



# EHS Compliance Update

Summer 2008

EHS Management Strategies, LLC

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### EHS Services

Air Quality Permitting  
 Internal Audits  
 Industrial Hygiene  
 Safety / OSHA Compliance  
 Management Systems  
 ♦ TS16949  
 ♦ ISO14001  
 ♦ OHSAS18001  
 Waste-Storm Water  
 Security Systems  
 IT Systems  
 Due Diligence—Phase I/II, BEA, Due Care  
 Waste Management  
 Facility Decommissioning  
**Low Cost Solutions**

## Who needs Hazwoper (Spill) Training and who doesn't? [29 CFR 1910.120]

Manufacturing companies can have a difficult time determining which employees may be required to have Hazwoper or spill training under 29 CFR 1910.120.

Paragraph (q) of 1910.120 covers emergency response operations for releases of, or substantial threats of releases of, hazardous substances without regard to the location of the hazard. However, responses to releases of hazardous substances where there is no potential safety or health hazard are not considered to be emergency responses. Incidental releases of hazardous substances where the substance can be absorbed, neutralized, or otherwise controlled at the time of the release by employees in the immediate release area, or by maintenance personnel, are not considered to be emergency responses within the scope of the standard.

Appendix E of OSHA Directive CPL 02-02-059 [formerly CPL 2-2.59A] - Inspection Procedures for the Hazardous Waste Operations and Emergency Response Standard, 29 CFR 1910.120 and 1926.65, Paragraph (q): Emergency Response to Hazardous Substance Releases provides a more thorough discussion of the distinction between **incidental releases** of hazardous substances and releases that require an **emergency response**, and hence, compliance with the provisions of 1910.120(q).

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## Lean EHS Management

By James Charles, PE, CPG

As manufacturing facilities struggle to cut costs to meet business conditions many are forced to cut personnel responsible for environmental and safety programs. Small to medium sized companies have been operating without internal EHS staff for several years. The question becomes “How do we maintain compliance with complex EHS regulations in a lean manufacturing environment?” The following process will help manage this process.

**Step 1 Accountability:** The responsibility for compliance with environmental and safety regulations must be assigned to specific staff. Initially, staff given these new responsibilities will feel overwhelmed and less than qualified. Often times safety programs may be delegated to HR and environmental may be assigned to engineering, facilities, or maintenance departments. The key is to incrementally increase their competency with the regulations through MDEQ/agency workshops and working with technical experts (consultants, agency resources, other companies).

**Step 2 Compliance Snap Shot:** The next step is to determine specifically what regulations apply to your operations and a detailed understanding of the requirements. This can be best accomplished by bringing an external consultant to review your

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**EHS clients include:**

- ◆ Lear Corporation
- ◆ Herman Miller
- ◆ IAC
- ◆ Inteva
- ◆ Sanden
- ◆ TRW
- ◆ Woodward
- ◆ Delphi Automotive
- ◆ Dextech
- ◆ Consumers Energy
- ◆ Dana Corporation
- ◆ American Axle & Manufacturing
- ◆ General Motors
- ◆ Steel Case
- ◆ DTE Energy
- ◆ Pfizer
- ◆ Eaton Corporation
- ◆ Meridian Automotive
- ◆ Exelon Energy
- ◆ Cascade Engineering
- ◆ Gill Industries
- ◆ Haworth
- ◆ Honeywell
- ◆ Textron
- ◆ Barnes Aerospace
- ◆ BEHR America
- ◆ O’Leary Paint
- ◆ Trimquest
- ◆ Styker Medical
- ◆ Kaumagraph Flint
- ◆ TESA Tape
- ◆ Kent County DPW
- ◆ Phillips Service Industries

**Maintaining an ISO 14001 EMS—why so much work?**

By James Charles, PE, CPG

Why does my ISO 14001 Environmental Management System (EMS) take so much effort to maintain? This is one of the most common questions I hear from clients. The answer is simple....”Because your doing it wrong”. When implemented properly, maintaining an ISO 14001 compliant EMS should require little effort beyond your routine business activities.

One major issue is that companies tended to develop stand alone EMS systems to get certified and then continued to maintain these separate systems. The key to reducing the number of hours needed to get ready for your next surveillance audit, is the complete integration of the EMS into your existing business systems—Financial, Human Resource, Quality, etc. Many sites started this integration process but the effort has gotten stalled along the way.

