

Board of Trustees Agenda Item

Board Meeting Date: 12/5/11

Title of Item: Environmental Compliance Annual Update

Background and Analysis:

FHDA Community College District (FHDA) is dedicated to both satisfying the legal regulatory requirements of the Stipulated Judgment and developing a strong environmental program. Annually, certain milestones are accomplished. These key milestones are Regulatory Inspections with Agencies (most notably the Department of Environmental Health), the Third Party inspections with environmental attorneys and internal self-inspections. The Environmental Department is actively involved with campus improvements and the closures that occur as part to renovations, improvements and the spending of the Bond funds. Finally, EH&S is maturing and focusing on the environmental program across campus for progressive improvements and to managing the expenses of the Department for the best value and the least expense to the District.

Attached for your information is a fact sheet summarizing the activities of the Environmental Health and Safety department during 2011.

Recommendation: Information only

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Is backup provided? Yes

EXECUTIVE SUMMARY OF EH&S ACTIVITY FOR 2011
MONA VOSS, DIRECTOR ENVIRONMENTAL HEALTH & SAFETY

STATUS OF STIPULATED JUDGMENT AND RESULTING FOCUS – FHDA IS OPERATING IN THE SIXTH YEAR OF THE AGREEMENT AND IS COMPLIANT WITH THE 5 MAJOR CRITERIA OF STIPULATED JUDGMENT.

REGULATORY INSPECTIONS – NUMEROUS INSPECTIONS HAVE BEEN CONDUCTED WITH NO VIOLATIONS, JUST FINDINGS (AREAS OF IMPROVEMENT) OR ACTION ITEMS. GENERALLY, INSPECTIONS HAVE BECOME SPECIFIC TO AN ISSUE (PERMITTING OR CLOSURES) NOT PUNITIVE. ANY INSPECTION “FINDING” OR QUESTION IS QUICKLY RESOLVED.

THIRD PARTY AND INTERNAL INSPECTIONS – BOTH THE THIRD PARTY AND THE INTERNAL INSPECTION PROGRAM ARE REQUIRED AND ARE COMPLETED TO MAINTAIN COMPLIANCE. THE THIRD PARTY INSPECTION INFORMATION IS SHARED BROADLY WITH THE CAMPUSES FOR A PROCESS OF SPECIFIC AND CONTINUED IMPROVEMENT.

REPORTS AND RECORDKEEPING – ALL REGULATORY REPORTS HAVE BEEN COMPLETED AND SUBMITTED IN A TIMELY FASHION.

CLOSURES AND PERMITTING – THE FULLY “RAMPED-UP” BOND MONEY SPENDING HAD RESULTED IN CLOSURES, INTERIM PERMITTING FOR TEMPORARY GENERATORS, AND PERMANENT PERMITTING FOR NEW ACTIVITIES.

MATURING PROGRAMS - EH&S IS EXERTING EXTENSIVE EFFORT ON MATURING PROGRAMS WITHIN THE DEPARTMENT. EMPHASIS IS PLACED ON CONSTRUCTION, CLOSURES, PROMPT RESOLUTION OF FINDINGS, TRAINING ENHANCEMENTS, COST EFFECTIVE WASTE DISPOSAL, E-WASTE TRACKING, ENHANCED COMMUNICATION, DESIGNATION OF RESPONSIBILITY THROUGH INSPECTOR PROGRAMS AND PRECISELY REVISED HMBPs.

FACT SHEET ON EH&S ACTIVITY FOR 2011
MONA VOSS, DIRECTOR ENVIRONMENTAL HEALTH & SAFETY

ENVIRONMENTAL FOCUS – IN 2005, FHDA SIGNED A COMPLIANCE ORDER WITH DEPARTMENT OF ENVIRONMENTAL HEALTH FOR A TERM OF TEN YEARS. THIS YEAR FHDA IS IN THE SIXTH YEAR OF COMPLIANCE WITH THE STIPULATED JUDGMENT. A MEASUREMENT OF SUCCESS FOR BOTH THE DISTRICT AND EH&S IS THE CONTINUED COMPLIANCE WITH THE AGREEMENT. THE SIGNIFICANT POINTS OF COMPLIANCE THAT MUST BE MAINTAINED ARE:

