

# ACE YOUR 2021 ENVIRONMENTAL INSPECTIONS

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Bright ideas. Sustainable change.

# WHAT TO EXPECT IN PERSON



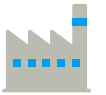


# PRE-INSPECTION TIPS

## HOW TO PREPARE

### Know where to find commonly requested information!

Facility description and map



Regulatory history



Existing compliance programs



**Up-to-date** compliance records (monitoring, work practices, recordkeeping, reporting)



Employee training records



Current environmental permits and licenses



# PRE-INSPECTION TIPS

## HOW TO PREPARE

### Make sure you can identify:

Your facility's  
SIC and  
NAICS codes

Waste  
streams (air,  
water, waste,  
hazardous  
waste)

Pollution  
control  
devices  
and/or waste  
minimization  
operations

Installation  
date of each  
process or  
potential  
source of  
pollution

History of  
spills and  
other  
accidents

Designate at least two spokespeople who know about this information and where to find it.

***Internal and third-party audits can help point out weak spots in your compliance programs!***





## COMMONLY MISSED SPCC

### **No SPCC Plan developed**

*1,320 gallons of oil  
in containers 55 gallons  
or larger*

### **Inaccurate facility diagrams and descriptions**

*Facility layout diagram must  
contain locations and contents  
of all oil storage containers,  
buried tanks, transfer stations,  
and connecting pipes!*

### **Prediction of direction, rate of flow and total quantity of oil that could be discharged from each area**

*"Gradual to Instantaneous",  
25 gpm, etc.*

### **Certification of the Applicability of Substantial Harm Criteria**

*Must be signed by the  
facility's certifying official*

# SPCC INSPECTION CHECKLIST

112.7(a)(3)	<p><b>Plan describes physical layout of facility and includes a digram<sup>7</sup> that identifies:</b></p> <ul style="list-style-type: none"> <li>• Location and contents of all regulated fixed oil storage containers</li> <li>• Storage areas where mobile or portable containers are located</li> <li>• Completely buried tanks otherwise exempt from the SPCC requirements (marked as “exempt”)</li> <li>• Transfer stations</li> <li>• Connecting pipes, including intra-facility gathering lines that are otherwise exempt from the requirements of this part under §112.1(d)(11)</li> </ul> <p><b>Plan addresses each of the following:</b></p> <p>(i) For each fixed container, type of oil and storage capacity (see Attachment A of this checklist). For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities</p> <p>(ii) Discharge prevention measures, including procedures for routine handling of products (loading, unloading, and facility transfers, etc.)</p> <p>(iii) Discharge or drainage controls, such as secondary containment</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No

[https://www.epa.gov/sites/production/files/2014-07/onshore\\_production\\_checklist\\_june\\_2014.docx](https://www.epa.gov/sites/production/files/2014-07/onshore_production_checklist_june_2014.docx)



# COMMONLY MISSED RCRA

Failure to identify hazardous waste/make a hazardous waste determination

Hazardous waste containers not currently in use left open

Missing hazardous waste labels or mislabeled containers

- Accumulation start date
- Type of waste (universal vs. hazardous, indication of the hazards)
- Satellite accumulation area vs. central accumulation area requirements

Inadequate aisle space

Incomplete manifest records



# RCRA LQG CHECKLIST

1. Uses manifest system-**262.20(a)(1)**
2. Maintains manifests for 3 years-**262.40(a)**
3. Has EPA I.D. number-**262.20(a)**
4. Has generator name, address, phone number on manifest-**262.20(a)**
5. Has transporter(s) name & EPA I.D. number on manifest-**262.20(a)**
6. Has designated facility name, address & EPA I.D. number on manifest-**262.20(a)**
7. Designates alternate facility on manifest (optional)-**262.20(c)**
8. Has unique pre-printed manifest tracking number and number of pages on manifest-**262.20(a)**
9. Has DOT shipping name, hazard class, waste code, and reportable quantity (RQ) (if required by 49 CFR 172) on manifest-**262.20(a)**

<https://www.epa.gov/sites/production/files/2018-05/documents/app-1-checklists-lqg.pdf>





# COMMONLY MISSED NPDES

**SWPP Plan not  
developed or not  
updated**

*Must be site-specific!*

**Missed inspections or  
compliance reports**

**Outfall monitoring  
and sampling**

*"Qualifying rain event"  
documented*

**Facility diagram  
incomplete**

*Must include outfalls,  
drainage areas, exposed  
significant materials and  
direction of stormwater flow*

# NPDES EVALUATION CHECKLIST

## SECTION 3.C.

### B. Recordkeeping and Reporting Evaluation

Yes	No	N/A	1.	Maintain record and report as required by permit.
Yes	No	N/A	2.	All required information is available, complete, and current.
Yes	No	N/A	3.	Information is maintained for 3 years (or 5 years for sewage sludge).
Yes	No	N/A	4.	If the facility monitors more frequently than required by permit (using approved methods), these results are reported.
			5.	Analytical results are consistent with data reported on DMRs:
Yes	No	N/A	a.	The data moves accurately from the bench sheets to the DMRs
Yes	No	N/A	b.	The calculations are performed properly (including loading, averages, etc.)
			6.	Sampling and analyses data are adequate and include:
Yes	No	N/A	a.	Dates, times, and location of sampling
Yes	No	N/A	b.	Name of individual performing sampling
Yes	No	N/A	c.	Analytical methods and techniques

[https://www.epa.gov/sites/production/files/2013-09/documents/npdesinspect\\_0.pdf](https://www.epa.gov/sites/production/files/2013-09/documents/npdesinspect_0.pdf)

# AIR

## YOUR PERMIT IS THE CHECKLIST!

**Go through your permit line-by-line**

**Pay attention to timelines**

- How often do you need to update usage records?
- What reports do you need to submit, and when?
- How long do records need to be maintained?