The EMS manual can be completely integrated into your quality management system (QMS). However, this integration must be done by somebody that knows the

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**New Purchasers may receive EPA Amnesty**

EPA is launching an interim policy that offers incentives to new owners who correct environmental violations at recently-acquired regulated facilities. Under the interim policy, new owners may receive lower penalties than long-time owners.

'This is an opportunity for new owners to make a 'clean start' by correcting environmental problems that began under the previous owner's watch,' said Granta Y. Nakayama, assistant administrator of EPA's Office of Enforcement and Compliance Assurance. 'This can lead to big gains for the public and the environment.'

Under the current EPA Audit Policy, the Agency offers reduced penalties to companies that self-audit their facilities, promptly disclose and correct any violations discovered, and take steps to prevent future violations. Under the interim policy announced today, an owner who acquires a new facility may get additional penalty reductions from disclosing an even greater range of violations.

EPA encourages companies with newly acquired facilities to examine compliance of their new facilities, correct environmental problems that began before acquisition, make changes to ensure they stay in compliance, and reduce pollutants going forward.

Since 1995, more than 3,500 companies at nearly 10,000 facilities have used the audit policy to disclose and resolve violations, most of which involved recordkeeping and reporting. With the incentives announced today, EPA hopes to encourage new owners to disclose violations that, once corrected, will yield significant environmental benefit and direct pollution reductions. The new interim policy will be in effect immediately and EPA will accept public comment until October 30, 2008. The policy may change in light of these comments.


**What is Environmental Coaching?**  
[www.EnvironmentalCoaching.Zoomshare.com](http://www.EnvironmentalCoaching.Zoomshare.com)

EHS Management Strategies has developed these training programs to help our clients meet business and regulatory compliance needs. Each program is designed to reinforce key concepts and considers each student's learning style. These programs consist of lecture and group exercises designed to keep the student interested.

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### **Management Systems**

**Designing Process Improvement Projects using your ISO 14001 EMS (1 day):** This program will provide an overview of environmental performance and establishing meaningful EHS metrics. It will include an overview of typical improvement projects and case studies. The student will learn how to develop and implement new EMS projects.

**EMR Training (1-day):** New Environmental Management Representatives (EMRs) need a good understanding of their ISO14001 environmental management system to be effective. This program was designed to give the new manager a detailed understanding of the ISO14001 standard, key EMS elements, and their role in driving the continuous improvement process.

**Internal Auditor Training— TS16949, ISO 14001 or OHSAS 18001 (2 days):** This is program is for anyone who wants to conduct internal audits. It will provide a detailed overview of the TS16949, ISO14001 or 18001 standards and auditing techniques. This is a very “hands on” program filled with exercises.

**Get ISO 14001 Certified in 120 Days (1 day):** This is a program designed for anyone getting ready to implement an ISO14001 compliant EMS. The program will define Environmental Performance, detailed review of the ISO 14001 Standard, development of key EMS elements, and development of an implementation plan. The student will leave this class ready to begin implementing their EMS.

**Lead Auditor Programs—TS 16949, ISO900, ISO1400 (5 days):** These are 5-day RAB accredited lead auditor programs. Each program is 36 hours with a final exam, and qualifies the student to become accredited auditors.

**Auditor UPGRADE© (1-day):** This is a one day program designed to designed for Quality Auditors that want to do EMS Auditing. The program will provide a good overview of the ISO14001 standard and auditing exercises designed to prepare someone with auditing skills to conduct EMS audits.

**ANSI Z10 Occupation Health & Safety Management System Implementation (1 days):** This course will provide a detailed overview of the Z10 standard and how to implement a Health & Safety management system. Each student will leave with a good working knowledge of the standard and the tools needed to develop an Z10 compliant H&S Management System. We will also cover the differences between Z10 and OHSAS 18001.

**OHSAS18001 Overview and Implementation (1 day):** This one day program will provide an overview of the OHSAS 18001 standard and how the implement a Health & Safety Management system. We will also map integration with the ISO14001 standard. The student will leave with the tools needed to plan their OHSAS 18001 certification.

### **EHS Compliance**

**Total WASTE Course (1 day):** This program provides the training required under DOT for hazardous materials transportation and RCRA hazardous waste. The DOT training will cover the requirements of Subpart H, §172.700-172.704 and an overview of the RCRA regulations. Course includes materials, testing, and certification. *Available DOT or RCRA only.*

**Hazwoper 8hr, 24hr, and 40 hr Courses:** These programs meet the requirements for 29 CFR1910.120 for initial and annual hazardous operations training.

