

Chapter 4. BASIC ELEMENTS CHECKLIST

The following checklist is a guide for DEP staff to check whether or not an agreement with a regulated entity to develop an EMS contains all the elements for a fully adequate EMS. This checklist sets forth the elements of an EMS required by the EMS policy. The checklist can also be used to determine whether or not the EMS is being implemented, and thus whether stipulated or suspended penalties in the order may be warranted. (See also the guidance on evaluation of EMS element implementation in Chapter 6).

Please note: generally, the evaluation of actual EMS implementation to determine compliance with a consent order requiring EMS implementation should include a compliance inspection to determine compliance with environmental requirements, and not just a review of documents showing that the EMS elements have been implemented. This ensures that the standard by which EMS implementation is judged includes evaluating whether the EMS is effectively functioning to achieve and maintain compliance.

Yes No

1. Did the regulated entity develop environmental compliance policies, procedures and guidance documents for all of the organization's operations and activities?

1. Is the regulated entity's organizational environmental compliance responsibility and accountability clearly specified in the EMS document, including the organization's staff and management structure, identification of on-site service providers and contractors for regulatory compliance?

3. Was a system for tracking compliance activities developed?

4. Were schedules and a system for conducting regular inspections of operations and facilities and annual self-audits of operations and facilities developed for the purposes of preventing and controlling releases, ensuring environmental protection, and maintaining compliance with statutory and regulatory requirements developed?

5. Was a system for ensuring that routine requirements for sampling, monitoring, and reporting data, as required by law, developed?

Yes No

6. Were standard procedures and requirements for incident and noncompliance reporting to regulatory agencies, including requirements to report releases of oil and/or hazardous materials and implementation of measures to minimize risks from such releases developed?
7. Was a system developed for establishing return to compliance plans for noncompliance identified during inspections and audits?
8. Was a system designed for the development of continuous improvement goals and results reporting that may include: recycling and the purchase of recycled products; pollution prevention; source reduction; resource conservation; energy consumption; waste minimization, renewable energy and/or renewable technologies?
9. Is there an annual compliance training program for management and personnel, and initiation training for new management and personnel?
10. Is there a process for an objective annual review and evaluation of the EMS and its components, including: implementation of modifications to ensure timely compliance and a commitment to continual improvement; and senior management review to ensure that goals are being achieved?
11. Was a program developed for ongoing community outreach in the environmental aspects of a regulated entity's operations and general environmental awareness?
12. Was each element integrated into the organization's overall decision making and planning, in particular, decisions on capital improvements, product and process design, training programs and maintenance activities?

Chapter 6. Evaluation of EMS Element Implementation

The guidance on the following page is for reviewing the documents agreed to be submitted (see previous chapter) to assure EMS element implementation, and for reviewing EMS element implementation during an onsite inspection. It is an optional tool that either DEP or the regulated entity may elect to use. Generally, DEP staff should not ask for, or review, full, complete copies of all EMS documentation, a complete environmental management system analysis (EMSA) report, or the results of audits done under consent orders, but should focus on the review of summary reports. And, although the entity should be required to keep documentation of EMS element implementation for potential review by an inspector, actual performance can and should be measured through evaluation of compliance.

DEP may draw an inference from noncompliance that the EMS is not functioning adequately, although an entity may be able to show that the noncompliance was an isolated incident and the EMS has in fact resulted in improvements in compliance and/or performance. Because instances of noncompliance are only indicative of EMS functionality (and not dispositive), it is also important to have the capability of directly reviewing EMS element implementation, and for regulated entities to know that DEP reserves this authority. If this activity is deemed appropriate to a particular case, it may be performed in a manner analogous to reviewing TURA planning compliance: the entity either has documentation that each required element is in place, or it does not. The following guidance presents each EMS element, as required by DEP's policy, along with questions intended to assist in determining if the element is in place. (Please see Chapter 4, as well, concerning evaluation of EMS implementation).

