



EHS COMPLIANCE AND SUSTAINABILITY OBJECTIVES: THE BENEFITS OF OVERLAPPING AND HOW TO MANAGE THEM

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Maddy Williams assists clients with a wide variety of sustainability services including GHG emissions calculations, emissions reduction plans and subsequent sustainability reporting. Ms. Williams began her corporate career within Keramida's EHS compliance division with a focus in air quality and management. Alongside those services, she leads Keramida's Sustainable Sports Initiative, combining her sports background and sustainability passion.

Ms. Williams holds a B.S. in Environmental & Ecological Engineering (EEE) and a Masters in Business Administration (MBA), both from Purdue University.





POLL

MANUFACTURING?

EHS MANAGERS?

COMPLIANCE AND SUSTAINABILITY?

BALANCING ACT

INTERNAL STAKEHOLDERS

Pushing for progress toward
sustainability objectives

REGULATORY AGENCIES

Increasing oversight and enforcement of
regulatory obligations



BIG IDEA

ALIGNMENT

WHY?

COMMON WINS

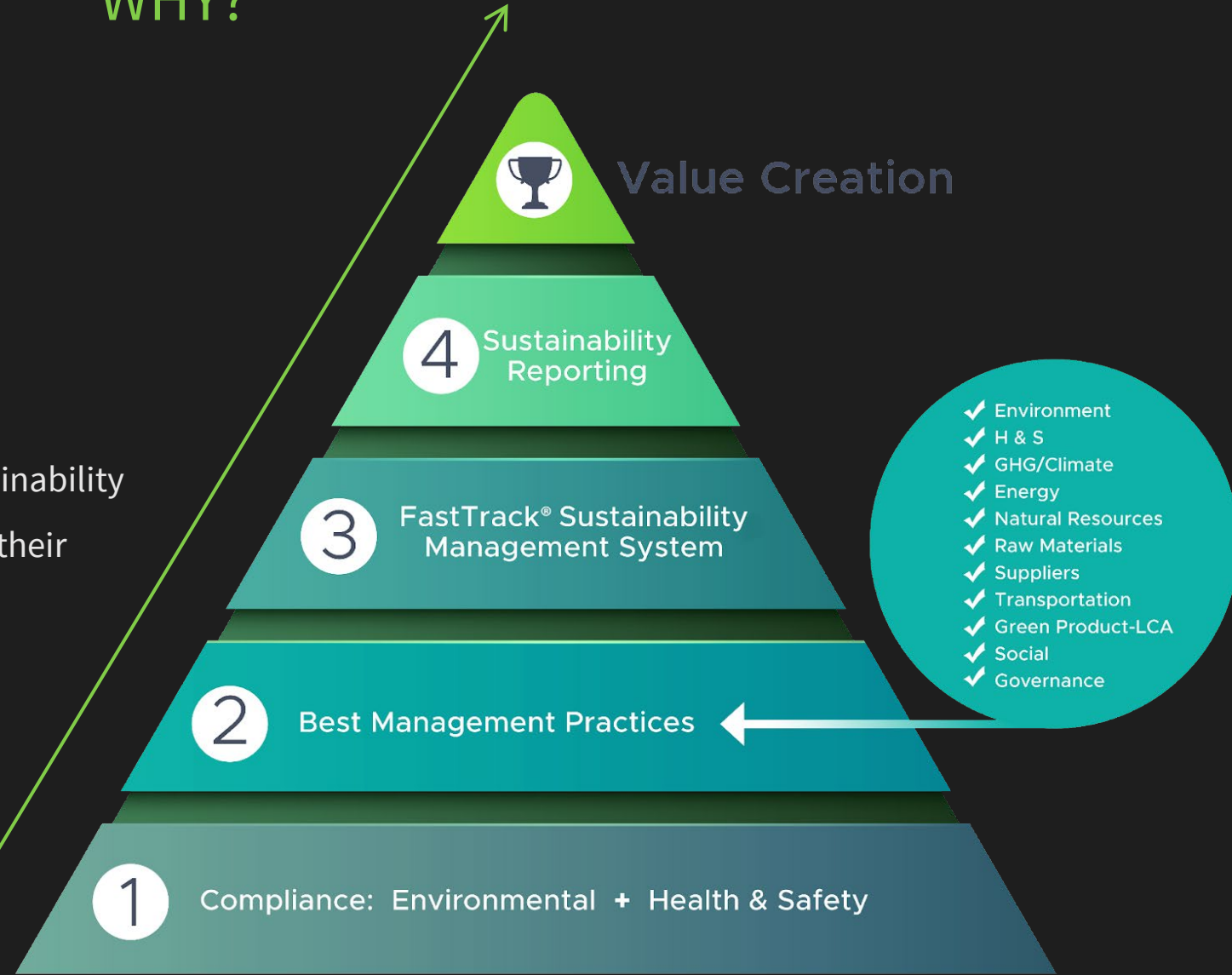
Energy and emissions reductions can be a path toward reduced regulatory burden. ESG efforts can build community ties and promote environmental justice.

