

“TOP TEN” CONCEPTS FOR ENVIRONMENTAL PREPAREDNESS



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Embracing the Why



Why Bother?

- Avoid enforcement
- Minimize regulatory applicability
- Minimize regulatory attention
- Promote Environmental Steward image
- Do The Right Thing





Embracing the Why



Why This But Not That?

- Wastes vs Products
- The Current Tank Exception
- The Developing APA Exception



Embracing the Why



Is Compliance Possible?

- Perfection is not required (80/20 Rule)
- Documented consideration is required



Know Your Site



Inventory Waste Streams and Evaluate Management

- Solid wastes
 - Municipal Solid Waste
 - Hazardous Wastes*
 - Universal Wastes*
 - Connecticut Regulated
 - Special Wastes

* Broader ramifications based on quantities/month.



Know Your Site



Liquid Wastes

- Wastewaters
- Stormwaters

Air Wastes (Discharges)

- Process
- Boilers





Know Your Site

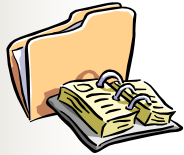


Inventory tanks

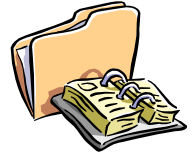
Identify and read permits and registrations

Identify structures and restrictions





Memorialize the Findings



- A system that works for you
 - Checklist(s)
 - Compliance Calendar
 - Palm Pilots



“It’s Only Paperwork” Myth



- Enforcement is infrequent
- Compliance is daily
- Paperwork Bridges the Gap!

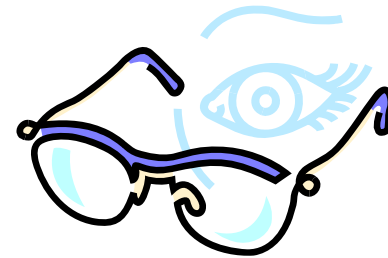




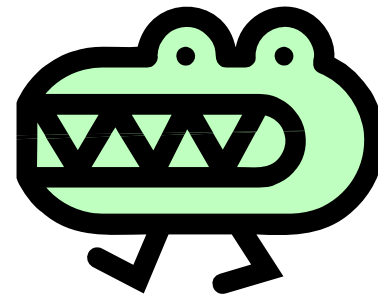
The Forest vs The Trees



Seeing through another's eyes



Alligators in The Swamp





Auditing



To Know or Not To Know

- Commitment before you start

Audit Options

- Formal, Self-Disclosure Programs
- Informal Internal
- Informal External