

Board of Trustees Agenda Item

Board Meeting Date: 12/10/12

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 2012.

Recommendation: Information only

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Is backup provided? Yes

FACT SHEET ON EH&S ACTIVITY FOR 2012
MONA VOSS, DIRECTOR ENVIRONMENTAL HEALTH & SAFETY

ENVIRONMENTAL FOCUS – THE CORE FOCUS REMAINS THE SAME. IN 2005, FHDA SIGNED A COMPLIANCE ORDER WITH DEPARTMENT OF ENVIRONMENTAL HEALTH FOR A TERM OF TEN YEARS. THIS YEAR FHDA IS IN THE SEVENTH 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 \$215K 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 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 2012, FHDA WAS INSPECTED BY ALL FIVE (5) MAJOR AGENCIES.

- DEPARTMENT OF ENVIRONMENTAL HEALTH (DEH) DID NOT CONDUCT THE COMPREHENSIVE CAMPUS-WIDE INSPECTION OF FHDA. HOWEVER, DEH WAS ON CAMPUS FOR 16 HOURS FOR SPECIFIC INSPECTION RELATED TO CLOSURES, PRE-CLOSURE WALKS, PERMITTING AND SPECIFIC AREA INSPECTIONS.
- SANTA CLARA COUNTY CENTRAL FIRE DEPARTMENT PERFORMED A ONE DAY INSPECTION OF ALL AREAS WITH HAZARDOUS MATERIALS 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. A NEW INSPECTOR WAS ASSIGNED AND HE INVESTIGATED THOROUGHLY TO BECOME FAMILIAR WITH THE FACILITIES.
- BAY AREA AIR QUALITY MANAGEMENT DISTRICT THIS YEAR REQUIRED OPERATIONAL REPORTS IN LIEU OF PHYSICAL INSPECTIONS OF THE REGULATED UNITS. DATA SUBMITTAL WAS SATISFACTORY FOR AGENCY REVIEW.
- TWELVE (12) CLOSURE INSPECTIONS FOR INITIAL SCOPE DEFINITION AND FIVE (5) 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 108 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.

- FHDA SELECTED A DIFFERENT **THIRD PARTY AUDITING FIRM** THIS YEAR BASED ON THE BEST COST FOR QUALITY SERVICE. AN ENVIRONMENTAL ATTORNEY (LYNN STETLER FROM THE STETLER & MCHUGH EH&S CONSULTING LLC) 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 STANDARDS. EH&S INFORMED THE CAMPUSES EXACTLY WHAT ACTIONS WERE REQUIRED IN EACH DEPARTMENT FOR SPECIFIC ISSUES.

- **UNDER THE DIRECTION OF EH&S, INTERNAL INSPECTIONS WERE CONDUCTED AT ALL THE HAZ-MAT STORAGE AREAS DEFINED ON THE HAZARDOUS MATERIAL BUSINESS PLAN (94 AREAS) ON A WEEKLY BASIS BY DESIGNATED FHDA STAFF FOR A TOTAL OF 4888 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 MANIFESTS** 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 AT FHDA, THIS SPREADSHEET IS UTILIZED TO PROVIDE REGULATORY AGENCIES SPECIFIC HAZARDOUS WASTE INFORMATION BY ACCESSING AND SORTING FIELDS. DATA IS USE FOR ANNUAL WASTE REPORT, SB-14 REPORT, BOE REPORTS, SOURCE REDUCTION REPORTS AND EXPENSE MANAGEMENT TRENDS.
 - **HAZARDOUS MATERIAL BUSINESS PLANS (HMBP)** FOR EACH CAMPUS PROVIDES ANNUAL UPDATES OF WHERE ALL DEPARTMENTS STORE HAZARDOUS MATERIALS AND WASTES, THE SPECIFIC MATERIALS, THE QUANTITIES 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.
 - **EPA VERIFICATION REPORTS** FOR HAZARDOUS WASTE MANIFESTS DEFINES THE WASTE AMOUNTS AND NUMBER OF MANIFESTS UTILIZED FOR THE PREVIOUS YEAR.
- **THE PERMIT RENEWAL APPLICATION** FOR DISCHARGES INTO THE PALO ALTO SEWER DISTRICT WAS REQUIRED THIS YEAR. THE PERMIT APPLICATION WAS VERY LENGTHY SUBMITTED. SINCE THE AGENCY HAD BEEN INFORMED THAT PSEC WILL BE OPERATIONAL IN JANUARY, THEY EXTENDED THE FHDA CURRENT PERMIT AND WILL ISSUE A COMPREHENSIVE PERMIT INCLUDING WITH PSEC WHEN THE NEW DISCHARGE POINT IS ON LINE.

