



EHS Compliance Update

Winter 2009

EHS Management Strategies

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EPA Issues Revised Definition of Solid waste to Encourage Recycling of Metal Bearing Materials

On October 30, 2008 EPA issued a new regulation to revise the definition of solid waste to encourage the recycling of more hazardous secondary materials. 73 Fed. Reg. 64668 (2008). The changes to the definition are in response to several court decisions that held EPA's regulatory definition was overly broad and did not clearly delineate when a material is discarded. Hazardous secondary materials that are sent for legitimate reclamation are eligible to be exempt from regulation as a hazardous waste under the new rule.

The new definition of solid waste could facilitate more recycling of electroplating waste water treatment sludge, i.e., the listed hazardous waste, F006. Under the revised definition of solid waste, sludge that is reclaimed for metals recovery would not be "discarded" for regulatory purposes, and would not, therefore, be subject to hazardous waste regulations, provided that the recycling is legitimate and that plating facilities and reclamation facilities meet a set of conditions regarding the management and recycling of the sludge.

Excluding the recycling of F006 sludge from the hazardous waste regulatory

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Revisions to the Regulatory Definition of Navigable Waters

On November 20, 2008, EPA promulgated a final rule to amend a Clean Water Act (CWA) section 311 regulation that defines the term "navigable waters." In this action, EPA announced the vacate of the July 17, 2002, revisions to the definition of "navigable waters" in accordance with an order, issued by the United States District Court for the District of Columbia (D.D.C.) in American Petroleum Institute v. Johnson, invalidating those revisions. The court decision also restored the regulatory definition of "navigable waters" promulgated by EPA in 1973; consequently, EPA is amending the definition of "navigable waters" in part 112 to comply with that decision. This final rule does not amend the definition of "navigable waters" in any other regulation that has been promulgated by EPA.

The 1973 regulatory definition of "navigable waters" for the SPCC rule was published in the Federal Register on December 11, 1973 (see 38 FR 34165) and reads as follows:

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EHS clients include:

- ◆ Honeywell
- ◆ Lear Corporation
- ◆ Herman Miller
- ◆ IAC
- ◆ Inteva
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- ◆ Woodward
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- ◆ Consumers Energy
- ◆ Dana Corporation
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- ◆ O’Leary Paint
- ◆ Trimquest
- ◆ Styker Medical
- ◆ Kaumagraph Flint
- ◆ TESA Tape
- ◆ Kent County DPW
- ◆ Phillips Service Industries

Who is REQUIRED to Recycle Universal Waste?

By James Charles, PE, CPG

When is a company *REQUIRED* to recycle universal wastes (light bulbs, batteries, and mercury containing equipment)? I will answer this question as defined in the Michigan regulations. The quick answer is that Small Quantity Generators (SQG) and Large Quantity Generators (LQG) must manage these materials as either a hazardous waste or be recycled as a Universal Waste. Conditionally Exempt SQG and facilities that do not generate hazardous waste may dispose of these materials with their solid waste (ie. Trash) if approved by the waste disposal company. The Michigan Manufactures Guide to Environmental and Safety Regulations, Chapter 2, Section 2.4.9 (page 2-52) states “CESQGs are not required to hire a permitted and registered hazardous waste transporter or dispose of your hazardous waste at a TSDF”.

The MDEQ urges all companies to recycle these materials to the extent possible to prevent them from being land filled and leaching into the environment. Many businesses choose to recycle these materials as a Best Management Practice even if not required. Many areas sponsor local Household Hazardous Waste collection programs and will allow CESQG to dispose of these materials.

Please contact us with any questions on how these regulations affect your facility at EHS-MS@charter.net.

Compact Fluorescent Light Bulbs: Do Energy-savings Outweigh Mercury Hazard?

With the issue of climate change on everyone’s mind these days, people are looking for ways to cut down on energy use. Many people are turning to compact fluorescent light bulbs (CFLs), which use 75 percent less energy and last up to 10 times longer than incandescent bulbs. These bulbs are available for commercial sale primarily for home use.

But there is also a concern because CFLs contain a small amount of mercury. One Pennsylvania resident recently emailed the U.S. Environmental Protection Agency’s mid-Atlantic region to ask what she should do:

“The problem with CFLs,” she wrote, “is that these bulbs contain mercury and they need to be disposed of properly but the box does not give any instructions. Should we be more concerned with energy saving or mercury hazards?”

