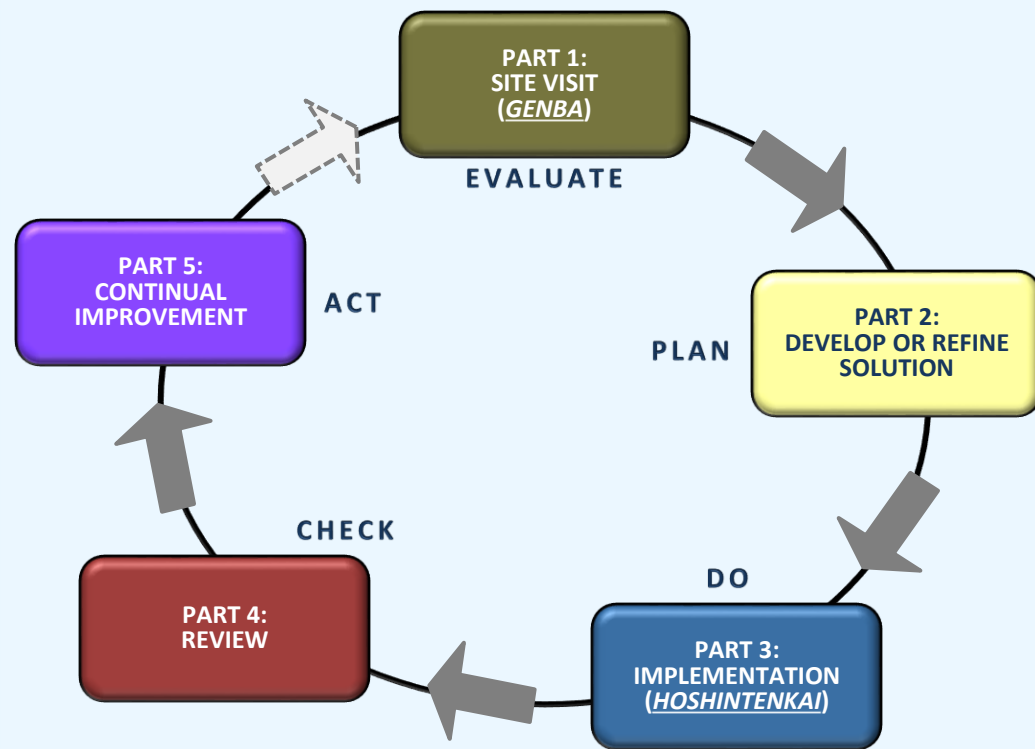


# ITA and Cornerstone EHS Solutions for Top Cited Violations for Industrial Sector

(The following is a sampling of solutions for frequent EPA and OSHA violations. Note that the information contained herein is not exhaustive and represents only the most prevalent cited violations).

## Our Approach to Environmental and Safety Compliance



### Outcome (a proactive approach to risk management)

Ensure continual regulatory compliance

Reduce potential financial risks and liabilities

Team with our clients to support their Corporate goals and directives

Aid in conformance with customer and NGO requirements

NOTE: U.S. States must adopt Federal regulations as written or may have an approved program (via Fed EPA or OSHA) that either meets or exceeds the Federal citations. It is important to verify State regulations

	Nature of Violation(s)	Federal Citation	ITA and Cornerstone Solution (Summary)
Clean Air Act	Facility added equipment <i>prior to</i> obtaining/updating Operating Permit	Clean Air Act Amendments of 1990	Evaluate current operations and equipment; submit application for new or modified Operating Permit
	Improper management of required air permit recordkeeping and reporting	USC Title 42, Chapter 85	Evaluate permit conditions; implement recordkeeping program to meet permit requirements; prepare and submit required reports
Resource Conservation and Recovery Act (RCRA)	Does not comply with requirements for:		Evaluate waste streams and monthly generation to verify waste generation level; apply for proper permit
	• Permitting	USC Title 42, Chapter 82	Track waste generation; collect manifests and other required data; complete and submit regulatory report(s)
	• Reporting		Work with client to identify based on 'generator knowledge' or coordinate with lab for proper analysis
	• Waste Identification		Conduct classroom (or webinar) training; provide written material outlining regulations and requirements; provide ongoing guidance and training as requirement dictates
• Personnel Training			
Emergency Planning and Community Right-to-Know Act (EPCRA)	Facility has not filed a Tier II report	Title 40 CFR, Parts 350 – 372	Collect and analyze data; generate aggregate calculations; submit Tier II report, if required; implement compliance program with annual and mid-year applicability review
	Failure to properly identify Extremely Hazardous Substances		As part of the above process, compile SDS data (chemical constituents and CAS #'s) and evaluate against corresponding thresholds
Toxics Substances Control Act (TSCA)	Does not comply with requirements for:		Implement a program for substance-level tracking of chemical manufacturing and/or importing; data collection and recordkeeping annually; compare to the EPA TSCA inventory list
	• Recordkeeping	Title 40 CFR, Parts 700-799	Preparation and filing of CDR reports via EPA CDX
	• Reporting		Collect data to prepare certifications for import; collect chemical/chemical mixture data to evaluate presence of 12 (b) reportable substances; prepare and submit notifications
• Import and export certification			
Occupational Health and Safety Administration (OSHA)	Lack of or gaps in compliance with:		Site visit to determine required fall protection; provide written material and training on applicable requirements; training to includes classroom and hands on with required equipment
	• Fall protection	29 CFR 1926.501	
	• Hazard communication	29 CFR 1910.1200	On site review of operations; develop written program and instructional program; assist in ongoing compliance procedures
	• Respiratory protection	29 CFR 1910.134	Conduct indoor air monitoring (if not previously completed); If air quality analysis exceeds Permissible Exposure Limits (PEL); prepare policy for use of respirators; provide instruction program; respirator fitting; written program to address ongoing compliance
	• Lockout Tagout	29 CFR 1910.147	On site review of operations and equipment to determine proper machine-specific procedures; provide written program and customized procedures; instructional program ; instruct employees how to maintain program
	• Electrical safety and machine guarding	29 CFR 1910.303, 305, 212	On site review of applicable equipment; development of written program, including electrical safety related work practices; conduct on-site training
	• Powered industrial trucks	29 CFR 1910.178	On site review of equipment and operations; development of written program; creation of instructional program, including review of regulation and hands-on session for employee awareness, operation and technique assessment