

Checklist for Campus Compliance Success

An environmental compliance and pollution prevention tool



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Section I: General facility information	2
Section II: Compliance self-assessment	3
1.0 Hazardous Waste (Resource Conservation and Recovery Act)	3
2.0 Universal Waste	6
3.0 Nonhazardous Solid Waste	7
4.0 Air and Radiation (Clean Air Act)	9
5.0 Clean Water Act	13
6.0 Community Right to Know	15
7.0 Spill Prevention Control Countermeasure Plan	15
8.0 Storage Tanks	16
9.0 Federal Insecticide, Fungicide, and Rodenticide Act	17
10.0 Toxic Substance Control Act	17
Section III: Laboratory self-assessment	18
Section IV: Pollution prevention	23
1.0 Solid Waste	23
2.0 Purchasing	24
3.0 Energy and Water Conservation	25
Compliance assistance and regulatory contacts lists	27
Note-taking section	28
Appendix A	29
Campus operations that need to be included in your environmental evaluation	

This publication was created by the Kansas State University Pollution Prevention Institute (PPI) through a grant from the Environmental Protection Agency (EPA). PPI's mission is to help Kansas small businesses comply with environmental regulations and identify pollution prevention opportunities. PPI services are free and confidential. For more information, call 800-578-8898; send an e-mail to SBEAP@ksu.edu; or visit our Web site at <http://www.sbeap.org>. Kansas State University is an EEO/AA provider.



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Introduction and instructions for use

Educational facilities often house many small businesses or separate operations, making proper emission and waste management and reporting requirements challenging. A list of these different operations can be found in Appendix A. EPA Region 7 funded this checklist in an effort to provide Kansas colleges and university facilities with a tool which helps them identify environmental compliance concerns and related pollution prevention (P2) opportunities that may reduce compliance burdens. While this tool strives to be comprehensive, its main purpose is to

identify the most critical compliance issues and related P2 opportunities. If you answer no (N) or don't know (DK), then this is a topic area you may want to investigate further. The Kansas State University Pollution Prevention Institute (PPI) and the Kansas Small Business Environmental Assistance Program (SBEAP) can provide free, confidential, environmental compliance and pollution prevention assistance. Contact PPI at 800-578-8898 or sbeap@sbeap.org with questions.

Section I: General facility

- 1.1 Facility name: _____
- 1.2 Contact name and phone _____
E-mail _____
- 1.3 Facility address: _____ Zip code _____
- 1.4 What department(s) is responsible for environmental compliance at your facility? (Check all that apply)
- _____ Health and safety _____ Maintenance/facility _____ Industrial hygiene
- _____ Environmental _____ Academic department _____ Other (specify)
- _____
- 1.5 Does the facility have a waste management or environmental committee? _____ Yes _____ No
- 1.6 Have you ever used PPI/SBEAP services before? _____ Yes _____ No

Section II: Compliance self-assessment

Checklist for campus compliance success

(A laboratory-specific, self-assessment tool can be found in Section III.)

1.0	Resource Conservation and Recovery Act (RCRA) (40 CFR 261, 262, 265) (K.A.R. 28-31)	Y	N	DK	NA
1.1	<p>Has your facility identified all RCRA hazardous waste streams?</p> <p><i>Tip: Hazardous wastes at campuses may come from a variety of departments including chemical laboratories, maintenance shops, physical plants, medical schools, carpentry, print shops, machine shops, agriculture, studio arts, and residence halls. See Appendix A for a list of possible campus operations that may need to be evaluated.</i></p>				
1.2	<p>Is there a hazardous waste determination retained on file for each waste stream?</p> <p><i>Tip: As the generator of wastes, it is your responsibility to make a hazardous waste determination. Use the MSDS and knowledge of process or certified testing to make a clear determination of all waste streams. By doing this, you may discover several wastes that really do not need to be handled as RCRA hazardous wastes, potentially saving \$\$ in disposal costs.</i></p>				
1.3	<p>What is your facility's generator status? (See categories below) (Please check)</p> <p>No hazardous waste SQG¹ KSG² EPAG³ Don't know</p> <p><i>Tip: The Hazardous Waste Generator Handbook contains additional guidance at http://www.kdhe.state.ks.us/waste/apps-hw/HW_Gen_Handbook_July_2003.pdf.</i></p>				
1.4	<p>Does your facility have an EPA hazardous waste generator (EPA ID) number?</p> <p><i>Tip: SQGs do not need to have an EPA generator number.</i></p>				

¹ A Kansas Small Quantity Generator (SQG) generates less than 25 kg/month (55 lbs/month) and never accumulates more than 1000 kg (2200 lbs). (Note: 55 lbs is about 5 to 7 gallons.)

² A Kansas Generator (KSG) generates more than 25 kg/month (55 lbs/month) but less than 1000 kg/month (2200 lbs/month) of hazardous waste, and never accumulates more than 1000 kg (2200 lbs). (Note: 2200 lbs is about 4 to 6, 55-gallon drums.)

³ An EPA Generator (EPAG) generates more than 1000 kg/month (2200 lbs/month) or accumulates more than 1000 kg at any one time, or generates 1 kg (2.2 lbs) or more of an acutely hazardous waste.

