



## PSC Industrial Outsourcing

### PSC's Fresh Start Environmental Management System Uses Online Regulatory Content to Ensure Compliance

"PSC solves clients' toughest environmental and industrial services challenges with the industry's most qualified people, state-of-the-art technologies and customized service programs." This is the mission statement of PSC Industrial Outsourcing LP – headquartered in Houston, TX with more than 2,000 employees at 100 locations across North America. PSC services include oil recycling and recovery, saltwater deep well injection, Naturally Occurring Radioactive Material (NORM) decontamination, sludge processing and more. PSC's Industrial Services Division addresses environmental management challenges on behalf of the petroleum refining, petrochemical, electric utility, manufacturing, transportation and other industries as well as a variety of government agencies.

In 2011, however, PSC senior management turned to the company's own environmental department and asked, "How do we confirm the fact that our facilities are in compliance with the regulations? How do our local managers know what regulations apply to their operations?" The environmental team responded by developing and deploying the Fresh Start Program. Modeled after ISO 14001, Fresh Start is a comprehensive environmental management system (EMS) designed to address a broad spectrum of compliance challenges. One of the EMS' first priorities is determining and communicating all of the applicable environmental regulatory requirements for PSC's dedicated nationwide network of industrial, transfer and recycling facilities.

The PSC environmental management team chose Sphera CyberRegs®, an online regulatory content service, as its primary resource to establish a baseline knowledge of the hundreds of federal, state or local regulations that apply to each of their 37 facilities and then track additional rules and changes.

"A critical component of any EMS is identifying the legal requirements," said Satara Henry, Division Director for Environmental Compliance. "In the evaluation phase, our team uses the Environmental Screening Questionnaire, Environmental Evaluation Form and Risk assessment tools to identify site-specific service line activities and how they impact the environment. Support programs like Sphera CyberRegs are instrumental to us keeping up with new and ever-changing regulations."

#### Challenge

- Identify environmental regulatory requirements for nationwide network of 37 dedicated industrial, transfer, and recycling facilities
- Assure compliance with new and ever-changing federal, state and local regulations
- Increase measurable environmental performance results across the company

#### Solution

Compliance Assurance Solution

- Regulatory Content for EHS
- Task Management

#### Results

- Established company-wide environmental management system (EMS) based on ISO 14001
- Enabled EMS with online regulatory content for government regulations and industry standards
- Helped divisional and facility managers collaborate with shared source of regulatory content
- Saved time/effort and improved data quality by replacing manual processes and disparate systems with instant access to authoritative regulatory info
- Provided requirements for 50-60 compliance tasks per year – 1000s of tasks annually companywide
- Helped EMS reduce Notices of Violation and Self-Reported Exceedances by 50% AND achieve zero reportable spills in 2012

## PSC Makes Fresh Start with Online Regulatory Content

PSC's leadership team has assigned ownership for compliance data to environmental managers at the individual site-level, who are most familiar with their operations, while assigning divisional environmental managers to provide best-practice guidance and standardization across facilities.

"We work together to determine which regulations really apply to a specific site," said Satara Henry, Division Director for Environmental Compliance.

"In some cases, we might be focused on used-oil regulations or storm-water regulations while at other sites the issue might be waste characterization – documenting whether a material is either exempt or non-hazardous. Some of our sites have to maintain air emission permits. It all depends on the nature and extent of work we do at that facility and how it compares to complicated regulatory standards – especially at the state and local levels because we operate in so many jurisdictions."

Prior to PSC's implementation of Sphera CyberRegs, those managers typically relied on manual processes or a patchwork of disparate tools to look up applicable regulations. The resulting workflows and applicability findings were not always consistent or efficient. Once Sphera CyberRegs was deployed as the company-wide standard, its managers still had the flexibility they needed to address their facility's issues but they were all now accessing the same authoritative regulatory information – saving time and money in the process.

Once regulatory requirements are identified, tasks were created and assigned through Fresh Start protocols to allow PSC to demonstrate compliance. Routine divisional calls provide an opportunity for the team to discuss regulatory challenges, share best practices and discuss upcoming regulatory updates.

By spending less time looking up details regarding regulatory requirements, the PSC environmental compliance team is able to invest a larger proportion of its time and attention on fulfilling those compliance responsibilities. A typical PSC facility averages an estimated 50-60 compliance tasks per year – adding up to thousands of total compliance tasks annually across the company.

"Understanding which regulations apply is also critical during the auditing process," Henry added. "We are required to audit our operations every 2 to 5 years depending on the facility. The audit team members may not be familiar with the site or the jurisdiction so they use Sphera CyberRegs to see which regulations apply – or if some aspects of its operations are exempt from a regulation – and to verify that we are fully documenting our compliance."

In some cases, the PSC environmental team has gone beyond government regulations to assure compliance with industry best-practice standards.

"We have decreased both Notices of Violation (NOVs) and Self-Reported Exceedances by 50 percent. In 2012, PSC did not have a single reportable spill! Our brand is built on providing our clients with best-in-class performance. Our Fresh Start EMS helps us do this and it is almost effortless with a tool like Sphera CyberRegs."

Satara Henry,  
Division Director for Environmental Compliance  
Industrial Services Division  
PSC Industrial Outsourcing LP

For example, one group is using the Sphera system to support the American Society for Testing and Materials (ASTM) standards for tank cleaning services, confined space entry and tank integrity assurance.

Ultimately, Henry emphasized that, "The biggest benefit we get from Sphera CyberRegs is from the updates it provides – the automated notifications that tell us when there is a change in the regulations and help us determine how that change is going to affect both our facilities and our customers. Our company is in the business of assuring compliance and the regulations are always evolving so it is essential that we are always current on the latest rules and requirements all across the country."

With the implementation of its comprehensive new environmental management system, the PSC team has already achieved outstanding, measureable results.

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