Environmental Protection Plans on Construction Sites

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Recognizing Environmental Issues

- Environmental Liabilities are becoming a significant financial burden to owners and construction companies.
- Depending upon the regulation a violation can result in a civil penalty of up to $27,500 and criminal penalties up to $250,000 and 15 years in prison.
Federal Construction Projects

- Most federal projects require the development of an environmental protection plan (EPP).
- An EPP is designed to reduce the impact of the construction process on the environment.

Environmental Protection Plan Overview

- Components of an EPP can include protection of natural resources, protection of historical/archeological resources, stormwater management and control, prevention of releases into the environment, unforeseen hazardous materials and wastes, and waste management/recycling of site-generated wastes.
Managing Environmental Regulations & Best Practices

- Reducing Environmental impact of the construction process begins with managing environmental responsibilities.

Materials Management and Waste Minimization

- Many materials can be salvaged for reuse or collected for recycling.
- These services can actually save money for the contractor or owner due to lower transportation costs and dumping fees.
- Often these construction/demolition materials are worth cash!
Preventing Environmental Damage from Construction

- Protecting the site from undue damage to soil, vegetation, and air quality.
- Preventing stormwater contamination during excavation and construction is another part of a responsible environmental protection plan.
- Toxic releases and exposures such as asbestos, lead & PCB’s must be minimized or eliminated.

Worker and Public Protection from Hazards

- Finally, the EPP must ensure that construction workers, building occupants, and the general public from construction related health hazards during renovations, demolitions, and first occupancy after completion.
EPP Components

- General overview and purpose of the plan.
- Protection of natural resources
- Protection of historical and/or archeological resources
- Stormwater management and control
- Prevention of releases to the environment

EPP Components (cont.)

- Prevention of releases into the environment
- Protection of the environment from waste derived from contractor operations
- Review of known environmental conditions reference documents
- Identifying unknown or unforeseen environmental conditions
- Hazardous material inventory
Who is Responsible?

- Environmental managers
- Safety personnel
- Foreman
- Who ever misses the meeting where responsibilities are delegated
- The plan is all we need

Responsible for what?

- The EPP requires the contractor to appoint an environmental manager for the project.
- This manager has direct responsibilities for coordinating compliance with federal, state, local, and client environmental requirements
Responsibilities

Include:

- Ensuring compliance with hazardous waste program requirements (including hazardous waste handling, storage, manifesting and disposal)
- Implementation of the EPP
- Ensuring all environmental permits are obtained, maintained, and closed out

Responsibilities

Continued

- Ensuring compliance with stormwater program management requirements
- Ensuring compliance with hazmat (storage, handling, and reporting)
- Coordinating remediation of regulated substances (asbestos, lead, PCB’s, UST’s)
Additional Duties

- Ensuring waste segregation and storage compatibility requirements are met
- Inspecting waste accumulation areas
- Ensuring that only authorized personnel add wastes to container
- Ensuring that employees are trained
- Waste removal coordination
- Maintaining environmental records

Impact on Site Safety Plan

- Many issues in a site safety plan overlap into an environmental protection plan
- Many issues in an environmental protection plan overlap into a site safety plan
- Who is responsible for identifying and addressing these overlaps?
**Site Safety Plans**

- Job Hazard Analysis or Activity Hazard Analysis is performed to identify known or potential hazards at a construction site.
- Identify training, PPE, monitoring, and other safety needs.

**Overlap Issues**

- Asbestos example
  - Inspections
  - Communication issues
  - Everyone is responsible
  - Blocking means of egress
  - Locking out ventilation
  - Locking out power
Where to get assistance

- Construction Industry Compliance Assistance Center (CICA)
- www.cicacenter.org
- Plain language explanations of environmental rules for the construction industry, as well as links to detailed information, including state regulations and other resources.