ADDITIONALLY, THE DISCHARGES LEVELS AT FOOTHILL AND DE ANZA WERE CALCULATED AND RECONCILED TO MAINTAIN INTEGRITY OF THE REPORTS NAMED ABOVE (PRCC AND SMR).

- THIS YEAR PERMITS FOR **SPILL PREVENTION COUNTER CONTROL MEASURES (SPCC)** FOR BOTH CAMPUSES WERE REVIEWED. THIS PROGRAM IS INTENDED TO ADDRESS THE GENERAL CONCERN FOR ANY TYPE OF OIL LEAK (GULF PETROLEUM OIL SPILL WAS THE MOTIVATING CONCERN). ALL SOURCES OF OIL AND MEASURES TO CONTROL A SPILL WERE VERIFIED.

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 DOCUMENTING THE ABSENCE OF CONTAMINANTS.

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. BOTH THE DIRECTOR OF EH&S AND 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 **ELECTRICAL UPGRADES** WERE COMPLETED THIS YEAR. THE PROJECT INVOLVED BRINGING TEMPORARY GENERATORS ONSITE WHILE THE RENOVATION WORK WAS BEING DONE. ALL TEMPORARY GENERATORS HAD TO BE PERMITTED.
- THE **REMOTE FUELING STATION** FOR THE CAMPUS CENTER GENERATOR HAS HAD AN APPARENT PANEL EQUIPMENT FAILURE. THE ISSUE WAS DISCUSSED WITH DEH. SINCE A PANEL REPLACEMENT WOULD BE A DIFFERENT UNIT FROM THE PERMITTED UNIT, THE SUBSTITUTE PANEL MUST BE PERMITTED. A THIRD PARTY TANK SPECIALIST IS EVALUATING THE MOST EFFECTIVE APPROACH.
- THE EFFORT FOR THE **PHYSICAL SCIENCE MATH & ENGINEERING (PSME) PROJECT** WAS PARAMOUNT.
 - THE NEW PSME BUILDING WAS REQUIRED TO HAVE A **PERMIT TO CONSTRUCT THE HAZARDOUS MATERIAL STORAGE AREAS** WITHIN THE LABORATORY. EH&S WORKED WITH THE PROGRAM MANAGER TO SECURE THE PERMIT. THE PERMIT WAS A VERY DETAILED AND COMPREHENSIVE DOCUMENT. THE HAZARDOUS MATERIAL STORAGE PERMIT TO CONSTRUCT WAS AWARDED IN NOVEMBER. A FINAL INSPECTION WILL OCCUR JANUARY 4, 2013 WHICH WILL APPROVE THE STORAGE STANDARDS FOR ALL THE CHEMICALS THAT ARE MAINTAINED IN CHEMISTRY.
 - EH&S HAS WRITTEN A "MOVE" PLAN THAT DESCRIBES THE PROCESS AND TECHNIQUES TO MOVE THE CHEMICALS FROM THE OLD CHEMISTRY BUILDING 5600 TO THE NEW PSEC BUILDING. THE PLAN HAS BEEN APPROVED BY THE AGENCY AND WILL BE EXECUTED IN DECEMBER.
 - EH&S PROVIDED ENVIRONMENTAL CONSULTING SERVICES TO GILBANE TO INSTALL A **CONTINUOUS FLOW METER AND PH METER** TO COMPLY WITH 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.
 - NOW EH&S IS WORKING WITH THE CITY OF PALO TO INCLUDE THE NEW DISCHARGE POINT IN THE DISCHARGE PERMIT AND TO HAVE LANGUAGE IN THE PERMIT REFLECT OPERATIONS.
 - THE **OUTFLOW VAULT** FROM THE OLD PSME BUILDING WAS SAMPLED AND FOUND TO HAVE HAZARDOUS SLUDGE. A PRE-CLOSURE WALK WAS CONDUCTED WITH DEH IN OCTOBER AND A COMPLETE CLOSURE PLAN WRITTEN. THE WORK WILL BE DONE IN 2013 WHEN FHDA WILL FORMALLY CLOSE THE VAULT BY THE REMOVAL OF THIS

