

# C2E2 2010 Projects Summary



## 2010 Highlights

2010 was a year in which we focused on a number of emerging and important regulatory compliance issues. New federal GHG reporting rules. PCBs in caulk and other building materials. New proposed air standards for boilers. An uptick in inspections and enforcement activity. While these issues fall clearly in the "domain" of the campus EH&S office, the consequences of these regulatory

issues affect green building plans and budgets, energy conservation initiatives, and evolving roles/responsibilities of EH&S, facilities and sustainability professionals. These regulatory issues also potentially affect the expenditure of money and the allocation of human capital that might otherwise be spent on improvements and programs that materially minimize the environmental impacts of university operations and

activities. We will continue to work on these emerging issues in the years ahead and proactively respond to members' interests, concerns and priorities. No rest for the weary.

Thomas Balf, Director, C2E2

### REGULATORY INNOVATION

- ▶ A C2E2 workgroup drafted and submitted comments to the U.S. Environmental Protection Agency concerning proposed National Emissions Standards for Area Sources of Industrial, Commercial and Institutional (ICI) Boilers, as published in the Federal Register on June 4, 2010 (75 FR 318960). Comments focused on (1) technical issues; (2) resource or cost burdens; (3) the process of developing the MACT Floor; (4) consistency/integration with other federal air programs and regulations; and the (5) potential for unintended consequences. Based on the significant volume of comments, the Agency has asked the courts for additional time to re-propose the standards.
- ▶ Our "PCBs in Caulk" workgroup served as the foundation/starting point for the creation of a NACUBO/CSHEMA/C2E2 workgroup that drafted and submitted comments to the EPA in response to the Advanced Notice of Proposed Rulemaking that would cover the potential modification of PCB in use regulations. The workgroup continues to track developments and share best practices and experiences.
- ▶ The C2E2 continues to promote the advantages of the "Academic Lab Rule" and support the adoption by states.

"C2E2's mission is to support the continuous improvement of **environmental management in higher education** through promotion of professional networking, information exchange, resources and tools, and the development of innovative regulatory models."

### ENVIRONMENTAL MANAGEMENT SYSTEMS AND PERFORMANCE

- ▶ We issued the 2010 Benchmark Survey of Environmental Management System (EMS) practices on campus. EMS implementation experience has been mixed, but it is clear that the use of EMS has significantly increased since our initial report in 2006. Major findings included: (1) the overwhelming EMS priority continues to be compliance with applicable environmental regulations, such as hazardous waste requirements. (2) More than half of the 151 respondents have a complete EMS in place (17%) or a partial EMS in place for selected campuses or selected environmental impacts (35%). The real growth in campus EMS is the development of partial or selective program EMS deployment. (3) Accountability and management review — based on the establishment of formal objectives and targets — was seen as the single most important factor leading to positive changes. The C2E2 report/white paper and PowerPoint were widely distributed.
- ▶ As one of twelve Founding Partners of STARS, the Sustainability Tracking, Assessment and Reporting System, C2E2 is proud that nearly half of our members were early adopters of STARS, which is a transparent, self-reporting framework for colleges and universities to gauge relative progress toward sustainability. C2E2 continues to be active within the STARS initiative.
- ▶ We continued to update and host the colleges/universities sector EMS website at [www.campusEMS.org](http://www.campusEMS.org)





# C2E2 2010 Projects Summary, continued

## PROGRAMS, PRODUCTS AND WORKSHOPS

- ▶ C2E2 initiated and coordinated — and EPA and other Higher Education associations sponsored — a successful webinar on February 17th on the subject of Federal Mandatory Greenhouse Gas Reporting. More than 100 colleges and



universities listened in to the session. The GHG rule guidance was tailored to colleges and universities.

Gordon Reynolds described Harvard's strategy and methodology for complying with this reporting rule. The slide presentations are available on the C2E2 website.

- ▶ Ralph Stuart and Tom Balf facilitated a half-day panel at the 2010 Northeast Campus Sustainability Consortium at McGill University that reviewed four campus environmental/sustainability management approaches. The different methods included: Behavior change programs based on social science and group goal setting; Paradigm changing approaches such as ecological economics; Environmental Management Systems such as STARS; and Financial tools such as budgetary incentives and regulation.
- ▶ We issued a report on the impact of the recession on EH&S resources and program priorities.
- ▶ C2E2 conducted a national survey on Managing PCBs on campus and shared the findings with C2E2 members and select respondents. The results were also incorporated into NACUBO's comment letter to EPA on proposed revisions to the PCB rules. The C2E2 also maintains a library of documents associated with science, risk and best practices regarding PCBs in building materials.
- ▶ Issued a package of information on Campus Enforcement Trends which included a review of EPA's Enforcement and Compliance Database; the results of a Survey on Campus Environmental Inspection trends over the past three years, and relevant resources from member institutions.
- ▶ Worked with other campus associations to develop the program agenda and conference for the fifth annual "Smart and Sustainable Campus" conference at the University of Maryland in April 2009.

## OUTREACH

- ▶ C2E2 played an important role in generating information in the form of survey findings and reports that were used by our strategic higher education partners, including NACUBO, APPA, CSHEMA and Director's Roundtable
- ▶ Continued to make available "cross-over" materials on our listserv that have relevance to EH&S professionals as well as campus facility and sustainability professionals.
- ▶ The C2E2 played a prominent role in providing support and documents to the [www.campuserc.org](http://www.campuserc.org) web site, which is the higher education sector website, sponsored by the U.S. EPA, and supported by NACUBO, APPA, C2E2 and CSHEMA.
- ▶ The C2E2 website continues to be actively used. The site averages more than 500 visitors and 2300 hits per day and includes visitors from around the world.

## MEMBERSHIP ACTIVITY

- ▶ Current membership of 27 colleges and universities
- ▶ Hosted three membership meetings on key topical subjects including PCBs in Caulk, Enforcement Trends and the use of multi-media materials and video to communicate EH&S and sustainability messages.
- ▶ Managed workgroups with respect to PCBs in Caulk, Emergency Engine Regulations in Massachusetts and STARS
- ▶ Re-elected Zehra Schneider Graham (UMass Boston) as President and Steve Brehio as Treasurer; Gail Hall was elected as Clerk

### Is Enforcement Increasing?