- ALL HAZARDOUS, UNIVERSAL AND MEDICAL WASTE ARE APPROPRIATELY DISPOSED, WITHOUT EXCEPTION. EH&S MANAGES ABOUT \$225K IN EXPENSES FOR WASTE DISPOSAL CAMPUS WIDE.
- DIRECTOR OF EH&S (POSITION CREATED IN RESPONSE TO REQUIREMENTS IN STIPULATED JUDGMENT) AND THE ENVIRONMENTAL SPECIALIST REMAIN FULLY ASSIGNED TO ALL ASPECTS OF THE AGREEMENT.
- ANNUAL THIRD PARTY AUDIT IS CONDUCTED FOR ALL REGULATED AREAS AND ALL INTERNAL INSPECTIONS ARE PERFORMED AS REQUIRED BY REGULATIONS.
- ALL CONSTRUCTION AND CLOSURE RELATED PROJECTS ARE PERFORMED WITHIN REGULATORY GUIDELINES.
- TRAINING IS PROVIDED TO THE PERSONNEL WHO MANAGE REGULATED ACTIVITIES.

REGULATORY INSPECTIONS - IN 2011, FHDA WAS INSPECTED BY ALL FIVE (5) MAJOR REGULATORS.

- DEPARTMENT OF ENVIRONMENTAL HEALTH (DEH) DID **NOT** CONDUCT THE COMPREHENSIVE CAMPUS-SIDE INSPECTION OF FHDA. HOWEVER, DEH DID INSPECT THE CAMPUSES FOR PERMITTING ACTIVITIES RESULTING IN 8 SPECIFIC INSPECTIONS (GAS TANK OR GENERATOR PERMITS).
- SANTA CLARA COUNTY CENTRAL FIRE DEPARTMENT PERFORMED A 1 DAY INSPECTION OF ALL HAZARDOUS MATERIALS AREAS ON THE DE ANZA CAMPUS AND SECOND DAY FOLLOW-UP INSPECTION TO OBSERVE THE IMPROVEMENTS REQUESTED.
- SANTA CLARA SEWER DISTRICT AT DE ANZA INSPECTED AND CONDUCTED 4 SAMPLING EVENTS.
- PALO ALTO SEWER DISTRICT PERFORMED 8 SAMPLING EVENTS AT FOOTHILL AND CONDUCTED 2 DAYS OF SITE INSPECTIONS.
- BAY AREA AIR QUALITY MANAGEMENT DISTRICT PERFORMED 2 DAYS OF DETAILED INSPECTIONS OF ALL REGULATED UNITS. A COMPLETE INVESTIGATION OF GENERATOR USAGE AND TREND ANALYSIS WAS REQUIRED TO SATISFY THE AGENCY. COMPILING OF DATA TOOK 4 DAYS WITH THE INVOLVEMENT OF EH&S AND PLANT SERVICES. ALSO 2 DAYS WERE DEDICATED INSPECTIONS RELATED TO GAS TANK STANDARDS AND NEW INSTALLATIONS.
- CLOSURE INSPECTIONS (10) FOR INITIAL SCOPE DEFINITION OR FINAL CLOSURE INSPECTIONS WERE CONDUCTED.
- **AGAIN, INSPECTIONS RESULTED IN ACTION ITEMS OR CONSENSUS ON PERMITTING OR CLOSURES, BUT, NO VIOLATIONS.** DIRECT DEPARTMENTAL TIME SPENT WITH ALL INSPECTORS WAS 180 HOURS! NUMEROUS OTHER HOURS WERE SPENT PREPARING FOR THE INSPECTION AND SHARING RESULTS OF THE INSPECTION.

THIRD PARTY AND INTERNAL INSPECTIONS – FHDA SELF-INSPECTED ALL AREAS HAVING HAZARDOUS MATERIALS AND BENEFITED BY THE THIRD PARTY AUDIT REQUIRED BY THE STIPULATED JUDGMENT.

- **THE THIRD PARTY AUDITOR** KNOWN AS BEYOND COMPLIANCE (ENVIRONMENTAL ATTORNEYS) CONDUCTED AN EXTENSIVE INSPECTION OF ALL HAZ-MAT AREAS ON BOTH CAMPUSES. UNBIASED “EYES” OVERVIEWED THE FHDA COMPLIANCE STATUS. A COMPREHENSIVE REPORT WAS GENERATED THAT WAS SHARED WITH THE CAMPUSES TO PROMOTE AND MAINTAIN DEH INSPECTION STANDARDS. EH&S LET THE STAFF KNOW EXACTLY WHAT ACTIONS WERE REQUIRED IN THEIR RELATIVE DEPARTMENTS.