DEP staff are encouraged to share this checklist with regulated entities interested in developing and implementing an EMS. Sharing this guidance with regulated entities will communicate to them the expectations of the Department relevant to each required EMS element, and will reduce questions arising from ambiguity or potentially variable interpretations.

It is not required that the answer to every question be “yes” to determine that an EMS element has been established and is being implemented. The questions are provided as a guide to making that evaluation. For example, if a clear set of prioritized initiatives has not been developed, it is not necessarily true that a policy has not been established. But if no prioritized initiatives have been developed and there is no evidence that the policy has been communicated, DEP may elect to presume that no policy has been established, and the burden would be on the entity to show that it has.

Although DEP may use the checklist as a tool for reviewing EMS implementation, the most important use of the checklist may be as a tool for regulated entities to use in reviewing their own EMS implementation. Communicating DEP's implementation standards provides regulated entities with a standard tool for measuring their own performance.

GUIDANCE for Evaluating Implementation and Review of EMS Elements

1. Environmental compliance policies, procedures and guidance documents for all of the organization's operations and activities.
 - a. Is the environmental policy clearly defined?
 - b. Has the policy been communicated?
 - c. Does it recognize that compliance is just part of environmental performance?
 - d. Is it effective in covering all applicable requirements: federal, state, and local environmental statutes, regulations, enforceable agreements and permits?
 - e. Has a clear set of environmental initiatives been developed and prioritized?

2. Clearly specified organizational responsibilities and accountability of organization's staff and management, on-site service providers, and contractors for regulatory compliance, required reporting to regulatory agencies, and corrective actions implemented in their area(s) of responsibility.
 - a. Are there clear lines of communication relevant to meeting environmental responsibilities?
 - b. Are there clear lines of command for meeting environmental responsibilities?
 - c. Are their clear lines of evaluation and reporting?
 - d. Is the accountability for environmental performance included in job descriptions?
 - e. Is the accountability for environmental performance included in the job performance process?
 - f. Are there consequences for departure from established policies and procedures?
 - g. Have all environmental requirements been identified and communicated to ensure compliance?

3. A system for tracking compliance activities.
 - a. Does the system track compliance with permits?
 - b. Does the system track compliance with sampling requirements?
 - c. Does the system track compliance with monitoring data?
 - d. Does the system track compliance with reporting requirements (including accident and release reporting – see question 6 below)?
 - e. Does the system include the results of audits?
 - f. Does the system track compliance with waste shipment requirements?
 - g. Does the system track all other applicable requirements?
 - h. Does the system provide for the interpretation of requirements to ensure that they are properly applied?

- i. Does the system also ensure that the requirements are accomplished?
4. Schedules and a system for conducting regular inspections of operations and facilities and annual self-audits of operations and facilities for the purposes of preventing and controlling releases, ensuring environmental protection, and maintaining compliance with statutory and regulatory requirements.
 - a. Has the self-auditing comprehensively assessed whether all applicable requirements are being identified?
 - b. Has the self-auditing assessed the effectiveness of in-place standard operating procedures to ensure compliance?
 - c. Does the self-auditing process keep up with changes in requirements?
5. A system for ensuring that routine requirements for sampling, monitoring, and reporting data required by law, regulation and permit are accomplished.

(If already covered by the system for tracking and self-auditing, check question 3(i) again).
6. Standard procedures and requirements for incident and noncompliance reporting to regulatory agencies, including requirements to report releases of oil and/or hazardous materials and implementation of measures to minimize risks from such releases.
 - a. Do the procedures for minimizing risks include evaluation and implementation of preventive measures, including alternatives to hazardous materials?
 - b. Does the emergency prevention and response plan include clear procedures for notifications of reportable quantities, including rapid reference to information for determining reportable quantities and contact information for notification recipients?
 - c. Does the emergency prevention and response plan include effective evacuation procedures that have been communicated to all on site?
 - d. Does the emergency prevention and response plan identify properly trained responders and provide for the maintenance of necessary onsite equipment, including wash stations, protective gear, and containment?
 - e. Is there a communication system for activating emergency response?
 - f. Does the emergency prevention and response plan provide for analysis of the cause of previous incidents, including near-misses, for preventing future incidents?
 - g. Has the emergency prevention and response plan been communicated to local responders?
7. A system for establishing return to compliance plans for noncompliance identified during inspections and audits.

