

SCOPE OF THE AUDIT

Regulatory Programs Covered: Under the Audit Program, AU and AUM will audit compliance with the following federal and state regulatory programs:

- 1. Clean Air Act:** Standards of Performance for New Stationary Sources (40 CFR Part 60); National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61); National Emission Standards for Hazardous Air Pollutants for Source Categories (40 CFR Part 63); Chemical Accident Prevention Provisions (40 CFR Part 68); Acid Rain Program Provisions (40 CFR Part 72); Title V Permits; Protection of Stratospheric Ozone (40 CFR Part 82); Applicable State Implementation Plans (SIPs), including New Source Review Regulations (40 C.F.R Part 52; 40 CFR 51.160 et seq,
- 2. Clean Water Act:** Spill Prevention, Control, and Countermeasures (40 CFR Part 112); The National Pollutant Discharge Elimination System Permits Including storm water management (40 C.F.R Part 122); General Pretreatment Regulations (40 CFR Part 403)
- 3. Safe Drinking Water Act:** National Primary and Secondary Drinking Water Regulations (40 CFR Part 141 and 143); (Underground Injection Control Program (40 CFR Part 144),
- 4. Federal Insecticide, Fungicide and Rodenticide Act:** Good Laboratory Practice Standards (40 CFR Part 160); State Registration of Pesticide Products (40 C.F.R Part 162); Worker Protection Standard (40 CFR Part 170); Certification of Pesticide Applicators (40 CFR Part 171); Experimental Use Permits (40 CFR Part 172),
- 5. Resource Conservation and Recovery Act:** Hazardous Waste Management System, Used Oil Handling, Underground Storage Tanks (40 CFR Parts 260-266, 268, 273, 279, 280)
- 6. Comprehensive Environmental Response, Compensation and Liability Act and Emergency Planning, and Community Right-to-Know Act:** Designation, Reportable Quantities, and Notification (40 C.F.R Part 302); Emergency Planning and Notification (40 CFR Part 355); Hazardous Chemical Reporting: Community Right-to Know (40 CFR Part 370); Toxic Chemical Release Reporting: Community Right-to Know (40 C.F.R Part 372).
- 7. Toxic Substances Control Act:** Pre-manufacture Notification (40 C.F.R Part 720); Lead-Based Paint Poisoning Prevention (40 C.F.R Part 745); Polychlorinated Biphenyls ("PCBs") Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions; (40 CFR Part 761); Asbestos (40 CFR Part 763).

Facilities and Documents: The following facilities and documents will be audited under this program. Note that the benefits of the Audit Agreement shall extend to only those facilities that are audited. This list is not meant to be all-inclusive.

Documents to Review (for the three years prior to the Program Period)

- Verify EPA identification numbers and generator status
- Hazardous waste manifests, Universal Waste Bills of Lading
- Training records
- Land disposal restriction notifications
- Exception reports
- Lead disclosure statements in leases, or associated with leases of residential housing let by the university in its capacity as a lessor, as defined in 40 C.F.R § 745.103
- Required certifications
- Required reports
 - Emissions monitoring reports for any onsite air pollution control equipment
 - SARA abatement or removal reports
 - Asbestos abatement or removal reports
 - Closure reports or sampling data for any underground storage tank removals
 - Environmental incident reports
 - Health and safety monitoring reports
- Requires plans and programs (only the current plan will be reviewed)
 - Spill preventions, control and countermeasure plans
 - Hazardous waste management program and spill contingency plan
 - Emergency Response Plan
 - SWPP plans and associated sampling results
 - Required permits
 - Copies of all air and water permits, currently in place at the institution; including a copy of the Title V permit (or application if a major source or the operating permits)
 - NPDES permits and sampling reports or water discharge permits issues
 - Recycling permits
 - Air Pollutant Source Registration lists
- Analytical tests, monitoring reports, surveys and studies
 - Existing studies (impact studies, previous environmental audits, waste characterization and minimization studies, water and energy reduction studies, asbestos surveys)
 - Test results from any lead paint sampling activities
 - Previous environmental assessment reports
 - Test results from drinking water sampling activities
 - PCB test data or removal documentation for any transformers, capacitors, hydraulic systems (including elevators, floor lifts, etc....)
 - Monitoring results for wastewater and air emissions, including sampling and analysis protocols
 - Analytical data from any waste characterization sampling

