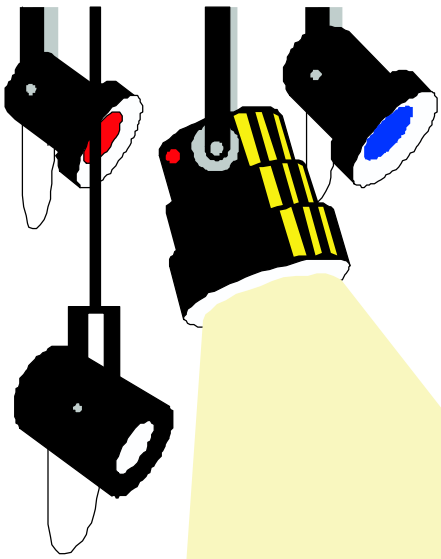

SPOTLIGHT REPORT 2001

EPA New England

Office of Environmental Stewardship

ACKNOWLEDGMENT

We want to express appreciation to the people that contributed information for this report. While the report "spotlights" several examples of how the Office of Environmental Stewardship tackles a broad range of challenges to protect the environment and public health, these examples are indicative of the creativity, innovation, and dedication in which each staff member in this office meets our environmental objectives. Each person has a critical role. Collectively, the talent in this office is the reason for the many enforcement, compliance assistance, and pollution prevention success stories.

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INTRODUCTION

Established in late 1995, EPA New England's Office of Environmental Stewardship (OES) houses EPA NE's Enforcement Office and its Assistance and Pollution Prevention (A&P2) Office. OES is comprised of a team of over 150 scientific, engineering, technical, legal, and support staff from various environmental programs including air, water, wetlands, hazardous waste, Superfund, toxics, pesticides, Native American tribes, and federal facilities.

We regulate many types of businesses and facilities, both public and private, throughout all six New England states, and those who do not properly follow environmental laws and regulations face appropriate enforcement action from OES' Enforcement Office. These enforcement actions often require the violator to correct the environmental violations and/or pay a civil penalty or cleanup costs. In cases of severe violations, the Enforcement Office may assist EPA's Criminal Investigation Division in pursuing criminal penalties against the violator, including both imprisonment and monetary fines.

We also seek to improve environmental compliance from those we regulate by encouraging and recognizing responsible environmental management. For example, the A&P2 Office provides outreach and technical assistance to the regulated community through workshops, printed materials, web sites, oral advice, and other media. The office also administers recognition programs for entities that demonstrate environmental leadership, and develops and tests innovative approaches to environmental protection.

By making it easier for the Enforcement and A&P2 Offices to work together, OES has been able to develop innovative compliance strategies and approaches that combine elements of both enforcement and assistance and are ultimately designed to achieve improved environmental performance from regulated entities. Through a combination of these "integrated" approaches and more traditional enforcement and assistance efforts, we hope that EPA New England, other federal agencies, state and local government, the business community, and the public can work effectively, efficiently and collaboratively to solve today's complex environmental challenges and improve New England's environment.

PROTECTING PEOPLE AND THE ENVIRONMENT

Protecting human health and the environment may sound like an impossible mission. But that has been EPA New England's mission for over 30 years. Whether the problem is reducing air pollution, minimizing exposure to hazardous substances, protecting waterways, or cleaning up toxic wastes, we in the Office of Environmental Stewardship, along with other regional staff, strive each day to make our communities and environment clean and healthy for all.

Strong enforcement of the law plays a crucial role in OES' work to protect people and the environment. But we also provide compliance assistance, promote pollution prevention and energy efficiency, and are developing new and innovative environmental practices. OES uses all of these strategies or develops others in order to meet the wide variety of environmental challenges facing New England. This report discusses just a few of the challenges that OES tackles every day and what our office does to address them.