- a. Does the system include analysis of the underlying cause of the noncompliance?
 - b. Does the system include training to prevent the violation from recurring?
8. A system for the development of continuous improvement goals and results reporting that may include: recycling and the purchase of recycled products; pollution prevention; source reduction; resource conservation; energy consumption; waste minimization, renewable energy and renewable technologies.
 - a. Have goals been set for pollution prevention, including source reduction?
 - b. Have results been measured and reported to management?
 - c. Have the goals and results been reviewed periodically for continuous progress?
 - d. Have goals and results been set and progress measured and reviewed for conservation, including: water, energy, land use, and materials?
9. Annual compliance training for management and personnel, and initiation training for new management and personnel.
 - a. Does the training include any new operating procedures, revised to ensure compliance?
 - b. Does the training include actions for which personnel are held responsible that go beyond compliance, in furtherance of environmental performance goals set by management?
10. A process for an objective annual review and evaluation of the EMS and its components, including: implementation of modifications as necessary to ensure timely compliance and a commitment to continual improvement, and senior management review to ensure that goals are being achieved.
 - a. Does the review include an evaluation of the continuous improvement of environmental performance, beyond the compliance minimum, as set forth in questions 8 a-d?
 - b. Does the review include senior management assessment of the adequacy of measurement activities to determine progress towards goals?
 - c. Does the review include senior management assessment of the adequacy of the goals themselves to improve environmental performance?
11. Program for ongoing community outreach in the environmental aspects of regulated entity's operations and general environmental awareness.
 - a. Does the program include ensuring the public has access to all information required by law, as under right-to-know or public documents law?
 - b. Does the program ensure response to community inquiries?
 - c. Does the program inform the community of actions they can take to reduce environmental impact, when the entity's provision of products or

services places the entity in the best position to know of and communicate this information?

12. Integration of the above elements into the organization's overall decision making and planning, and in particular, decisions on capital improvements, product and process design, training programs and maintenance activities.

- a. Are product designers required to anticipate and consider environmental aspects of materials, and charged with considering safer alternatives?
- b. Are financial officers required to assess the full costs of activities and proposals, including environmental costs subsumed under overhead, and including contingent, external, and nonquantifiable environmental costs?

Chapter 7. Small Business EMSs

Small businesses may not be able to go directly to implementation of a full-scale EMS. An incremental approach to establishing the systematic approach may be best.

Technical assistance is particularly appropriate, and probably necessary, to help small businesses implement an EMS. See Chapter 11 for information on resources, which may include sample model EMSs.

Required elements can be grouped or integrated – but described in briefer fashion, to allow for greater flexibility.

RECOMMENDED EMS ELEMENTS FOR THE SMALL BUSINESS

- 1) Environmental Policy (top managements unifying vision)
- 2) Identifying Environmental Aspects (+/- aspects & significant impacts)
- 3) Legal and Other Requirements (ID and communicate requirements)
- 4) Objectives and Targets (translate purpose into action)
- 5) Environmental Management Program (responsibilities, means, timeframes)
- 6) Structure and Responsibility (aligning resources)
- 7) Training, Awareness and Competency (capacity building)
- 8) Communications (Int./Ext. flow of info)
- 9) EMS Documentation (Company manual)
- 10) Document Control (formal procedure for tracking/updating etc.)
- 11) Operational Control (Written Procedures)
- 12) Emergency Preparedness and Response
- 13) Monitoring Measurement (system performance)
- 14) Nonconformance and Corrective Action Plan (flagging and fixing)
- 15) Records (forms and records management)
- 16) EMS Auditing (periodic audits internal or third party)
- 17) Management Review (closing the loop)

A small business may need more time to fully establish an EMS. The following is a suggested time-line, but each business may have different capabilities or a different culture.