UNDERGROUND HOLDING VAULT AND DISPOSAL OF THE REMAINING SLUDGE AND SOIL BENEATH THE VAULT.

- **ASBESTOS** HAS OCCURRED 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 CHEMISTRY BUILDING 5600 IS BEING PLANNED WITH DEH. THE PRE-CLOSURE WALK WAS COMPLETED IN OCTOBER 2012. THE CLOSURE PLAN IS NOW IN DRAFT FORM.
- THE PLANNING FOR THE RENOVATION OF BUILDING 5100 BEGAN FROM A REGULATORY PERSPECTIVE WITH A VISIT FROM THE DEPARTMENT OF ENVIRONMENTAL HEALTH FOR A PRE-CLOSURE VISIT. THE AGENCY AND FHDA DETERMINED THAT WE WOULD CONDUCT AN INTERIM CLOSURE WITH AGENCY OVERVIEW. EH&S DEMONSTRATED TO DEH THE STORAGE LOCATIONS OF ALL HAZARDOUS MATERIAL DURING THE RENOVATION. BUILDING 8700 WAS INSPECTED TO SHOW THE LOCATION OF INTERIM STORAGE. THE INTERIM CLOSURE PLAN WAS FORMALIZED IN WRITING AND CHANGES INDICATED IN THE HMBP.
- THE OLD SMITHWICK **GENERATOR IS BEING REPLACED**. THE SCOPE OF WORK TO PROVIDE ADEQUATE ELECTRIC POWER TO KEY AREAS AND PERMITTING PROCESS IS BEING DISCUSSED. A NEW SCENE SHOP IS BEING DESIGNED ADJACENT TO THE NEW GENERATOR. BOTH PROJECTS ARE GOING TO BE NEARBY EACH OTHER SO SET-BACKS, FIRE ACCESS, GENERATOR FUELING SPACE AND OTHER COMPLIANCE ISSUES ARE BEING CONSIDERED.
- **DIESEL TANKS** FOR BOTH CAMPUSES WERE PLANNED. FOOTHILL HAD THE SPACE AVAILABLE IMMEDIATELY SO PERMITTING BEGAN. THE PLATFORM TO HOUSE THE TANK WAS CONSTRUCTED AS THE PERMITTING OF THE TANK, THE DISPENSER AND THE PIPING WAS BEING SECURE.
- **MULTIPLE TRUCK INCIDENTS** OCCURRED AT FOOTHILL THIS YEAR. ONE TRUCK ROLLED OVER AND SPILLED ALL THE HYDRAULIC LIQUIDS INTO THE SOIL. ANOTHER TRUCK LEAKED DIESEL ONTO THE DRIVE. A THIRD TRUCK LEAKED OIL ON THE STREET. IN ALL CASES, THE SPILLS WERE REPORTED, REMEDIATED AND PRELIMINARY AND FINAL REPORT ISSUED TO DEH.
- THE LANDSCAPING INTRA-STRUCTURE PRODUCES AN **EXCESS SOIL**. THE SOIL WAS QUALIFIED FOR DISPOSAL BY ANALYTICAL TESTING. THEN, THE SOIL WAS EITHER SUPPLEMENTED FOR BETTER PLANT GROWTH, USED A FILL OR CONTOURING OR REMOVED FROM THE CAMPUS.

