

# VANGUARD

ENVIRONMENTAL, INC.



North America's Foremost Expert in  
Regulatory Compliance Management

*Sustainability Through EHS Compliance!*

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van • guard (văn 'gärd') n.

1. the leading position in a trend or movement; 2. the foremost position in an army or fleet.



# Why does Vanguard serve more companies across North America than any other regulatory compliance consulting firm?

**I.** There are well **over 60 Laws/Regulations** imposed upon industry by the U.S. EPA, OSHA, U.S. DOT, and the Department of Homeland Security, with further regulations mandated by state, county, and local regulatory agencies.

**II. Significant Enforcement Penalty Policies** (increasing annually via the U.S. CPI).

## **Two Examples:**

- EPA's penalty policies are set from \*\$69,000 per day to \*\$121,000 per day.
- OSHA's penalty policies are set in a range, depending on the severity of the violation and several factors...\*\$16,131 to \*\$161,323 per violation.

\*[These 2024 numbers increase annually via the U.S. Consumer Price Index.]

## **The popularity of Vanguard is founded on two core values:**

- (1)** Ethics, featuring turnkey compliance for a flat-rate fee, avoiding "billable hours;"
- (2)** Treating others the same way you'd like to be treated (*The Golden Rule*)!

The attention of Vanguard's staff is focused on **efficiency through precision due diligence** to satisfy and manage a client's EHS compliance, rather than generating high-dollar revenues. After all, why should a client have to pay for inflated hours, or worse, something not required by law?

With dozens of degrees and certifications, Vanguard's personnel maintain over 400 combined years of EHS compliance experience, comprising departments in Environmental Engineering, Environmental Science/Technology, OSHA Education, Regulatory Specialists, and Information Technology.





## Converting enforcement risks to *Risk Management Value!*

Established in 1992, Vanguard serves its clientele in the same way a CPA firm handles a client's IRS and tax matters (Canada Revenue Agency / CRA in Canada), thereby converting each client's *Risk Management Metric* (a measurable minimum dollar amount of enforcement risk) to a *Risk Management Value* through an alliance that typically lasts for decades. This, in turn, keeps the client's personnel focused on their own company's operational and revenue-producing activities, while relying on Vanguard to enhance the client's commitment to corporate citizenship, environmental stewardship, and world-class sustainability.

Though they may not realize it, virtually every client has a *Risk Management Metric* equal to \$540,840 at a minimum in 2024 (increasing annually via the U.S. CPI). Vanguard offsets that minimum number by automatically satisfying 20 different EPA, OSHA, and DOT compliance laws on behalf of the client on the very first service, along with identifying any compliance gaps the client may have on over 40 other regulations regarding water, air, chemicals management, and occupational health & safety training. Each compliance gap increases the client's overall *Risk Management Metric*. So, it's one of the wisest decisions anyone can make to have Vanguard convert their *Risk Management Metric* to a *Risk Management Value!*





## U.S.EPA

- SARA Title III, Sections 301-312  
(March 1 deadline annually)  
- HMIS & HMMP for Selected Cities
- Toxic Release Inventory, aka Form R  
(July 1 deadline annually)
- Per- & Poly-Fluoro Alkyl Substances (PFAS)
- Stormwater Runoff Permitting  
(Pollution Prevention Plan & Training)
- Spill Prevention Control & Countermeasure (SPCC) Plan & Training
- Air Permitting – Major & Minor Source, FESOP, Permit-by-Rule, & ROSS
- Emissions Inventory Reporting  
(State-specific deadlines annually)
- RCRA Hazardous Waste – All Services  
(HazWaste Mgmt. Plan, Reporting, Training, Re-Notification, Source Reduction / Waste Minimization, Contingency Plan, Emergency Response Plan)
- Chemical Data Reporting  
(Toxic Substance Control Act / TSCA)
- ESG Reporting  
(Environmental, Social, & Governance)
- Phase I Environmental Site Assessment (ESA)  
(with ASTM's new standard: E1527-21)
- Registration of Hazardous Substances (RoHS)  
(Selected States)
- **California-Specific...**
  - Hazardous Materials Business Plan (HMBP)
  - Proposition 65  
(Implementation & Consumer Labeling)
  - Stormwater Reporting via SMARTS  
(July 15 annually)
  - Injury & Illness Prevention Program (IIPP)
  - Heat Illness Prevention Program (HIPP)
  - Workplace Violence Prevention Program (WVPP)
- Michigan Pollution Incident Prevention Plan (PIPP)
- Florida Environmental Resource Permit (ERP)





