

Bond

ENVIRONMENTAL COMPLIANCE AUDIT

A protocol for limiting environmental risks

Mastering environmental regulatory demands is imperative for manufacturing companies whose products contain hazardous substances, or whose processes generate waste materials or require air or wastewater permitting.

Waiting until an inspector identifies a problem can result in unintended risks to worker health and safety, the imposition of significant penalties, increased future scrutiny by governmental authorities, higher remediation costs, and loss of reputation in the community.

Bond, Schoeneck & King's Environmental Compliance Audit service helps manufacturers proactively assess their environmental risks and their compliance with federal, state and local environmental laws and regulations.

Mounting Challenges

As manufacturers large and small have gained sophistication in handling environmental matters, many employ well-trained staff to monitor compliance and stand ready to respond quickly to any problems.

Nevertheless, unforeseen environmental concerns can persist. Companies that are expanding or whose infrastructure has reached an advanced age may face elevated risks. In-house staff may be too stretched to monitor all areas; an expert in wastewater treatment or PCB management, for example, may lack familiarity with air permitting or wetland issues.

The sheer volume of federal, state and local laws and regulations and their associated guidance documents can overwhelm the resources of in-house staff. Perhaps employees on the plant floor suspect a problem but do not effectively communicate their observations to management. Or, rather than report the problem, an employee may violate protocol and try to handle it.

The Benefits of Proactivity

A manufacturer that assumes compliance but does not obtain independent verification risks major disruption should the facility fail to properly handle an environmental matter.

Bond's Environmental Compliance Audit process is designed to head off disruptions by determining a facility's compliance status. A manufacturer may opt for a comprehensive audit—or may focus on one or more of the following areas:

- Solid waste
- Storage tanks and drums
- Water
- Indoor air quality
- Occupational safety and health
- Pesticides
- Hazardous waste
- PCBs
- Asbestos
- Air emissions
- Noise

Worried that a hidden environmental issue could expose your business to liability, excessive costs and loss of reputation? Contact Bond today.

About Bond, Schoeneck & King

Bond, Schoeneck & King PLLC serves individuals, companies and public-sector entities in a broad range of areas.

With 270 lawyers and 11 offices, we represent clients in agribusiness; commercial lending and real estate development and construction; manufacturing; energy; health care and long term care; and municipalities, school districts, higher education, and other exempt and nonprofit organizations. We maintain nine offices across New York; one in Naples, Florida; and one in Overland Park, Kansas.

Bond is committed to understanding our clients' needs and providing comprehensive, practical, high-quality and responsive solutions. We strive to maintain the highest professional and ethical standards, and to provide leadership in community activities, pro-bono work and service to the Bar.

For more information, visit www.bsk.com.

Bond's audit process supports manufacturers in promoting the health and safety of employees and neighbors and boosting employee morale by verifying compliance. The audit also helps minimize the risk of unnecessary costs and liabilities stemming from a reactive rather than proactive approach to an environmental problem.

Bond also helps clients manage legal needs arising from the discovery of possible violations, such as leveraging federal and state audit incentive policies and helping implement corrective action.

Why Choose Bond?

- **We are experienced.** For nearly four decades, Bond attorneys have been guiding manufacturing clients to operate effectively amid shifting legal and regulatory environmental landscapes. As new and revised laws, regulations and guidance emerge, we help our clients understand and manage the demands represented by these developments. We're skilled in matters involving the Clean Air Act, including Title V permitting; the National Environmental Policy Act (NEPA); the Resource Conservation and Recovery Act (RCRA); the Clean Water Act; the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA); and New York's State Environmental Quality Review Act (SEQRA), Navigation Law, and Inactive Hazardous Waste Disposal Site Law.
- **We are well-connected.** Bond's relationships with representatives from the U.S. Environmental Protection Agency (EPA), the New York State Department of Environmental Conservation (DEC) and Public Service Commission (PSC), and other agencies and local boards position us to advocate effectively on our clients' behalf. Our relationships with environmental consulting firms allow us to help our clients move quickly to prevent or reduce the impact of an environmental problem.
- **We are cost-sensitive and accessible.** Bond's experience and relationships allow us to work efficiently and to respect our clients' cost constraints and schedules.
- **We are involved in the environmental law policy-making community.** Through our activities in the following professional organizations, Bond tracks environmental law developments:
 - New York State Bar Association, Environmental Law Section
 - Air & Waste Management Association of Central New York (A&WMA)
 - Business Council of New York State, Inc., Environment Committee
 - Central New York Land Trust
 - Manufacturers Association of Central New York (MACNY)
 - New York State Association for Solid Waste Management (NYSASWM)

- New York Construction Materials Association, Inc.
- New York Planning Federation (NYPF)
- New York Water Environment Association, Inc. (NYWEA)
- New York State Wetlands Forum, Inc. (NYSWF)
- U.S. Green Building Council (USGBC) New York Upstate Chapter

Getting Started

Bond makes it easy for manufacturing companies of all sizes to experience the benefits of an audit. Our unique process begins with a complementary consultation and involves a proprietary assessment that helps a client understand its status regarding more than a dozen key environmental areas.

Contact Bond Today

To learn how Bond's Environmental Compliance Audit process can help your manufacturing company stay on top of regulatory demands.



Barry R. Kogut

Member, Bond Manufacturing Practice
Member, Bond's Environmental and Energy Practice
315.218.8181
bkogut@bsk.com

Or contact one of the following individuals in Bond's Environmental and Energy Practice



Virginia C. Robbins

315.218.8182
vrobbins@bsk.com



Robert R. Tyson

315.218.8221
rtyson@bsk.com