

Compliance Assistance Pilot Project



CEHA
COUNTY
AGENCIES

COMPLIANCE
ASSISTANCE
PILOT
PROJECT
CHEMICAL
MANAGEMENT
IN PUBLIC
SCHOOLS



In 2007, the following CEHA counties, with grant funds made available by NJDEP's County Environmental Health Act program, are participating in an ongoing pilot project to conduct compliance assistance visits at 10 to 20 schools within their county: Bergen, Burlington, Camden, Cumberland, Essex, Gloucester, Hudson, Hunterdon, Mercer, Middlesex, Monmouth, Sussex, Union and Warren.

The purpose of this project is to address chemical management practices and pesticides use throughout public school laboratories and buildings. The counties conduct cost-free site visits, and educate the school districts on applicable regulations and best management practices about chemical safety, inventory reduction, and the proper disposal of waste materials. One of the priority areas of the project is raising awareness of the necessary reduction of school chemical inventory and waste stream, by introducing a cost benefit analysis of ordering only those chemical supplies needed on an annual basis, rather than stockpiling large amounts of chemicals onsite.

The project is derived from the NJDEP's Greenstart compliance assistance program for small businesses and municipalities, which proactively assists those sectors that lack funding and/or on-site environmental expertise. This type of free consultation has proven to be successful with the school districts because it relies on achieving compliance by joint problem solving between the school and the county, with an enforcement response policy that waives penalties for up to 180 days, allowing schools time to address problems. After the initial site visit, the county develops an action plan for the school to follow to address problems and then the county monitors the progress of the schools by conducting periodic follow-up visits to determine if they are complying with the plans, and to provide additional assistance as needed.

This type of project exemplifies the partnership between NJDEP and county health departments, that participate in the County Environmental Health Act program. It also reiterates the commitment of the counties serving as the vital link they are to their community, protecting the environment and public health - in this case, a vulnerable school population. The counties have stated that their personnel involved in these inspections express a feeling of accomplishment in doing a service that is much needed and appreciated by the schools involved.

To date, the project has revealed a number of chemical management problems at the schools, including overstocking of chemicals, improper labeling and not storing chemicals according to compatibility.

Listed below are the top 10 most frequently encountered compliance issues found in the School Laboratory Chemical Management Project, along with photos of school chemical storage problems.

- 1. Not marking materials with the date on which they were received.**
- 2. Storing incompatible chemicals together.**
- 3. Maintaining more than 2 years of chemical supply in storage.**
- 4. Storing concentrated acids and bases together.**
- 5. Not isolating, or properly storing concentrated oxidizers.**
- 6. Storing chemicals above eye level.**
- 7. Not properly labeling containers with chemical name, C.A.S. number, and concentration.**
- 8. Not labeling storage cabinets with the hazards contained within.**
- 9. Not posting emergency telephone numbers and emergency plans.**
- 10. Using improper shelves, which do not prevent containers from sliding or rolling off.**

If you know of a school or school district that could benefit from this program, please contact the NJDEP's Office of Local Environmental Management at 609-292-1305.