



July 14, 2008

William Ferland  
Associate Dean of Administration  
Community College of Rhode Island  
400 East Avenue  
Warwick, RI 02886

Re: Working Agreement # 7016, EHS Onsite Support Services; 2008-2009

Dear William;

Thank you for giving Triumvirate Environmental the opportunity to present you with a Working Agreement to conduct specific environmental health and safety compliance consultation services at Community College of Rhode Island (CCRI) in cooperation with your professional staff.

We propose to provide routine, onsite services each week, which we believe would allow your campus to achieve and maintain consistent Environmental, Health and Safety (EHS) compliance. Weekly visits would give you the opportunity to conserve resources, maintain budgets, and allow facilities staff to focus on their areas of expertise. This plan would eliminate the need to hire additional full-time personnel.

A description of our proposed Scope of Services and estimate of fees for our professional services to help monitor and build CCRI's EHS program is presented below for your consideration. These services are in accordance with the State of Rhode Island contract MPA 363.

In addition, our experience has shown that many employees experience a high level of frustration when dealing with EHS compliance since they may not have the background or training to manage properly. We have implemented this program at other facilities with great success.

### ***Our approach***

We will continue to provide routine weekly onsite assistance to maintain and implement programs, conduct employee training, and oversee and track the campuses EHS program.

Triumvirate will continue to provide cost efficient, effective consulting services to CCRI to manage and update the campuses EHS programs in accordance with federal regulations. We have developed a scope of work in which we will provide ongoing assistance to which priority will be placed on specific regulatory compliance requirements as detailed below, and on the maintenance of an annual compliance calendar identifying the regulatory requirements applicable to the campuses.

In general, our services would include routine onsite assistance to ensure that applicable EHS programs are in place and fully implemented through interaction with college administration and personnel. We will prepare compliance reports, conduct employee training, inspect laboratory areas and serve as a liaison to regulatory agencies, providing verbal and written correspondence as needed.

To ensure successful achievement of this project's expected outcomes both of us should clearly understand what is – and is not – to be done as a part of this project. Herewith, we will present our understanding of the project's scope of work:

*What are the regulatory requirements?*

Colleges and Universities are regulated by, but not limited, to the following federal regulatory agencies:

1. U.S. Dept of Labor (DOL) OSHA CFR Title 29 - Labor
2. Environmental Protection Agency (EPA) CFR Title 40 - Protection of the Environment
3. U.S. Department of Transportation (DOT) CFR Title 49 - Hazardous Materials Transportation
4. U.S. Department of Homeland Security - Chemical Facility Anti-Terrorism Regulations
5. Rhode Island Department of Environmental Management
6. DEM/NBC/Local Treatment Plants - Wastewater discharges
7. Rhode Island Department of Health and Labor

To quickly address areas of concern, initially we would focus on the following tasks:

1. Update, maintain and develop when necessary the applicable OSHA-required programs including but not limited to:
  - a. Personnel Protective Equipment
  - b. Lockout/Tagout
  - c. Accident Reporting
  - d. Emergency Action Plan/ Fire Prevention
  - e. Chemical Hygiene Plan
    1. MSDS Management
  - f. Electrical Safety
  - g. Hazardous Materials
  - h. Respiratory Protection (if needed)
  - i. Hazard Communication
  - j. Confined Space Entry
  - k. Fall Protection
  - l. Radiation Safety
  - m. Compressed Gases
  - n. Laboratory Safety for Students

2. Update, maintain and develop when necessary the following programs:
  - a. Environmental Health and Safety reference collection
  - b. CCRI EHS website
3. Conduct routine employee training on hazardous materials and hazardous waste management, laboratory safety, hazardous materials right-to-know, blood borne pathogens, Oil Spill Prevention and Counter Control measures (Oil SPCC), fire extinguishers, fire safety and other EHS-related training requirements applicable to CCRI.
4. Perform routine inspections and oversight of hazardous waste practices including chemical waste in the laboratories and waste oil in the Physical Plant department.
5. Prepare annual reports for submittal to regulatory agencies, including Tier II Chemical Inventory Reports, and those required for; air emissions, biennial hazardous waste reports, wastewater discharge reporting, etc. (as applicable).
6. Participate in CCRI Safety or Hazardous Materials Committee meetings, as a forum to promote EHS compliance throughout the facility.