1.0	Resource Conservation and Recovery Act (RCRA) (40 CFR 261, 262, 265) (K.A.R. 28-31)	Y	N	DK	NA
1.5	<p>Storage and labeling</p> <p>a. Is all hazardous waste stored in either a satellite accumulation area and/or a separate permanent hazardous waste storage area?</p> <p>b. Are there any hazardous wastes stored in tanks? [If yes, see K.A.R. 28-31-4 (g)(h)]</p> <p>c. Are all hazardous waste containers labeled with the words “Hazardous Waste?”</p> <p>d. Are containers marked with the accumulation start date?</p> <p>e. Are all hazardous waste storage containers in good condition?</p> <p>f. Are all hazardous waste containers kept closed except when filling or adding waste?</p> <p>g. Are weekly inspections of hazardous waste storage areas documented and maintained for a minimum of three years?</p>				
1.6	If a regulated generator, is emergency response information posted by at least one phone?				
1.7	Are hazardous waste manifests, land disposal restrictions (LDR), exception reports, inspection documents, and any other related hazardous waste documents maintained for a minimum of three years?				
1.8	<p>KSG and EPAG training</p> <p>a. Do employees receive hazardous waste handlers/management/emergency response training related to their job duties?</p> <p>b. Are training records maintained?</p> <p><i>Tip: PPI offers free Web training for Kansas generators that need hazardous waste handler training. Access this training at http://www.sbeap.org/waste/welcome.htm.</i></p>				

1.0	Resource Conservation and Recovery Act (RCRA) (40 CFR 261, 262, 265) (K.A.R. 28-31)	Y	N	DK	NA
1.9	<p>EPAG Contingency Plan</p> <p>a. Is there an updated RCRA Contingency Plan, including accurate phone numbers?</p> <p>b. Was a copy of the RCRA Contingency Plan sent to the local hospital, and police and fire departments?</p>				
1.10	Does your hazardous waste coordinator have access to a communication device (telephone, alarm, etc.)?				
1.11	<p>Has your facility taken steps to reduce and eliminate the toxicity and amounts of chemicals at your facility wherever possible?</p> <p><i>Tip: Want to reduce your regulatory burden? Call PPI to help you reduce your wastes and regulatory burden or to get involved in the "Rehab the KS Lab" program. For a list of EPA's waste minimization chemical priorities, go to http://www.epa.gov/epaoswer/hazwaste/minimize/chemlist.htm.</i></p>				
1.12	<p>Are computer monitors and other unusable electronics recycled?</p> <p><i>Tip: Although Kansas does not currently regulate disposal of these materials as hazardous wastes, other states are moving in that direction due to the heavy metal content in these materials. Locate a recycling outlet near you by going to http://www.kansasbirp.com/.</i></p>				
1.13	<p>Have you identified an overstock of unopened, excess, or outdated chemicals?</p> <p><i>Tip: If so, try to use them up for their intended purpose within the specific department or in another. Some unopened chemicals may be sent back to the supplier or traded through a waste exchange. Use the Internet to search for one of several waste exchange programs that are available nationally or visit the SBEAP waste exchange Web site at http://www.sbeap.org/ppi/waste.asp for a current listing of waste exchanges.</i></p>				

1.0	Resource Conservation and Recovery Act (RCRA) (40 CFR 261, 262, 265) (K.A.R. 28-31)	Y	N	DK	NA
1.14	<p>Used Oil</p> <p>a. Are used-oil containers or tanks labeled with the words “Used Oil?”</p> <p>b. Do you ensure that hazardous waste is not added to your used oil?</p> <p>c. Do you use a registered used-oil transporter to remove your used oil?</p> <p>d. Are used oil filters drained of all free liquids prior to disposal or recycling?</p> <p><i>Tip: Burning used oil on site in a space heater is an excellent energy recovery practice that can save you money. However, if your facility receives or sends used oil to or from another business, it must be tested to ensure it is “on spec.” See these specifications at http://www.kdhe.state.ks.us/waste/guidance/hw98-02.pdf.</i></p>				

2.0	Universal Waste (40 CFR 273) Federal definition includes batteries (e.g., nickel cadmium), certain pesticides, lamps, and thermostats. In addition to these four federal wastes, the state of Kansas allows other mercury-containing devices to be handled as universal wastes.	Y	N	DK	NA
2.1	<p>Does your campus facility handle universal waste separately from your other hazardous waste?</p> <p><i>Tip: For regulated generators of hazardous waste, utilizing the universal waste rule will decrease your regulatory paperwork and possibly your generator status, while recycling the waste in an environmentally preferred manner.</i></p>				
2.2	<p>If yes to 2.1, does your campus facility label its universal waste and specify type (e.g., lamps, batteries)?</p> <p><i>Tip: Read more about requirements for the handling of fluorescent lamps at http://www.kdhe.state.ks.us/waste/guidance/hw95-01.pdf.</i></p>				
2.3	<p>If yes to 2.1, does your campus facility store universal waste in appropriate containers that prevent releases to the environment?</p>				