SAMPLE INCREMENTAL SCHEDULE FOR SMALL BUSINESS EMS

<u>ELEMENT</u>	<u>YEAR 1</u>	<u>YEAR 2</u>	<u>YEAR 3</u>	<u>YEAR 4</u>
Policy Statement	X			
Environmental Aspects		X		
Legal & Other Requirements	X			
Objectives & Targets		X		
Structure & Responsibilities	X			
Training/Competencies		X	X	X
Communications				X
EMS Documentation			X	
Document Control			X	
Operational Controls		X		
Emergency Preparedness	X			
Monitoring/Measurement			X	
Nonconformance Plan			X	
Records				X
Auditing		X		X
Management Review			X	

Chapter 11. Resources on EMSs and Environmental Improvement

Caveat: The internet web citations below are current as of April, 2003. They are considered examples only and the user should consult the most recent information available about a particular standard or program.

1. Environmental Management System Resources

Environmental Protection Agency:

<http://www.epa.gov/ems/>

Find tools and examples, agency EMSs, EMS principles agreed to by U.S., Canada and Mexico (Commission on Environmental Cooperation).

Design for Environment (DFE) Guide: *[Integrated Environmental Management Systems \(IEMS\) Implementation Guide](#)*. This Guide has been designed to help companies integrate environmental concerns into business decision-making using the Design for Environment Program's Integrated Environmental Management System. (The Design for the Environment Program involves voluntary partnerships with industry and other stakeholders to develop cleaner, safer alternatives to existing products and processes).

Small and Medium-sized Enterprises Guide: *[An Implementation Guide for Small and Medium-Sized Organizations](#)*. An Implementation Guide intended to offer a plain English, common sense guide to organizations interested in implementing an EMS, using the basic Plan-Do-Check-Act model. The revised guide includes a number of updated examples and can be used by organizations of all sizes.

National Directory of EMS Technical Assistance Providers:

<http://www.sectorstar.org/taps/>. Joint project of EPA, the PEER Center, and Sector Star, developed by Global Environment and Technology Foundation.

Sector Star: <http://www.sectorstar.org/>. "Online portal for environmental excellence."

MA State Sustainability Program:

<http://www.mass.gov/envir/sustainable/default.htm>. Executive Order 438 establishes a state sustainability program. Website contains details on existing sustainability activities at state facilities, resources for state agencies, links to useful sites, and contact information for a number of related state programs.

ISO14000: <http://www.iso.ch/iso/en/ISOOnline.frontpage>
<http://www.quality.co.uk/iso14000.htm>

EPA pilot program for Colleges and Universities:

<http://www.epa.gov/region01/steward/univ/pilotproject.html>

Public Entity Environmental Management System Resource Center:
<http://www.peercenter.net/>. Specially dedicated to assisting public agencies in implementing EMSs.

Research Triangle Institute EMS Plus:
<http://ems.rti.org>

Waltham Public Schools EMS:
<http://www.city.waltham.ma.us/SCHOOL/WebPAge/EMS/EM.htm>

EMAS – Eco-Management and Audit Scheme
<http://europa.eu.int/comm/environment/emas/>

MADEP - EMS in Enforcement
<http://www.mass.gov/dep/enf/enforce.htm> - policies

OTA – EMS Guide
<http://www.mass.gov/ota/support/EMSGuidance.pdf>

Pollution Prevention Pays EMS resources: <http://www.p2pays.org/iso/>. North Carolina's P2-oriented EMS program.

