

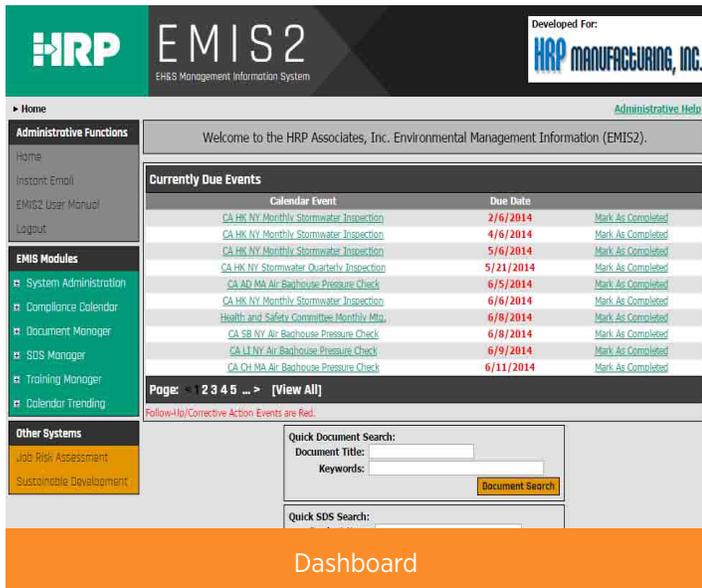
# COMPLIANCE CHALLENGES AND SOLUTIONS FOR THE REGULATED COMMUNITY

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Environmental Health and Safety (EHS) regulations impact many facilities across the United States and the world. Whether in a public sector, industry or educational setting, EHS compliance managers face an increasingly complex and burdensome regulatory environment, often while attending to their agency or industry operational needs on a day-to-day basis to manage the facility, production, or core services they provide.

Throughout the last decade, regulatory compliance has morphed into a document intensive exercise. Inspections, QA/QC reports, test results, training documents, lengthy applications, checklists, pollutant discharge forms, and a myriad of other forms are now required by various Clean Air and Clean Water Act programs. Completing and maintaining these documents to record compliance and make them available for regulators at a moment's notice is an ongoing challenge.

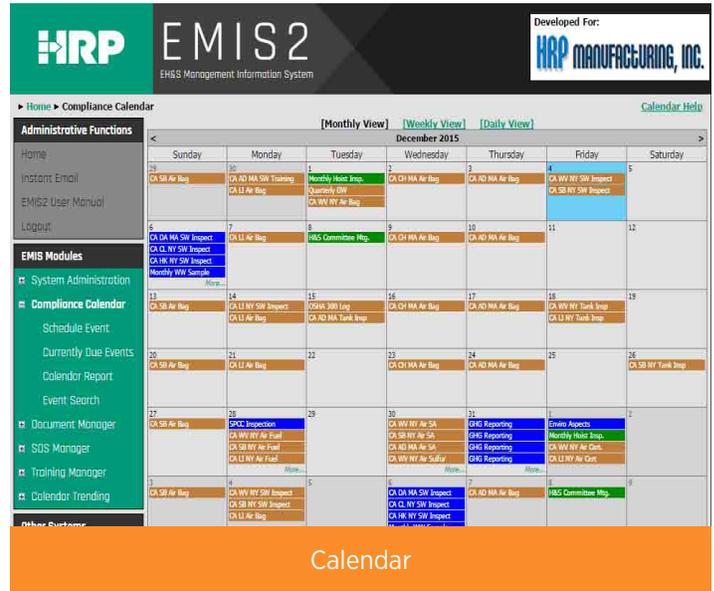
In addition to regulatory concerns, facilities face scrutiny of their activities by various public groups. A forgotten or incorrect report or submittal can have significant ramifications among the public and even rile stockholders and board members - potentially affecting the bottom line. Also, industry exposure to the public is ever more prevalent as urban and suburban expansion encroaches upon facilities, leaving facility operations little room for error.



The dashboard shows a welcome message and a table of 'Currently Due Events'.

