and retrain (if needed)



Summary

- ▶ EPA likely to have budget cuts
- ▶ State agencies likely to have more enforcement responsibilities
- ▶ Have a good program that makes it easy to defend your position
- ▶ In a legal case with environmental groups, what side of the table do you want the regulators to be on?

Questions/Discussion

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