

MANAGING ENVIRONMENTAL INSPECTIONS

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Your Inspector just called to let you know that tomorrow will be your Environmental Inspection, perhaps in water or air or waste. As you put it on the calendar, you are wondering what the Inspector might find, and worrying about which items could result in violations that are problematic to your facility, and therefore to you....

There are some easy ways to prepare for your inspection that will help it go smoothly. Obviously, being in total compliance with your permits 365 days a year is the very best way to manage an inspection. But in most organizations, being 100% sure that everyone is doing everything they are supposed to at every minute is a huge challenge. So, follow these basic steps to help cover some of the simple areas of compliance.

- (1). Get your permit out. Make sure you have the most recent copy on hand. Your permit and the regulations will be what your Inspector is checking against, so have it ready and read through it so you have a refresher in your mind of what your compliance requirements are.
 - (2). Make sure your records are readily available, for the last year at the very least. Most permits require 3-5 years of records be maintained, but if it is an annual inspection you probably only need the past years records printed out and on hand. (Make sure you have kept the other records, though, in case you are asked).
- The permit itself will list most of the records you have to keep, or will cite the regulations that list the records. Take ten minutes to make sure they are all there and up to date. If they are not, see step # 6 below.
- (3). Check that you have filed required notifications and reports, and write a post-it or small note summarizing the dates they were submitted, in case you are asked.
 - (4). Check that your personnel training records are available and up-to-date.
 - (5). Do a walk-through and look for obvious problems. In many industries, the same types of violations show up again and again, and are an easy fix. Look for open containers, open parts washers, signs that are not present or are unreadable, filters that are dirty, storm water conveyances or enclosures that have litter, or garbage receptacles that are overflowing. Make sure that all areas are clean and accessible.
 - (6). If you find that you have missing records, pull together the data needed for the records and have your support staff or a consultant put together your records for you for the inspection. Your consultant or environmental staff can later put together a system for ensuring that records are kept on a monthly basis so you don't have missing records again.

- (7). During the inspection:

- After the inspector arrives but prior to starting, determine the purpose of the inspection and complete whatever is the required safety discussion for your facility. Ensure that proper personal-protective equipment (PPE) is being worn.

- Clearly determine what areas of the facility or equipment at the facility the inspector wishes to see. Determine if there are any obstacles to the inspection or hazards (for example, active construction areas) and let the inspector know ahead of time if these are an issue.
- Allow inspectors to review all files that they request to see.
- Take accurate notes during the inspection (questions asked, documents requested, areas reviewed, etc.).
- If an inspector asks for copies of paperwork, make the necessary copies and also make a copy for the Environmental staff to keep as part of the inspection record.
- If an inspector obtains a sample of any material, take a duplicate sample and forward it to the Environmental staff using the same type of sample container and preservation. If you cannot take a duplicate sample, take detailed notes on what was sampled. Obtain the sample parameter list from the inspection.
- If an inspector asks to take a picture, make sure pictures are allowed and discuss the use of a flash and if personnel can be photographed. If a picture is taken, take a similar picture, if possible, and forward to the Environmental staff. If you cannot take a similar picture, take detailed notes on what pictures were taken.
- Be cooperative and answer questions. If you do not know the answer to a question or how to answer a request, tell the inspector that you do not know, but offer to get back with him or her within a reasonable time that gives you time to obtain the information. If you need to contact someone else within your organization, ask for time to get the correct person on the phone or to the facility.
- Always have at least one company employee present with the inspector(s). Do not leave the inspector(s) alone.
- Request a post-inspection meeting. Ask if anything was observed that needs immediate attention and ask if instances of non-compliance were found.
- Ask for a copy of the report (if available) before they leave or ask when we can expect to receive a copy of the inspection report.
- Share all notes, pictures, and inspection records taken during the inspection with your environmental compliance coordinator.

(8). Finally, if your Inspector finds problems, work with them to correct problems immediately. At the end of the day, using the inspection as a way to determine what procedures and systems are missing to ensure continuous compliance is what they are there for, and working with your Inspector on developing those procedures and systems is the very best way to help your company meet its environmental obligations.