

Robert A. Bray

Mr. Bray is a Managing Director of The Elm Consulting Group International, LLC., an independent environmental, health, and safety consulting practice. Mr. Bray has 21 years of experience in regulatory compliance and environmental management, helping clients from the automotive, coatings, petroleum, food processing, electronics, consumer product, aerospace, primary and secondary metals, pharmaceutical, printing and utility industries understand the complex and ever-changing environmental regulations and policies. Mr. Bray's specific environmental management experience includes assisting several large corporations in the design and implementation of auditing programs and environmental management systems by conducting training, developing state- and industry-specific audit protocols, developing audit report formats, designing databases to store and track audit information, and leading audit teams in the field. The following are examples of Mr. Bray's project experience:

- Mr. Bray has conducted more than 450 compliance/management systems audits throughout the world. He has managed a number of other projects for clients as well, such as developing facility-specific environmental procedures manuals, conducting environmental, health and safety awareness training, performing targeted regulatory and statutory research, conducting waste characterization and hazardous wastes management.
- Conducted management systems audits of large aerospace facilities to determine causes of non-compliance with environmental regulations and provided recommendations to eliminate these causes. Project consisted of conducting a multi-media compliance audit and interviewing key facility and corporate personnel to evaluate the environmental management activities at the facility and corporate levels. Recommendations were made to revise existing management systems to reflect operation philosophies. A follow-up assessment revealed the facilities had reduced compliance deficiencies through the implementation of recommendations.
- Conducted multi-media environmental compliance audits of food processing facilities throughout the United States and Canada. Facilities were evaluated for compliance with federal, state and local regulations governing air emissions, wastewater management, storm water management, solid and hazardous waste management, emergency planning and right-to-know, USTs, pesticide management, drinking water, and PCBs. Briefed facilities environmental staff, corporate environmental director and division counsel on compliance status.
- Performed environmental, health and safety (EHS) risk management services for an electric power generating company. The services performed include development and implementation of EHS risk based audit program. The program is designed to evaluate power generating facilities compliance with applicable standards and determine if the systems are in place to effectively manage SHE related risk. The scope of services includes the development of an SHE risk-management tool and performance of SHE audits. The risk management tool identifies and prioritizes the types of SHE related risk at the corporate and facility level. Based on the results of the audits the facility specific risk are identified and prioritized and a determination is

made as to whether the risk are being managed effectively. To evaluate risk we conduct SHE audits of facilities to evaluate compliance with local regulations and corporate guidelines. Upon completion of each audit a report summarizing issues identified is prepared and whether the facility are effectively managing SHE related risk. The areas evaluated during the program include EHS management, air pollution control, water and wastewater, emergency preparedness, waste management, employee safety, industrial hygiene and EHS sustainability.

- Performed comprehensive compliance audits at pharmaceutical/medical device manufacturing facilities located throughout the U.S., engaged in production (tablets, capsules, liquids and sterile injectables), medical equipment, and pilot scale chemical development. Audited facilities for compliance with federal and state regulations governing solid, hazardous and medical waste management, air emissions, emergency planning and right-to-know, USTs, wastewater discharges, drinking water, and PCBs. Briefed facilities environmental staff and division counsel on compliance status and ranked deficiencies according to corrective action priority.
- Develop and conducted environmental related training of environmental contacts from food processing facilities located throughout the United States. Training topics include waste management, ozone depleting substance recordkeeping and reporting, storm water management and spill prevention control and countermeasure planning.
- Responsible for developing and implementing environmental, health and safety programs for an aluminum casting facility. Responsibilities included day-to-day compliance with applicable EH&S regulations and corporate policies, air and wastewater permitting, industrial hygiene monitoring, accident investigation, emissions control system design, subsurface investigation and remediation project management, facility closure activities, waste pile characterization, building decontamination, and EH&S training.

Mr. Bray received a B.S. in Environmental Science from the University of California and currently a Board Member of the Auditing Roundtable. In addition, Mr. Bray is a Certified Professional Environmental Auditor and has successfully completed the ISO 14000 Lead Auditor training.