2.0	Universal Waste (40 CFR 273) Federal definition includes batteries (e.g., nickel cadmium), pesticides, lamps, and thermostats. In addition to these four federal wastes, the state of Kansas allows other mercury-containing devices to be handled as universal wastes.	Y	N	DK	NA
2.4	If yes to 2.1, does your campus facility have a system to document the length of time the universal waste has been accumulating to ensure the wastes are removed at least once per year?				
2.5	If yes to 2.1, does your facility train employees to respond to releases of universal wastes? <i>Tip: For more information on universal waste, visit http://www.epa.gov/epaoswer/hazwaste/id/univwast.htm.</i>				
2.6	Does your facility accumulate 5000 kgs (11,000 lbs) or more of universal waste? If yes, you should be registered as a large quantity handler of universal waste. <i>Tip: Go to http://www.kdhe.state.ks.us/waste/guidance/hw01-01.pdf to read more about these requirements.</i>				

3.0	Nonhazardous Solid Waste KAR 28-29	Y	N	DK	NA
3.1	If the facility has any active landfills on site, are they permitted by KDHE?				
3.2	Does your facility have a solid-waste minimization plan that includes any of the following: a. Cardboard, paper, or metal recycling b. Material reuse or donation programs c. Yard waste or food composting <i>Tip: For more information about solid-waste reduction opportunities, go to http://www.epa.gov/epaoswer/hazwaste/minimize/index.htm.</i>				

3.0	Nonhazardous Solid Waste KAR 28-29	Y	N	DK	NA
3.3	<p>If a facility is planning to demolish or renovate a structure, are you aware of the two categories of construction and demolition (C&D)?</p> <p><i>Tip: The option for recycling or disposal of construction and demolition (C&D) at a C&D landfill should be utilized whenever possible. Read more about C&D materials at http://www.kdhe.state.ks.us/waste/guidance/sw94-02.pdf.</i></p>				
3.4	<p>Medical Services Waste (K.A.R. 28-29-27) (commonly known as biohazard wastes)</p> <p>Do you have a training program in place to minimize mixing of medical service waste and solid waste?</p> <p><i>Tip: Through training and clearly defining what does and does not belong in the “red bags,” medical facilities can decrease their medical waste disposal costs up to 50%. For a healthcare-specific, self-assessment tool, go to www.sbeap.org.</i></p>				
3.5	<p>Is bulk, bloody fluid discharged to the municipal sewer with written permission?</p>				
3.6	<p>Are sharps segregated from other medical services waste and placed in rigid, leak-proof, and puncture-resistant containers?</p>				
3.7	<p>Are all other medical services wastes placed in red bags with the biohazard symbol?</p>				
3.8	<p>Are all containers labeled with the words “Biohazard” or color coded in accordance with CFR 29 1910.130?</p>				
3.9	<p>Is medical service waste managed or processed on site or off site in one of the three approved methods?</p> <p><i>Tip: In Kansas, medical service waste that is not processed (sterilized or autoclaved) on site or hauled off by a licensed transporter can be sent to the local landfill with a Special Waste Authorization. If it is processed on site, with the exception of sharps, the processed medical service waste can be commingled with your regular trash. Read more at http://www.kdhe.state.ks.us/waste/guidance/sw00-01.pdf.</i></p>				

4.0	Air and Radiation/Clean Air Act (CAA) (K.A.R. 28-19)	Y	N	DK	NA
4.1	Does your campus facility have a KDHE Class I or EPA Title V operating permit for air emissions from its power plant or other areas?				
4.2	If no to 4.1, does your campus facility have a Class II operating permit?				
4.3	<p>If any of the shops at the campus have air emissions, has the facility evaluated the emissions if not already addressed in permits 4.1 or 4.2?</p> <p><i>Tip: The facility should maintain an up-to-date site plan or blueprint showing all existing (air emission) sources.</i></p>				
4.4	Does the facility keep yearly records of all raw materials consumed and compare these raw material records to the volume and type of material found in its emissions?				
4.5	<p>If any facility plans to add a new emission source, has it applied for a construction permit or modifications to its existing permits?</p> <p><i>Tip: The following fact sheet provides an overview of the Kansas Air Quality Act and associated permitting requirements: http://www.sbeap.org/ppi/publications/airqual.pdf.</i></p>				
4.6	<p>Has the facility evaluated campus-related shops for possible MACT standards?</p> <p><i>Tip: Review this site for possible MACT application: http://www.epa.gov/ttn/atw/mactfnl.html.</i></p>				
4.7	<p>If the facility burns any waste (as fuel or for disposal purposes), does it hold a permit for this practice?</p> <p><i>Tip: All incinerators need to be permitted by KDHE. New standards went into effect in 2001, at which time many old incinerators were closed. Any use of incinerators, even occasionally or for solid-waste disposal, requires the process be permitted in some form by KDHE. Open burning of leaves or other wastes is also prohibited.</i></p>				

4.0	Air and Radiation/Clean Air Act (CAA) (K.A.R. 28-19)	Y	N	DK	NA
4.8	Does your campus facility have emergency generators? a. Specify type of fuel: Diesel ____ #2 ____ Natural gas ____ b. Approximate number of hours operated last year _____				
4.9	If yes to 4.8, does your campus facility use the generator for purposes other than just emergency backup, such as a supplement at peak-use times? <i>Tip: If your generator is used for purposes other than for emergencies, then it no longer qualifies as an emergency generator, allowing other regulatory thresholds to apply.</i>				
4.10	New Source Performance Standards - 40 CFR Part 60 (K.A.R. 28-19-720) Does your campus facility have boilers constructed (manufactured) or modified after June 9, 1989, with heat input between 10-100 MMBTU/hr or larger?				
4.11	If yes to 4.10, did your campus facility notify KDHE that you are subject to the New Source Performance Standard (NSPS)?				
4.12	Kansas City Sources Does your campus facility have a solvent parts washer in the motor vehicle shop? <i>Tip: Kansas City-area facilities that have solvent parts washers must use low-vapor-pressure solvents and degreasers. For more information, see http://www.sbeap.org/ppi/publications/smell_of_success.pdf.</i>				
4.13	Chlorofluorocarbon (CFC) Does your campus facility use a certified vendor to service your refrigeration units with freon?				
4.14	If no to 4.13, a. Are your in-house technicians certified?				
	b. Is your recovery/recycling equipment registered with EPA?				

