



FY06-09 EPA Laboratory Initiative Findings and Observations

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General Observations Common Concerns and Issues

- Scattered, incomplete, and/or missing compliance documentation
- Incomplete institutional knowledge regarding process operations and environmental regulatory requirements
- Ineffective purchasing and inventory control related to hazardous materials/waste management (bar coding)
- Limited evaluation of non-hazardous substitutes

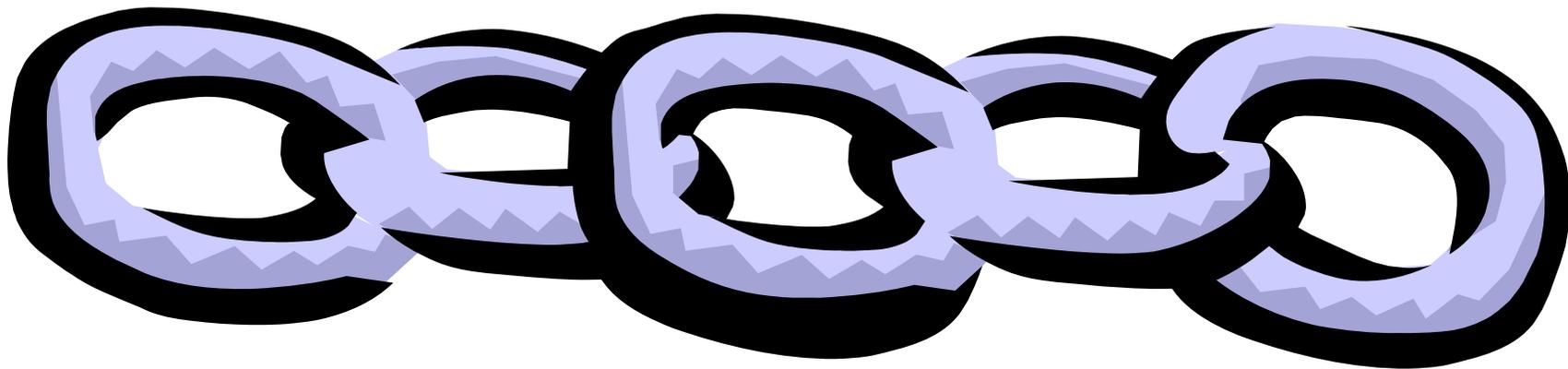


General Observations Common Concerns and Issues

- Poor or inappropriate storage and disposal practices
- Inadequate resources
- Limited or no environmental compliance accountability for individual departments, laboratories, and staff
- Limited authority vested in environmental compliance managers
- Lack of integration into EMS

Requirements, Require a Compliance Monitoring and Enforcement “System”

An internal system that contains five key links



- 1 Target +
- 2 Auditing + Skills
- 3 Regulatory + Knowledge
- 4 Communication + Skills
- 5 Enforcement (accountability)



The CM&ES Requires a Paradigm Shift From: **Auditee** to **Auditor**

- This shift requires you to prove how you know the information you are receiving from staff is correct
- This approach is the same approach EPA and other regulatory agencies use
- Effective Environmental Management Systems require this same **mental shift** by managers
 - From: Merely complying with the regulatory requirements
 - To: **Ensuring compliance** and **preventing future non-compliance** through self-auditing
 - From: Training about compliance requirements
 - To: Training on how to audit **for compliance** with requirements



Link 2

Auditing Skills

- Do your auditors know the business/process operations they are auditing?
 - Do they need process OJT or other training?
- How do they keep their skills current?
- Do they audit other facilities?
- Assess each job description for appropriate
 - Knowledge
 - Skills
 - Abilities



Internal Auditing Approach

- A spread sheet is a very effective way to identify and capture all key requirements
 - Start small, e.g., one room, a process, a building, etc.
 - Go from the **known** to the **unknown**
 - Look at everything **going in** and **coming out**
 - Evaluate **what** is happening related to each media
 - Air – evaporation, discharges, burning, volatilization, etc.
 - RCRA – all solid wastes, generation, storage, transport, etc.
 - Water – all liquids down drains, sinks, sumps, tanks, etc.
 - Apply appropriate requirements to each

Internal Auditing

- Focus questions on who, what, when, where, how, and why
- Focus on proof and documentation of facts

Room #: 21	Contact: Bob	Process: Distillation	Requirement	Etc...
RCRA			Yes	
CAA			Yes	
CWA			No	



Setting Verifiable Internal Requirements

- Keep them simple, clear, understandable
- Develop and provide **audit tools** for each
 - Checklists
 - Log sheets
 - Inspection forms, etc.
- Provide training on **how to use the self-auditing tools** to ensure the requirements are understood at the **implementation level**



How To Help Ensure Effectiveness?

- Have **accountability**
 - Incorporate performance criteria **into job descriptions** and performance reviews
- Perform routine **internal** and **external** performance audits where knowledge, skills, and abilities **are demonstrated**
- Use the Plan, Do, Check, Act model