**Confined Space (2 day):** This course fulfills the classroom requirements of 29 CFR 1910.146 for Confined Space Entry. This is a MUST for anyone responsible for Confined Space programs.

**Site Supervisor Training (1 day):** This course meets OSHA training requirements for supervisors and managers involved in the management and administration of waste site activities. Per 29 CFR 1910.120, each site must have a Supervisor who has received an additional 8 hours of training beyond their initial 40 hour certification.

<b>Training Schedule Public Courses</b>				
<b>Course</b>	<b>Cost</b>	<b>October</b>	<b>November</b>	<b>December</b>
<b>Designing Process Improvement Projects using your EMS</b>	<b>\$495</b>	Orlando, FL	Chicago, IL Toledo, OH	Detroit, MI Grand Rapids, MI
<b>NEW EMR Training (1-day)</b>	<b>\$495</b>	Cleveland, OH Fort Wayne, IN	Grand Rapids, MI Detroit, MI	Indianapolis, IN
<b>ISO 14001 Internal Auditor (2-days)</b>	\$695	Indianapolis, IN Cincinnati, OH	Grand Rapids, MI Detroit, MI	St. Louis, MO Toledo, OH
<b>TS16949 Internal Auditor (2-day)</b>	\$1,195*	Detroit, MI Fort Wayne, IN	Milwaukee, WI Dallas, TX	Grand Rapids, MI Indianapolis, IN
<b>Get ISO 14001 Certified in 120 Days (1 Day)</b>	\$695		Detroit, MI Grand Rapids, MI	Indianapolis, IN Cincinnati, OH
<b>ISO14001 Lead Auditor Training (5-days)</b>	\$1,575*	Columbus, OH Madison, WI	Orlando, FL Grand Rapids, MI	Detroit, MI Chicago, IL
<b>ISO14001 Auditor UPGRADE</b>	\$495	Toledo, OH	Grand Rapids, MI	Chicago, IL Indianapolis, IN
<b>ANSI Z10 OH&amp;S Management System Implementation</b>	\$795	Atlanta, GA	Chicago, IL	Detroit, MI
<b>OSHAS 18000 Overview and Implementation</b>	\$695	Cleveland, OH Fort Wayne, IN	Detroit, MI	Chicago, IL Atlanta, GA
<b>TOTAL Waste Program (DOT &amp; RCRA)</b>	\$499/both \$275/ea	Toledo, OH Indianapolis, IN	Grand Rapids, MI Detroit, MI	Chicago, IL Atlanta, GA
<b>Hazwoper 8 hr, 24 hr, and 40 hr (more locations and dates available—call)</b>	\$125 \$425 \$525	Detroit, MI St. Louis, MO	Chicago, IL Gary, IN Indianapolis, IN	Detroit, MI Chicago, IL
<b>TS Process Based Auditing</b>	\$295	Detroit, MI	Milwaukee, WI	Grand Rapids, MI
<b>Six Sigma—Yellow Belt (3 days)</b>	\$1595		Indianapolis, IN	
<b>Six Sigma—Green Belt (8 days)</b>	\$3095	Indianapolis, IN	Indianapolis, IN	

To get specific dates and to register contact Jim Charles at [JimCharlesPE@Charter.net](mailto:JimCharlesPE@Charter.net). (\*) These courses offered at significant discounts for 30, 60, and 90 day prepayment. Don't see your location contact us!!! All pricing based on 30 day advanced payment subject to our cancellation policy. Add \$100 for late registrations.



Any of these courses can be held at your location with 6 or more students

## Maintaining an ISO 14001 EMS—why so much work? [Con't]

*(Continued from page 2)*

ISO 14001 standard and how this system can improve environmental performance. The EMS procedures for auditing, corrective action, document control, control of records, and management review should be completely integrated. Some of the EMS procedures and all the work instructions can be maintained within the QMS documentation.

The objectives & targets and EMS measurables should be managed within the plant's continuous improvement process. Many plant level projects result in improved energy usage, waste minimization, and improved scrap rates, and can be documented as EMS improvements. Once your plant level engineers learn how to document these within the EMS little to no "additional" effort will be needed.

Sites that do not have dedicated environmental and safety staff struggle to maintain their environmental compliance programs and this is an expected output of the EMS. See the article titled "Lean EHS Management" on Page 1 for some ideas on improving this process.