- Tightness test reports for any active underground storage tanks (most recent results)
- Effluent monitoring data for any onsite wastewater treatment systems (most recent quarter)
- Water quality data from any onsite production wells or monitoring wells (most recent quarter)
- Well logs (boring logs) for any onsite groundwater production wells or monitoring wells
- SPCC inspection logs

Additional Documents to Review

- Copies of any Administrative orders, Notices of Violation and Consent Agreements or consent Decrees from any local, state or federal agency from the last 10 years
- EH&S manual
- Detailed list of known Satellite Accumulation Areas
- List of non-contiguous properties owned or leased by the institution and its function within the institution
- An organization charge for the institution and for the EHS department
- Site layout plan(s) if available, or any lists associated with any of the issues noted below-principal chemical and hazardous waste storage areas, underground storage tank locations, above ground storage tanks, elevators, generators, transformer pads and vaults, storm and sewer draining networks and on site pumping wells locations
- Latest chemical inventory and access to Material Safety Data Sheets (MSDS) list of chemicals currently used or stored on site
- Environmental capital expenditure plans (3 to 5 years)
- List of solid waste materials generated and disposal methods used
- List of septic tanks, sumps oil water separators
- list of storage tanks (underground and aboveground), size and contents
- Sources of water discharges, list of contact and non-contact cooling waters
- Available subsurface information
- Pesticide use info

Facilities Operation and Maintenance

- Air conditioning/refrigeration service
- Appliance and equipment repair, including medical equipment
- Athletic facilities, maintenance and management (including, but not limited to ice rinks, swimming pools, fields, gymnasiums, rifle ranges)
- Building cleaning and maintenance
- Building renovation and construction
- Cafeteria/Food Service Areas
- Chemical storage areas
- Distillation units
- Drinking water treatment systems
- Fabrication shops
- Furniture repair
- Heating and power plants (e.g., boilers, emergency generators)

- House or architectural structure painting
- Janitorial closets
- Landscaping operations
- Laundry
- PCB transformers and switches
- Pesticide storage facilities
- Resource recovery/incinerator facilities (including animal carcass incinerators)
- Solid waste management areas, rubbish trucks and trucking operations
- Waste disposal areas (landfills)
- Wastewater treatment facilities
- Waste treatment facilities such as autoclaves

Fleet Maintenance

- Automotive, truck, and ambulance servicing areas
- Gasoline service stations
- Garages

Hazardous Waste / Tanks / Wells

- Aboveground and current operating underground storage tanks and their containment areas/systems, and documentation concerning closures of regulated tanks previously removed from service.
- Dry wells, septic systems, cesspools, floor drains, sink drains, and disposal wells.
- Facilities treating, storing or disposing of hazardous wastes.
- Hazardous waste satellite accumulation areas.
- Hazardous waste storage areas.
- Tanks that have been permanently or temporarily closed
- Transformers and oil-containing electrical equipment (PCB and non-PCB).
- Universal waste storage areas.

Laboratories

- Clinical and pathology laboratories
- Teaching and research laboratories with regular chemical use

Pharmacy and Health Clinic

- Chemical and Pharmaceutical storage areas
- Biomedical waste management areas
- Mercury waste management areas
- Outdated pharmaceuticals

Sterile Supply and Materials Management

- Autoclaving Units
- Ethylene Oxide Units
- Glutaraldehyde
- Use and disposal of disinfectants

Use and Disposal of Known Chemicals/Products of Concern

- Artist paints, ceramic clays, ceramic glazes and solvents
- Computers/monitors, circuit boards, and other lead-bearing electronics
- Ethanol and formaldehyde/ethanol solutions
- Fluorescent light bulbs and other types of lamps, including high-intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps
- Formaldehyde/Formalin
- Laboratory chemicals and waste products
- Mercury and Mercury-containing devices and products
- PVC-containing devices
- Xylene
- Batteries
- Solvents
- Photographic chemicals and scrap film

Other Services

- Athletic and training facilities
- Photo processing/publishing
- Animal care areas
- Farm and agricultural facilities
- Remote research stations
- Aquaculture facilities
- Destructive testing laboratories
- Pilot plants and reduced-scale engineering facilities
- Microelectronics fabrication facilities
- Theater scene studios and fine art studios
- Ceramic studio