- UNDER THE DIRECTION OF EH&S, **INTERNAL INSPECTIONS** WERE CONDUCTED AT ALL THE HAZ-MAT STORAGE AREAS DEFINED ON THE HAZARDOUS MATERIAL BUSINESS PLAN (88 AREAS) ON A WEEKLY BASIS BY DESIGNATED FHDA STAFF FOR A TOTAL OF 4576 SPECIFIC INSPECTIONS. EH&S DIRECTLY CONDUCTED 104 INTERNAL INSPECTIONS. ALSO THE 22 AREAS FOR THE UNIVERSAL WASTE / BATTERY COLLECTION AND THE 6 AREAS FOR MEDICAL WASTE WERE INSPECTED BY STAFF.

DETAILED REPORTS SUBMITTED AND RECORDKEEPING MAINTAINED – NUMEROUS REPORTS WERE PREPARED FOR AGENCIES WITH STRICT DEADLINES. LENGTHY AND TECHNICAL ANNUAL REPORTS WERE SPECIFICALLY PREPARED FOR THE DEPARTMENT OF ENVIRONMENTAL HEALTH (8), DEPARTMENT OF TOXIC SUBSTANCE CONTROL / DTSC (7), CA INTEGRATED WASTE MANAGEMENT BOARD (4), BAY AREA AIR QUALITY MANAGEMENT DISTRICT (6) AND BUREAU OF EQUALIZATION (6).

ROUTINE REPORTS AND DATA MANAGEMENT INCLUDE, BUT ARE NOT LIMITED TO:

- **HAZARDOUS WASTE MANIFEST** SUBMITTAL TO DTSC UPON EACH SHIPMENT
 - **ELECTRONIC WASTE (E-WASTE) REPORT** REQUIRED ANNUALLY TO CAL EPA ON TYPES AND AMOUNTS OF E-WASTE GENERATED AT FHDA.
 - **UNIVERSAL WASTE** TRACKED WEEKLY AND REPORTED TO DEH ANNUALLY
 - **MEDICAL/BIO WASTE** TRACKED WEEKLY AND REPORTED ANNUALLY TO DEH
 - **HAZARDOUS WASTE COMPREHENSIVE TRACKING SPREADSHEET** (REFERRED TO AS THE “ALBATROSS” BY EH&S) CONTAINS DATA FROM EACH LINE FROM EVERY MANIFEST GENERATED FROM FHDA, THIS SPREADSHEET IS UTILIZED TO PROVIDE REGULATORY AGENCIES SPECIFIC HAZARDOUS WASTE INFORMATION BY ACCESSING AND SORTING INPUTTED FIELDS. DATA IS USE FOR ANNUAL WASTE REPORT, SB-14 REPORT, BOE REPORTS, SOURCE REDUCTION REPORTS, EXPENSE MANAGEMENT TRENDS AND OTHERS.
 - **HAZARDOUS MATERIAL BUSINESS PLANS (HMBP)** FOR EACH CAMPUS PROVIDES ANNUAL UPDATES OF THE WHERE ALL THE DEPARTMENTS STORE HAZARDOUS MATERIALS AND WASTES, THE SPECIFIC MATERIALS, THE AMOUNTS AND THE SAFETY EQUIPMENT AT EACH LOCATION. EH&S WORKS WITH EACH DEPARTMENT DIRECTLY FOR **REVISING THE HMBP** TO REFLECT ACTUAL INVENTORY AS WELL AS TO DIRECTLY EDUCATE ON COMPLIANCE ISSUES. THIS PROJECT IS VERY LABOR INTENSIVE.
 - **SB-14 CERTIFICATIONS** DOCUMENT THE TRACING OF THE WASTE VOLUME PRODUCED ANNUALLY AND THE PROCESS TO REDUCE WASTE PRODUCTION
 - **PERIODIC REPORT OF CONTINUED COMPLIANCE (PRCC)** FOR FOOTHILL COLLEGE PROVIDES SEMI -ANNUAL UPDATES OF THE SEWER DISCHARGES FOR THE PREVIOUS 6 MONTH PERIOD. IT IS SUBMITTED TO PALO ALTO – REGIONAL WATER QUALITY CONTROL PLANT.
 - **SELF MONITORING REPORT (SMR)** FOR DE ANZA COLLEGE SUMMARIZED THE REGULATED CHEMICALS ANALYZED IN THE DISCHARGE WATERS FOR THE CITY OF SAN JOSE
 - **PHOTO WASTE REPORT** SUBMITTED ANNUALLY FOR EACH CAMPUS TO TRACK TRACE SILVER USED AT EACH CAMPUS IN PHOTOGRAPHY, DENTAL, X-RAY OR VETERINARY TECHNOLOGY
 - **HAZARDOUS WASTE GENERATOR FEE REPORT** COMPLETED ANNUALLY FOR THE TYPES AND AMOUNT OF WASTE DISPOSED FROM EACH CAMPUS.
 - **BOE REPORTS** FOR HAZARDOUS WASTE AND ELECTRONIC WASTE PROVIDES THE ACCOUNTING OF WASTE SHIPPED AS A MECHANISM FOR THE STATE TO TAX BASED ON QUANTITY. NOTE THAT ISSUES WERE RESOLVED CONCERNED THE SALES OF COMPUTER IN THE BOOKSTORE COMPARED TO THE USED COMPUTER SENT FOR RECYCLING
 - **EPA VERIFICATION REPORTS** FOR HAZARDOUS WASTE MANIFESTS DEFINES THE WASTE AMOUNTS AND NUMBER OF MANIFESTS UTILIZED FOR THE PREVIOUS YEAR.
- THE PERMIT RENEWALS FOR THE SANTA CLARA SEWER DISTRICT AND THE PALO ALTO SEWER DISTRICT WERE NOT REQUIRED THIS YEAR. HOWEVER, THE DISCHARGES LEVELS