EXPERTISE

EHS Managers have key knowledge needed to attain sustainability goals, including in-depth knowledge of your facilities and their regulatory obligations (permits).

MGMT SYSTEMS

EHS and Sustainability Management Systems provide the framework for effective management of change, implementation of new strategies.



ALIGNMENT

OBJECTIVES

Align EHS and sustainability objectives

MGMT OF CHANGE

Maintain alignment as you manage changes in your facility

DATA

Create consistent, efficient data gathering and management procedures aligned with needs of both EHS and Sustainability



OBJECTIVES

Aligning EHS and
Sustainability
Objectives

An aerial photograph of a winding asphalt road through a dense green forest. The road curves through the trees, with several cars visible on it. The image is partially obscured by a dark diagonal overlay on the right side.

ALIGNMENT

Creating alignment vs finding alignment

UNDERSTAND THE DESTINATION

Objectives and goals: Formalized? Specific?

IDENTIFY SYNERGIES AND CONFLICTS

- Find the overlap
- Find the hurdles, regulatory idiosyncrasies
- Use EHS regulatory applicability and compliance assessments (audits) as the foundation of Materiality

CREATE A MATRIX OR MAP

	Goal #1	Goal #2
<i>Media</i>	<i>Air</i>	<i>Air, Water</i>
<i>Permits</i>	<i>Title V</i>	<i>Title V, Wastewater</i>
<i>Data</i>	<i>Throughput, emissions</i>	<i>Paint usage, VOC Emissions, WW flow</i>

MEDIA

Which media (air, water, waste) are involved?

PERMITS

Which regulations, permits, and plans will be affected?

STAKEHOLDERS

Who are the internal and external stakeholders?

PEOPLE

Which departments / personnel will be involved in pursuing this objective?

EQUIPMENT / PROCESSES

Which significant pieces of equipment or manufacturing/business processes are involved?

DATA

What data are needed to track progress?



MANAGEMENT OF CHANGE

Maintain alignment as
you manage change in
your facility



WHY?

ROBUST MOC PROCESS

To move quickly toward sustainability objectives

To avoid noncompliance, facility disruptions

PREVENT NONCOMPLIANCE

Sometimes common-sense changes may have regulatory hurdles

Existing EHS management systems can provide the foundation for managing sustainability objectives, driving continuous improvement

ISO 14001 Environmental Management

ISO 45001 Occupational Health & Safety

ISO 50001 Energy Management

Sustainability MS



Example 1: Air Permit Modifications

- Emissions reductions could change required permit type:
Title V > Synthetic Minor (FESOP) > Minor Source
- Examples
 - Changing combustion processes from fuel oil to natural gas OR natural gas to electric
 - Chemical/coating change to lower VOC or HAP emissions
- Ensure permit limits (throughput/usage limits) are written in away that allows you to utilize your most efficient equipment to its maximum capacity



Example 2: Water Use

- Lower water use may increase the concentration of pollutants in effluent
- Causes
 - Decreased sanitary wastewater discharge
 - Decreased blowdown rates (e.g., cooling towers, quenching and washing operations)
 - Increased water recycling

Example 3: Weekend Shutdown

- Foundry desired to shut down baghouses over the weekend when equipment was idled (zero/negligible emissions during this time)
- “Baghouse X for particulate control shall be in operation and control emissions from the following emission units at all times that these processes are in operation”
- Required a permit modification to clarify meaning of “in operation” (differentiate between “melting” and “idling”)
- Outcome
 - Part of **\$11k enforcement case** (excluding legal and consulting fees)
 - Resulted in increased regulatory burden (record keeping) after permit modification
 - **Significant energy savings**



DATA

Create consistent, efficient data gathering and management procedures aligned with needs of both EHS and Sustainability



SUSTAINABILITY DATA

KEY PERFORMANCE INDICATORS

Much of the data used for compliance monitoring and reporting is *also* used in sustainability benchmarking and reporting

KNOWLEDGE

EHS staff

- Collect, generate and/or control key environmental data
- Understand (1) nuance and (2) quality of the data

SAME DATA, DIFFERENT PURPOSES

QUIRKS

Absolute vs Normalized

Units, e.g., tons vs metric tons

Reporting periods – calendar vs fiscal


CAUTION

Be consistent! Many regulatory and sustainability reports become part of the public record.

Use caution when collecting data more frequently than required by a permit/regulation.

Closing Thoughts

- Be realistic about your commitments
- Encourage your firm to be realistic about *their* commitments
- Don't wait for noncompliance to ask for help
- Don't let safety culture degrade because of new sustainability goals

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- ✓ Align EHS and sustainability objectives
 - ✓ Management Systems / MOC
 - ✓ Shared Data

Build the Sustainability business case to reduce costs and corporate risk and improve market positioning!



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