4.0	Air and Radiation/Clean Air Act (CAA) (K.A.R. 28-19)	Y	N	DK	NA
4.15	<p>Are annual CFC leak-rate records and maintenance and repair records maintained for the refrigeration and air-conditioning systems having over 50 lbs of CFC normal refrigerant charge for a period of three years?</p> <p><i>Tip: If your facility still uses CFCs, read more about the benefits of a phase-out program at http://www.epa.gov/ozonelgeninfo/benefits.html.</i></p>				
4.16	<p>Asbestos - 40 CFR Part 61 Has your campus facility undergone any demolition/renovation recently?</p>				
4.17	<p>Has the campus facility removed any asbestos from any facility components?</p>				
4.18	<p>If yes to either 4.16 or 4.17, a. Was notification for the project provided to KDHE? b. Was a thorough inspection conducted to determine the presence of asbestos prior to commencement of the renovation/demolition activity? (NESHAP (40 CFR Part 61) c. Was a licensed contractor used?</p>				
4.19	<p>Lead Abatement a. If pre-1978 structures were remodeled, was the structure assessed for the presence of lead? b. If lead abatement was necessary, was a licensed lead-abatement contractor used?</p> <p><i>Tip: Lead-abatement contractors performing lead activities must be specifically trained and licensed. A facility may send their own staff to training or contract out for the services. For more information, go to http://www.kdhe.state.ks.us/lead/forms.html. Another helpful site can be found at http://www.epa.gov/docs/fedrgstr/EPA-TOX/1996/August/Day-29/pr-24181DIR/pr-24181.txt.html.</i></p>				

4.0	Air and Radiation/Clean Air Act (CAA) (K.A.R. 28-19)	Y	N	DK	NA
4.20	Campus Facility/Medical/Infectious Waste Incinerators – K.A.R. 28-19-729 Does your campus facility operate a medical-waste or solid-waste incinerator on site?				
4.21	If yes to 4.21, is it permitted by KDHE? <i>Tip: All incinerators need to be permitted by KDHE. New standards went into effect in 2001 at which time many old incinerators were closed. Any use of incinerators, even occasionally or for solid-waste disposal, requires the process be permitted in some form by KDHE. Open burning of leaves or other wastes is also prohibited.</i>				
4.22	Radiation Does your facility utilize radioactive materials in a medical facility or in research? <i>Tip: Read more about KDHE requirements at http://www.kdhe.state.ks.us/radiation/index.html.</i>				
4.23	If yes to 4.22, does the licensee or facility take responsibility for the waste management that results from these therapies or use, as specified in its license?				
4.24	Does the licensee or facility periodically monitor all waste streams for radioactivity or test buildings for exposure to radiation? <i>Tip: The licensee is responsible for radiation waste management and monitoring.</i>				
4.25	Ethylene Oxide (EtO) Does your medical facility use EtO as a sterilant or fumigant? <i>Tip: EtO effectively kills microorganisms but is very toxic to human health. EtO users will fall under strict new air emission standards in the near future. For a list of safer alternatives to EtO use, go to http://www.h2e-online.org/pubs/leo.pdf.</i>				

5.0	Clean Water Act (CWA)	Y	N	DK	NA
5.1	<p>Have all wastewater discharges been identified and traced to verify discharge points and evaluated to determine whether they comply (at a minimum) with local municipal sewer use ordinance requirements?</p> <p><i>Tip: If the campus facility discharges wastewater, outdated chemicals, or medications into a municipal sewer system, you should check with the local sewer authority or KDHE for regulatory requirements. Many campus facilities are regulated as significant industrial users and hold discharge permits.</i></p> <p><i>Tip: Are you recovering your silver fixer—the effluent from x-ray processors and photo labs? If not, you are dumping money down the drain and may be out of compliance. Read why you should recover your silver fix at http://www.sbeap.org/ppi/publications/silverfix.pdf.</i></p>				
5.2	<p>Does your campus facility have any wastewater discharges to the ground or into surface waters (e.g. contact cooling waters, decontamination waters, fire-protection test wastewaters, vehicle equipment washing wastewaters, janitorial wastewaters)?</p> <p><i>Tip: If your decontamination water drains to the parking lot, you need a plan to contain and properly dispose of this water. Several vendors offer systems which satisfy this need.</i></p>				
5.3	<p>If yes to 5.2, does your campus facility have a National Pollutant Discharge Elimination System (NPDES) permit? (Discharges to groundwater are usually prohibited.) In addition, a Kansas Water Pollution Control Permit is needed for non-overflowing/non-discharging systems.</p> <p><i>Tip: For more information about NPDES, go to http://www.kdhe.state.ks.us/water/index.html.</i></p>				
5.4	<p>Does your campus facility contain any interior floor drains that are connected to storm drainage or subsurface drainage?</p> <p><i>Tip: Flows other than storm water runoff require authorization by the governmental entity regulating storm sewer/storm water drainage utilities. An NPDES permit is usually required by KDHE. A permit can be avoided when practical alternatives are utilized, either eliminating the discharge or diverting it to the sanitary sewer system.</i></p>				

