

Environmental Leadership and Organizational Change

Howard N. Apsan, Ph.D.

*University Director
Environmental Health and Safety
The City University of New York*

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“[The] EPA Felt That Colleges and Universities, Because of Their Status, Should Set a Standard of Environmental Leadership.”

- ◆ National college and university audit initiative.
- ◆ Campuses expected to be in full compliance with environmental requirements.
- ◆ EPA to measure compliance in one of two ways:
 - Direct EPA enforcement inspections.
 - Voluntary audit and disclosure agreements.

“CUNY Was One of the First Public Universities to Opt for Voluntary Disclosure.”

- ◆ Audits conducted within a 5-year period.
- ◆ Final audit reports to be disclosed to EPA semi-annually.
- ◆ Avoid gravity-based and economic-benefit fines.
- ◆ Minimize inter-agency referrals.

“A Campus Before an Audit Is Like a Study Hall During Final Exams Week.”

- ◆ Lab chemicals storage and labeling.
- ◆ Hazardous wastes.
- ◆ Air emissions (e.g., permits, Community Right-to-Know.)
- ◆ Petroleum bulk storage (e.g., registrations, system upgrades.)
- ◆ Asbestos and lead.
- ◆ Radioactive sources.
- ◆ Universal wastes and electronic wastes.
- ◆ Select agents (e.g., anthrax, botulism, plague.)
- ◆ Training and documentation.

“The Audit Program Began With Some Initial Awkwardness but Has Developed a Certain Procedural Rhythm.”

◆ Fourteen campuses audited to date, including:

■ 10 senior colleges

- ◆ CSI, York, Queens, Brooklyn, Lehman, CCNY (including Sophie Davis Medical School), Hunter, Medgar Evers, John Jay, Baruch.

■ 3 community colleges

- ◆ Hostos, Queensborough, Kingsborough.

■ 1 graduate school

- ◆ CUNY Law School.

“The Success of an Audit Is Measured Not Only by the Number of Findings It Generates, but by How Well It Prepares the Campus for the Future.”

- ◆ **First twelve audits resulted in almost \$4 million in fines.**
 - 100% of fines were waived.

- ◆ **Far fewer findings in recent audits.**
 - Ultimate goal of zero findings.

“Once the Audit Is Over
(and Sometimes Even While It Is Still Under Way)
the Corrective Action Phase Begins.”

- ◆ Internal assessments of audit findings.
- ◆ Environmental sampling and analysis
- ◆ Labeling, record-keeping, training
- ◆ Documentation of regulatory status
- ◆ Improvement targets set

“At a Time When Colleges and Universities Must Compete for Students and Resources, It Is Remarkable That There Is So Much Cooperation in the EHS Arena.”

- ◆ CUNY Environmental Health and Safety Council.
- ◆ New York Campus Environmental Resource.
- ◆ SUNY Environmental Health and Safety Association.
- ◆ Environmental Protection Agency.
 - Public meetings to foster open exchange.
 - Resource and information sharing.

“After Three Years of Auditing, CUNY Is Still Developing Effective Measurement Tools.”

◆ Why is measurement so challenging?

- Success measured not in profitability, but in cost avoidance.
- Comparing findings is misleading.
- Fines and penalties are inconsistent.
- Few understand technical aspects of compliance.

“We Need Indicators That Will Foster a Commitment to Compliance, As Well As a Fundamental Change in the Environmental Culture of the University.”

- ◆ Integrating EHS indicators into general management metrics.
- ◆ Gaining insights from the CUNY-wide productivity program.
- ◆ Including EHS criteria in presidential performance evaluations.

Beyond Compliance

- ◆ CUNY sustainability initiative.
- ◆ Emergency preparedness.
- ◆ Fostering a proactive organizational culture.
- ◆ Environmental stewardship.

Environmental Leadership and Organizational Change: Setting and Meeting Expectations

- ◆ What gets measured gets done.
- ◆ Continuous improvement.
- ◆ Trust, but verify.

References

“What Gets Measured Gets Done: Two Years into the CUNY-EPA Audit Agreement.”

Howard N. Apsan

Environmental Quality Management, Autumn 2005

For more information contact:

howard.apsan@mail.cuny.edu