Green Plans: <http://www.rri.org/>. Resource Renewal Institute's green plan examples include life-cycle approaches.

Global Reporting Initiative: <http://www.globalreporting.org/>. GRI's common framework for corporate reporting on sustainability provides a context for planning EMSs that advance towards ever higher quality.

Environmental Management Accounting: <http://www.info@emawebsite.org/>. Primary international site for EMA, the management accounting system consistent with EMS establishment.

Multi-State Working Group on EMS: <http://www.iwrc.org/mswg/>. Stay up to date on latest EMS developments. Coordinates regulatory officials working on EMS matters.

2. Government Recognition Programs for Environmental Performance:

Massachusetts Environmental Stewardship Program:
<http://www.mass.gov/ota/SUPPORT/MESP.htm>

EPA Performance Track:
<http://www.epa.gov/performancetrack>

New Jersey Silver and Gold Track:

<http://www.state.nj.us/dep/opppc/silver.html>

Clean Texas Program:

<http://www.tnrcc.state.tx.us/exec/sbea/cleantx/index.html>

3. Compliance and Pollution Prevention Assistance Resources

MA Office of Technical Assistance for Toxics Use Reduction:

<http://www.mass.gov/ota/ota.htm>

Resources available on the web, but OTA is available for assistance in Massachusetts over the phone or by onsite visit.

Toxic Use Reduction Institute P2 Gems:

<http://www.p2gems.org/>

Portal to hundreds of web resources on Pollution Prevention.

EPA's Compliance Assistance Centers:

<http://www.epa.gov/compliance/assistance/index.html>

These "virtual" centers promote links between the small business community and their technical and regulatory providers. Through plain-English guides, consolidated checklists and other tools, compliance assistance centers seek to minimize waste production and maximize environmental performance.

Metal Finishing: [National Metal Finishing Resource Center](#)

Provides comprehensive environmental compliance, technical assistance, and pollution prevention information to the metal finishing industry.

Printers: [Printers' National Environmental Assistance Center](#)

Offers training, state regulatory compliance guides, and two e-mail discussion groups on technical and regulatory issues.

Automotive: [Automotive Compliance Information Assistance Center](#)

Helps the automotive service and repair community identify flexible, common sense ways to comply with environmental requirements

Agriculture:

<http://www.epa.gov/compliance/assistance/sectors/agriculture.html>

Offers comprehensive easy-to-understand information on environmentally protective and agriculturally sound approaches to compliance.

Paint and Coatings: <http://www.paintcenter.org/>. Provides regulatory compliance and pollution prevention information to organic coating facilities, industry vendors and suppliers, and others.

Chemicals:

<http://www.epa.gov/compliance/assistance/sectors/chemical.html> and [ChemAlliance](#). Directs chemical manufacturers to information resources and plain-language compliance assistance material.

Local Government Environmental Assistance Network: [Local Government Environmental Assistance Network](#)

Serves as a "first-stop-shop" by providing environmental management, planning, and regulatory information for local government officials, managers, and staff.

Transportation: [Transportation Environmental Resource Center](#)

Provides compliance assistance information for each mode of transportation - air, shipping and barging, rail, and trucking.

Electronics: [Printed Wiring Board Resource Center](#)

Provides regulatory compliance and pollution prevention information to printed wiring board manufacturers, industry vendors and suppliers, and others.

Design for the Environment: [DOE's Design for the Environment](#)

The Pollution Prevention by Design project developed an integrated set of tools to help engineers, designers, and planners incorporate pollution prevention (P2) strategies into the design stage of new products, processes, and facilities.

National Pollution Prevention Roundtable: <http://www.p2.org/>

The largest membership organization in the United States devoted solely to pollution prevention (P2). The Roundtable's mission is to provide a national forum for promoting the development, implementation, and evaluation of efforts to avoid, eliminate, or reduce pollution at the source.