DE ANZA COLLEGE CAMPUS:

- THE **SUNKEN GARDEN** PROJECT DEMANDED A HUGE INVESTMENT OF TIME. AS PART OF THE CAMPUS SITE IMPROVEMENT PROJECT, 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, SANDIS ENGINEERS, GILBANE PROJECT TEAM, GENERAL CONTRACTOR. EH&S SUBMITTED A WRITTEN VOLUNTARY CLEANUP PLAN TO THE COUNTY REMEDIATION SPECIALIST WHICH CONSISTED OF SAMPLING AND ANALYTICAL PLANS THRU REMEDIATION GOALS FOR CLOSURE AND CAPPING OF THE SITE. EH&S ALSO WORKED WITH 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). EH&S ACTED AS THE LEAD FOR THE CLEANUP THROUGH THE SUBMITTAL OF DOCUMENTS THRU THE ONLINE GEOTRACKER SYSTEM.
- THE **SWIMMING POOL IMPROVEMENT PROJECT** HAD SEVERAL ASPECTS. EH&S PROVIDED GUIDANCE TO GILBANE AND WORKED WITH THE REGULATORS TO OBTAIN A PERMIT ALLOWING THE DISCHARGE OF POOL WATER INTO THE SEWER FOR THE TWO PHASES OF THE PROJECT. EH&S CAME TO AN AGREEMENT WITH THE CITY OF SAN JOSE TO ALLOW THE MULTIPLE DISCHARGES BY SUBMITTING A SELF MONITORING REPORT AND A FINAL REPORT WHICH INCLUDED SAMPLING AND ANALYSES OF DISCHARGE WATER, CONTINUOUS FLOW AND BACKFLOW MONITORING.

- **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 COMPLETED UTILIZING TEMPORARY GENERATORS. THE PERMITTING EFFORT WAS EXTENSIVE.
- **BY WORKING WITH CALCON SYSTEMS** (VENDOR SPECIALIZING IN WASTE WATER MONITORING), **A NEW DISCHARGE MONITORING SYSTEM WAS INSTALLED** THAT HAS THE POTENTIAL TO REDUCE THE CAMPUS WATER BILL BY THOUSANDS OF DOLLARS PER MONTH 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. WE ARE ANTICIPATING THAT THE CITY OF CUPERTINO WILL ALLOW THE CHANGE IN 2013.
- 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 WERE DEVISED LAST SPRING PRIOR TO THE **CORPORATION YARD PROJECT** TO ADDRESS THE STORAGE AND USE OF THE PRODUCTS IN THESE AREAS WHILE RENOVATION WAS PERFORMED. EH&S PROVIDED GUIDANCE TO GILBANE AND DE ANZA COLLEGE REGARDING THE CORP YARD PROJECT AND IS WORKING AGAIN WITH SCCFD TO OBTAIN ANOTHER PERMIT ALLOWING FOR THE RE-LOCATION OF HAZARDOUS MATERIAL STORAGE AREAS BACK TO THE CORP YARD FOLLOWING COMPLETION IN JANUARY 2013.
- **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 OF THE SOILS PRIOR TO BID DOCUMENT BEING PUBLISHED. THIS RESULTED IN LESS CHANGE ORDERS AS A RESULT OF THE CONTAMINATED SOILS FOUND DURING THE PROJECT [LESSONS LEARNED FROM THE SUNKEN GARDEN]. EH&S WORKED WITH GILBANE AND THEIR TRENCHING CONTRACTOR WHO LOCATED ASBESTOS PIPE THROUGHOUT THE PROJECT. EH&S SITE WALKTHROUGHS DISCOVERED ASBESTOS WASTE NOT BEING PROPERLY STORED AND THE ISSUE WAS REMEDIATED IMMEDIATELY WITHOUT VIOLATIONS.
- **THE FLINT CENTER PARKING GARAGE**, EH&S IS PROVIDING ENVIRONMENTAL CONSULTING SERVICES TO GILBANE AND BOND MANAGER BY REVIEWING BID ATTACHMENTS AND EMAILS REGARDING THE ASBESTOS RELATED SCOPE OF WORK.
- **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 RELOCATION TO THE BALDWIN WINERY AND BECOME A MASTER COPY CENTER ONLY, NOT A PRINT PRESS SHOP. EH&S MANAGED A FULL CLOSURE OF ALL HAZMAT AREAS – CLOSURE PLAN, AREA DECONTAMINATION, WASTE SHIPMENTS, AGENCY INSPECTIONS AND FINAL CLOSURE REPORTS FOR THE AGENCY.
- **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.
- **MLC BLDG. – DURING CONSTRUCTION** A LARGE RELEASE OF PROPYLENE GLYCOL OCCURRED FROM TWO TANKS IN MECHANICAL ROOM 147. THE RELEASE WAS A REPORTABLE SPILL. SPILL WAS COMMUNICATED VIA PHONE IMMEDIATELY FOLLOWED WITH A DRAFT WRITTEN