AT FOOTHILL WERE CALCULATED AND RECONCILED TO MAINTAIN INTEGRITY OF THE PERMIT IN REPORTS NAMED ABOVE (PRCC AND SMR).

- THIS YEAR NEW PERMITS FOR **SPILL PREVENTION COUNTER CONTROL MEASURES** FOR BOTH CAMPUSES WERE REQUIRED DUE TO THE CONCERN FOR OIL LEAKS (GULF PETROLEUM OIL SPILL CONCERN). ALL SOURCES OF OIL AND MEASURES TO CONTROL A SPILL WERE DEFINED.

CLOSURES AND PERMITTING DOMINATED ACTIVITY AT FOOTHILL AND DE ANZA

IF AN AREA EVER CONTAINED HAZARDOUS MATERIALS, IT MUST BE MADE CLEAN (CLOSED) BEFORE IT CAN BE REMODELED OR DEMOLISHED IN A PROCESS THAT INCLUDES SAMPLING AND ANALYTICAL WORK. PROCEEDING WITHOUT AN AGENCY APPROVED CLOSURE PLAN IS A VIOLATION. AT END OF EVERY CLOSURE, A FINAL REPORT IS WRITTEN.

CONVERSELY, WHEN AN AREA IS REBUILT OR RENOVATED OR NEW CONSTRUCTION IS INITIATED, THERE IS A PERMIT PROCESS FOR THE HAZARDOUS MATERIAL AREAS. THE PROJECTS ARE LIKELY TO BE MEASURE "C" OR "E" FUNDED AND INVOLVE THE BOND MANAGERS, GILBANE AND THE REGULATORY AGENCY. EITHER THE DIRECTOR OF EH&S OR THE ENVIRONMENTAL SPECIALIST ATTEND THE GILBANE PROJECT MEETINGS TO PROVIDE ENVIRONMENTAL COUNSEL AS COMPLIANCE QUESTIONS ARISE RELATED TO HAZARDOUS MATERIALS, WASTES OR OTHER REGULATORY ISSUES. THIS YEAR THE FOLLOWING AREAS WERE ADDRESSED:

FOOTHILL COLLEGE CAMPUS:

- THE PLANNING FOR CAMPUS WIDE **ELECTRICAL UPGRADES** RELATED TO BRINGING TEMPORARY GENERATORS ONSITE WAS INITIATED AND SEVERAL PHASES OF THE UPGRADES WERE PERFORMED. EH&S PROVIDED ENVIRONMENTAL CONSULTING SERVICES TO GILBANE TO ENSURE THE PROPER USE OF TEMPORARY GENERATORS ON CAMPUS FOR PLANNED OUTAGES AND THAT IMPLEMENTATION WAS IN COMPLIANCE WITH REGULATORY REQUIREMENTS. SHUT DOWNS WERE PLANNED MONTHS IN ADVANCE BEFORE THEY WERE PERFORMED.
- THE PERMIT FOR THE **REMOTE FUELING STATION** FOR THE CAMPUS CENTER GENERATOR WAS REACTIVATED AND THE SENSOR INSTALLATION WAS COMPLETED TO FINALLY RESOLVE THE ONGOING NON-COMPLIANCE ISSUES WITH THIS FUELING STATION BY WORKING WITH DEH AND SCCFD.
- NUMEROUS ASPECTS OF THE **PHYSICAL SCIENCE MATH & ENGINEERING (PSME) PROJECT** WERE ADDRESSED.
 - EH&S PROVIDED ENVIRONMENTAL CONSULTING SERVICES TO GILBANE TO INCLUDE A **CONTINUOUS FLOW METER AND PH METER** TO COMPLY WITH EXISTING REPORTING REGULATIONS ENFORCED BY THE PALO ALTO SEWER DISTRICT. EH&S WORKED WITH CALCON SYSTEMS TO DELIVER A SYSTEM COMPARABLE TO THE ONE ALREADY EXISTING AT FOOTHILL COLLEGE SO THAT KEY INFORMATION DERIVED FROM THE SYSTEM IS DELIVERED TO EH&S WHERE DATA FOR REPORTS IS ASSEMBLED.
 - THE **OUTFLOW SUMP** FROM THE OLD PSME BUILDING WAS SAMPLED AND FOUND TO HAVE HAZARDOUS SLUDGE. A CLOSURE SCOPE FOR THIS UNIT IS BID AND WILL BE PERFORMED IN 2012. EH&S PROVIDED ADVICE TO GILBANE AND WORKED WITH THE DEH TO ESTABLISH AN INTERIM PLAN TO CLEAN THE SUMP AND THEN LATER TO FORMALLY CLOSE THE SUMP BY THE REMOVAL OF THE UNDERGROUND HOLDING SUMP/TANK AND DISPOSAL OF THE REMAINING SLUDGE.
 - THE NEW PSME BUILDING WILL BE REQUIRED TO HAVE A **PERMIT TO CONSTRUCT** FOR HAZARDOUS MATERIAL STORAGE WITH DEH FOR THE INSTALLATION OF THE HAZARDOUS MATERIAL SAFETY EQUIPMENT. THIS PERMIT PROCESS IS UNDERWAY.
 - **ASBESTOS** IS OCCURRING IN THE OLD PIPES IN THE AREA OF THE NEW CONSTRUCTION OF THE PSME BUILDING. EH&S IS CO-COORDINATING WITH ECS (ASBESTOS CONSULTANT) FOR ASBESTOS AND LEAD ABATEMENT.
 - THE CLOSURE OF THE OLD PSME BUILDING IS BEING PLANNED WITH DEH.

- **THE SMITHWICK COOLING TOWER** WAS REMOVED FROM SERVICE (INFORMALLY CLOSED). ACTUALLY, EH&S DEMONSTRATED THAT THE TOWER DID NOT CONTAIN HAZARDOUS MATERIAL AND THE CHEMICALS HISTORICALLY USED IN THE UNIT LEFT NO RESIDUES REQUIRING A FORMAL CLOSURE. UNIT WAS RELEASED OFFICIALLY TO CONTRACTOR.
- **THE UPGRADES FOR THE GASOLINE TANK** REQUIRED EH&S INVOLVEMENT FOR PERMIT MODIFICATIONS AND RECERTIFICATION. EH&S SET UP THIRD PARTY TESTS WITH REGULATORS PRESENT TO RE-CERTIFY THE UNDERGROUND GASOLINE STORAGE TANK.