Triumvirate proposes to provide oversight and coordination for compliance with the following federal and state regulations as applicable to the campus operations.

7. Clean Water Act - Wastewater and storm water discharge permitting requirements including sampling and analysis coordination, reporting, and local agency interaction
8. Clean Air Act - Identification of air emission sources and permitting requirements
9. Emergency Planning & Community Right-to-Know Act (EPCRA) and Massachusetts Toxics Use Reduction Act (MA TURA)- Chemical inventory and release reporting for hazardous materials above Threshold Reporting Quantities
10. Occupational Safety & Health Act (OSHA) - program development and employee training

### **Project Requirements**

Specific activities related to this project requiring unique resources, preliminary research, data collection at the college, and other preparatory steps necessary to ensure the achievement of pre-established outcomes. The unique requirements of this project are listed in three sections below:

### **Scope of Work**

Triumvirate will offer the following to assist with CCRI's EHS requirements:

Please note: Hours could be interchangeable between personal depending on project.

**EHS Specialist**- Once a week for 10 total hours per week

**Responsibilities-** The EHS Specialist will be responsible for assisting in the development and improving the safety culture at CCRI. The EHS Specialist will work with the administrators, faculty members, the physical plant department and students to assist in the development of safe work practices, train, and provide insight into safe and compliant practices. Tasks will include:

General work

- Assist the Senior Environmental Compliance (Senior. ECA) advisor with revising and updating all EHS programs and plans
- Coordinate with faculty and staff to designate Emergency Response coordinators
- Train the CCRI community on the Emergency Action Plan (EAP)
- Assist the Senior ECA with the Environmental Protection Agency Tier II reporting if necessary. At a minimum we will review the current chemical storage amounts to ensure compliance
- Oversee the Hazardous waste manifest management program
- Oversee the waste water compliance program including sampling and report completion
- Assist the Senior ECA with updating and maintaining the EHS website

Work with Academia

- Assist the Senior ECA with the development of safe procedures and tasks for all areas and departments including but not limited to:
  - Machine shop
  - Metal shop
  - Wood shop
  - Biology labs
  - Chemistry labs
  - Art Studios
  - Photography Dark Rooms
  - Nursing Labs
  - Dental Clinic/ Materials Lab
  - Engineering Technology Lab
  - MLTC (Clinical Lab Technology)
  - Phlebotomy Lab
  - Motorcycle safety
- Assist the Senior ECA in identifying responsibilities in work spaces for safe working procedures
- Assist the Senior ECA with the development of trainings for faculty, staff and students including,
  - Machine shop safety
  - Metal shop safety
  - Wood shop safety
  - Lab safety
- Give the aforementioned trainings.

- Annual lab inspections
  - Generate audit reports
  - Assist with identifying corrective suggestions and actions
- Assist the Senior ECA with the updating and improvement of the Chemical Hygiene Plan at least annually
- Assist the Senior ECA with the development of Health and Safety Plans for student projects

Work with Facilities

- Assist the Senior ECA with the development OSHA safety trainings for the Physical Plant department:
  - Haz Comm- Right to Know
  - Electrical Safety
  - Lock out/ Tag out
  - Machine Safety
  - Confined Space
  - Emergency Action Plan
  - PPE
  - Fire Safety
  - Other applicable safety trainings
- Assist the Senior ECA with updating the Hazard Communication Plan
- Assist the Senior ECA with the development the Contractor Safety Plan
- Assist the Senior ECA with updating the CCRI website
- Assist the Senior ECA with the implementation the Contractor Safety Plan
  - Contractor training
  - Contractor tracking

**Senior Environmental Compliance Advisor-** Up to 30 hours per month

The Senior ECA will provide project management oversight and the following task:

- Develop and conduct Quality Control reviews on the required plans and programs with the assistance of the EHS Specialist
- Develop, review and conduct Quality Control reviews of all environmental reporting
- Provide additional project management support to the EHS Specialist and to CCRI

**Description of Other Tasks:**

Triumvirate Environmental will place **priority** on performing the following tasks:

- Development of an annual facility-specific compliance calendar and planning/preparation of environmental compliance reports required by Federal and State regulatory agencies:
  - Annual EPCRA Tier II Report
  - Annual EPCRA Toxics Release Inventory Report (Form R) (If applicable)

- Hazardous Waste Compliance and Manifest Recordkeeping
- OSHA Site Compliance

Ongoing basis

- Maintain the Master Material Safety Data Sheet inventory (based upon the existing inventory management program and MSDS binders in place at the campuses)
- Eye wash and safety shower bi-annual inspections
- Personal Protective Equipment assessments

***CONDITIONS OF SERVICES, SCHEDULE & FEES***

We are proposing the establishment of a one-year (twelve-month) contract beginning upon a mutually agreed upon date. The Project Manager assigned to assist CCRI will be Rick Foote, Triumvirate's EHS Onsite Support Services Coordinator and experienced senior compliance/regulatory specialist with over 20 years of experience. An experienced compliance specialist in our onsite support services group will provide onsite routine assistance.

In order to provide these services to CCRI, Triumvirate requests the following:

- ◆ Suitable onsite workspace, equipment and materials necessary to complete the tasks associated with this proposal;
- ◆ Access to the building, and records and documents associated with the EHS programs discussed in this proposal; and
- ◆ Availability and assistance of CCRI staff involved in EHS programs.

**What are the fees for our services?**

We are proposing to provide annual routine services at a monthly flat rate fee. Please note that providing these services on a separate project-by-project basis would be more costly, less efficient, and more likely to extend the timeframe in which the projects could otherwise be completed.

EHS Team for CCRI

A dedicated team of Triumvirate's Environmental Compliance Advisors will be assigned to CCRI under the guidance of our firm's Consulting Services Manager, Sandra Perry and EHS Onsite Support Services Program Coordinator, Rick Foote, as follows:

Environmental Compliance Advisor  
Environmental Health and Safety Specialist

TOTAL ANNUAL CONTRACT:     \$81,000.00

Triumvirate's experience with other colleges and universities that 50% of our time is spent in physical plant while the remaining 50% is spent on the Academic side.

For those projects or tasks not identified within the scope of this proposal, Triumvirate will meet with CCRI to discuss costs.

At any time during the twelve month period, both parties may elect to propose revisions to the original agreement the terms of which will be discussed and amendments documented. Upon completion of the one year contract, renewable terms will be considered. Triumvirate will provide these services in accordance with our enclosed Schedule of Fees and Conditions and Master Services Agreement.

This working agreement is for a length of 1 year with the option to extend to additional years (as long as the MPA # 363 is active) if both parties agree.

Please note that the hours estimated above include normal travel time and mileage to and from our Somerville, Massachusetts office. Work outside of the scope of this proposal will be billed in addition to the monthly fees above and must be discussed and approved by CCRI. Also note that the costs above do not include any agency fees associated with permits, applications or reports.

We will submit a monthly task summary that details the projects worked on and completed during the previous month. In addition, we will hold quarterly meeting with the appropriate CCRI staff to review progress to date.

## **BENEFITS OF TRIUMVIRATE ENVIRONMENTAL EHS ASSISTANCE**

Triumvirate fully understands the challenges in maintaining compliance with the many, ever-changing laws and regulations facing colleges such as CCRI. With limited internal resources, constrained budgets, and multiple responsibilities, it is difficult, at best, for companies to ensure compliance with all local, state and federal EHS requirements.

In addition to providing comprehensive environmental services, including hazardous waste management and disposal, field services and consulting and training services, Triumvirate's EHS compliance staff is an experienced, highly trained and innovative group of dedicated professionals, with many years of experience, who are well qualified to assist you. Our company is dedicated to environmental, health and safety compliance. We strive to provide the highest quality and most cost effective services.

