

Administration & Finance

BUSINESS POLICY LETTER

TO: All Members of the University Community 97:46

DATE: September 1997

Environmental Audit Policy

(Supersedes 92:4; updated, not revised)

I. PURPOSE

Because of the tremendous costs of environmental clean-ups, asbestos abatement, underground storage tank remediation, and retrofilling of PCB transformers, it is prudent practice to determine before acquiring or accepting any real property what environmental liabilities Ferris State University might incur with that purchase or acceptance.

II. PROCEDURES

Prior to the purchase or acceptance of any real estate, a Phase I Environmental Audit will be performed by an outside consultant chosen from an approved list, which will be updated regularly.

This Phase I Audit will minimally include the following items:

- A. Document and Record Review - Information on the previous use of the property and the past or present environmental problems will be collected and reviewed. This information will be obtained from all the following sources, if available:
 1. Title records, to determine past property owners;
 2. Historical aerial photographs of the site;
 3. USGS Topographic Maps of the area;
 4. Federal Superfund Sites (CERCLIS) list;
 5. National Priority List of Federal Superfund Sites;
 6. Michigan Sites on Environmental Contamination Act 201 List;
 7. Michigan Hydrocarbon Production Sites with Environmental Contamination;
 8. Michigan Landfills and Disposal Sites listed with the State of Michigan;
 9. Records of past environmental incidents at the Michigan Department of Natural Resources, Michigan Department of Public Health, the County Health Department, the City Public Health Department, and Fire Department;
 10. Records of past permits for waste discharge or waste disposal at the Michigan Department of Natural Resources, Michigan Department of Public Health, the County Health Department, and the City Public Service Department.
- B. Site Inspection - A Site inspection will be conducted to identify other sources of potential environmental contamination. The potential sources to be considered include:
 1. Presence of flooring, insulating and/or sealing materials which may contain asbestos;
 2. Presence of above-ground or underground storage tanks;
 3. Presence of PCB transformers and/or capacitors;
 4. Past or present activities conducted and chemicals, toxic and/or carcinogenic materials used or which may have been on the property that may cause environmental concern.
- C. Report - A formal report of the results of the Phase I Environmental Audit will be prepared, which will include recommendations for additional investigation, if required.

Upon review of the Phase I Audit Report, a determination will be made whether a Phase II Environmental Audit is required. A Phase II Environmental Audit may include sampling of the air, the soil, or water (including ground water) for contaminants. The following list indicates what typical findings in the Phase I Environmental Audit would indicate that a Phase II Environmental Audit be performed;

1. Evidence that a building contains asbestos containing material (ACM) would require that samples be

- taken for analysis and the scope of the removal project and cost estimated.
2. Evidence of a PCB transformer would require an estimate for the retrofilling or replacement.
 3. Evidence of past or present property use for chemical, toxic or carcinogenic material handling or storage may require soil samples, ground water sampling, or exploratory excavation.

It is the policy of Ferris State University to fully comply with all Federal and State laws pertaining to Environmental Contamination. It is also the policy of Ferris State University that before real estate is acquired, either by purchase, gift, bequest, or otherwise, that an environmental audit be performed to minimize the potential liability to the University.

In furtherance of this policy, prior to the purchase, receipt through gift, bequest, or otherwise, the Phase I Environmental Audit shall be conducted and a report shall be made available to the offices of the Vice President for Business Affairs and the General Counsel. The decision as to whether a Phase II Environmental Audit should be conducted will be made by the Vice President for Business Affairs, after consultation with the Office of General Counsel and Environmental Engineer's Office - Physical Plant Department.

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