Protecting The Quality of Our Waters

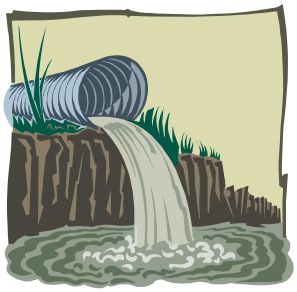
Water pollution can contaminate our food, drinking water and recreational waterways, destroy aquatic life, and threaten public health. Safeguarding our waters requires protecting not just the water we drink, but all of our water resources, and OES dedicates significant manpower and resources to address water quality problems in New England. For example, we continue to pursue legal action to require the Massachusetts Water Resources Authority to provide filtration for the drinking water supply for over two million Boston area residents. Furthermore, the Enforcement Office issued over 200 non-penalty enforcement actions against community water systems in 2000 for not providing required information to consumers about the quality of their drinking water.

We are especially concerned with controlling sources of water pollution that can arise in times of wet weather, such as **storm water** (water that runs off from large surface areas, such as agricultural or urban land); **sanitary sewer overflows (SSOs)** (overflows from sewer systems that carry sanitary sewage and storm water runoff in separate pipes); and **combined sewer overflows (CSOs)** (overflows from sewer systems that collect both sanitary sewage and storm water runoff in the same pipe). Often not treated or controlled, storm water runoff is a leading cause of pollution to nearly 40% of the U.S. bodies of water that do not meet water quality standards. SSOs are overflows from sanitary sewers that can result in the discharge of raw, untreated sewage into yards and basements, out of manholes and onto streets, playgrounds, and other public areas, and into waterways. Extreme rain or melting snow can lead to SSOs, particularly in systems that are improperly designed, undersized, or have deteriorated from lack of proper maintenance. Vandalism and accidental blockage or breakage of sewer system components can also result in SSOs. CSOs are intentional overflows from sewer systems which are designed to overflow after heavy rain or snow melts. CSOs release untreated wastewater directly into nearby streams, rivers, lakes, and coastal areas

through discharge pipes or points. New England has more than 120 communities with these types of combined sewer systems and over 1000 of these CSO discharge points, which can carry excess storm water, untreated human and industrial wastes, toxic materials, and other debris. CSOs can result in beach and shellfish bed closures and restrictions on fishing and other recreational activities, and some CSOs may even discharge raw sewage into rivers that are later used as drinking water supplies.

OES is actively engaged all over the region to reduce the impacts of pollution from these wet weather sources. For example, we are presently working with the U.S. Department of Justice to pursue enforcement cases which involve storm water violations against several New England companies. Over half of the CSO communities in New England and all but three of the largest systems (those with more than 10 CSO discharge points) currently face either state or federal enforcement actions to either eliminate CSO discharge points or to develop plans to reduce pollution from CSOs. In addition to targeting the largest CSO systems, OES and the states have also focused enforcement efforts on areas near sensitive, vulnerable, and highly valued regional waters as top priorities. Some of these areas are Casco Bay, the Merrimack River, the Charles River, the Connecticut River, Narragansett Bay, Long Island Sound, Buzzards Bay, and Lake Champlain.

In order to more effectively address the complex challenges that wet weather has on our water quality, OES has created practical, common sense approaches to controlling CSOs. Eliminating CSOs is an enormous financial challenge, costing an estimated $4 billion in New England alone, and OES is working hard with communities in New England to develop cost effective solutions that protect human health and the environment.



The Clean Water Act authorizes the states and the EPA regional offices to make water quality standards less stringent in communities where meeting the standards is prohibitively expensive or technically impossible. We are the first (and only) EPA regional office in the country to revise water quality standards for communities in order to account for wet weather conditions. These revised standards assure communities, where it is not feasible to eliminate CSOs, that after they have implemented an expensive CSO control plan, they won't be held liable for Clean Water Act violations for CSOs remaining after the plan. We have also pioneered a holistic, watershed-based approach that allows communities to decide which CSO discharges and other critical environmental needs to tackle first, so that taxpayer dollars are spent in a way that maximizes environmental returns. The result is the greatest possible environmental and health benefits at the least cost.

One example of our efforts on CSOs is our work on the Upper Blackstone River, one of several areas where EPA NE is concentrating its efforts to improve water quality. Moreover, the Blackstone River was chosen by President Clinton as an American Heritage River and its waters have direct impacts on Narragansett Bay.

