

ENVIRONMENTAL PROTECTION PROGRAM

Program Element R2-10-207(10)

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:	Program and procedures implemented to minimize loss, limit liability, and maintain environmental compliance through the identification, prevention, or control of emissions and/or discharges in excess of local, state, and federal laws and rules.
Why do I need this program?	To prevent losses resulting from pollutant discharges into the environment, to comply with regulatory requirement, and to avoid liabilities.
How do I know if this program applies to my agency and my specific job hazards?	Many processes, activities, and equipment can require an EPP. Determining if your agency needs an EPP will involve a comprehensive assessment. The Loss Prevention Consultant (LPC) shall assist agency supervisors and managers in assessing agency work areas, procedures, processes and practices to determine if an EPP is required. It is critical that the supervisors and managers work with the LPC to ensure that all operations and tasks that may require the implementation of an EPP are identified and responsibilities assigned.

Some examples include:

- Processes and practices that generate hazardous, medical, or radioactive waste(s)
- Land acquisitions
- Operation of 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 or ongoing remediation and closure of contaminated land, surface water and groundwater all require an EPP
- If the location is remote, additional activities to consider are drinking water systems, land application of bio-solids, burn pits, and solid waste
- Some recyclable wastes can be regulated such as florescent light bulbs, used oil, lead containing materials, and silver recovered from dental and photo equipment
- Agency operation or equipment that requires environmental permits for discharges to air or water, produces a waste, or emits ionizing radiation; 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 discharge (or could discharge) to the land, surface water, drywells, or sewer systems, e.g. 55-gallon drums stored outside, a stockpile of material such as unused road salt, or excavated soil

Review job activities, job safety analysis, and Safety Data Sheets (SDS). Is Personal Protection Equipment (PPE) such as a respirator or chemical resistant gloves needed? Does waste generated, such as rags, tape, gloves, or spent wash-water, require special training, handling, storage, or reporting?

<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 also 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 is required to inspect and operate fuel tanks, WWTPs, and other equipment. Many permits require inspections and repairs to be documented.</p> <p>Training documentation should be maintained in accordance with all applicable local, state, or federal rules and laws.</p>
<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.</p> <p>EPA, ADEQ, the State Fire Marshal, Arizona Radiation Regulatory Agency, County, and City websites all have Guidance documents.</p> <p>ADEQ's web site: http://www.azdeq.gov/</p> <p>EPA's website: http://www.epa.gov/</p>