## OSHA-GHS / DOT / Homeland Security

*(onsite employee training, bilingual as needed)*

- Hazard Communication (HazCom)...  
All States, Provinces, & Territories  
(WHMIS in Canada)
- OSHA Compliance Modules: Baseline & Comprehensive (multiple compliance laws to save time, money, & workplace productivity)
- Lockout/Tagout (Machine-Specific), HAZWOPER, Indoor Air Quality, Blood-borne Pathogens, Noise Monitoring, Forklift, Respirator, Confined Space, Arc Flash Safety, New-Hire Orientation, & more.
- OSHA Process Safety Mgmt. & EPA Risk Mgmt. Plan
- DOT "HazMat Employee" Training, HazMat Security Plan, "24-Hour" [Air, Land, & Sea], & International Maritime Dangerous Goods
- Terrorist Prevention Programs (Security Clearance)

## Miscellaneous Compliance Programs and Services

- Sexual Harassment Training  
(Selected States)
- Chemical Weapons Convention  
(International)
- Persistent Organic Pollutants –  
Banned Toxics (Stockholm Convention)
- Endocrine Disruptors Screening Program
- Conflict Minerals Reporting –  
Supply Chain Analysis (Selected Entities)
- Occupational Vibration Exposure

### Coming soon:

- *EMS Mexico!*
- *EMS EU/REACH!*
- *EMS Global!*



# Vanguard's Four Primary Benefits

*It's easier to stay out of trouble  
than to get out of trouble!*

When industry executives face significant risks on a myriad of compliance laws, Vanguard addresses those risks in the form of four client benefits, the equivalent of a grand-slam homerun!

## **1. Risk Management Against Enforcement Penalties**

There are four penalties with every Notice of Violation (NOV). These risks must be managed.

- (1) The civil penalty
- (2) Attorneys' fees – usually 30% to 50% above the civil penalty
- (3) Lost productivity costs suffered through one-to-three years of legal proceedings
- (4) Violators then placed on inspectors' "hit lists" through agency networking

## **2. Legislative Updating**

Regulatory compliance laws evolve by about 30% per year through scientific research, amendments, reauthorization, and newly enacted laws. Vanguard alerts the client via regulatory updates, typically building the updates directly into Vanguard's systems and programs.

## **3. Economic Benefits: Flat-rate Fees vs. Excessive "Billable Hours"**

Regulatory compliance must be cost-effective. That's why Vanguard's philosophy on cost is based on flat-rate reasonable fees for each turnkey service, as opposed to the exorbitant scheme of "billable hours." Cost effectiveness is key, or the relationship between the client and Vanguard would be short-lived.

## **4. Technical Representation in the Event of Enforcement Inspections**

Every compliance project Vanguard performs is accompanied by defensible documentation, an inspection showpiece to be shared with an enforcement inspector at a moment's notice. This is evidence-based compliance at its finest!



# Environmental Management Systems: *EMS USA!, EMS California!, and EMS Canada!*

**Compliance Gap Analysis.** Vanguard's proprietary technologies execute precision due diligence to screen the client's facility against, literally, billions of variables to provide compliance excellence. There are over 60 Environmental, Health, & Safety (EHS) Compliance laws imposed upon Industry by the U.S. EPA, OSHA, DOT, & Homeland Security. An overwhelming majority of them are based on three government benchmarks:

**(1) Chemical Hazards, (2) Thresholds in 4 Categories, (3) Regulatory Mandates**

**Facility Management Reports (FMRs).** The client's *Environmental Management System (EMS)* is comprised of over 20 FMRs to illustrate complex details required by federal, state, county, and local agencies. This defensible documentation, aka evidence-based compliance, brings the essential firepower to an enforcement inspection to send inspectors on their way.

**Regulatory Compliance Management.** Once Vanguard gathers a facility's compliance data (109 data points), then develops the client's *Environmental Management System*, the client's compliance is satisfied and managed, year-in and year-out, just as the client would expect. Sr. Managers don't want to become experts in the regulatory compliance field. They want to protect their bottom line against penalty policies starting at \$64K per day.

**EMS Summaries I, II, and III.** The client's *Environmental Management System* highlights three site-specific summaries for optimal understanding of a facility's *Regulatory Compliance Agenda*. Summary I demonstrates results for 20 EPA, OSHA, and DOT laws/regulations – automatically satisfied – then illuminates the client's *Risk Management Value*, representing a minimum offset of the client's exposure to enforcement risks! In screening over 40 other laws to identify the potential for a client's compliance gaps, Summary II identifies compliance gaps stemming from the U.S. EPA and Homeland Security, while Summary III covers laws and regulations imposed upon industry by OSHA and the U.S. Department of Transportation.



# *Sustainability Through EHS Compliance!*