**Is your permit up-to-date with current facility operations?**

**Make sure you know what you are required to do for federal regulations (NSPS, NESHAP, ODS, GHG)**

- May not be listed in your permit!





# TRAINING REMINDERS

## WHEN & WHO?

### DOT

- Every three years
- Employees who “directly affect hazardous materials transportation safety” – commonly, those who sign hazardous waste manifests

### RCRA

- Annual training for KSQGs (Kansas), SQGs and LQGs
- Employees involved in waste handling and management

### SPCC

- Annual training
- All oil-handling personnel

### SWPPP

- Depends on permit – typically annual
- Pollution Prevention Team and any employees who work in NPDES covered areas

*Your air permit  
may have  
additional  
requirements  
(NESHAP 6H)*



# WHAT TO EXPECT VIRTUAL INSPECTIONS

## **Timeline is a bit different!**

- Agency will provide a due date and a list of requested documentation

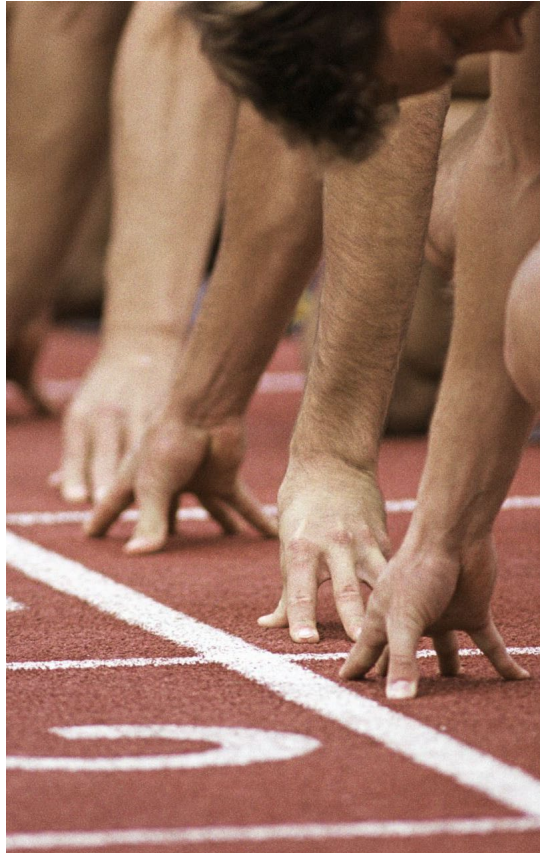
## **Potential to be more data driven**

- Can request years of records depending on the compliance area
- Compliance statements



# PATH TO SUCCESS

## ON YOUR MARK, GET SET...



**Are you updating your ongoing recordkeeping (daily, weekly, monthly, etc.) promptly?**

- Set an internal deadline before the regulatory deadline
- If you are relying on others to record or provide information, make sure they understand the significance of compliance

**Check your permits to make sure you have all necessary records**

- Natural gas bill, diesel fuel delivery ticket (ULSD), manufacturer/vendor certifications, safety data sheets, etc.

**Is employee training up-to-date and documented?**

- Where are these records kept? For how long?



# DOCUMENTATION & DIGITALIZATION

**Are you familiar with where all documents are kept?**



Consider transitioning to digital documentation when possible – it is typically easier to organize documents in folders, and subsequently easier to find what you are looking for!

**Working off an established management system can give a solid starting framework**



ISO 14001

**Take advantage of your resources!**



Teams, SharePoint, etc.

**Documents required for compliance need to be backed up!**



No desktop files!

***Gut check – if everyone helping to manage environmental compliance left, how long would it take for someone else to figure out where everything is?***

# WHAT TO DO

## VIRTUAL INSPECTIONS

You get this email from your state agency bright and early Monday morning:



*Your facility is due for a routine \_\_\_\_\_ compliance evaluation. Ordinarily, inspections are performed on-site and unannounced; however, due to the ongoing COVID-19 pandemic, we are performing our inspections off-site. To that end, I have attached some documents requesting the information necessary to determine compliance. Provide all requested information as soon as possible, but no later than **8:00 a.m. next Tuesday**.*

The attachments outline seven requested compliance statements and twenty-one (!) requested documents and records from 2018 through 2020.

**What is your initial reaction? How do you tackle this successfully?**

# PATH TO SUCCESS

## ... GO!

First things first:  
go through the entire  
request and see if  
you have any  
questions

01

Figure out what  
information you  
already have on file  
and who you will  
have to contact to  
get the rest

02

Start an inspection  
folder for your  
documentation  
Break out each  
document request  
into subfolders and  
save the information  
into the folders as  
you get it!

03

Organize your records  
using the same  
labeling as the  
request to make it  
easy for the inspector  
to find information

04

Provide additional  
supporting information  
if it will help show  
compliance  
This can include  
supporting statements  
explaining various  
operations, photos of  
equipment or name  
plates, or anything  
else you can think of!

05



# QUESTIONS?

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