REPORT. EH&S SECURED THE ENVIRONMENTAL CLEANUP TEAM FOR DISPOSAL. ALL SPILL MATERIAL WAS REMOVED AND THE FINAL REPORT WRITTEN. THE FINAL WRITTEN REPORT, INCLUDING A DETAILED TIME LINE AND PHOTOS, WAS ACCEPTED BY DEH. ADDITIONALLY, EH&S WAS REQUIRED TO UPDATE THE ONLINE SMARTS WEBSITE WITH COMPLETED INFORMATION REGARDING OUR SWPP [STORM WATER PREVENTION] EFFORTS.

- **THE MLC GENERATOR** WAS INSTALLED AT THE CORP YARD WITHOUT EH&S KNOWING OF ITS EXISTENCE. ADDITIONALLY, OUR DEH AND SCCFD REGULATORS DID NOT KNOW OF IT EITHER BECAUSE THERE WAS NO “PERMIT TO CONSTRUCT” COMPLETED BY THE CONTRACTOR PRIOR TO CONSTRUCTION. TO MAKE MATTERS WORSE, THE GENERATOR WAS FUELED WITH DIESEL. EH&S MET WITH THE REGULATORS, DISCUSSED THE OPTIONS AND DECIDED THAT A PERMIT APPLICATION NEEDED TO OCCUR BETWEEN THE CONTRACTOR AND SCCFD TO GET THE COMPLIANCE ISSUE RESOLVED. THE CONTRACTOR OBTAINED THE PERMIT. THE GENERATOR PLANNING PRE-DATED EH&S’S ATTENDANCE AT MEETINGS AND ENFORCED THE NEED OF EH&S TO ATTEND THE DESIGN AND CONSTRUCTION MEETINGS (NOW CURRENT PRACTICE).
- **INTERFACE WITH PUBLIC CONCERNS** - THE G-BUILDING PROJECT WAS A PARTIAL ASBESTOS AND LEAD SAMPLING AND ABATEMENT OF THE OUTER BUILDING SURFACE. THE ABATEMENT OCCURRED WHILE STUDENT HAD ACCESS TO THE INTERIOR OF THE BUILDING FOR CLASSES. EH&S RESPONDED TO AN INQUIRY FROM CATHY SMITHWICK ALERTING THE DISTRICT OF POTENTIAL DANGERS OF EXPOSURE AND ALLEGATIONS THAT THE STUDENTS IN THE G-BUILDING CLASSROOMS WERE IN DANGER OF BREATHING ASBESTOS WHILE WORKMEN WERE ABATING THE MATERIALS ON THE EXTERIOR. EH&S RESPONDED ON BEHALF OF FHDA SUCCINCTLY BY DETAILING THE ALL THE EFFORTS MADE BY EH&S TO ENSURE THAT NO SUCH ON-GOING RISK OR EXPOSURE EXISTED. AFTER RECEIVING THE EH&S RESPONSE, MS. SMITHWICK CONCERNS WERE QUIETED.

