

# **“Twenty Questions for College and University Presidents”**

***Developed by EPA Mid-Atlantic Region***

Is your college or university in compliance? If your key environmental expert left suddenly, would your campus be safe tomorrow? Would you be ready for an inspection?

At the request of a number of leaders in the higher education field, EPA Mid-Atlantic Region has developed the following list of questions to help you to determine if your college or university is meeting its legal and leadership obligations in the environmental realm. As part of the regulated community, it is important that colleges and universities are aware that EPA holds educational institutions to the same high environmental compliance standards expected of private industry.

Many of the following questions relate to an Environmental Management System (EMS). An EMS includes such elements as policies, procedures, tracking and auditing. This framework helps to provide a systematic approach to managing environmental compliance and improving environmental programs. While having a good system doesn't guarantee compliance, if your environmental expert suddenly leaves, it greatly increases the chances that your college or university will not falter in meeting its environmental obligations. It does this by integrating environmental compliance activities into routine campus operations. For EMS guidance information: [www.epa.gov/region1/assistance/univ/emsguide.html](http://www.epa.gov/region1/assistance/univ/emsguide.html)

Some questions to consider:

1. Does the school have a written policy on protecting public health and the environment through compliance with applicable requirements and conservation programs?
2. How are policy and other environmental information communicated on a regular basis to others, including campus administration, facility management, faculty, students and their parents, alumni, and the neighboring community?
3. Is there an Environmental Management System (EMS) in place to help the school maintain compliance and operate in an environmentally responsible manner through policies, training, tracking, procedures and organizational structures that support compliance?
4. Does the EMS track campus operations which are covered by environmental regulations, including state and Federal regulations?
5. Is the EMS updated on a regular basis to cover new, expanded or changed operations?
6. Who is responsible for ensuring that each operation is in compliance and has all the required approvals, licenses and permits?

7. Do all persons responsible for and working on environmental matters have adequate training, required certifications, resources, and authority to perform their jobs?
8. Does the school's website link to EPA and other websites that provide access to on-line regulations, guidance, and other environmental information?
9. Do contracts require that all outside lessees, facility users, and contractors are properly trained and certified and comply with all applicable environmental regulations?
10. Where are documents kept such as required permits, plans, chemical toxicity sheets and monitoring reports which can help prevent illegal releases, address problems in a timely fashion, provide quick access on proper handling and disposal, as well as respond to questions during inspections?
11. Are campus legal advisors familiar with EPA's Supplemental Environmental Projects Policy, which promotes the use of environmental projects in lieu of a portion of penalties?
12. Are campus legal advisors familiar with EPA's Audit Policy, which can waive up to all penalties for self-disclosed violations that meet the Policy guidelines?
13. If the school conducts compliance self-audits, is there a system in place to:
  - (a) Ensure prompt correction of violations;
  - (b) Prevent future problems;
  - (c) Elevate compliance problems immediately to campus officials?
14. What has been done to identify and correct environmental problems on land formerly used as disposal sites by the college or university?
15. Is there a program in place to review energy consumption, use of chemicals, and operating systems to determine how public health and environmental impact can be reduced while operating effectively and reducing operating costs and potential financial liability?
16. Is the campus participating in voluntary programs such as Energy Star or Waste Wise and receiving national environmental recognition?
17. Is the school a good neighbor in helping to address area environmental issues such as smog producing traffic, water conservation, and sprawl?
18. Have environmental goals been set for reducing the impact of the campus on the environment?
19. Does the college or university have a system for rewarding campus employees for environmental compliance and excellence?
20. Is the school a good role model for providing an education in a safe, healthy environment?

