

ENVIRONMENTAL PROTECTION PROGRAM

Program Element

[R2-10-207\(9\)](#)

Each agency shall develop a “land, facility, equipment, or process environmental protection program” (EPP).

An EPP should include:

- a. “Procedures to ensure compliance with all applicable local, state, and federal environmental laws;
- b. Identification of equipment, processes, and practices that may cause water pollution, air pollution, or land and property contamination;
- c. Procedures to prevent or control emissions and discharges in excess of local, state, and federal laws and rules; and
- d. Procedures to investigate, report, and remediate any discharge or contamination in excess of local, state, or federal laws and rules.”

| | |
|------------------------------------|--|
| Definition: | The Environmental Protection Program (EPP) is a unique component of a Loss Prevention Program that evaluates, monitors, and controls environmental releases in the form of air, water, hazardous waste, and assets. It also ensures the agency has assessed operational processes to identify and minimize environmental impacts to ensure these processes are safe, compliant, and cost-effective. |
| Why do I need this program? | To minimize environmental impacts and to avoid liabilities associated with environmental damage. Examples Include: <ul style="list-style-type: none">● Site – Optimize site potential● Energy – Minimize non-renewable energy consumption● Materials – Use environmentally preferable products● Water – Protect and conserve water● Indoor Environmental Quality – Enhance indoor environmental quality● Operations and Maintenance – Optimize operational and maintenance practices These principles shall serve as the basis for planning, programming, budgeting, construction, operation, maintenance, purchasing and decommissioning facilities/property, and major renovation and alteration of existing buildings and facilities. |

How do I know if this program applies to my agency and my specific job hazards?

Determining if your agency needs an EPP will involve a comprehensive assessment of the agency's facilities, procedures, processes, and practices.

Possible resources include:

- Job Safety Analysis
- Safety Data Sheets (SDS)
- Chemical characterization documentation
- Required Personal Protection Equipment (PPE) documentation and or practices, e.g. respirators, splash shields, or chemical-resistant gloves
- Fire Code requirements for handling or storage of generated waste, e.g. rags, tape, gloves
- Requirements for training, handling, storage, or reporting of wash or waste-water

Some examples of activities that may require an EPP include:

- Generation of hazardous, medical, or radioactive waste(s)
- Land acquisitions
- Operation of boilers, standby electric generators, vehicle fueling facilities, vehicle maintenance shops, fuel storage tanks, mines, shooting ranges, airports and aircraft hangars, water or wastewater treatment plants (WWTP), septic tanks, groundwater wells, ponds, and/or landfills
- Investigation, remediation, and closure of contaminated land, surface water, and groundwater
- For remote locations consider drinking water systems, [land application of biosolids](#), burn pits, and solid waste
- Special wastes can be regulated, such as fluorescent light bulbs, used oil, lead-containing materials, and silver recovered from dental and photo equipment
- Equipment operation that produces waste, or emits ionizing radiation that requires environmental permits for discharges into the air or water; e.g. paint booths, boilers, solvent parts washers, laboratory hood exhaust, soil vapor extraction systems, chemical storage tanks, X-ray machines, nuclear moisture/ density gauges
- Stored materials that could discharge to the land, surface water, dry wells, or sewer systems, e.g. 55-gallon drums stored outside, a stockpile of materials such as road salt, or excavated soil

Supervisors and managers must work with an EHS professional to identify all environmental risks and assign oversight responsibilities.

| | |
|---|---|
| <p>What are the minimum required elements and/ or best practices for an EPP?</p> | <p>Guidelines and Criteria: Agencies that acquire land or have employees who work at facilities that generate hazardous or regulated recyclable waste or activities that require worker PPE must have a written program that consists of at least the following:</p> <ul style="list-style-type: none"> ● Determination of applicability ● An assigned qualified employee for implementation ● Worker training ● Records and record-keeping ● Reporting releases or permit compliance requirements to regulatory agencies such as the Arizona Department of Environmental Quality (ADEQ), the Environmental Protection Agency (EPA), or the County Air Quality Division ● Procedures for notifying State Risk of releases that may result in an Environmental Claim in accordance with R2-10-501 |
| <p>Are there any mandatory training requirements or best practices that must be developed by the agency?</p> | <p>All activities requiring the agency to have an EPP will have associated mandatory training requirements and applicable best practices.</p> <p>In addition to the agency’s site-specific training, State Risk Management recommends the following general awareness training available through the State’s Employee Learning Portal.</p> <ul style="list-style-type: none"> ● ADRISKENV, Environmental Awareness ● ADRISKWMGT, Waste Management ● Use the keyword “Loss Prevention” to search the Library for additional topics |
| <p>Are there specific requirements for documenting the program element(s), training, etc...?</p> | <p>Employee training and certification are required to inspect and operate fuel tanks, WWTPs, and other equipment.</p> <p>Many permits require documentation of inspections and repairs.</p> <p>Develop and convey written EPP procedures to all employees.</p> <p>Document all training, using paper formats, electronic means, or the State’s Employee Learning Portal.</p> <p>Maintain program documents, training materials, and attendance rosters according to the AZ Library, Archives and Public Records general retention schedules.</p> |

Are there any resources available that can assist in developing an EPP?

State Risk Management has Loss Prevention Consultants available to assist in developing an EPP.

The ADOA Risk Management website has Loss Prevention Checklists at <https://staterisk.az.gov/loss-prevention/loss-prevention-forms>.

For assistance, contact State Risk Management Loss Prevention at rmdlossprevention@azdoa.gov.

Additional Resources

- EPA, ADEQ, the State Fire Marshal, Arizona Department of Health, Bureau of Radiation Control, County, and City websites all have Guidance documents.
 - ADEQ's website: <http://www.azdeq.gov/>
 - EPA's website: <http://www.epa.gov/>
- Training Requirements in OSHA Standards: <https://www.osha.gov/sites/default/files/publications/osha2254>