5.0	Clean Water Act (CWA)	Y	N	DK	NA
5.5	Do your systems have public water supply cross-connection control?				
5.6	<p>If your campus has its own water supply system, is it considered a public system?</p> <p><i>Tip: If the campus has its own water supply, certain regular testing of the supply is required.</i></p>				
5.7	<p>Are there any abandoned or unplugged wells on campus?</p> <p><i>Tip: Abandoned wells can be a conduit for contaminants to enter an otherwise protected aquifer. For more information on well plugging, consult KDHE's Web site at http://www.kdhe.state.ks.us/pdf/heflec5027.pdf.</i></p>				
5.8	<p>Are there any septic tanks in use for anything other than domestic wastes?</p> <p><i>Tip: Septic tanks cannot be used for anything other than domestic wastes without specific permission from KDHE. These systems are not designed to handle any industrial discharges. Motor pool dry-well systems are prohibited.</i></p>				
5.9	<p>If the campus has livestock, is there a waste management plan in place?</p> <p><i>Tip: Confined animal feeding operations with greater than 300 animal units must register with KDHE. Regulatory and pollution prevention information is available at http://www.kdhe.state.ks.us/feed-lots/.</i></p>				
5.10	<p>Has your facility taken steps to conserve water?</p> <p><i>Tips: Conserving water can be as simple as using low-flow faucets or monitoring the facility's water use to identify problem areas. For more information on water conservation, see the P2 section within this document or go to http://www.dep.state.pa.us/dep/subject/hototpics/drought/facts/school.htm.</i></p>				

6.0	Community Right to Know SARA Title III - EPCRA (Sections 302-304, 311, and 312) State, county, and local governments are exempt from these reporting requirement.	Y	N	DK	NA
6.1	<p>Does the campus facility have on site at any time during the calendar year a listed extremely hazardous substance (EHS) in an amount over the threshold reporting quantity?</p> <p><i>Tip: State, county, and local governments are exempt from OSHA hazcom standards, and therefore are also exempt from these reporting requirements. The standard applies to all others. The list of EHS can be found at http://yosemite.epa.gov/oswer/ceppoehs.nsf/EHS_Profile?openform.</i></p>				
6.2	<p>Does the campus facility have on site at any time during the calendar year 10,000 lbs of any product/material requiring a material safety data sheet (MSDS)?</p>				
6.3	<p>If yes to 6.1 or 6.2, have Tier II chemical inventory forms been filed annually with the local fire department, LEPC, and SERC?</p> <p><i>Tip: If the EHS regulation is the only portion of the regulation that applies, simply check the 302 section of the form. Other sections may be left blank. To read more, go to http://www.kdhe.state.ks.us/asbestos/download/TIER_II_Instructions.pdf.</i></p>				

7.0	Spill Prevention Control Countermeasure (SPCC) Plans (40 CFR 112)	Y	N	DK	NA
7.1	<p>Is oil of any kind stored above ground in containers or equipment that have a capacity of 55 gallons or greater and a total aggregate capacity of over 1,320 gallons?</p>				
7.2	<p>Does your campus facility store oil below ground in any size tank (s) with a total aggregate volume over 42,000 gallons, not including underground storage tanks regulated under 40 CFR 280 and 281? (For example: Properly regulated USTs containing heating fuels are exempted from 40 CFR 280 and 281.)</p>				

7.0	Spill Prevention Control Countermeasure (SPCC) Plans (40 CFR 112)	Y	N	DK	NA
7.3	<p>Does your campus facility have a spill prevention control countermeasure (SPCC) plan?</p> <p><i>Tip: If you answered yes to 7.1 or 7.2, then you will most likely need an SPCC plan. In some instances if you are just near the 1,320-gallon threshold, you may want to consider inventory control or waste management options to decrease your regulatory burden.</i></p>				
7.4	<p>If your facility has an SPCC, is it signed by a professional engineer?</p> <p><i>Tip: To learn more about SPCC plans, go to www.epa.gov/oilspill.</i></p>				

8.0	Underground Storage Tanks (USTs) and Aboveground Storage Tanks (ASTs) (KAR 65-34)	Y	N	DK	NA
8.1	<p>Does your campus facility store motor fuels, heating oils, waste oils, and/or hazardous substances in USTs with a capacity of greater than 110 gallons, or ASTs with a capacity greater than 660 gallons?</p>				
8.2	<p>If yes to 8.1, are the tanks registered with the state?</p> <p><i>Tip: Read more about Kansas tank requirements at http://www.kdhe.state.ks.us/tanks/.</i></p>				
8.3	<p>If yes to 8.1, is the annual permit posted in a conspicuous location?</p>				
8.4	<p>If yes to 8.1, is there some form of release detection in use for the UST system's tank and associated piping?</p>				
8.5	<p>If yes to 8.1, are there records showing one or more of the following for USTs: monthly release detection, tightness testing along with inventory control, or manual tank gauging?</p> <p><i>Tip: Use EPA's "Basic Checklist for USTs" found at http://www.epa.gov/swerust1/cmplastc/cheklist.htm as a helpful, comprehensive tool to identify compliance lapses.</i></p>				
8.6	<p>Have you evaluated the need for an SPCC plan as it relates to these materials stored in your tanks? See section 7.0.</p>				