GENERAL PROJECTS AND MATURING PROGRAMS:

- **OWNERS MEETINGS & INDIVIDUAL PROJECT MEETINGS ON BOTH CAMPUSES** WERE ATTENDED BY EH&S TO KEEP ABREAST OF DESIGN, PERMITTING AND POTENTIAL CHALLENGES FROM THE BEGINNING OF A PROJECT. SUPPORT TO CONSTRUCTION, RENOVATION, DEMOLITION, AND PERMITTING HAVE BEEN A PRIORITY THIS YEAR. THIS POINT HAS BEEN STATED EARLIER AND HAS BEEN RE-STATED SIMPLY DUE TO ITS IMPORTANCE.
- **ONIZUKA AIR FORCE PROPERTY – EH&S** REVIEWED PROPOSALS FROM THE TOP TWO ENVIRONMENTAL CONSULTANTS COMPETING FOR THE PROJECT WORK AT ONIZUKA BY ANALYZING THE STRENGTHS AND WEAKNESS ON EACH LEVEL OF PERFORMANCE. EH&S PARTICIPATED IN INTERVIEWS WITH THE ENVIRONMENTAL CONSULTING FIRMS TO QUALIFY THE STRONGEST PROPOSAL FOR THE PROGRAM MANAGER. EH&S CONDUCTED A COMPLIANCE INSPECTION THROUGHOUT ONIZUKA WITH CHOSEN CONTRACTOR.
- **ASBESTOS** - EH&S WORKED WITH GILBANE AND PLANT SERVICES FOR ALL RENOVATIONS, ABATEMENTS OR PROJECT THAT HAVE ASBESTOS BY REVIEWING ALL THE ASBESTOS WORK PLANS. EH&S REMAINED INVOLVED WITH THE DISTRICT CONSULTANT, ECS, UNTIL ALL ASBESTOS RELATED WORK WAS COMPLETE AND ENSURED THAT THE DISTRICT ASBESTOS MANAGEMENT PLAN WAS UPDATED SHOWING ALL ASBESTOS RELATED WASTE WAS REMOVED FROM THE BUILDING.
- **TRAINING PROGRAM** – THE TWO ESSENTIAL PROGRAMS THAT ARE REQUIRED FOR THOSE PERSONS WHO HAVE HAZARDOUS MATERIALS IN THEIR DEPARTMENT WERE REWRITTEN, UPDATED AND FORMATTED FOR THE BANNER TRACKING SYSTEM. NOW EMPLOYEES CAN TAKE THE TRAINING MODULES “AWARENESS TRAINING” AND “HAZARDOUS MATERIALS – CONDUCTING AN INSPECTION” AND THEIR PERFORMANCE WILL BE RECORDED IN THE HUMAN

RESOURCE MASTER FILE. THE RESULT IS UPDATED TRAINING MATERIAL WITH A USER-FRIENDLY RECORDKEEPING FUNCTION ON THE BANNER EMPLOYEE PAGE.

