## **APRIL 1990**

## Conference Report

## Self-audit 1st-year report card: 'Very favorable'

## BY PETER BLAIS

"Very favorable" is how Hall-Kimbrell project manager Steve Wharton describes the first-year response to his company's environmental self-audit program.

Courses in 34 states have taken part in the Environmental Compliance Assistance Program since it was launched in February 1989.

"That speaks well of the superintendents across the country and their awareness of their environmental responsibilities," said Wharton.

Still, there are those who have not heard of the program and its potential to help courses comply with environmental, health and safety laws. But that is changing.

"The program was almost ahead of its

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time last year," said Wharton. "People weren't thinking about environmental issues as much as they are now."

There were also misconceptions about the program, many of which have been dispelled over the past 12 months, according to Wharton. Among them:

• It would be a struggle to get course boards of directors to approve the self-audit. In reality, nearly 80 percent of the boards have been strongly behind the program and 15 percent weren't opposed if the superintendent was in favor. • The program wouldn't address a course's particular situation. Over 90 percent of the superintendents participating have in fact commented that all their issues were addressed. Another eight percent wrote that the audit included all but one of their problems.

• The cost (\$725) was too high or superintendents didn't have authorization for the additional expense. Actually, cost and authorization have not been issues. This spring's incentive plan lowering the price to \$600 for courses signing up by May 1 has left many

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superintendents with extra cash in their budgets for other compliance projects.

• It will take too much time. Superintendents have more often said they don't have the time not to participate. The 600-question audit and the final report (usually returned to the course within a month) have allowed superintendents to organize their thoughts and provided an educational tool. In three-fourths of the cases, superintendents have been able to implement any proposed changes themselves, instead of relying on expensive, outside help. And completing the audit presents the course to the public and governmental agencies in a very positive light.

"It allows a course to be pro-active rather than re-active," said Wharton. "If a government agency sees that a course has made a good-faith effort toward complying with the law, it is more likely to issue a warning rather than just automatically levy a fine."

The most common recommendations contained in the audits have involved health and safety issues, worker protection, underground storage tanks and pesticide safety.

"Some of the changes have been simple and inexpensive, like moving where you store something from one part of a room to another or putting up a safety sign. Others have been more complicated and expensive, like building a new type of facility or removing a tank. The advisories don't discriminate as to cost. But the cost of noncompliance generally far exceeds complying," explained Wharton.

Wharton said the program has produced some major accomplishments during its inaugural year, including upgrading superintendents' awareness of their environmental responsibility; providing a program recognized by insurance companies that can lead to premium discounts; allowing re-certification credits for superintendents; and being required as part of the remedy at New Jersey courses where state enforcement of laws is necessary.

"Overall, we're very happy with the way things went this past year," said Wharton. "It's given superintendents a way to figure their way through the complex information coming out today."