

Sacred Heart University

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University's Self-Audit Disclosure Results



Overview of Campus



- First institution of Catholic higher education founded (1963) to be led and staffed by the laity.
- ➤ 69-acre main campus located in Fairfield, CT; other facilities in Bridgeport and Trumbull.
- Over 6,400 students, including international campuses in Ireland and Luxembourg.



Overview of Audit Process

- University applied for bonding through the Connecticut Hospital & Education Finance Authority (CHEFA).
- CHEFA required that a full compliance audit be conducted.
- University's compliance counsel Robinson & Cole and environmental consultant Fuss & O'Neill were retained.
- ➤ Upon completion of the audit, Fuss & O'Neill identified opportunities for corrective action and along with Robinson & Cole recommended that a self-disclosure notification be filed with the Department of Energy & Environmental Protection (DEEP).
- Executive Director for Public Safety & Campus Operations, Paul J. Healy was tasked with coordinating corrective action efforts on behalf of the University.



☐ UST Compliance

Advantages of Self-Policing

Issues identified in the Phase One environmental compliance audit included:
Air Permitting (GPLPE Registration)
Hazardous Waste (Generator Status)
Biomedical Waste Management Plan
Spill Prevention

- ➤ University contracted with Fuss & O'Neill to assist in performing corrective actions outlined in the self-disclosure notification.
- ➤ By utilizing the self-disclosure option, the University was able to establish reasonable timeframes for corrective actions to be taken and provide DEEP with a schedule for completion.



Advantages of Self-Policing

- ➤ University's due diligence and research raised questions regarding the large quantity generator (LQG) classification.
 - ☐ Historically has operated as conditionally exempt small quantity (CESQG)
 - ☐ Episodic status (?)
- University contacted DEEP representatives for clarification.
- Review by DEEP confirmed that a manifest error was made and that the University was actually a small quantity generator (SQG) based on the records presented.
- > SHU submitted a request for change of status to DEEP and received acknowledgement.



Outcomes of Self-Disclosure

- University staff gained knowledge of DEEP compliance processes.
- > SHU interfaced and had positive experiences with DEEP officials and our consultants.
- University created a Microsoft SharePoint site to document and track all compliance matters going forward.
 - > Online system creates transparency and builds confidence across the University enterprise.
- > The only remaining self-disclosure item to be addressed is closure of a former UST gasoline tank.
 - Sampling to be performed to demonstrate complete tank closure and attainment of applicable criteria under DEEP's RSRs.



SHU Compliance SharePoint Site

Modified By



Compliance



Biomedical Waste

CHEFA

Type

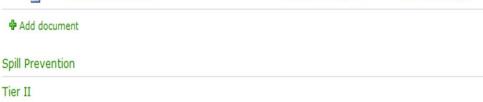
USTs

Hazardous Waste

Name

. / P G	1101110	1100.1100	
	Generating Departments	1/31/2012 12:11 PM	Barrett, Jeffrey
	Hazardous Waste Contract	1/31/2012 9:59 AM	Barrett, Jeffrey
	Hazardous Waste Disposal Services RFP	1/27/2012 4:00 PM	Barrett, Jeffrey
	RCRA Subtitle C Site Identification	1/27/2012 2:29 PM	Barrett, Jeffrey
	Training	1/27/2012 2:20 PM	Barrett, Jeffrey
	Waste Determinations	1/27/2012 11:10 AM	Barrett, Jeffrey
W	Contingency Plan	1/27/2012 2:11 PM	Barrett, Jeffrey
W	Inspection Schedule	1/27/2012 2:06 PM	Barrett, Jeffrey

Modified



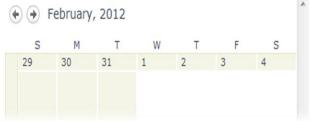








Calendar





Summary

- ➤ Self-Disclosure gave SHU flexibility and ownership of scheduling for and completion of corrective actions versus direct mandates from regulating authorities.
- > SHU officials garnered a better understanding of compliance requirements through collaboration as it relates to hazardous waste and UST notification and built positive relationships with DEEP representatives.
- > SHU continues to improve its environmental footprint with external consultants and plans to file a request for change of status to return to CESQG in the near future with DEEP.