EPA’s electronics recycling specialist Dan Gallo, who responded to the question, says the benefits of lower energy consumption outweigh the disadvantages but “EPA promotes and encourages the safe disposal of old CFLs to prevent the release of mercury into the environment,”

“Although CFCs do contain mercury, it is present in trace amounts -- five milligrams -- an amount that would cover the tip of a ballpoint pen,” said Gallo. “It would take 100 CFLs to equal the amount of mercury contained in older thermometers, which is about 500 milligrams.”

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What is Environmental Coaching?

www.EnvironmentalCoaching.Zoomshare.com

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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.

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.

Training Schedule Public Courses				
Course	Cost	April	May	June
Designing Process Improvement Projects using your EMS	\$495	Indianapolis, IN Buffalo, NY	Lansing, MI Cleveland, OH	Chicago, IL Columbus, OH
NEW EMR Training (1-day)	\$495	Cleveland, OH Fort Wayne, IN	Grand Rapids, MI Detroit, MI Buffalo, NY	Indianapolis, IN Columbus, OH
ISO 14001 Internal Auditor (2-days)	\$795	Indianapolis, IN Cincinnati, OH	Grand Rapids, MI Detroit, MI Buffalo, NY	Fort Wayne, IN Toledo, OH
TS16949 Internal Auditor (2-day)	\$1,195*	Columbus, OH	Grand Rapids, MI Cincinnati, OH	Indianapolis, IN Cleveland, OH
Get ISO 14001 Certified in 120 Days (1 Day)	\$695	Cleveland, OH	Detroit, MI Grand Rapids, MI	Columbus, OH Cincinnati, OH
ISO14001 Lead Auditor Training (5-days)	\$1,675*	Indianapolis, IN	Columbus, OH	Chicago, IL St. Louis, MO
ISO14001 Auditor UPGRADE (1-day)	\$495	Toledo, OH	Grand Rapids, MI	Chicago, IL Indianapolis, IN
ANSI Z10 OH&S Management System Implementation	\$795	Atlanta, GA	Chicago, IL	Detroit, MI
OSHAS 18000 Overview and Implementation	\$695	Atlanta, GA Orlando, FL	Detroit, MI Cincinnati, OH	Chicago, IL
TOTAL Waste Program (DOT & RCRA)	\$499/both \$275/ea	Detroit, MI Toledo, OH	Grand Rapids, MI Indianapolis, IN Buffalo, NY	Chicago, IL Fort Wayne, IN Columbus, OH
Hazwoper 8 hr, 24 hr, and 40 hr (more locations and dates available—call)	\$125 \$425 \$525	Detroit, MI St. Louis, MO	Chicago, IL Gary, IN Indianapolis, IN	Detroit, MI Chicago, IL
TS Process Based Auditing	\$295	Detroit, MI	Milwaukee, WI	Grand Rapids, MI
Six Sigma—Yellow Belt (4 days)	\$2,595*			Indianapolis, IN
Six Sigma—Green Belt (8 days—2x 4)	\$4,995*		Indianapolis, IN	Indianapolis, IN

To get specific dates and to register contact us at EHS-MS@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.



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

TRI (Form R and Form A) Reporting Requirements—Who needs to report? [40 CFR 372]

Three criteria must be met during the previous calendar year in order to require your facility must report under SARA Section 313:

- ◆ 10 or more full-time employees, or any combination equal to 20,000 hours
- ◆ Primary NAICS code among those listed in the Federal Register, and federal facilities. The SIC-to-NAICS code conversion table recommended by EPA is available at <http://www.census.gov/epcd/www/naics.html>
- ◆ Manufactured, processed, or otherwise used a SARA 313 toxic chemical in excess of its established threshold: For non-PBT SARA 313 toxic chemicals (see 40 CFR 372.65), the thresholds are:
 - ◆ Manufacturing—25,000 lb
 - ◆ Processing—25,000 lb
 - ◆ Otherwise use—10,000 lb

If the SARA 313 toxic chemical is a persistent bioaccumulative toxic chemical (see [40 CFR 372.28](#)), or PBT, the thresholds are lowered to:

- ◆ PBT—100 lb
- ◆ Highly PBT—10 lb
- ◆ Dioxins—0.1 grams

If your facility that meets these criteria for 2008, you must submit a Form R or Form A to EPA by **July 1 of 2009**. Ensure that you don't overlook any chemicals are in your raw materials (such as lead and chromium in steel, or barium in pigments). Also keep in mind that you might manufacture chemicals in your air emissions or wastewater discharges that must be accounted for in your TRI report.