9.0	Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Note: Pesticides include disinfectants, sterilants, germicides, algicides, virucides, swimming pool compounds, insecticides, fungicides, herbicides, etc.	Y	N	DK	NA
9.1	Does your campus facility contract out for pesticide application for a. Landscaping? b. Structural? c. Janitorial (groundskeeping and facility maintenance)? d. Cooling tower?				
9.2	If any of the above pesticide applications are performed by commercial pesticide applicators, are the applicators licensed?				
9.3	If your campus facility uses its own janitorial employees to apply restricted-use pesticides, are the employees certified?				
9.4	Does your campus facility have procedures in place to keep informed about recently banned pesticides? <i>Tip: All health facilities should be using an integrated pest management program for insect control to prevent any potential for pesticide residues being deposited (and potentially redeposited) onto inappropriate surfaces. For more information, go to http://www.epa.gov/pesticides/factsheets/ipm.htm.</i>				

10.0	Toxic Substances Control Act (TSCA) (40 CFR 761) - Polychlorinated Biphenyl (PCB)	Y	N	DK	NA
10.1	Does the campus facility have any PCB-containing electrical equipment on site? <i>Tip: If older electrical ballasts are not labeled “contains no PCBs,” then handle and dispose of the units as if they contain PCBs. X-ray machines manufactured before 1997 may also contain PCBs. The following document list options for safe disposal of these units: http://www.kdhe.state.ks.us/waste/guidance/sw98-03.pdf.</i>				
10.2	If yes to 10.1, is the PCB-containing equipment properly identified?				
10.3	If yes to 10.1, does your campus facility inspect PCB-containing equipment regularly for leaks and keep records of the inspections?				

Section III: Laboratory self-assessment *Checklist for campus compliance success*

This checklist offers a simple screening tool for compliance and best management practices for the laboratory or the EH&S staff. Refer back to earlier media-specific sections for more detail.

1.0	(Portions of this section were used with permission and adopted from the document “The Environmental Self-Audit for Campus Organizations.”)	Y	N	DK	NA
1.1	Are you aware of the requirements of the Resource Conservation and Recovery Act (hazardous waste) relative to chemical storage and waste disposal?				
1.2	<p>It is estimated that up to 40% of chemical lab waste is unused virgin chemical. Do you have a program to minimize wasting unused material?</p> <p><i>Tip: Basic inventory control can save money and help you stay in compliance. Read about another university’s inventory control policy at http://offices.colgate.edu/chemmgt/CHP/c-cheminvn.html.</i></p>				
1.3	<p>Do you limit purchases of chemicals to amounts needed for a project or specific calendar period, rather than buying in bulk?</p> <p><i>Tip: Purchasing in bulk may be cheaper on a per-unit basis, if all the material is used. However, having to dispose of unused, outdated, or unknown material is costly and defeats the bulk-buying concept.</i></p>				
1.4	Have you explored centralized chemical purchasing and storage so that some volume purchasing can occur with the knowledge that the volume will be used?				
1.5	<p>Since many chemicals are hazardous when disposed, have you investigated micro or green chemistry techniques? These serve the same purpose but use micro quantities or less harmful materials.</p> <p><i>Tip: For more information on “Green Chemistry,” go to http://www.epa.gov/greenchemistry/index.html.</i></p>				

1.0	(Portions of this section were used with permission and adopted from the document “The Environmental Self-Audit for Campus Organizations.”)	Y	N	DK	NA
1.6	<p>Are all incompatible chemicals and wastes stored separately at the correct temperature and humidity?</p> <p><i>Tip: For guidelines to proper chemical segregation and lab safety go to http://www.dq.ua.pt/seguranca2/Download/Safety%20Guide%20in%20English.pdf.</i></p>				
1.7	<p>Do you segregate the following highly reactive materials?</p> <p>a. Oxidizing agents from reducing agents and combustibles?</p> <p>b. Reducing agents from reducible substances?</p> <p>c. Acids from reducing agents?</p> <p>For example: Many biology labs use strong acids (oxidizing agents) and solvents (highly reactive with strong oxidizers). Are these stored in separate cabinets?</p>				
1.8	Do you record spills, have an emergency plan to respond to them (along with emergency telephone numbers), and have adequate safety and response equipment readily available?				
1.9	Do you inspect stored chemicals regularly for out-of-date products, leakage, and proper storage?				
1.10	Do you maintain a file on all chemicals purchased including date of purchase, expiration date, purchaser, and frequency of use?				
1.11	If there is more than one laboratory (and chemical storage area) at your facility and no centralized purchasing, have you explored circulating a periodic list of available/surplus chemicals?				
1.12	Do you regularly discard chemicals that are no longer used, needed, or expired? If so, do you know if they are hazardous wastes before you dispose of them? If not, is there someone you can consult with?				