Calendar Event	Due Date	Mark As Completed
CA HK NY Monthly Stormwater Inspection	2/6/2014	Mark As Completed
CA HK NY Monthly Stormwater Inspection	4/6/2014	Mark As Completed
CA HK NY Monthly Stormwater Inspection	5/6/2014	Mark As Completed
CA HK NY Stormwater Quarterly Inspection	5/21/2014	Mark As Completed
CA AZ MA Air Baithouse Pressure Check	6/5/2014	Mark As Completed
CA HK NY Monthly Stormwater Inspection	6/6/2014	Mark As Completed
Health and Safety Committee Monthly Mtg.	6/8/2014	Mark As Completed
CA SB NY Air Baithouse Pressure Check	6/8/2014	Mark As Completed
CA LI NY Air Baithouse Pressure Check	6/9/2014	Mark As Completed
CA CH MA Air Baithouse Pressure Check	6/11/2014	Mark As Completed

Page: 1 2 3 4 5 ... [View All]  
Follow-Up/Corrective Action Events are Red.



The screenshot shows a monthly calendar view for December 2015. The calendar is color-coded by event type: orange for Air Bag events, blue for Reporting events, and green for Inspection events. A sidebar on the left lists administrative functions and EMIS modules.

For example, a discharge of silt from a poorly maintained storm water control is no longer “water under the bridge.” More likely, a concerned member of the public will notify public activists and regulators, resulting in compliance inspections and potentially damaging publicity and fines.

Staffing challenges can also negatively affect an otherwise exemplary compliance record at a facility. Thinner profit margins and staff downsizing add stress to employees with multiple obligations and roles at their facility, resulting in the often heard complaint, “there isn’t enough time to do what I need to accomplish.” When faced with a choice, managers will complete those tasks essential to keeping the operation running, leaving compliance tasks unattended.

Employers also face an unprecedented amount of mobility in the workplace: managers moving to different locations within the company, working remotely, or changing employers. This effect presents a constant challenge, as those with institutional knowledge of the day-to-day EHS process at a facility take information with them. The departure of the experienced EHS manager imparts a twofold blow to the facility: the immediate loss of most of the EHS responsibilities and the learning curve with training a replacement. During this period, it’s highly likely that there will be a negative impact on compliance.

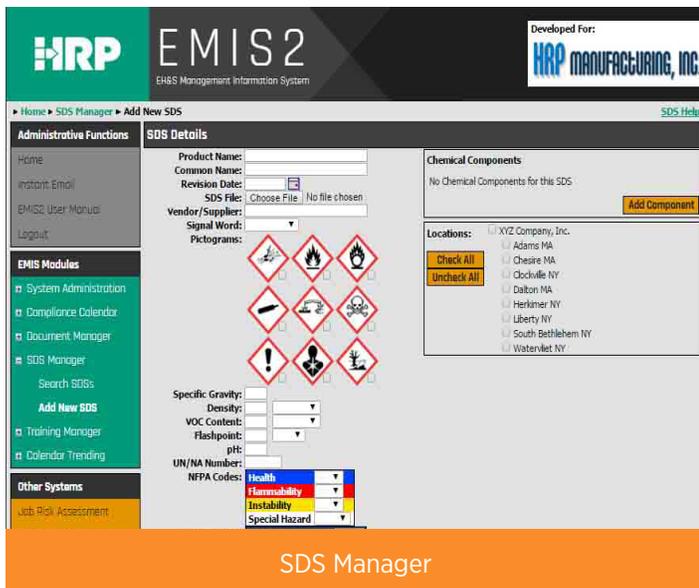
## COMPLIANCE METHODS

Compliance management strategies vary widely across the regulated community, with two basic strategies emerging most commonly to address compliance among industry leaders.

