



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.**



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**
 - UST Compliance**

- **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

- Lists
- Fuel Analyses
- Tank Index
- Libraries
- Air Permitting
- Biomedical Waste
- CHEFA**
- Hazardous Waste
- Spill Prevention
- Tier II
- USTs
- Recycle Bin
- All Site Content

Compliance

Air Permitting

Biomedical Waste

CHEFA

Hazardous Waste

Type	Name	Modified	Modified By
Folder	Generating Departments	1/31/2012 12:11 PM	Barrett, Jeffrey
Folder	Hazardous Waste Contract	1/31/2012 9:59 AM	Barrett, Jeffrey
Folder	Hazardous Waste Disposal Services RFP	1/27/2012 4:00 PM	Barrett, Jeffrey
Folder	RCRA Subtitle C Site Identification	1/27/2012 2:29 PM	Barrett, Jeffrey
Folder	Training	1/27/2012 2:20 PM	Barrett, Jeffrey
Folder	Waste Determinations	1/27/2012 11:10 AM	Barrett, Jeffrey
Document	Contingency Plan	1/27/2012 2:11 PM	Barrett, Jeffrey
Document	Inspection Schedule	1/27/2012 2:06 PM	Barrett, Jeffrey

+ Add document

Spill Prevention

Tier II

USTs



Calendar

February, 2012

S	M	T	W	T	F	S
29	30	31	1	2	3	4



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.**