Because both CSOs and storm water are pollution sources, an innovative, collaborative

effort with the City of Worcester and the Upper Blackstone Water Pollution Abatement District was created to address the most significant pollutant sources. Under a September 2000 agreement with EPA, the City of Worcester will develop a two-phased water quality improvement program in which the city will first identify ways to reduce the effect of pollution from CSOs and later devise storm water related projects. The agreement to study both CSO and storm water projects enables everyone involved to make more informed decisions about how much CSO control is appropriate in light of other water quality issues, and most effectively uses public funds to improve the quality of the Blackstone River and Narragansett Bay.

Cleaning Up Hazardous Waste Sites

Releases or potential releases of hazardous substances or wastes into the environment can pose a substantial threat to the surrounding soil, water, air, and community. The identification, investigation and cleanup of these hazardous waste sites remains a major priority of our Enforcement Office. This usually requires us to identify the owners/operators of the site or other parties responsible for the pollution, negotiate with them to perform and pay for the cleanup, and recover from them any cleanup costs spent by EPA.

Although cleaning up hazardous waste sites generally takes several years, when there is an immediate danger to human health or the environment, we can order responsible parties to promptly investigate contamination and to take whatever actions are necessary to reduce the threat of exposure to hazardous substances. For example, in April 2000, soil samples indicated the presence of dioxin and other contaminants at two low-income elderly housing complexes at the Centerdale Manor Restoration Project Superfund Site in North Providence, Rhode Island. The site had been the former home of chemical manufacturing and storage drum recycling facilities and may have also been used for the disposal and treatment of some hazardous wastes. We ordered the responsible parties to immediately install a protective soil cap over the site and implement certain flood control measures in order to prevent the exposure of humans and wildlife to dioxin and other toxic material and stop the migration of the hazardous substances to the nearby Woonasquatucket River and other sensitive ecosystems. The parties completed the work in September 2000.

In the past year, we've recovered hundreds of millions of dollars in settlement agreements with responsible parties for cleanup work and costs at hazardous waste sites all over New England. Besides cleaning up a site, we also contribute to the national effort, called the Brownfields program, to put Superfund sites back into productive use by working with various parties to redevelop previously contaminated urban properties.

In addition, we sometimes become involved in preserving a site's history whenever potentially significant archaeological artifacts are discovered while cleaning up hazardous wastes. On one such occasion, several months of intense negotiations were needed

before we were able to reach a groundbreaking agreement with the federal Advisory Council on Historic Preservation, the State of Maine and the Passamaquoddy Tribe. The settlement ensures the safe excavation and appropriate preservation of Native American artifacts found at the Eastern Surplus Company Superfund Site in Meddybemps, Maine. Under the July 2000 accord, EPA NE will minimize the loss of historic or archaeological relics through a controlled scientific excavation to recover archaeological artifacts, the interpretation of recovered material, and the generation of reports. Moreover, in order to resolve a dispute between the State of Maine and the Passamaquoddy Tribe over ownership of the artifacts, everyone agreed to keep all the artifacts excavated from the site at the Abbe Museum in Bar Harbor, Maine until their eventual transfer to a facility to be designated by the tribe.

Securing Extra Environmental Benefits

In resolving enforcement cases, we generally require violators to correct their violations and pay a monetary penalty. However, as part of a settlement, OES also often encourages violators to voluntarily take on a project that improves, protects, or reduces threats to the public health or the environment beyond the requirements of the law. In exchange, a violator who agrees to perform such a Supplemental Environmental Project (SEP) usually receives a lower penalty than one who does not. While penalties do serve a vital role in our mission by deterring violations and ensuring everyone bears the same costs for environmental protection, SEPs often help us secure significant environmental or public health protection and improvements which penalties alone may not achieve. Thus, we evaluate each of our enforcement actions to assess whether a SEP may be an appropriate component of a settlement.