North East Waste Management Officials Association: [Northeast Waste Management Officials' Association](#) (NEWMOA)

A nonprofit, nonpartisan interstate association for the hazardous waste, solid waste, waste site cleanup and pollution prevention program directors for the environmental agencies in Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont. NEWMOA has developed many tools useful for pollution prevention implementation and compliance assistance.

Pollution Prevention Resource Exchange (P2RX): [Pollution Prevention Resource Exchange](#)

Portal to nine regional pollution prevention centers that offer a variety of resources, including information for specific industry sectors, training, libraries, referrals and research.

Industrial Environmental Performance Metrics:

<http://www.nap.edu/books/030906242X/html/>

An overview of metrics developed for various industries.

Access to All State P2 Programs:

<http://www.epa.gov/oppt/p2home/resources/statep2.htm>

States have made numerous reports and tools available on the web, typically developing expertise related to the industry located in the state.

CONSENT ORDERS WITH EMS COMPONENTS ¹

NAME AND REGION	SECTOR	TOWN	TYPE-ENFORCEMENT NUMBER	DEP LEAD	DATE ISSUED
CENTRAL REGION					
ALPHAGARY CORP.		Leominster	ACOP-CE-98-9016-27AB	BWP	06/29/98
AMERICAN POLYMERS INC.	LQG-hazardous waste, SQG-waste oil	Oxford	ACOP-CE-00-9037-27A	BWP	01/03/01
ATHOL TABLE MANUFACTURING	Wood Furniture Manufacturing	Athol	ACO-CE-02-7002	BWP-Air	05/02/02
BAY STATE/STERLING/TYROLIT INC.	Abrasive Grinding Wheels Manufacturing	Westborough	CIVIL-CE-98-2471G	BWP-21C	05/14/98
CHASE WALTON ELASTOMERS	Commercial Silicone Rubber Manufacturing	Hudson	ACOP-CE-03-9015-27-EMS	BWP	04/16/03
GIBBS OIL CO.	Gas Station	Various	ACOP-CE-99-9029-27	BWP	03/29/00
GITTO GLOBAL CORPORATION	Polyvinylchloride (PVC) Manufacturing	Lunenburg	CIVIL-CE-00-4151H-SEP/EMS	BWP-SW	01/16/04
LANTOR INC.	Emits Volatile Organic Compounds and Combustion-Related Air Pollutants	Bellingham	ACOP-CE-00-9042-27	BWP	12/29/00 STP 06/06/02
MASS HOSPITAL-U MASS MEMORIAL	Medical-Charitable Corporation	Worcester	ACOP-CE-01-9008-27A	BWP	04/02/01

¹ *NOTE: Some of these cases include requirements to implement elements of an EMS, but would not fully meet EMS definition in DEP's 2001 Policy.

NAME AND REGION	SECTOR	TOWN	TYPE-ENFORCEMENT NUMBER	DEP LEAD	DATE ISSUED
NORTON COMPANY + ST. GOBAINS	Abrasives Manufacturing	Northborough	CIVIL-CE-97-3523E-EMS	Civil	07/02/97
GITTO GLOBAL CORPORATION	Polyvinylchloride (PVC) Manufacturing	Lunenburg	CIVIL-CE-00-4151H-SEP/EMS	BWP-SW	01/16/04
LANTOR INC.	Emits Volatile Organic Compounds and Combustion-Related Air Pollutants	Bellingham	ACOP-CE-00-9042-27	BWP	12/29/00 STP 06/06/02
MASS HOSPITAL-U MASS MEMORIAL	Medical-Charitable Corporation	Worcester	ACOP-CE-01-9008-27A	BWP	04/02/01
NORTON COMPANY + ST. GOBAINS	Abrasives Manufacturing	Northborough	CIVIL-CE-97-3523E-EMS	Civil	07/02/97
NORTHEAST REGION					
INTELLISENSE/CORNING	Microelectromechanical Devices Manufacturing for Telecommunications Industry	Wilmington	ACOP-NE-02-9006-27-SEP EMS	BWP	05/24/02
MBTA	Transportation	Readville	CIVIL-NE-01-4492E	Civil	02/23/04
MCI WORLD COM	Installation of Diesel Generators Telecommunications	Billerica	ACOP-NE-01-7001-EMS	BWP – Air	06/21/01
MERRILL COMMUNICATIONS	Commercial Lithographic Printing	Everett	ACOP-NE-00-7004	BWP – Air	06/07/00