1.0	(Portions of this section were used with permission and adopted from the document “The Environmental Self-Audit for Campus Organizations.”)	Y	N	DK	NA
1.13	<p>Do you have a designated chemical waste storage area with</p> <p>a. Containers clearly labeled “Hazardous Waste”?</p> <p>b. Provisions for segregation of incompatible waste clearly labeled?</p> <p>c. Policy for clear and permanent labeling on individual containers of waste chemicals?</p> <p>d. Regular inspection for damage, leaks, etc.?</p> <p>e. Cleared aisles and proper spill-response equipment?</p>				
1.14	<p>If you generate large quantities of waste solvents, have you explored recycling them (e.g., a solvent distillation unit)?</p> <p><i>Tip: Solvent distillation can be up to 90% efficient for some facilities, greatly reducing the cost through decreased raw materials and avoided hazardous waste management costs.</i></p>				
1.15	<p>Mercury continues to be a major environmental and health issue. Have you examined your laboratory for</p> <p>a. Elemental mercury and mercury compounds used in experiments?</p> <p>b. Mercury-filled measuring devices, like thermometers and barometers?</p> <p>c. Mercury switches, etc.?</p>				
1.16	<p>*If you have mercury, have you explored replacing the experiments or replacing the measuring devices/switches with non-mercury technology?</p> <p><i>Tip: Mercury-free replacement devices and vendors can be found at http://www.sustainablehospitals.org/cgi-bin/DB_Index.cgi. Refer to Section 2.0, Universal Wastes, if you have questions about disposing of mercury sources at your facility.</i></p>				

1.0	(Portions of this section were used with permission and adopted from the document “The Environmental Self-Audit for Campus Organizations.”)	Y	N	DK	NA
1.17	<p>Do you have a policy and procedures for addressing mercury spills?</p> <p><i>Tip: A spill-response plan is posted at the KDHE site at http://www.kdhe.state.ks.us/mercury/what_to_do.html.</i></p>				
1.18	<p>Do you dispose of any lab waste down the sink drains? Do you provide a guidance document to labs for this practice?</p>				
1.19	<p>Do you discharge any wastewater to floor drains or sinks that flow to anything other than a holding tank or a publicly owned treatment works (POTW)?</p>				
1.20	<p>Does your facility discharge its wastewater to a publicly owned treatment works (POTW)?</p>				
1.21	<p>If you do not have a POTW in your area, do you have either (1) a state pollutant discharge elimination system (SPDES) permit, or (2) a holding tank before you discharge your wastewater?</p>				
1.22	<p>Do all your lab departments (i.e. chemistry, physics, biology) meet on a monthly basis to discuss total amounts of hazardous waste generated from each department?</p>				
1.23	<p>Did you know that you can accumulate up to 55 gallons of each type of hazardous waste at your lab area or working area before you bring it to your hazardous waste storage area? This accumulation area is known as a satellite accumulation area. Are containers set up in the work area to collect the daily lab wastes?</p> <p><i>Tip: Use of “day containers” is allowed in the lab as long as the containers are labeled as “Hazardous Waste” and kept closed (vapor-tight seal) at all times, except when adding or removing waste. Day containers should be emptied at the end of every shift into their respective satellite waste containers.</i></p>				
1.24	<p>Do you keep good records of your hazardous waste generation and accumulation?</p>				

1.0	(Portions of this section were used with permission and adopted from the document “The Environmental Self-Audit for Campus Organizations.”)	Y	N	DK	NA
1.25	Do you have a training program for hazardous waste management?				
1.26	Do you know your hazardous waste generator status?				
1.27	When you discard a waste, do you know if it is hazardous? If you do not know, do you have someone you can ask?				
1.28	Do you add up, on a monthly basis, total poundage of all the hazardous waste you generate?				
1.29	<p>Does your lab need an air permit or registration for your air emissions that are discharged through your fume hoods?</p> <p><i>Tip: Refer to section 4.0 for more details related to general air emissions.</i></p>				
1.30	If your lab operation has air emissions, have you identified, measured, and documented these emissions and evaluated them for air-permitting needs?				
1.31	Do you keep chemical (including waste) containers closed in order to eliminate fugitive emissions and evaporative losses?				

Section IV: Pollution prevention

This section includes additional voluntary actions your facility can consider that may reduce environmental liability, waste disposal costs, and worker exposure.

1.0	Solid Waste	Y	N	DK	NA
1.1	<p>Do you donate/compost any of the following? (Circle all that apply)</p> <ul style="list-style-type: none"> a. Food scraps/plate waste b. Edible food c. Office equipment d. Landscape waste e. Medical devices/equipment f. Manure or animal carcasses 				
1.2	<p>Do you recycle any of the following materials? (Circle all that apply)</p> <ul style="list-style-type: none"> a. Paper, white b. Cardboard c. Newspaper d. Batteries – all types e. Lead aprons f. Plastics g. Toner cartridges h. Ink-jet cartridges i. Printer ribbons j. Computers k. Fluorescent lamps l. Scrap metal m. Motor oil n. Construction/demolition waste o. X-ray films p. Waste photographic fixer solutions q. Solvents/fixers r. Packaging s. Mercury t. Pallets u. Glass v. Steel cans w. Aluminum cans x. Grass, leaves, shrubs, tree trimmings y. Other (Please specify) _____ 				
1.3	<p>Does your campus facility reuse any of the following materials? Note percent of reuse.</p> <p>Furniture _____</p> <p>Books _____</p> <p>Excess foods _____</p> <p>Lab reagents _____</p>				