- **RESOLUTION OF FINDINGS** OCCURS WHEN EH&S DISCOVERS THAT A PERMIT CONDITION BEEN EXCEEDED. WHEN THE SMITHWICK THEATER WAS OPENED AGAIN, EH&S COLLECT WATER FROM THE PAINT TREATMENT SYSTEM FOR ROUTINE ANALYTIC TEST. EH&S FOUND ELEVATED LEVEL OF COPPER. THE FINDING WAS REPORTED TO THE AGENCY AND A SELF-MONITORED CORRECTION PLAN WAS INITIATED. FHDA PROVED THAT THE COPPER RESULTED FROM A ONE-TIME PIPE REPLACEMENT IMPROVEMENT MADE IN THE THEATER IN ALL AREAS. AFTER A SHORT TERM USE, THE LEVEL RETURNED TO ACCEPTABLE RANGES. THE AGENCY WAS PLEASED WITH OUR INVESTIGATION.
- **EH&S MAINTAINS A CONSULTATION ASPECT** FOR THE PLANT SERVICES AND ACADEMIC PERSONNEL AT EACH COLLEGE BY INVOLVEMENT WITH SPECIAL COMPLIANCE PROJECTS. FOR EXAMPLE, EH&S AT FOOTHILL, HELP DEFINE THE WATER HARVESTING PROJECT FOR THE HORTICULTURE DEPARTMENT SO THE WATER NOW BEING DISCHARGED FROM THE COOLING TOWERS CAN BE USED TO WATER PLANTS. FULL ANALYTICAL WORK WAS PERFORMED ON THE DISCHARGE TO CONFIRM THAT IT WAS “PURE” ENOUGH TO BE REUSED. FOOD SERVICES RECEIVE ATTENTION FOR THE MANAGEMENT PRESSURIZED GAS CYLINDERS FOR BARBEQUES AND THE SUMPS / TANKS FOR GREASE COLLECTION. A SPECIALIZED AREA FOR SOLDERING WAS SET UP AT DE ANZA SO THAT EACH DEPARTMENT DID NOT NEED TO HAVE THEIR OWN HAZARDOUS MATERIAL AREA BUT ONLY ONE FOR COMMON USE.
- **EH&S ADDRESSED BOTH COST OF DISPOSAL** AND THE QUALITY OF SERVICE FOR WASTE COLLECTION EACH YEAR AS PART OF THE CONTINUAL IMPROVEMENT PROCESS. THIS YEAR ALL DISPOSAL PRICES WERE MAINTAINED AT PRIOR YEAR LEVELS DESPITE THE INDUSTRY MOVEMENT TO INCREASE PRICING BY 3.5% AND APPLY A GAS FUEL SURCHARGE OF 14%. GENERALLY SPEAKING, FHDA WAS ONE OF 3 WASTE GENERATORS OF OVER 6000 GENERATORS IN THE UNITED STATES WHICH DID NOT RECEIVE A PRICE INCREASE.
- **HMBP UPDATES** – THE CAMPUSES ARE CONSTANTLY CHANGING AND NEW HAZARDOUS MATERIAL AREA ARE BEING ESTABLISHED AND OTHER CLOSED. THIS YEAR TWO AREAS OF HVAC STORAGE AT DE ANZA WERE CLOSED (MATERIAL STORED AT FOOTHILL), ONE PAINT STORAGE AREA CLOSED AT DE ANZA (PAINT MOVED TO FOOTHILL) AND THE PRINT SHOP AT DE ANZA (REGULATED) CONVERTED TO A COPY SHOP (NON-REGULATED), THE ENTIRE BUILDING HOLDING CUSTODIAL AND GROUNDS WAS CLOSED AND RELOCATED TO OTHER SPACES AT DE ANZA. MULTIPLE ACTIVITIES WERE SUSPENDED (MECHANIC WATER TREATMENT AND GASOLINE DISPENSING). THE NEW MLC BUILDING BECAME A HAZ-MAT AREA. EVERY ONE OF THE MOVES TRIGGERED A NEW SUBMITTAL OF THE HAZARDOUS MATERIAL BUSINESS PLAN OVER THE YEAR.
- **HMBP PROGRAM SUBMITTALS** - FHDA IS SUBMITTING THE NEW COMPREHENSIVE HAZARDOUS MATERIAL BUSINESS PLAN FOR BOTH CAMPUSES IN DECEMBER 2012. THIS PROCESS ALLOWS FHDA TO SUBMIT A “PAPER / HARD COPY” PLAN INSTEAD OF FILING ELECTRONICALLY. THE BENEFIT IS THAT THE NEW ELECTRONIC PROGRAM IS STILL “HAVING THE BUGS WORK OUT” AND REQUIRES EXCESSIVE TIME EFFORT. FHDA WILL FILL NEXT YEAR IN THE ELECTRONIC FORMAT ONCE THE PROGRAM IS PERFECTED.
- **COMMUNICATION TO HANDLERS OF HAZARDOUS MATERIALS** IS ESSENTIAL AND REQUIRED BY REGULATIONS. AS PREVIOUSLY NOTED, FHDA HAS 92 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 FOR COMPLIANCE.
- THE COMPUTER “REFRESH” PROGRAM THAT RESULTED FROM BOND MONEY FUNDING HAS GENERATED MORE COMPUTERS AND ELECTRONIC EQUIPMENT FOR SURPLUS. THE **QUALITY OF THE E-WASTE TRACKING AND PROGRAM** HAS BEEN ENHANCED TO ADDRESS THE INFLUX OF E-WASTE THAT HAS RESULTED FROM THE PURCHASE OF NEW COMPUTERS.