DE ANZA COLLEGE CAMPUS:

- **THE SUNKEN GARDEN** WAS A HUGE INVESTMENT OF EH&S TIME. AS PART OF THE CAMPUS IMPROVEMENT PROJECT THIS AREA, THE FOUNTAIN WAS TO BE RENOVATED, THE SOIL GRADE CHANGED AND NEW LANDSCAPING PLANTED. HOWEVER, SAMPLING OF THE SOIL REVEALED SMALL AMOUNTS OF CONTAMINANTS (PESTICIDES / DDT, PCBs AND CERTAIN METALS / ARSENIC). EXTENSIVE AND DETAILED PLANS WERE MADE TO REMEDIATE THE SOILS. EH&S PROVIDED ENVIRONMENTAL CONSULTING TO THE BOND MANAGER, THE SANDIS ENGINEERS, THE GILBANE PROJECT TEAM, THE GENERAL CONTRACTORS, THE HAZARDOUS WASTE DISPOSAL SITES, THE TRANSPORTERS AND SITE REMEDIATION SUBCONTRACTORS TO BRING THE AREA INTO COMPLIANCE WITH THE REGULATORY AGENCY IN CHARGE OF THE CLOSURE (DEH).
- **THE SWIMMING POOL IMPROVEMENT PROJECT** HAD SEVERAL ASPECTS. EH&S PROVIDED GUIDANCE TO GILBANE AND WORKED WITH THE REGULATOR TO OBTAIN A PERMIT ALLOWING THE DISCHARGE OF POOL WATER INTO THE SEWER SO THAT THE PROJECT WORK COULD BE CONDUCTED. ISSUES WITH THE **NEW POOL PULSAR CHLORINATION SYSTEM** WAS RESOLVED FOLLOWING SEVERAL LEAKS / SPILLS. THE HMBP PLANS WERE MODIFIED FOR CHANGES IN CHEMICAL STORAGE.
- **THE ROOF REPAIR PROJECTS** FOR BUILDINGS E2 AND E3 WERE PLANNED WITH GILBANE REGARDING THE METHODS ALLOWED BY REGULATORS TO CLEAN AND DISCHARGE WATERS TO THE SEWER AND IN KEEPING WITH THE STORM WATER PREVENTION PROGRAM.
- **CAMPUS WIDE ELECTRICAL UPGRADES** IN THE INTRA-STRUCTURE WERE MADE UTILIZING TEMPORARY GENERATORS. THE PERMITTING EFFORT WAS EXTENSIVE.
- **BY WORKING WITH CALCON** (VENDOR SPECIALIZING IN WASTE WATER MONITORING), A **NEW DISCHARGE MONITORING SYSTEM WAS INSTALLED** THAT HAS THE POTENTIAL TO REDUCE THE CAMPUS WATER BILL BY IMPROVING THE BASIS FOR THE WATER USAGE INVOICES. THIS INSTALLATION WILL ALLOW DE ANZA COLLEGE TO BE CHARGED FOR THE AMOUNT OF WATER USED DAILY VERSUS THE NUMBER OF STUDENTS ENROLLED AT THE COLLEGE. HOPEFULLY, THIS WILL RESULT IN A LARGE ANNUAL SAVINGS WHEN INSTALLATION IS COMPLETE AND MODIFIED CALCULATIONS ARE ACCEPTED.
- **THE WAREHOUSE AND THE YARD** HAS A VERY HIGH CONCENTRATION OF REGULATED HAZARDOUS MATERIAL STORAGE AREAS (GAS TANK, HAZARDOUS WASTE AND UNIVERSAL WASTE STORAGE SHEDS, PROPANE STORAGE, HVAC SUPPLIES, CUSTODIAL STORAGE, MECHANIC SHOP PRODUCT STORAGE, ETC.). PLANS ARE REQUIRED TO ADDRESS THE STORAGE AND USE OF THE PRODUCTS IN THESE AREAS WHILE RENOVATION IS PREFORMED. EH&S PROVIDED GUIDANCE TO GILBANE ON THE **CORPORATION YARD PROJECT** AND IS WORKING WITH SCCFD TO OBTAIN A PERMIT ALLOWING THE RE-LOCATION OF HAZARDOUS MATERIAL STORAGE AREAS TO OTHER ONSITE LOCATIONS WHILE WORK IS BEING DONE.
- **FOR THE STADIUM TRACK PROJECT**, EH&S IS PROVIDING ENVIRONMENTAL CONSULTING SERVICES TO GILBANE AND BOND MANAGER TO DETERMINE WHAT SAMPLING AND ANALYTICAL SHOULD BE CONDUCTED PRIOR TO BID DOCUMENT BEING PUBLISHED.
- **THE PRINT SHOP** HAD HISTORICALLY CONTAINED TWO OFFSET PRESSES AND A HIGH VOLUME OF OIL, PIGMENTS, SOLVENTS, FIXERS AND DEVELOPERS. THE INTENT FOR THE PRINT SHOP WAS TO MOVE TO THE NEW LOCATION IN THE **BALDWIN WINERY** AND BECOME A MASTER COPY CENTER ONLY, NOT A PRINT PRESS SHOP. EH&S MANAGED A FULL CLOSURE OF ALL HAZ-MAT AREAS – CLOSURE PLAN, AREA DECONTAMINATION, WASTE