EMS and environmental training should be completely integrated into the plant training process managed by Human Resources. The first step is to develop a simple one page training matrix that summarizes who needs what training and specifics the frequency of training. HR can then manage and track new employee orientation, and schedule and track recurring training. Much of the required training can be accomplished in routine plant meetings and may only require 10 to 15 minutes. However, many companies do not do a good job documenting these training sessions and fail to follow-up with employees that were absent. A good practice is to develop a sign-in sheet with all the people that require the training and use this to document the training and follow-up with those missing. Also, leave a few blanks at the end for new employees who many not have been added. HR can then update these lists on a quarterly basis (ie, add this to your training procedure).

EMS communication programs need to be designed to be effective for people with all types of learning styles. This should include communications boards, video screens, and verbal communications. The following EMS information should be routinely communicated to employees— Environmental Policy, List of Significant Aspects, Continuous Improvement Projects, and Emergency Preparedness. One of the best approaches is to prepare an EMS topic for supervisors to cover during their routine meeting once or twice a month. The information should take no more than 2 to 3 minutes to cover. You will be surprised at how this "routine" communication will improve your EMS awareness and simplify getting ready for your next audit.

So if you are spending too much time maintaining your ISO 14001 certification trying implementing a few of these changes. Please contact me with any questions at [JimCharlesPE@charter.net](mailto:JimCharlesPE@charter.net) (they are FREE).

**Tired of sending flowers to show you care. Get creative and send balloons!!!**



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<b>EHS Compliance Programs</b>	<b>Cost</b>
<b>Environmental Compliance Assessment:</b> EHS-MS has developed a risk based approach to conducting environmental compliance assessments to reduce your risks of regulatory enforcement and to comply with your ISO 14001 EMS. This program includes a pre-audit assessment, 1 or 2 day onsite audit, and preparation of an audit report. This will include a review of the applicable air, water, and waste regulations. A draft assessment report will be issued with a detailed list of findings and finalized upon approval from the client.	<b>\$1,975 (1-day)</b> <b>\$2,450 (2-day)</b>
<b>Audit Coaching™:</b> This is a comprehensive environmental compliance management process that will improve your compliance with regulations and improve your staff’s understanding of environmental regulations. This program includes a 1-day compliance assessment, preparation of an audit report with findings, development of a site specific audit checklist, and a monthly compliance calendar. We will then spend one day with your staff reviewing the audit checklist and compliance calendar, and provide training on how to conduct self assessments. This process will dramatically improve your staff’s knowledge of regulations and overall compliance.	<b>\$3,450</b>
<b>In-Plant Services:</b> Many times an EHS manager needs temporary help to get a project completed or EHS expertise to help resolve a compliance issue. EHS-MS will provide a professional to support your projects – permitting, EHS reporting, waste water optimization, EHS audits, site remediation, or any others.	<b>\$640 day</b>
<b>DOT Training:</b> EHS-MS will deliver a one day DOT Hazardous Materials training program designed to meet the requirements for DOT training required every 3 years. This program will cover identification of hazardous materials, shipping papers, labeling & marking, security, and site safety. We will incorporate information for the specific materials managed at your plant. This program includes training documentation and testing as required. (up to 6 students) and additional students \$125/each. Add a 2 hr RCRA Refresher for \$250.	<b>\$1,450</b>
<b>Hazard Communications and RCRA Training Program Development:</b> EHS-MS will conduct an onsite review of your operations, review the waste and chemical management program, and develop a site specific Hazard Communications and RCRA training program. We will provide an electronic copy of all training materials. We can also deliver the training .	<b>\$2,990</b> <b>\$975 (training)</b>
<b>Waste Management Plan/Pollution Prevention Assessment:</b> EHS-MS will conduct an on-site review of your facilities waste and recycling programs. We will then develop a written plan for how these wastes are to be disposed of and recommended disposal facilities. We will look for opportunities to re-characterize waste and identify savings on waste disposal. The plan will identify the generated waste streams, record keeping, and training requirements. We will typically identify \$1,000’s in annual waste reduction savings.	<b>\$3,345</b>
<b>Chemical Inventory and MSDS Review:</b> EHS-MS will spend a maximum of 2 days at your facility developing a detailed chemical inventory for your facility and eliminate obsolete MSDS. This inventory will be summarized in an excel spread sheet. We will also verify that the facility has an MSDS for each material.	<b>\$2,445</b>
<b>ISO 14001 Internal Auditor Training:</b> EHS-MS has developed an interactive and highly effective auditor training program. This program will provide a detailed overview of the ISO 14001 standard, the auditing process, ISO 19011 auditing guidance, and how to plan and conduct an internal audit. It includes many hands on exercises to re-enforce the auditing skills needed. (up to 6 students) Additional students \$250/each.	<b>\$2,950 (2-day)</b>
<b>Internal EMS Audits:</b> EHS-MS help the facility to plan and perform ISO14001 internal audits of their environmental management system (EMS). This can include audit planning, records review, and completion of internal Audit. EHS-MS staff can provide checklist/audit plan templates or use the facility’s. This can be much less expensive than maintaining a group of internal auditors.	<b>\$775/day</b>
<b>ISO 14001 or OHSAS 18001 QuickStart™:</b> This is program designed for sites getting ready to implement an ISO 14001 or OHSAS 18001 management system. This is a 3-day process. Day 1 will review the facilities operations, meet with plant management, and assess existing EMS programs. Day 2 will be a 1/2 training program for the implementation team and development of a detailed implementation plan. Day 3 includes a 2 hour leadership training for plant management, presentation of the implementation plan, and facilitation of the first implementation team meeting.	<b>\$3,750</b>
<b>SPCC Review/Certification:</b> A PE will spend one day at your facility reviewing your updated SPCC plan and providing certification. Any discrepancies will be discussed and PE will complete a final review and issue certification of your plan once updated.	<b>\$850</b>