NAME AND REGION	SECTOR	TOWN	TYPE-ENFORCEMENT NUMBER	DEP LEAD	DATE ISSUED
PEABODY MUNICIPAL LIGHT	Electrical Company	Peabody	ACOP-NE-04-9001-2-EMS-SEP	BWP	03/31/04
PENSKE (STATEWIDE)	Auto Service Center	Various	ACOP-NE-97-9008-2	BWP	11/10/97 STP 04/12/00
SARNIFIL, INC	Roofing Material Manufacturing	Canton	ACOP-NE-01-7005-EMS	BWP – Air	07/10/01
SUNOCO (STATEWIDE)	Gas Station	Various	ACOP-NE-99-9014-27	BWP	01/20/00 STP 03/23/00
WALTHAM, CITY OF	Municipal	Waltham	CIVIL-NE-99-2080-E-EMS	Civil	05/12/99
SOUTHEAST REGION					
CHRISTIES OF CAPE COD	Gas Station	Various	ACOP-SE-00-9008-7-EMS	BWP	10/18/00 EMS 12/18/00
CHRISTIES MARKET INC. (7-11 STORES)	Gas Station	Various	ACOP-SE-00-9007-27	BWP	10/18/00 EMS 12/18/00
COURIER STOUGHTON INC	Offset Lithograph Book Printing	Stoughton	ACOP-SE-01-7002-EMS	BWP – Air	09/28/01
FIBERSPAR CORP.	Spoolable Pipe Manufacturing	Wareham	ACOP-SE-01-9005-7-EMS	BWP	08/09/01

NAME AND REGION	SECTOR	TOWN	TYPE-ENFORCEMENT NUMBER	DEP LEAD	DATE ISSUED
NORTHEAST CONCRETE PRODUCTS	Concrete Products Manufacturing		ACOP-SE-00-R011-23P467A-SEP	BWP-21C-REACT	12/21/01
ROTONDO PRECAST	Concrete processing	Rehoboth	ACOP-SE-00-R001-2467A-SEP	BWP-21C-REACT	03/01/01
STAR ENTERPRISE (MOTIVA)	Gas Station	Various	ACOP-SE-01-7001-EMS	BWP- Air	04/06/01
STOUGHTON STEEL CO	Metal Fabrication for construction industry	Hanover	ACOP-SE-02-9004-7-EMS	BWP	07/23/02
TEKNOR APEX	Polymer processing and plasticizer manufacturing	Attleboro	ACOP-SE-00-3P003	BWSC	07/11/00
WESTERN REGION					
ADAMS FIRE DISTRICT	Municipal	Adams	ACOP-WE-01-6006-EMS	BRP-Wet	12/03/02
ANTHONY'S AUTO SALES	VSQG of hazardous waste and waste oil	Pittsfield	ACOP-WE-02-9003-2 EMS	BWP	12/20/02
AUTOZONE (ADAP)	Auto Repair	Various	ACOP-WE-00-9009-2	BWP	10/02/00
ARMSTRONG/BLUM	Saw Blades Manufacturing	Agawam	ACOP-WE-01-9001-27-EMS	BWP	08/30/01
BALISE MOTOR SALES COMPANY	Auto Dealer	West Springfield	ACOP-WE-04-9004-27-EMS	BWP	02/24/04
B&M RAILROAD CORPORATION	Transportation	Northfield	ACOP-WE-02-4005-STP	BWP-SW	08/07/02