1.0	Solid Waste	Y	N	DK	NA
1.4	How much solid waste does your campus facility generate per year (tons/year)? _____ tons for calendar year _____				
1.5	How many tons/year did your campus facility recycle? _____ tons for calendar year _____				
1.6	What percentage of your campus facility's waste is medical red bag waste? _____ % for calendar year _____				

2.0	Purchasing	Y	N	DK	NA
2.1	Has your campus facility called upon vendors and your group purchasing organization (GPO) to identify and develop alternatives for harmful and/or wasteful products and materials? Have you considered establishing an environmentally preferred purchasing (EPP) program? <i>http://www.pprc.org/pubs/topics/epr/epp.pdf</i>				
2.2	Has your campus facility worked with suppliers to minimize wasteful packaging?				
2.3	Does your campus facility receive supplies in reusable shipping containers?				
2.4	Does your campus facility use office paper with at least 30% recycled content?				
2.5	Has your campus facility evaluated alternatives to polyvinyl chloride (PVC) and DEHP-containing products?				
2.6	Does your campus facility have a central system in place for tracking and quantifying the amount of chemicals purchased, dispensed, and disposed of?				

3.0	Energy/Water Conservation Read more about compliance issues and P2 opportunities related to power systems at campuses at www.sbeap.org .	Y	N	DK	NA
3.1	Have you created a baseline of energy performance for your campus facility using EPA's benchmarking tool? <i>Tip: Read more about EnergyStar at http://www.seac.org/energy/resources/energystarprograms.pdf</i>				
3.2	Has your campus facility done an energy management review within the last three years?				
3.3	Has your campus facility implemented, within the last three years, any of the following? (Circle all that apply) a. Heating/ventilation upgrades b. Air-side, cooling-economizer cycle c. Programmable thermostats d. Control ventilation rates to minimum requirements e. Energy-efficient lighting upgrades f. Lighting occupancy sensors				
3.4	Does your campus facility purchase EnergyStar equipment? (Circle all that apply) a. Computers b. Monitors c. Copiers d. Scanners e. Multifunction devices f. Fax machines g. Printers h. TVs i. Exit signs j. Water coolers k. Roofing products l. Transformers m. Dishwashers n. Commercial refrigerator/freezers o. Other (specify) _____ _____				
3.5	Have you implemented a water conservation program? <i>Tip: For tips on water conservation for campuses, go to http://www.dep.state.pa.us/dep/subject/hotopics/drought/facts/school.htm</i>				

3.0	Energy/Water Conservation Read more about compliance issues and P2 opportunities related to power systems at campuses at www.sbeap.org .	Y	N	DK	NA
3.6	Does your campus facility use any of the following water-efficient equipment or practices? (Circle all that apply) <ul style="list-style-type: none"> a. Low-flow toilets b. Low-flow faucets c. Automatic faucet shutoff d. Low-flow showerheads e. Flow-control mechanisms f. Recirculating cooling water g. Recirculating sterilizer water h. Kitchen equipment i. Regular inspection and repair of leaks j. Landscaping/irrigation k. Low-water X-ray process l. Other (specify) _____ _____ 				

Compliance assistance and regulatory contacts lists

This checklist was developed using other existing templates and is not intended as a substitute for the regulations but as a guideline to help facilities with compliance, pollution prevention, and best management practices.

For more information on specific aspects within this checklist, contact one of the programs listed below:

Pollution Prevention Institute at Kansas State University operates the SBEAP for Kansas providing free, confidential, nonregulatory assistance to Kansas industries and businesses. Contact Nancy at 800-578-8898.

The Kansas Department of Health and Environment is the regulatory authority for most of the compliance items noted on the checklist.

- Bureau of Air and Radiation, 785-296-6024
- Bureau of Waste Management, 785-296-1600
- Bureau of Water, 785-296-5500
- Bureau of Environmental Remediation (tanks), 785-296-1678

EPA Region 7 has the regulatory authority for state programs and any federal programs not enforced by the KDHE. Contact EPA in our region at 800-223-0425.

The Environmental Self-Audit for Campus-Based Organizations, a detailed checklist for campuses, can be found at <http://www.dec.state.ny.us/website/ppu/esacamp.pdf>.

Appendix A

Campus operations that need to be included in your environmental evaluation

Colleges and universities often house several smaller businesses or operations. If your facility houses any of the operations listed below, make sure you have evaluated them separately for compliance.

- appliance repair shops
- automobile repair shops
- assembly shops
- auto body shops
- bakeries
- building cleaning and maintenance
- car washes
- construction
- dentist offices
- doctor offices
- dry cleaners
- educational and vocational shops
- equipment repair shops
- farms, animal-feeding operations
- fuel-oil storage
- foundries
- funeral services
- furniture manufacturing and repair
- gasoline service stations
- graphic arts
- house or architectural structure painters
- garages or motor pool service and repairs
- laboratories
- laundromats
- leather manufacturing facilities
- lumber mills
- metallurgical shops
- metal treatment/plating operations
- photo processing
- print shops
- refrigeration/air-conditioning service
- restaurants/cafeterias
- resource recovery/incinerator facility
- small-engine repair shops
- solvent metal cleaning
- veterinary facilities
- waste-disposal areas (landfills)
- woodworking and refinishing operations