If your facility manufactured or used toxic chemicals at or above EPA thresholds during 2008, you may find it much easier to report using EPA's Toxics Release Inventory Made Easy (TRI-ME) reporting software. The internet-based version, TRI-MEweb, offers several advantages over the standard TRI-ME desktop software. TRI-MEweb has a feature called the Trend Analysis Report, by which a facility can compare current releases to previous years.

New Basis of Estimate Codes for Form R Reports

For reporting year (RY) 2007 and afterward, EPA has changed the Basis of Estimate codes by subdividing the monitoring (formerly "M") and emission factor (formerly "E") codes used on the Form R. EPA believes this modification will better enable a facility to accurately describe the method used to determine the amount of toxic chemical released. EPA's TRI 2008RY Forms and Instructions have a more complete description of where these codes must be used in the Form R.

Please contact us with any questions on how these regulations may impact your operations at EHS-MS@charter.net.

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EHS Compliance Programs	Cost
Safety Walk Through: OSHA compliance and personnel safety are critical to minimizing worker injuries and workman’s compensation costs. A senior safety compliance specialists will review the operations of your operations and written safety programs to identify areas for improvement and possible OSHA compliance issues. This program is great for the manager with responsibility for safety compliance but a limited understanding of the requirements. A risk based list of recommendations will be provided. Typical sites will require 1 to 2 days to complete.	\$775/day
SPCC Review/Certification: A PE will spend one day at your facility reviewing your operations and updated SPCC plan. Any discrepancies will be discussed and PE will complete a final review and issue certification of your plan once updated.	\$850
Executive EMS Improvement Coaching: Many sites spend countless hours maintaining an EMS and fail to see operational improvements, improved legal compliance, and documented cost reductions. Through this one to two day process we will streamline the operation of your EMS, reduce the hours needed to manage the system, develop key environmental performance metrics, and identification of new environmental programs. We will work with your facility EMS cross functional team and senior management team to improve the overall EMS process and environmental performance of the facility.	\$1000/day
Environmental Compliance Assessment: EHS-MS has developed a risk based approach to conducting environmental compliance assessments to reduce your risks of regulatory enforcement and to support your ISO 14001 EMS. This program includes a pre-audit assessment, 1 or 2 day onsite audit, and preparation of an audit report and 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.	\$995/day \$795/report
Compliance Audit Coaching™: This is a comprehensive environmental compliance management process that will improve your compliance with regulations and improve your staff’s understanding of environmental regulations. A senior level environmental specialist will review your operations and prepare a compliance audit checklist, compliance calendar, and audit report template. We will then review this with onsite personnel, train them on how to conduct an environmental compliance audit, and work with them to complete a compliance audit.	\$3,450
In-Plant EHS Services: 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 – facility closures, permitting, EHS reporting, waste water optimization, due diligence, site remediation, or any others.	\$640 day
DOT Training: 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.	\$1,450
Hazard Communications and RCRA Training Program Development: 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 .	\$2,990 \$975 training
Internal EMS Audits: 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. Typical audits will require 2 to 3 days onsite and include a completed audit report. This can be much less expensive than maintaining a group of internal auditors.	\$775/day
ISO 14001 or OHSAS 18001 QuickStart™: 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.	\$3,750

The above pricing is based on prepayment and does not include travel expenses. Add 10% for net-30 days.



EPA Issues Revised Definition of Solid waste to Encourage Recycling of Metal Bearing Materials (continued from page 1)

restrictions can encourage more recycling of the sludge and save platers money. The final rule is also broad in scope and could beneficially impact recycling of other hazardous secondary materials used in the finishing industry such as solvents.

Basic Structure of Final Rule

The revised definition of solid waste is comprehensive and detailed rulemaking. There four major components of the final rule:

- ◆ Under the Control of the Generator Exclusion (a self-implementing exclusion for materials that are recycled under the control of the generator);
- ◆ Transfer-Based Exclusion (a self-implementing exclusion for materials that are transferred to another company for recycling);
- ◆ Non-Waste Determination Procedure (a petition process); and
- ◆ Legitimate Recycling Provision.

