

TOOLS FOR TRACKING COMPLIANCE

***Aegis Environmental, Inc. Co-Authors: Lori Bonds, President and Managing Principal
Jessica Gunter, Shield® Program Director***

Corporations, and the environmental compliance professionals serving at or for them, need a variety of tools to manage the many varied and dynamic requirements of environmental regulations. Frequently, personnel (from operators to supervisors to engineers) are asked to manage compliance for regulations on which they have little to no formal training; while the demands of their main job tasks often does not allow sufficient time to effectively understand such complex environmental regulations. To help these staff manage compliance in a simple, practical way, several tried-and-true tools and techniques are readily available:

- Compliance Toolkits containing training and audit tools, summaries, and checklists, can help staff keep track of their requirements with minimal updates required from time to time as regulations change.
- Custom Scorecards can be used to track compliance among departments or multiple facility locations.
- Training on environmental requirements can serve both to meet required regulatory training requirements, and to help remind staff of the routine compliance tasks...
- Finally, compliance software, designed to have a simple monthly or daily data input, can track specific requirements and complete complex calculations and reporting requirements.

From small to large operations, supplying tools for compliance to appropriate personnel can be a simple, practical way to minimize the potential risk of regulatory non-compliance, and provide a basis for continuous compliance with minimal time demands on a facility's environmental professionals.

COMPLIANCE TOOLKITS

Compliance Toolkits are provided as a one-stop shop for environmental compliance, providing regulatory and company policies in an easy-to-use, accessible, and uniform format. Toolkits are particularly suited to companies with numerous locations or large facilities with complicated regulatory requirements specific to many separate process areas and are tailored to provide the necessary information to the user in an easy-to-use format. Toolkits can be as extensive and detailed as needed and typically contain additional tools for compliance such as plans, permits, audit checklists, staff meeting training aides, posters, etc.

Air, water, and waste compliance is the main focus of a typical Toolkit, but general environmental awareness is also a key goal. The Toolkit provides the user with awareness tools such as simple, illustrated training handouts for use in monthly staff meetings. These documents focus on specific regulatory and/or company policies regarding various topics such as: how to handle wildlife, refrigerant awareness, recycling policies and rules, and vehicle idling limits, just to name a few.

The Toolkit can also include additional company documents such as: instructions and guidance for inspections; labeling guidance for wastes including used oil, used oil filters, lamps, asbestos, PCBs; and labels for containers pending analysis.

SCORECARDS

Scorecards are a great motivational and visual tool to supply a compliance assessment at a glance. Scorecards can be designed to demonstrate achievements or areas for improvement as well as track environmental

initiatives for multiple facilities. They can be easily adapted for large facilities with multiple departments, or for multiple locations such as municipalities to compare buildings, departments, or processes. The scorecard can highlight scores across facilities, departments or process areas while providing specific scoring data by which performance can be gauged and for each entity to facilitate improvements. Scorecards are a great way to promote friendly competition for improving compliance among facilities, departments and/or process areas.

TRAINING ON ENVIRONMENTAL REQUIREMENTS

Proper training can be crucial for compliance and can provide important reminders for compliance tracking. Training can also mean the difference between low company insurance costs or high premiums; a competitive EMR rate or a loss of potential work; or—at worst—the life or death of an employee. Meeting both required and best practices training, including compliance training, can greatly improve employee efficiency and effectiveness, and reduce the costs of lost work time and compliance enforcement fees due to material mishandling or lack of proper documentation. Regular compliance training (such as Air Permit operator training, RCRA training, SPCC training, SWPPP training, DOT training, and many others) can provide facility personnel with the references needed, as well as the reminders, to help them meet their compliance requirements. Hands-on compliance training, such as manifest checks and inspection checklists, during the training may even get them jump-started on their required inspections and reporting. In addition to formal in-house training, keeping up to date with applicable regulations can be done in-house or with outside assistance. These days, regulatory agencies and trade organizations provide many means for staying up to date on regulations, including webinars, email notifications, and environmental outreach programs. Environmental consultants can provide expert advice and regulatory updates on an as-needed basis without the expense of a full-time environmental staff.

COMPLIANCE SOFTWARE

There are numerous time and cost-saving benefits to utilizing compliance software. Most available compliance software programs are relational database systems. These programs eliminate duplicate data entry, such as fuel usages for the year that may be used for air permit compliance reports, Greenhouse Gas (GHG) reports, TRI reporting, etc. These databases also simplify the Quality Assurance process by handling calculations in a consistent manner (e.g., homogenizing methodology) and by moving calculations to a background function where routine user errors are prevented from creeping into the calculations. Simple data entry forms allow for operators and administrative professionals to handle most of the data entry, with review and audit by environmental compliance personnel, which can save on costs and employee time.

Much commercially available software for compliance tracking is pre-built, very expensive, and requires substantial implementation time due to trying to fit the facility's specific issues, requirements, and preferences into a prefabricated system. One way to reduce costs and implementation time is to select a software system specifically built to your facility's permits and needs. These customized systems, such as Aegis Environmental's Shield® compliance tracking database, can be developed with the assistance of a facility's in-house IT professionals. These customized databases can be built from the ground up, using the facility-specific permits and existing data tracking procedures. Reports can be customized to state and federal reporting forms, or facility-specific reporting formats. The system can also be customized with additional features including document housing, task alerts, training tracking, etc.

For more information on any of these topics or to receive a webinar demonstration of compliance software, please call Jessica Gunter of Aegis Environmental, Inc. toll-free at 888-675-1220 or email your request to jgunter@aegisenv.com.