The above pricing is based on prepayment and does not include travel expenses. Mileage is billed at \$0.50/mile.

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## Sustainability of Plastic Building Products

Source: Business Wire—July 2, 2008

To evaluate the total environmental impact of plastic piping, the Plastic Pipe and Fittings Association (PPFA) has completed a Life Cycle Inventory (LCI) for the manufacture of plastic piping. The LCI (a component of a Life Cycle Analysis) is the first phase of three planned for a complete Life Cycle Analysis (LCA) on plastic plumbing pipe. It evaluated the environmental profiles of selected pipes most commonly used in three plumbing applications: service lines, water distribution, and drain, waste and vent (DWV) applications. Plastic pipe manufacturing data was modeled using resin production data released in 2007 and published in the U.S. LCI Database. Current plastic pipe fabrication data were collected for this study and averaged from plastic pipe producers.

The PPFA LCI will be submitted to LCI databases and to the Building for Environmental and Economic Sustainability (BEES) program. BEES is a National Institute of Standards and Technology (NIST) program and an ISO compliant LCA-based selection tool. LCA-based product selection tools are critical for unbiased green and sustainable building material and product decision making. PPFA encourages other piping material industries to develop and submit LCI data to LCI databases to allow for greater transparency.

The LCI report studied included: 4-inch solid wall PVC pipe, made with both virgin resin and 50% postconsumer recycled (PCR) content, cellular core PVC pipe, and ABS pipe with solid and cellular core for drain, waste, & vent (DWV) applications; 1-inch Polyethylene (PE) pipe and PVC pipe for inlet pressurized water supply applications; and ¾-inch CPVC & PEX tubing for Hot and Cold Water Distribution (HCWD) applications.

The report explores the environmental benefits of plastic cellular core and recycled content DWV pipe, and potential energy, landfill reduction, and carbon dioxide implications of energy recovery from waste-to-energy incineration of post-consumer plastic pipe. It also considers the environmental impacts from the extraction of natural gas and petroleum (the raw material feedstocks for plastic resins), through the production of resin to the manufacture of the products.

Some conclusions based on the LCI are:

- ◆ Light weight piping products generally have lower environmental burdens than heavier products so they reduce manufacturing, transportation and disposal burdens.
- ◆ Plastic piping systems show a relatively low energy consumption profile in their manufacturing process. Therefore, plastic pipe extrusion processes are clean and low impact manufacturing operations.
- ◆ Reducing emissions of CO<sub>2</sub>, a greenhouse gas, could be accomplished by the selection of products with lower total process and transportation energy requirements, such as plastic pipe.

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## Who needs Hazwoper Training and who doesn't?

Continued from Page 1

Hence, employees cleaning up routine spills or spills not deemed to cause a potential or actual safety hazard may not require formal Hazwoper training. However, employees should always be trained on the proper procedure for cleaning up spills even if not subject to the Hazwoper standard. This routine spill training could include hazard identification, PPE selection, spill response, and disposal of spill wastes and can be completed in 1 to 2 hour session. The training should be completed at the time of hire and refresher training conducted every 1 to 2 years. This training, even though not specifically required by regulations, will insure proper response to routine chemical spills. Many companies will choose to train a handful of employees ("Spill Team") to the Operations Level Hawoper (8 hour) training. This provides a core team who can direct and manage containment of larger spills. Well trained employees will minimize EHS risks and liabilities for your company.

