

## Environmental Impairment Risk

Our world is fragile and so are we! Could we have a starker reminder of this than the Deepwater Horizon oil spill disaster in the Gulf of Mexico earlier this year?

There are many lessons which have been learned and remain to be learned from the Deepwater Horizon catastrophe. All the facts are not known, but one factor is certain: It will take a long time for all the facts surrounding the oil spill to be made known. If there is any doubt about this, consider how long it took for the full story of the 1989 *Exxon Valdez* oil spill off the coast of Alaska to become known.

Investigations into the *Exxon Valdez* accident found a breakdown in risk management procedures and practices. Contributing factors to the accident included: 1) failure by the shipping company to maintain the ship's sonar equipment in operating condition; 2) sailing into unsafe waters without an adequate safety plan; and 3) allowing a captain with a history of a drinking problem to be in charge of the vessel. This factor led to the third mate being in charge of the vessel at the time it struck the reef. Ironically, the third mate didn't know how to turn on the sonar even if had been operational.

Early information on the cause of the Deepwater Horizon disaster suggests that breakdowns in risk management practices were the underlying cause of this accident as well. Disaster often follows when those who are in charge don't make risk management a number one priority. Now that the spill appears to be contained, the rest of the story will eventually unfold.

### Overview

As camp memories fade into fall weather and the holiday season, planning for summer 2011 is well underway. While the disastrous images along the coastlines of the Gulf of Mexico are still fresh in our thoughts, let's take some time to consider environmental risk at camp.

Environmental risk at camp is more than an oil spill. Environmental risk is the chance that campers, staff, and other people's health will suffer harm, or that natural resources will be damaged, as the result of environmental hazards at camp.

The risk includes diminished property value, collateral value, and potential inability to sell the property because of the presence of environmental hazards such as toxic mold, asbestos, lead, polychlorinated biphenyls (commonly known as PCBs), radon, or other hazardous materials which may be leaking from areas on your camp property used by previous owners as a dump.

The risks vary greatly from one camp to another, as does the degree of risk. Who owned the property before, how they cared for it, and who your neighbors are can influence your camp's environmental risk. Damages and consequences can vary greatly as well.

Costs to defend civil suits alleging impaired health from exposure to toxic mold at camp, for example, can be significant and are most likely not covered by general liability insurance. Costs to respond to actions brought by the state and federal environmental protection agencies for clean-up can go on for years.

Risk management planning begins with risk identification. This is the foundation of the risk management process. For the record, camps have a marvelous history of being conservators of and advocates for the environment. In spite of this, environmental risks remain and grow. The risk doesn't go away if it is not recognized, or if it is recognized and ignored. Dedication to the risk management process, increased awareness of

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environmental risks at camp, and vigilance are needed. We must overcome the inertia embodied by the thought "it can't happen here."

The purpose of this article is to raise awareness of environmental risk and to urge camp professionals to upgrade and refine their environmental risk management plans.

The following are some environmental risk issues which are common to many camps.

### Site Pollution Risks

**Risk:** Presence of remediated underground storage tanks (USTs) on the camp premises.

In the past, gasoline and diesel fuel tanks were often buried underground because they were unsightly. Burying them often

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**Risk Management** continued from page 16 allowed the owner to put in a bigger tank for convenience, and also reduced the risk of spills from vehicle damage or from damage during windstorms, tornados, and floods.

Like many ideas, it seemed good at the time. But the recipe for a problem developed out of the fact that most of these underground storage tanks were made of steel. After some time in the ground, the steel would break down and fuel would begin leaking into surrounding soil — in some cases, polluting aquifers, wells, lakes, and streams; making people sick; and damaging property values.

As camp owners became aware of the issues, many took action to eliminate the pollution risk by removing the

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underground tanks or draining and sealing them in place. If you still have sealed, steel USTs on your property, try to get some documentation from the local fuel company or state environmental conservation unit that it has indeed been sealed and the date it was done. Confirmation of this may be important to you if you ever plan to sell the property, or if a neighbor discovers hidden damage on their property and decides to sue using a “shot gun” approach to identify responsible parties.

**Risk:** Leakage of fuel from a damaged above-ground storage tank (AST).

As the risks of USTs became known, camp owners moved their fuel storage above-ground to reduce the risk of continuous, undetected seepage from a compromised underground tank. As is sometimes the case, one solution that solves a problem results in another risk developing that was not initially anticipated. Specifically, camp vehicles began striking the tanks, causing spills and property damage. Camp directors realized the problem and reduced this risk by strategically placing steel or concrete

posts in the ground in front of the tanks. Some also began placing containment systems (dams or dikes) around ASTs to contain any spill that might occur. This is especially important around ASTs at your waterfront.

If your camp ASTs are not protected against vehicle damage, or enclosed in a containment system, you’ll want to investigate these risk reduction actions at your first opportunity.

**Risk:** Hazardous materials are used for maintenance and cleaning at camp.

Toxic, hazardous materials are everywhere in the maintenance garage at camp: for example, all sorts of wood finishing products such as paints, stains, shellac, and varnish; lubricants for chain saws; herbicides; and pesticides. Hazardous materials are also found in many of the daily cleaning products used by housekeeping staff.

Knowing the hazardous properties of each item, what to do if someone is exposed in normal use, the type of personal protective equipment needed to reduce the risk of exposure, and how to properly use and dispose of these materials are absolutely essential parts of a camp risk management plan. Securing the material data safety sheets for all of these hazardous materials will provide insight and help you decide how to reduce the risks.

Hazardous materials which are improperly dumped on your property or into your septic system may not only damage the system, but may also migrate onto your neighbor’s property, potentially causing hundreds of thousands of dollars in damages. Other consequences may include delays in the sale of your property and/or the neighbor’s property until the environmental impairment is cleaned up.

**Risk:** Storage, handling, and use of chlorine and other potentially hazardous pool chemicals. Storing, handling, and using chlorine presents many risks. If you use chlorine in your pool and to treat your water supply, take time to be sure you understand all the facts and risks associated with it. Chlorine can be deadly if not handled properly in a commercial environment.

The type of chlorine in use (liquid, gas, tablet, or granular) matters, as does how it is stored. Educate staff responsible for the operation of your camp pools. Encourage staff to complete certified pool operator programs if the courses are not already required in your state.

Provide appropriate personal protective equipment for all employees involved in handling, using, and storing chlorine. Arrange for continuing education of staff. Enlist them in the development of your emergency action plan if there is an accident involving chlorine. Seek substitute products, should they become available, to reduce the risk of exposure to chlorine.

### **Other Risks**

Consider the following additional risks to begin your own risk identification process:

- Waste water treatment facility operations
- Drinking water treatment operations
- Auto repair and maintenance operations
- Chemicals used in photo labs
- Medical/bio-hazard waste from wellness center

There are many other risks at camp than just the ones highlighted above. Take the time this winter to consider the environmental risks/hazards unique to your camp program, location, and facilities.

Form a team to assist you: key staff, possibly an engineer, your lawyer, and an insurance broker. While some risks may be managed through policies and procedures, others that pose catastrophic loss potential might be handled more appropriately through buying insurance. Then take action to protect your campers, staff, organization, and the environment.

Good luck in your efforts!

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*Edward A. Schirick, C.P.C.U., C.I.C., C.R.M., is president of Schirick and Associates Insurance Brokers in Rock Hill, New York, where he specializes in providing risk management advice and in arranging insurance coverage for camps. Schirick is a chartered property casualty underwriter and a certified insurance counselor. He can be reached at 845-794-3113.*