For example, a SEP made up part of a settlement of a recent enforcement action against a Dalton, Massachusetts paper maker that has supplied the U.S. Treasury with paper used to print money for over 120 years. We claimed that Crane & Co., Inc. had failed to file the required toxic chemical inventory forms for several years for some of its manufacturing facilities. Under the law, companies that store certain hazardous chemicals in large quantities must report this information to local and state authorities in order to aid authorities in planning for and responding to emergency situations which may occur at the company. This information also informs the public about hazardous chemicals in their community.

In resolving this case in September 2000, Crane not only submitted the missing forms and paid a civil penalty, but also agreed to perform a SEP. Estimated to cost up to $100,000, the SEP requires Crane to replace a chlorine compound used in paper-making with a less toxic substance -- a substitution that OES expects to generate several environmental benefits, including reducing human and environmental exposure to chlorine residue, eliminating the potential threat of exposure to chlorine gas to employees and emergency crews during chemical accidents, and reducing the amount of chlorine compounds discharged into the nearby Housatonic River.

SEPs were also involved in the resolution of an enforcement action against King Industries, a Norfolk, Connecticut chemical manufacturer, for violations of federal hazardous waste requirements. King and OES reached a settlement in September 2000 where the chemical manufacturer agreed to pay a penalty and undertake a SEP costing at least $500,000. Under the agreement, King promised to build a state-of-the-art hazardous waste storage building containing four new 8,000 gallon hazardous waste storage tanks and to take its old, outdoor storage tanks out of service. The company also agreed to write and distribute technical information about the new tank system and to share this information with chemical industry members and other interested parties. As a result of this project, the Norfolk community and King's employees will enjoy a reduced threat of accidental spills of hazardous wastes from the facility.

Ensuring Long-Term Compliance

Occasionally, we encounter companies which seem to consistently experience problems in complying with environmental laws. In these cases, we may require that, as part of a settlement, violators undertake additional actions that are necessary for the companies to achieve and maintain long-term environmental compliance. One case where we used enforcement to require pollution prevention activities involved our attempts to deal with the environmental problems we encountered at facilities owned by United Technologies Corporation (UTC) of Hartford, Connecticut. UTC is a multi-national corporation whose holdings include Pratt & Whitney, Carrier Corporation, Otis Elevator Company, and Sikorsky Aircraft Corporation. In 1990, EPA NE sued UTC for numerous hazardous waste and Clean Water Act violations at several facilities in New England. Because UTC facilities had consistently shown little or no improvement in their environmental performance despite prior enforcement actions, EPA NE decided that simply fining the company would not be enough to improve UTC's environmental performance. Ultimately, to resolve the case in 1993, UTC paid a substantial fine and also agreed to take additional corrective actions, including analyzing its existing environmental management system (EMS), developing and implementing an improved EMS, and having an independent third party conduct compliance audits at UTC's New England facilities after the improved EMS had been implemented. UTC initiated its enhanced EMS in 1996, and the follow-up compliance audits were completed in 1998.

The results of this enforcement action and subsequent agreement with UTC so far have been quite impressive. Prior to 1990, UTC lacked many of the key elements for an effective EMS. By 1998, UTC had incorporated almost all of the key EMS elements. In addition, in UTC's Environment, Health & Safety Progress Report 1999, the corporation reported that, during the 90s, its U.S. operations reduced their hazardous wastes by 85 percent, reportable chemical releases by 95 percent, and lost time injury rate by 83 percent. Furthermore, in comparing eight UTC facilities in 1998 against 1990, the follow-up compliance audits revealed that in 1998, UTC had fewer total violations and less

severe violations, and fewer individual facilities had violations. A study on EMS' effect at UTC is available on our web site at: www.epa.gov/region01/steward/strack/ems.html.

Punishing Criminal Behavior

Criminal enforcement is reserved for the most serious environmental violations, such as those involving intentional disregard for the law, fraudulent behavior, or actual or potential risk of significant harm to people or the environment. In order to adequately punish and deter such crimes, criminal sanctions are potentially severe: heavy fines and incarceration in federal prison.