SHIPMENTS, AGENCY INSPECTIONS AND FINAL CLOSURE REPORT FOR THE AGENCY ONCE THE PROJECT WAS COMPLETED.

- **PLANT SERVICES WANTED THE PAINT SHOP INVENTORY AT DE ANZA TO BE CONSOLIDATED INTO THE STORAGE AREA LOCATED AT FOOTHILL. EH&S WROTE THE CLOSURE PLAN, HAD THE EXPIRED OR HARDENED PAINTS DISPOSED, AND RECEIVE AGENCY CONSENSUS THAT THE AREA WAS “CLOSED” AND AVAILABLE FOR NON-HAZARDOUS MATERIAL STORAGE.**
- **GAS TANK CLEANING WAS REQUIRED TO EMPTY THE TANK FOR TANK MODIFICATIONS. EH&S ARRANGED FOR THE CLEANING AND ASSURED THAT IT WAS PERFORMED WITH COMPLIANCE STANDARDS.**

MATURING PROGRAMS – EH&S EXERTED EXTENSIVE EFFORT ON MATURING PROGRAMS TO INCLUDE: CONSTRUCTION FOCUS, PROMPT RESOLUTION OF FINDINGS, TRAINING ENHANCEMENTS, COST EFFECTIVE WASTE DISPOSAL, E-WASTE TRACKING, ENHANCED COMMUNICATION, DESIGNATION OF RESPONSIBILITY THROUGH INSPECTOR PROGRAMS AND PRECISELY REVISED HMBPS. THIS FOCUS IS SEEN BY:

- **EMPHASIS WAS PLACED UPON THE SUPPORT OF CONSTRUCTION ACTIVITIES SINCE THE BOND MONEY SPENDING WAS FULLY RAMPED UP. CONSTRUCTION ACTIVITIES RESULT IN BOTH PERMITTING CHALLENGES AND ALSO DEMOLITION.**
- **RESOLUTION OF FINDINGS OCCURS WHEN EH&S DISCOVERS THAT A PERMIT CONDITION BEEN EXCEEDED.**
 - **DURING PALO ALTO DISCHARGE SAMPLING AT FOOTHILL COLLEGE, ELEVATED LEVELS OF CONTAMINANTS RESULTED IN A NOTICE OF NONCOMPLIANCE (NON). EH&S CONDUCTED ADDITIONAL SAMPLING AND ANALYTICAL TO DETERMINE THE SOURCE OF THE DISCHARGE. EH&S WAS ABLE TO DETERMINE THE SOURCE OF THE DISCHARGE AND ELIMINATE THE POTENTIAL FOR THE ELEVATED DISCHARGE RECURRING AGAIN. EH&S PROVIDED ALL OF THE SAMPLING AND COORDINATED THE ANALYTICAL WITHOUT OUTSOURCING TO THIRD PARTY CONSULTANTS. ISSUE RESOLVED.**
 - **ON A SECOND OCCASION, BAQMD OBSERVED THAT IT APPEARED THAT THE GENERATORS WERE BEING RUN IN EXCESS OF THE PERMITTED TIMES. EH&S TEAMED WITH PLANT SERVICE TO PROVIDE ALL THE DOCUMENTATION TO RESOLVE THE ISSUE – THE EMERGENCY GENERATORS WERE BEING USED FOR EMERGENCIES, NOT FHDA CONVENIENCE. ISSUE RESOLVED.**
- **EH&S HAS EXTENDED THE CONSULTATION ASPECT OF THE DEPARTMENT BY ONGOING CONSULTATION WITH PLANT SERVICES AND ACADEMIC PERSONNEL AT EACH COLLEGE. BOTH GROUPS ARE RESPONSIBLE FOR VARIOUS REGULATED OPERATIONS THAT ARE INSPECTED ANNUALLY BY VARIOUS REGULATORS. EH&S WORKS WITH THEM TO ENSURE THAT ALL DOCUMENTATION IS OCCURRING AND IS BEING DONE CORRECTLY FOR CONTINUED COMPLIANCE. SPECIFIC CONSULTATION FOR PROJECTS IS EQUALLY IMPORTANT. FINALLY EH&S WORKED WITH SUPPORT SERVICES THAT WOULD NOT NORMALLY BE CONSIDERED TO BE “WASTE” OWNERS. BOTH FOOD SERVICES, BUT PARTICULARLY THE NEW FOOTHILL FOOD SERVICE, RECEIVED ATTENTION SO THAT THEY KNEW HOW TO MANAGE THEIR WASTES – PRESSURIZED GAS CYLINDERS FOR BARBEQUES AND THE SUMPS / TANKS FOR GREASE COLLECTION.**
- **EH&S HAD WRITTEN 2 ESSENTIAL TRAINING PROGRAMS IN 2007. THESE HAVE BECOME OUTDATED BY CHANGES IN REGULATIONS AND ALSO BY PRACTICAL EXPERIENCE. THE PROGRAMS KNOWN AS “AWARENESS TRAINING” AND “HAZARDOUS MATERIALS – CONDUCTING AN INSPECTION” AND THEIR RESPECTIVE TESTS WERE UPDATED. THROUGH THE EFFORT OF ETS, THEY HAVE A NEW FORMAT AND USER FRIENDLY RECORDKEEPING FUNCTION ON THE BANNER EMPLOYEE PAGE.**
- **EH&S ADDRESSED BOTH COST OF DISPOSAL AND THE QUALITY OF SERVICE FOR WASTE COLLECTION. EH&S QUALIFIED A NEW MEDICAL WASTE DISPOSAL VENDOR AS ONE WHICH SERVICED PROFESSIONALLY AND ALSO OFFERED PRICES THAT WERE OVER 30 % LESS. LIKEWISE, EH&S QUALIFIED AND BEGAN WORK WITH AN ENVIRONMENTAL DISPOSAL**

COMPANY WHICH PROVIDED HIGHLY QUALIFIED STAFF FOR WASTE COLLECTION AT A 15% REDUCTION OF FEES. EH&S ALSO BID THE WASTE STREAMS THAT WERE MOST FREQUENTLY SHIPPED AND RECEIVED A 10% DISCOUNT ON THESE WASTES.

- **AS PREVIOUSLY NOTED, FHDA HAS 88 HAZARDOUS MATERIALS AREAS REQUIRING A PRIMARY AND ALTERNATE INSPECTORS WITH MANAGERIAL OVERVIEW. THIS IS THE “CORE” GROUP. QUARTERLY LIST OF AREAS AND PERSONS RESPONSIBLE FOR THOSE AREAS ARE MAINTAINED IN ORDER FOR COMMUNICATION TO GO DIRECTLY THROUGH THE CORRECT CHANNELS TO THE CORE STAFF.**
- **IMPROVING THE QUALITY OF THE E-WASTE PROGRAM TO ADDRESS THE INFLUX OF E-WASTE THAT HAS RESULTED FROM THE PURCHASE OF NEW COMPUTERS.**
- **EH&S PARTICIPATED IN TWO HIRING COMMITTEE FOR POSITIONS USING HIGH QUANTITIES OF HAZARDOUS MATERIALS IN THE PERFORMANCE OF THEIR JOBS (LEAD MECHANIC AND THE PAINTER). EH&S SCREENED TO SEE THAT THE PERSON SELECTED WOULD GIVE ADEQUATE ATTENTION TO REGULATORY ISSUES SINCE LARGE AMOUNTS HAZARDOUS MATERIALS ARE HANDLED, STORED AND DISPOSED OF ANNUALLY THESE DEPARTMENTS.**