Effective Date and Applicability in States

The final rule is effective 60 days from the date of publication in the Federal Register (i.e., December 29, 2008) in states without authorized RCRA programs (e.g., Alaska, Iowa, Puerto Rico and Virgin Islands). The rule is not effective in an authorized state until the state adopts the rule into its own state regulations. While adoption of federal regulations is automatic in some states, most states must take some affirmative action to adopt the new regulation.

If you have any questions on EPA's revised definition of solid waste and how it may impact the surface finishing industry, please contact us at EHS-MS@charter.net.

Compact Fluorescent Light Bulbs: Do Energy-savings Outweigh Mercury Hazard?

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The good news is that old CFC bulbs can be taken to Home Depot, IKEA and Ace Hardware for recycling. And Wal-mart is piloting a CFL recycling program at its stores in the Richmond, Va. area.

Since CFLs use 75 percent less energy than traditional incandescent light bulbs, if every American switched one incandescent bulb to a CFL, it would save more than \$600 million in annual energy costs and prevent greenhouse gases equivalent to the emissions from 800,000 cars.

“Using CFLs is a quick and easy way for Americans to save energy and money everyday, while they also protect the environment,” Gallo said.

But if a bulb accidentally breaks, proper clean-up is necessary.

“The first thing you want to do is to get everyone out of room, including pets,” Gallo said. “Open a window to air out the room for at least 15 minutes. If you broke the bulb on a hard surface, take a piece of stiff paper or cardboard and scoop up as much of the debris and residue as you can.”

Gallo advises to use an old glove or sock to protect hands and then wipe up any remaining residue with a moist paper towel. “If you broke the bulb on a carpeted surface, you’ll want to use sticky tape to blot up any residue. Put everything in a plastic bag or a jar that can be sealed with a lid and dispose of it with the regular household trash.”

How to Label Stationary Process Containers Under the Hazcom Standard [29 CFR 1910.1200(f)(6)]

Under OSHA's Hazard Communication Standard (29 CFR 1910.1200), there are labeling requirements for hazardous chemicals that employers must meet. Specifically, 29 CFR 1910.1200(f)(6) identifies an alternative way for employers to meet the labeling requirements for hazardous chemicals contained in stationary process containers.

For stationary process containers, you have the option of using signs, placards, process sheets, batch tickets, operating procedures, or other such written materials rather than affixing labels to an individual stationary process container as long as the alternative method identifies the container(s) it applies to and as long as the information required by paragraph (f)(5) of 29 CFR 1910.1200 is conveyed by the alternative means that are being used.

29 CFR 1910.1200(f)(6) also states that the written materials used to meet this alternative labeling method for stationary process containers must be readily accessible to employees in their work area throughout each work shift.

According to 29 CFR 1910.1200(f)(5), the following information must be conveyed through the allowable labeling method:

- ◆ Identity of the hazardous chemical(s).
- ◆ Appropriate hazard warnings, or alternatively, words, pictures, symbols, or combination that provide at least general information regarding the hazards of the chemicals, and that, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

Please contact us with any questions on how these regulations may impact your

Revisions to the Regulatory Definition of Navigable Waters (continued from page 1)

The term "navigable waters" of the United States means "navigable waters" as defined in section 502(7) of the FWPCA, and includes: (1) all navigable waters of the United States, as defined in judicial decisions prior to the passage of the 1972 Amendments of the Federal Water Pollution Control Act, (FWPCA) also known as the Clean Water Act (CWA), and tributaries of such waters as; (2) interstate waters; (3) intrastate lakes, rivers, and streams which are utilized by interstate travelers for recreational or other purposes; and (4) intrastate lakes, rivers, and streams from which fish or shellfish are taken and sold in interstate commerce.

The primary affect of this rule is in determining whether or not a facility is subject to the SPCC regulations and required to maintain an SPCC regulation.

Software Solutions



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

EHS Trivia

Which of the following are subject to the DOT Hazardous Materials training requirements?

A) LQG HW Generators
 B) SQG HW Generators
 C) CESQG HW Generators
 D) Companies that only receive hazardous materials

Answer:
 All of the above. See 49CFR172.

Web Site of the Month

DOT Hazardous Materials Table:
WWW.hazplus.com/cfr_table.asp

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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. **Onsite course \$2,400 plus travel costs for up to 6.**

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.**