Unlike civil enforcement, criminal investigations are handled by EPA's Criminal Investigation Division (CID). We provide CID and the Department of Justice with the legal and technical support necessary to prosecute these complex cases. Over the past several years, this partnership has produced some of the most important cases in the country.

For example, EPA and the Department of Justice recently prosecuted a case involving the illegal removal and dumping of large quantities of asbestos from the old YMCA building in New Haven, Connecticut. The New Haven YMCA had been originally built in 1902, but had fallen into great disrepair by the 1990s. Since it was situated in a prime downtown location and close to Yale University, the building still had great financial value. A wealthy and highly experienced real estate developer from New York, Melvin Weintraub, and two of his companies purchased the building in 1997 in order to build luxury apartments.

As with most old buildings, the old YMCA was loaded with asbestos, and Mr. Weintraub knew it. The City of New Haven repeatedly told Mr. Weintraub about the asbestos and insisted that he have it removed properly. In spite of these warnings, Mr. Weintraub, his construction manager and his demolition contractor hired illegal aliens from Mexico, who were desperate for work, to remove the asbestos from boilers, pipes and flooring. The laborers worked without proper safety equipment, and removed the asbestos dry with crow bars and their hands. The asbestos was subsequently put in flimsy garbage bags that Mr. Weintraub had arranged to be hauled and dumped off-site. The bags were later found in various poor neighborhoods throughout New Haven. Mr. Weintraub and his co-conspirators later submitted falsified reports regarding the asbestos to his bank, the city, and the state environmental agency.

In October 1999, a federal jury convicted Mr. Weintraub and his two companies of conspiracy and criminal violations of the Clean Air Act. In May 2000, a federal judge sentenced Mr. Weintraub to a year and a day in prison and also fined him $250,000; Mr. Weintraub's companies were fined $300,000 each. In all, a total of nine defendants were convicted in the case.

PROMOTING ENVIRONMENTAL LEADERSHIP

Enforcing our environmental laws and regulations is an important part or our job. But besides strong enforcement of the law, other methods of motivating positive environmental behavior, including encouraging the regulated community to become environmental leaders, can also be effective. That is why we devote energy towards developing new and creative approaches for protecting the environment without compromising it. Our A&P2 Office fosters innovative strategies for achieving improved environmental protection, while at the same time providing assistance to the regulated community on complying with environmental laws and regulations.

Project XL

EPA's regulatory reinvention effort, known as "Project XL" (e**X**cellence in **L**eadership), was developed and supported by EPA to provide a means of conducting limited and controlled tests to explore alternative regulatory strategies. At the most basic level, Project XL provides regulatory flexibility to project sponsors (company, state, tribe or municipality) in return for a commitment that the project will offer "superior environmental benefit," better than what could have been obtained by compliance with existing regulations or policies. Since 1995, 50 projects have been negotiated nationwide, eight of them in New England. Now that the model for regulatory flexibility has been tested and developed, EPA New England can efficiently use regulatory flexibility to support priority environmental problems throughout the region.

In one project, at International Paper's (IP) pulp and paper mill in Jay, Maine, IP will develop, test and implement a computer model that can estimate air pollutant emissions from its facility on a continuous basis. Currently, some of the pollutants are only required to be measured once per year. This computer model will provide the public with constant, up-to-date information on IP's air emissions and allow the facility to maximize the efficiency of its operations and improve its environmental performance. If the project is successful, in return for developing the model and providing the public with a high level of information, IP will receive flexibility from some state and federal air regulations.

A second project involves Lead Safe Boston, an agency of the City of Boston, which requested an EPA policy change regarding architectural debris from lead remediation projects. The proposed policy change would increase the number of homes for which it could provide lead remediation, and greatly reduce the risk of lead poisoning for children living in those homes. Previously, all architectural debris from lead remediation projects was regulated as hazardous waste, making the disposal of that material quite costly. EPA reviewed the facts and agreed to issue a policy memo allowing carefully managed lead remediation projects to dispose of lead contaminated architectural debris from residential units less expensively as non-hazardous waste, much in the same way that ordinary household waste is currently disposed. Although it began with Boston, this policy will apply to lead remediation projects across the country.