NAME AND REGION	SECTOR	TOWN	TYPE-ENFORCEMENT NUMBER	DEP LEAD	DATE ISSUED
CHICOPEE LANDFILL/ CONNECTICUT VALLEY SANITARY WASTE DISPOSAL	Municipal; Solid Waste Management	Chicopee	ACOP-WE-01-4001-A- EMS	BWP-SW	04/19/01
CONSOLIDATED EDISON (CEEMI)		West Springfield	ACOP-WE-02-7002- EMS	BWP-Air	05/01/02
CURRY AUTOMOTIVE LLC	Auto Dealer & Body Shop	Chicopee	ACOP-WE-02-9015-27- EMS	BWP	02/27/03
CURTIS FINE PAPERS	Paper Manufacturing	Adams	ACOP-WE-02-9008- EMS	BWP	08/16/02
DECORATED PRODUCTS	Product ID Tags Manufacturing	Westfield	ACOP-WE-01-9004-27- EMS	BWP	02/06/02
EAST LONGMEADOW, TOWN	Municipal	East Longmeadow	ACOP-WE-00-3013 EMS	BWSC	11/09/00
EASTERN ETCHING & MFG	Nameplate Etching Manufacturing	Chicopee	ACOP-WE-01-A001- EMS	BWP-IWW	12/04/01
HADDAD MOTOR GROUP INC	Auto Sales	Pittsfield	ACOP-WE-01-3008- EMS	BWP-21C	02/25/02
HODGE MANUFACTURING COMPANY, INC.	Metal-parts Coating Manufacturing	Springfield	ACOP-WE-02-9001-27- EMS	BWP	12/06/02
INDUSTRIAL ETCHING	Printed and/or Etched and Painted Labeling	East Longmeadow	ACOP-WE-03-9002-27- EMS	BWP	04/22/03
LANE CONSTRUCTION	Gravel Processing, Asphalt/Concrete Batching	Various	ACOP-WE-02-9007- 246A-EMS	BWP-multi bureau	12/20/02

NAME AND REGION	SECTOR	TOWN	TYPE-ENFORCEMENT NUMBER	DEP LEAD	DATE ISSUED
MASSACHUSETTS TURNPIKE AUTHORITY	State agency; Transportation	Berkshire County	ACOP-WE-03-9001-46W-EMS	BWP-multi-bureau	05/07/03
PALMER FOUNDRY	Vacuum Tight and High Stability Aluminum Casting	Palmer	ACOP-WE-02-7004-EMS	BWP-Air	11/25/02
PERSTORP COMPOUNDS	Thermoset Chemistry and Fiber Reinforced Resin Systems	Northampton	ACOP-WE-02-9012-2 EMS	BWP	10/24/02
PRO CORP PMC GROUP	Molded Plastic Parts Manufacturing	Northampton	ACOP-WE-02-9004-27A-EMS	BWP	11/14/02
REXAM IMAGE PRODUCTS	Coating for paper, plastic film and canvas	West Springfield	ACOP-WE-02-7001-EMS	BWP-Air	04/01/02
SMITH & WESSON	Gun Manufacturing	Springfield	ACO-WE-01-7001-EMS	BWP-Air	06/13/01
TYCO HEALTHCARE GROUP, LP	Coating Manufacturing	Chicopee	ACOP-WE-03-9009-27-EMS-SEP	BWP	01/22/04
UNISTRESS CORPORATION	Precast, Prestressed Concrete Structures for Parking Facilities	Pittsfield	ACOP-BO-02-Z006-SETT/EMS (PAN-WE-02-3004 03/12/02)	BWSC	01/15/03

BOSTON Office					
RITZ CAMERA CENTERS, INC	Photo Processor	Various	ACOP-BO-02-2001H- SEP/EMS	BWP-ERP	04/17/02