



Environmental Management Briefing

for scrap recyclers only

9000 Solutions Group

www.scrapleaders.com

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Is your environmental system too people-dependent?

When we at 9000 Solutions Group start working with a scrap recycler on an ISO 14001 environmental program, we usually find good news and bad news:

- a) The good news: The recycler is almost always fully compliant with laws and regulations.
- b) The bad news: The environmental system is highly people-dependent. Almost dangerously so.

Here's what we mean. In most scrap firms, management of the relevant permits, reports, certificates, controls, etc. is assigned to a single individual. (Sometimes this person is a "compliance specialist" or what we often call "The Alphabet Person": EPA, DNR, OSHA, etc.) Usually this person is highly dedicated, detail oriented, thorough, and competent at keeping the maze of environmental activities under decent control.

And, just as often, much of the critical detail is inside the person's head.

This presents two problems. First, even the best and brightest of us has a struggle trying to remember even just the key details of every permit, deadline, report, certificate, test result, etc. This can result in missed deadlines, lack of follow-through, and, potentially, NOV's or worse.

Second: if the person leaves the company, the replacement has a terrible problem catching up.

Bringing the environmental control practices under an ISO 14001 program greatly reduces the people-dependency. It organizes the information, makes it easy to access, control, and schedule, and puts the practices on an objective system footing that helps assure that compliance – and environmental performance – continue and improve over time.

ISO 14001 is not a tool for getting compliant with environmental regulations. Most scrap recyclers are already there. ISO 14001 is a tool for *staying* compliant – as people, regulations, and circumstances change, protecting the recycler from needless and foreseeable crises and expense.

– Rob Kantner

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