Subject to local, state, and federal regulations established under the Clean Air Act, Clean Water Act, Emergency Planning & Community Right-to-Know Act, Resource Conservation & Recovery Act, the Department of Transportation of Hazardous Materials, International Air Transportation Act, and the Occupational Safety & Health Act.

CCRI is committed to the safety of their employees and to compliance with applicable regulatory requirements. Currently, the responsibility of complying with applicable EHS laws and regulations and maintaining consistency lies with individuals who have other time consuming responsibilities. The challenges that this system poses includes:

- Identifying and keeping current with applicable laws and regulations;
- Tracking the accountability of those responsible for compliance;
- Ensuring that all permitting and reporting requirements are being met; and most importantly,
- Maintaining an overall “big picture” of CCRI’s compliance status.

With your best interests in mind, we invite you to consider an EHS compliance program that addresses the above challenges. Specifically, our Scope of Work offers a holistic approach, by giving you the benefit of our solid team of experts on a consistent, ongoing basis, rather than a “shotgun,” reactive approach to compliance issues as they arise.

#### **What are the benefits of routine onsite EHS assistance?**

- ✓ Cost savings associated with comprehensive EHS services provided in tandem versus separately;
- ✓ Most expedient means of addressing identified issues of non-compliance;
- ✓ Provides customized, facility-specific employee training for maximum benefit to your operations;
- ✓ Provides immediate access to an experienced team of environmental professionals skilled in all areas of EHS compliance, and
- ✓ Promotes proactive versus reactive compliance with applicable regulatory requirements, which minimizes the potential for penalties.

#### **Added Value**

- **Niche Focus** - As the leading environmental services firm within higher education settings, Triumvirate Environmental understands the culture of laboratory and facility type environments.
- **Experience** - Our staff is led by highly trained certified environmental auditors with over 100 hours of technical training on hazardous waste management and environmental compliance.
- **Technical Experts** - Triumvirate will provide support to CCRI for hazardous waste removal and compliance. Our extensive resources and highly trained people are able to assist with environmental, health & safety goals.
- **Status Reports** - These reports will provide CCRI with valuable information specific to completed tasks, on-going projects, issues identified, and any service that will need scheduling.

- **Routine Summary Development** - To standardize duties that occur, Triumvirate will compile all routine tasks into a summary. This will detail how all services are completed in an efficient manner.
- **Emergency Response** - With Triumvirate already on-site, we can respond to any spill that occurs.
- **Exotic Waste Management** (i.e. High Hazard, Compressed Gas, DEA, Select Agent, Biological, and Radioactive Wastes) - Triumvirate will provide highly trained staff to assist with the proper handling and management of these types of waste streams.

**Benefits of Utilizing Triumvirate Environmental, Inc:**

- **Work Force Dependability** - Triumvirate will train multiple persons to share the responsibilities, eliminate inconsistent scheduling, and create a strong team dedicated to CCRI's needs.
- **Minimize Costs** - Hiring Triumvirate's chemists eliminates costly benefits, vacation days, sick days, and the human resources and management burden of turnover and oversight.
- **World Class Expertise** - Triumvirate's chemists are highly trained and have a wealth of corporate support, expert consultants, and compliance specialists available for technical and compliance assistance.
- **Higher Education Community** - Triumvirate works with more than 90% of all colleges and universities in New England and fosters a community dedicated to networking and shared success. State Universities such as UMass Amherst, Lowell and Dartmouth are a few that currently receive onsite support services. Brandeis, Simmons, Wentworth, Emerson, Holy Cross, Tufts, Woods Hole Oceanographic Institute among other schools that utilize our services and participate with our growing network of professionals.

Sincerely,

Michael P. Dube, CEA  
Senior Account Manager - Education Division

CC: Sandra Perry, Consulting Services Manager  
Rick Foote, EHS Onsite Services Program Coordinator

*Annual Environmental Health & Safety Services  
Proposal approval by Authorized Representative*

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Company: CCRI \_\_\_\_\_

Date: \_\_\_\_\_

Working Agreement No.:7016 \_\_\_\_\_

Purchase Order: \_\_\_\_\_