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## DOT Placarding Exemptions [49 CFR 172.500]

There are several types of hazardous materials that need not be placarded. These exceptions may be found at 49 CFR 172.500. Placards are not required for infectious substances, hazardous materials classed as ORM-D, limited quantities (49 CFR 173.203(b)), small quantities of hermetically sealed materials (49 CFR 173.13), small quantity exceptions (49 CFR 173.4), non-bulk shipments containing less than 1,001 lb of materials listed in Table 2 of 49 CFR 172.504, and combustible liquids in non-bulk packaging.

While not required, placards for the above materials may be used, if applicable.

Software Solutions



EHS –MS can help you  
pick the right tools for  
your organization

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## Lean EHS Management (con't)

By James Charles, PE, CPG

*(Continued from page 1)*

operations and the a detailed summary of the requirements. The summary should not be a mere list of regulations but a detailed list of specific requirements. This information should then be explained to the onsite personnel responsible for compliance. This can be done as part on an initial compliance audit and the checklist can be used by onsite personnel to periodically verify compliance. Depending on your facility this type of assessment could cost between \$2,000 and \$3,500.

**Step 3 Training and Associations:** Personnel assigned responsibility for environmental and safety regulations should periodically attend training programs and plan to participate in local chapters of technical associations. Most state agencies will sponsor periodic workshops and other training is available. Environmental and safety associations typically will have local meetings monthly or quarterly. These meetings may provide technical updates and will an opportunity to network with others with similar responsibilities.

**Step 4 Periodic Compliance Evaluations:** The facility should periodically review their compliance with regulations. This can be done with internal staff using the checklist developed in Step 1 or every 1 to 3 years the facility may wish to bring in an external consultant to conduct a compliance evaluation. The external audit will help the facility maintain compliance and be prepared for agency inspections.

Using this simple compliance management process a company can effectively manage their environmental and safety requirements.

Web Site of  
the Month

DOT Hazardous Materials Table:

[http://www.hazplus.com/cfr\\_table.asp](http://www.hazplus.com/cfr_table.asp)

## EHS Management Strategies, LLC

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## RAB Lead Auditor and Internal Auditor Programs

Internal Auditing is one of the key's to an effective management system. EHS offers these programs for **ISO14001, OHSAS18001, TS16949, and ISO9000** management systems.

### Lead Auditor Training (5-day)

This is a RAB accredited course that is necessary to become a RAB certified Lead EMS Auditor. This 36 hour program will cover all aspects of ISO 14001 and auditing protocol. The student will leave with a detailed understating of the standard, how to conduct EMS audits, and how to setup an auditing program. We will walk the student through a variety of auditing exercises and hands on workshops that will give the students

confidence in their ability to conduct audits. Upon course completion and passing the exam the student will receive a Lead Auditor Training certificate. This course is offered through our partner program.

### Internal Auditor Training (2-day)

This program is designed for people who will conduct internal audits of their facility. The program will cover the standard, auditing protocols, and hands on auditing exercises. The auditor will leave the course with the ability to start doing internal audits.

Both of these programs are offered onsite and through our public course offerings

## EHS Management Strategies, LLC

EHS offers high quality cost effective consulting services in the following areas:

- ◆ Air Quality & Permitting
- ◆ Environmental / Safety Coaching Services
- ◆ Remediation Services / Facility Decommissioning
- ◆ EHS Compliance, Auditing and Training
- ◆ Sustainability Planning
- ◆ Environmental liability assessments and financial reporting (Sarbanes-Oxley Compliance)
- ◆ Site remediation technology and closure evaluations
- ◆ Integrated Contingency Planning—SPCC, Stormwater, RCRA, Risk Management Plans
- ◆ Hazardous Waste Management and Cost Minimization
- ◆ Management Systems Auditing / Training
  - ◆ ISO14001
  - ◆ OHSAS18001
  - ◆ TS16949 / ISO9001
- ◆ ASTM Phase I/ BEA / Due Diligence
- ◆ Process Safety Management (PSM) Tools
- ◆ Data Management & IT Tools
- ◆ Industrial Cleaning
- ◆ Capital Project Planning and Management

EHS specializes in delivering these services in a manner that integrates compliance into your business operations. Our compliance assessment services focus on best management practices as well as regulatory compliance. **Please consider us for your next consulting assignment.**