Performance Track

Building upon the success of EPA NE's similar StarTrack program and other government re-invention efforts, EPA launched the National Environmental Performance Track program in June 2000. This two-tier program is designed to recognize and encourage top environmental performers. (With the advent of Performance Track, EPA NE's StarTrack program has been retired.) The first tier, Achievement Track, recognizes facilities that consistently meet their legal environmental requirements and have implemented high quality environmental management systems (EMSs) and encourages them to continue improving their environmental performance. An EMS enables an organization to identify and systematically manage its environmental responsibilities. EMSs include operating policies and procedures, such as training and preventive maintenance programs, as well as audits of both environmental compliance and the management system itself. As of December 2000, 225 facilities were accepted as charter Achievement Track members. Over 30 of these charter members are New England facilities.

The second tier, Stewardship Track, is still under development. It is being designed to recognize and encourage broader and higher levels of voluntary environmental performance than those expected under Achievement Track. Stewardship Track will be launched in the summer of 2001.

Benefits to all National Environmental Performance Track participants include national recognition, flexibility on meeting certain environmental regulations, a reduction in both recordkeeping and reporting requirements, access to state-of-the-art information on environmental practices, streamlined EPA administrative procedures, and a more cooperative relationship with EPA.

COMBINING ENFORCEMENT WITH ASSISTANCE

Enforcement and compliance assistance/pollution prevention operations are often separate and independent functions within a regulatory agency such as EPA, and indeed, a great deal of OES' work continues along these distinct lines. Nevertheless, OES was established in part to look for more opportunities where a mixing or integration of enforcement with compliance assistance/pollution prevention would produce better environmental results than either function would accomplish on its own. These "integrated strategies" have proven quite constructive in several instances, and OES remains committed to identifying situations where using the expertise of both the Enforcement and the A&P2 Offices may be a more effective and efficient means in addressing environmental problems.

Colleges and Universities

Our initiative on colleges and universities uses an integrated strategy in order to improve environmental performance. Activities at colleges and universities (C/Us) are varied and complicated, much like those in a small city. These activities generate significant amounts of solid and hazardous waste, and are regulated by a plethora of environmental regulations. The attitudes of these institutions towards environmental compliance influence hundreds of thousands of their students and the communities in which they reside. In March 1999, EPA New England decided to focus enforcement efforts on this sector. The region's subsequent inspections detected numerous environmental and compliance problems at some schools, some of which generated serious health, safety and environmental concerns. These inspections ultimately led to significant enforcement actions.

For example, in November 2000, we proposed up to $500,000 in fines for Brown University for violations of federal hazardous waste and oil pollution prevention laws. In January 2000, the University of New Hampshire agreed to pay a $49,000 fine and perform environmental improvement projects worth around $180,000 for violating federal and state hazardous waste management laws. We settled the largest enforcement action ever taken against an university in 1997 when Boston University agreed to pay a $253,000 penalty, invest $500,000 on environmental projects, and conduct a comprehensive environmental compliance audit. In addition, Yale University paid $69,570 in fines and agreed to spend $279,000 in environmental programs in 1995 for mishandling and mislabeling hazardous chemicals.

The region's early enforcement activities triggered efforts by the C/U community to address compliance. However, as our inspections continued, we found that environmental performance remained inconsistent. Clearly, EPA's enforcement effort alone could not yield consistent compliance throughout the sector. In addition, our heightened enforcement presence generated requests for assistance to help C/Us understand environmental requirements and comply with them.

In response to what we learned, we developed a three-phased strategy integrating our ongoing enforcement activities with an assistance program to: (1) provide basic compliance information to C/Us while continuing enforcement in this sector; (2) develop specific tools that will help ensure their compliance with environmental laws; and (3) promote environmentally sustainable practices on college campuses. Our goal is to help all New England colleges and universities understand that environmental performance must be a priority. In the first phase of the strategy, EPA New England will continue its enforcement activities in this sector, with the added participation of several state agencies. At the same time, we have begun to provide C/Us with basic regulatory information through access to our newly-created web site and through compliance workshops.

