

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 that comprehensively evaluates, monitors, and controls environmental releases in the form of air, water, hazardous waste, and assets, and ensures releases to the environment are safe, compliant, and cost effective.
Why do I need this program?	To avoid liabilities and to be positive environmental stewards; preventing pollutant discharges, complying with regulatory requirements, and applying business practices that sustainably use resources. 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, commissioning, operation, maintenance, decommissioning facilities, and for 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:

- Hazardous, medical, or radioactive waste(s)
- Land acquisitions
- Boilers, stand-by 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
- Recyclable 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 a waste, or emits ionizing radiation that require environmental discharge 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, drywells, or sewer systems, e.g. 55-gallon drums stored outside, a stockpile of materials such as road salt, or excavated soil

It is critical that the supervisors and managers work with an EHS professional to ensure that all environmental risks are identified and responsibilities are assigned.

<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 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 that would require the agency to have an EPP will have associated mandatory training requirements and applicable best practices.</p>
<p>Are there specific requirements for documenting the program element(s), training, etc...?</p>	<p>Employee training and certification is required to inspect and operate fuel tanks, WWTPs, and other equipment.</p> <p>Many permits require inspections and repairs to be documented.</p> <ul style="list-style-type: none"> ● Training documentation should be maintained in accordance with all applicable local, state, or federal rules and laws.
<p>Are there any resources available that can assist in developing an EPP?</p>	<p>State Risk is available to assist in developing an EPP. Contact Loss Prevention at rmdlossprevention@azdoa.gov.</p> <p>EPA, ADEQ, the State Fire Marshal, Arizona Department of Health, Bureau of Radiation Control, County, and City websites all have Guidance documents.</p> <p>ADEQ's website: http://www.azdeq.gov/</p> <p>EPA's website: http://www.epa.gov/</p>