

# ENVIRONMENTAL RISK ACTION PLAN FOR HIGHER ED CAMPUSES

A PROACTIVE APPROACH TO MANAGING COMPLIANT UNIVERSITY AND COLLEGES CAMPUSES

## 5 MOST COMMON ENVIRONMENTAL RISKS ON TODAY'S CAMPUSES

1. Neglected fuel storage tanks
2. Asbestos in outdated building materials
3. Unmanaged air pollution emissions
4. Aging power generating and water treatment facilities
5. Unnecessary and improper chemical and hazardous waste management

**“** Higher education institutions are under more scrutiny than other industries because of the populations they serve. Students are passionate activists for environmental and sustainability issues and hold their institutions to higher standards. **”**

— LARA MALATESTA, DIRECTOR OF ENVIRONMENTAL RISK AND COMPLIANCE FOR ARAMARK

## 3 LEADING RISKS OF POOR ENVIRONMENTAL MANAGEMENT

Colleges and universities face three clear and present threats from environmental incidents — **a risk to brand reputation, remediation costs and regulatory penalties.**

### 1. BRAND REPUTATION

When the public learns an educational institution has put the community and students in harm's way, the fallout can result in:

- Negative public image
- Lack of community support
- Impaired recruitment efforts
- Reduced donations

### 2. REMEDIATION COSTS

The costs of cleaning up an environmental spill or release can total millions of dollars depending on the extent of harm caused.

For example, aging underground storage tank (UST) systems associated with a building's heating system, if left unmanaged, are likely to release fuel into the surrounding environment over time. Identifying and replacing high-risk fuel USTs with above-ground, compressed gas solutions not only protects the environment and helps to avoid penalties, but it also provides a long-term, energy-efficient and cost-effective alternative.

### The Most Common Violation on Today's Campuses

Violations of the Resource Conservation and Recovery Act (RCRA) can reach up to

# \$99,681

per violation, per day, based on the potential for harm and the extent of deviation from the legal requirement.

### 3. REGULATORY PENALTIES

Colleges and universities must comply with a long list of environmental regulations from multiple federal, state and local agencies. A single higher education institution could be subject to hundreds of compliance requirements.

#### Leading Environmental Laws

The Environmental Protection Agency (EPA) is the leading federal regulatory body that protects air, water and land. Congress provides the EPA with the authority to establish national regulations through laws, such as:

- Clean Air Act (CAA)
- Clean Water Act (CWA)
- Resource Conservation and Recovery Act (RCRA)

#### Leading Enforcement Actions

The EPA and state agencies enforce environmental regulations through routine campus inspections and have the authority to issue enforcement actions against institutions for noncompliance, such as:

- Administrative penalties
- Administrative orders requiring abatement
- Civil actions with injunctive relief
- Civil penalties per violation, per day of violation
- Criminal sanctions against organizations and individuals

## 3-STEP ENVIRONMENTAL RISK MANAGEMENT ACTION PLAN AND SKILL SETS

To keep students safe, protect our communities and ensure compliance with all regulations, today's higher education institutions need a centralized, continuously operating environmental risk management and compliance program that includes these three steps:

#### STEP 1

### IDENTIFY ALL ENVIRONMENTAL RISKS ON CAMPUS

Skill sets required for this step include:

- **Higher Ed Experience** — possesses a strong background in the higher education environment and activities that pose the greatest risks to the institution
- **Environmental Risk Expertise** — comprehends the full scope of environmental risk management based on the unique locale and operations of the institution
- **Regulatory Expertise** — understands compliance and possesses the skills, systems and tools to support compliance

#### STEP 2

### REMEDIATION OF ALL ENVIRONMENTAL RISKS ON CAMPUS

Capabilities required for this step include:

- **Resource Network** — draws on either an internal or external network of experts in environmental risk management with experience in higher education and beyond
- **Advanced Resources** — offers access to sophisticated capabilities, such as an engineering and assets resource team to provide long-term, cost-effective solutions to challenges within the higher education space

#### STEP 3

### CREATE A LONG-TERM IMPROVEMENT AND PREVENTATIVE STRATEGY

Aptitude required for this step:

- **Holistic Operational Approach** — maintains a campus-wide operational improvement, efficiency and cost reduction methodology
- **Continuous Improvement Philosophy** — practices a continuous improvement approach aligned with internationally recognized standards
- **Fiscally Responsible** — demonstrates a history of helping campuses cost-effectively execute the highest-quality risk management programs
- **Risk Prevention Culture Advocate** — supports a culture that prevents compliance failures and proactively identifies and addresses concerns

## ARAMARK: YOUR ENVIRONMENTAL RISK MANAGEMENT PARTNER

Many college and university administrators are not aware that environmental risk management is an embedded specialty of today's leading facilities service providers. When looking for a facilities partner to manage your environmental risk, look for a provider with all of the qualifications listed above. Also, choose a service provider with a true partnership approach — one that understands the “shared liability” inherent in an environmental risk partnership.

**To ensure student safety and regulatory compliance, learn more about managing environmental risk in higher education with this free guide.**

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