The region has now conducted compliance evaluation inspections at more than a dozen institutions. In the year 2000, we continued our assistance activities by sponsoring workshops on environmental regulatory requirements at Worcester State College and the

University of New Hampshire, and by co-sponsoring a workshop on environmental management systems at Boston University. At least 300 individuals attended these workshops.

In addition, we continue to add material to our college and university web page which can be found at: www.epa.gov/region01/steward/univ. The web page allows us to efficiently distribute the latest information on best management practices, including access to audit checklists and protocols, environmental management systems, and information on sustainability/"green" campus practices.

Once basic compliance information is available to all C/Us, we plan to enter the second phase of our strategy. We are planning to develop specific tools to help ensure compliance with environmental laws, including tools to enable C/Us to perform environmental audits of their facilities, and provide incentives to encourage them to perform such audits periodically. In particular, EPA will work with C/Us and others to develop an environmental management system guide tailored to their sector. Once created, this EMS guide will be made available to C/Us which will help us realize our goal of fostering continuous improvement in their performance.

As a third phase of our strategy, the region plans to develop and promote environmentally sustainable practices and programs on college campuses. To do this, EPA New England will encourage other organizations -- including C/Us, not-for-profit institutions and trade groups -- to promote green building design, energy conservation, and other pollution reduction measures

Chemical Industry Audit Project

By its very nature, the chemical industry is a major source of pollution as it buys, stores, uses, and produces huge quantities of toxic substances each year. With about 180 chemical firms in New England, OES realized that environmental compliance in this industry sector was especially crucial to protecting the region's people and environment and using an integrated enforcement and assistance strategy might be an effective way to improve compliance. Through a partnership with state authorities, industry members, and trade association representatives, OES started its Chemical Industry Audit Project in November 1997. Focused on Connecticut, Massachusetts, and Rhode Island, the three-year project was designed to encourage firms to conduct environmental compliance audits and improve their operations, improve regulatory compliance of firms in the sector, encourage firms to self-disclose violations, and build relationships between EPA and the industry and states.

After meeting with representatives from the states and the chemical industry to design the project, we provided several months of compliance assistance (beginning in February 1998) to chemical companies, including workshops and written material, before the start of enforcement inspections. We also encouraged firms to conduct environmental compliance audits and to voluntarily disclose to us any violations that were discovered since, under EPA policy, businesses that discover and self-disclose violations may be

eligible for substantial penalty reductions. In October 1998, OES and the states began conducting enforcement inspections of the chemical industry, and following the inspections, appropriate enforcement actions were taken against several companies. In the final stage of the project, we distributed a confidential survey to all the firms in the sector as part of our evaluation process.

The project appears to have worked out well. Involving the states, trade associations, and individual companies in the project planning enabled us to gain cooperation and support for the initiative, identify what regulations were the least understood by the industry and should be the focus of our compliance assistance workshops and mailings, and identify and address concerns about self-disclosing violations. Furthermore, awareness of EPA's self-disclosure policies seemed to increase after the project as eight companies self-disclosed violations to OES when, prior to the project, very few companies from this sector had done so. Our assistance workshops were also both well received and attended by industry members based on post-workshop feedback. In addition, the confidential survey results indicated that the project encouraged firms to improve their environmental compliance, such as conducting audits or changing management procedures. Finally, our preliminary enforcement data indicates that our inspections discovered less significant violations after the project began.

CONCLUSION

Protecting human health and the environment is the constant focus of our work in OES, as it is in the rest of our regional EPA office and EPA offices nationwide. And, although we have made great progress in cleaning up the environment in the 31 years of EPA's existence, there is still much more to do. EPA alone cannot address all our environmental challenges; solving them requires the cooperation and support of everyone in New England -- businesses, state and local governments, and individual citizens. Thus, whether it's enforcing the law, providing assistance, or promoting environmental leadership, OES will continue to do whatever it takes to protect human health and the environment. A healthier and cleaner environment for everyone in New England remains our goal.