### The Minimalist Approach

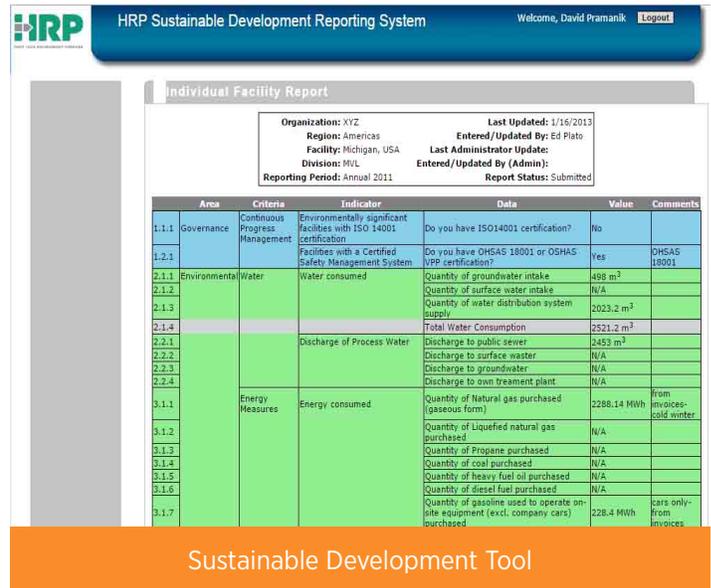
These compliance systems are often paper-based and sometimes electronic, with the responsibility resting on one person to understand and execute tasks. These tasks might consist of conducting applicability evaluations, preparation of reports, training, inspections or testing. Often the simpler approaches to compliance omit day-to-day inspections, training, and safety requirements, resulting in a poor or erratic compliance track record.

A basic electronic compliance system may include some routine inspection forms that allow you to complete them “on-the-go,” providing some flexibility. However, they are limited with regards to document management, trending or auditing of the compliance program and ability to educate the user on the details behind the requirement. Often, these systems are very focused in scope and application, leaving many of the details to be filled in by others, or simply left behind.



The screenshot shows the HRP EMIS2 SDS Manager interface. It features a sidebar with navigation options like 'Home', 'instant Email', 'EMIS2 User Manual', and 'Logout'. The main area is titled 'SDS Details' and includes fields for 'Product Name', 'Common Name', 'Revision Date', 'SDS File', 'Vendor/Supplier', and 'Signal Word'. There are also sections for 'Chemical Components', 'Locations', and 'Specific Gravity'. A 'Health, Flammability, Instability, Special Hazard' indicator is visible at the bottom.

These systems typically are not developed or supported by experienced environmental professionals. Tasks or events may not be set up to ensure a particular item has been identified and described adequately to ensure its proper completion, filing and follow-up. These systems are typically lacking the detailed knowledge of the specific regulation or Act driving the particular event. Additionally, the limited compliance system is not able to address ever-increasing corporate initiatives such as sustainability, green house gas tracking and social responsibility tracking and reporting.



The screenshot shows the HRP Sustainable Development Reporting System 'Individual Facility Report'. It includes a header with 'Organization: XYZ', 'Region: Americas', 'Facility: Michigan, USA', 'Division: MVL', and 'Reporting Period: Annual 2011'. A table below lists various indicators and their values, such as 'Do you have ISO14001 certification?' (No), 'Quantity of groundwater intake' (498 m³), and 'Quantity of natural gas purchased' (2288.14 MWh).

Area	Category	Indicator	Date	Value	Comments
1.1.1	Governance	Environmentally significant facilities with ISO 14001 certification	Do you have ISO14001 certification?	No	
1.2.1	Continuous Progress Management	Facilities with a Certified Safety Management System	Do you have OHSAS 18001 or OSHAS VPP certification?	Yes	OHSAS 18001
2.1.1	Environmental	Water consumed	Quantity of groundwater intake	498 m³	
2.1.2			Quantity of surface water intake	N/A	
2.1.3			Quantity of water distribution system supply	2023.2 m³	
2.1.4			Total Water Consumption	2521.2 m³	
2.2.1		Discharge of Process Water	Discharge to public sewer	2453 m³	
2.2.2			Discharge to surface water	N/A	
2.2.3			Discharge to groundwater	N/A	
2.2.4			Discharge to own treatment plant	N/A	
3.1.1	Energy Measures	Energy consumed	Quantity of Natural gas purchased (gaseous form)	2288.14 MWh	From invoices-cold winter
3.1.2			Quantity of Liquefied natural gas purchased	N/A	
3.1.3			Quantity of Propane purchased	N/A	
3.1.4			Quantity of coal purchased	N/A	
3.1.5			Quantity of heavy fuel oil purchased	N/A	
3.1.6			Quantity of diesel fuel purchased	N/A	
3.1.7			Quantity of gasoline used to operate on-site equipment (excl. company cars) purchased	228.4 MWh	cars only-from invoices

Sustainable Development Tool

Typically these systems cannot be remotely accessed, further limiting their appeal and usefulness. Unfettered access to a compliance system is especially important to small groups or individuals to ensure compliance success via real time tracking and monitoring. To be sure, these limited systems offer an initial advantage of cost savings, but at the potential expense of compliance and public attention.

### The Elaborate Approach

These systems are typically overly complex with detailed software that will track, trend, complete forms and reports for various agencies and often complete calculations. These systems will also typically include detailed safety modules and other modules used for corporate sustainability programs.

However, the disadvantages of these systems can be numerous. Initially, they often involve high initial costs to purchase, customize and train users to understand the system, recurring costs to use the system on a corporate and user level and additional costs for revisions to detailed forms if there are changes to the forms by regulators or the client.

Internal participation in these systems can be low due to their complexity and non-intuitive format, resulting in lower effectiveness of the system. These elaborate systems are almost always hosted by the provider and not by the client, incurring additional charges for off-site hosting, less control and potentially less security than that provided by the client's own IT infrastructure. If there are any changes to the system, or if the system is no longer willing to be “leased” by the client, what happens to the client data, document, and tracking system? While the complexity of the “all in one” solution can be alluring, there are significant concerns that should be reviewed prior to leasing such a product.



An EHS director at a large state university system shared that the organization tools of EMIS had made the biggest difference for his organization. “The material safety data sheet (MSDS) manager and training components are key elements of EMIS for us,” he said. “We have more than 100 labs where researchers use thousands of chemicals, so keeping track of all the MSDSs is very important.”

“We also have about 850 employees and deliver quite a bit of training, which can be tracked through EMIS. The EMIS software helps us stay on track in many areas of compliance, and our success of zero state violations can be attributed in part to the EMIS calendar and task functions,” this EHS director added.

HRP offers a number of expansion packages for EMIS allowing it to scale up to meet and exceed needs across a corporation, including but not limited to sustainability, training manager, SDS manager, and asset tracking. In addition, HRP routinely customizes existing EMIS components as well as creating new modules and reports to address future needs and optimize existing data.

“The automated EMIS compliance emails used with all of our facilities generate a wealth of positive feedback, foster communication and suggestions from the field, minimize overdue compliance items, help protect the environment and save the organization money on avoided regulatory violations,” shared an EHS director of a large global manufacturer. “Facilities have commented that they rely on the EMIS reminders to keep them informed in a very busy job atmosphere with many duties.”

“We are pleased to offer EMIS as a simple and effective solution for our clients’ compliance needs,” offered HRP’s Goetcheus. “Of all the benefits shared by clients, perhaps most importantly, using the EMIS software results in clients being able to focus on their core mission of providing their own product or service efficiently.”

## HRP’S ADVANTAGE

### **Environmental Consulting**

HRP’s EMIS was shaped from our 30 years of environmental consulting experience. We know what is important in a compliance system: ease of use across the company, flexibility, expansion capability, instant compliance snap shot, wireless access, a robust document manager, a detailed calendar and SDS or training manager. The EMIS is the solution.

Our EMIS is backed up by HRP’s diverse technical professionals who offer exceptional client satisfaction. Our professionals listen to our clients to provide the right solutions. We customize the EMIS to reflect the client’s culture and objectives. We also help clients navigate new requirements and capture those in the EMIS so that they can be managed and compliance maintained, no matter what lies ahead.