How to Prepare for an Inspection and Navigate Enforcement

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How to **ALWAYS** be prepared for an inspection!
2 Rs

Relationships

Record Keeping
**Management**
- Major project coordination
- Help implement changes to procedures/policy
- Support for environmental program

**Operations Staff**
- Do the work to keep your facility in compliance
- Know when things go wrong
- Come to you with questions
- Go say hi, they probably have a question

**Inspector**
- Reach out if you have ANY questions
- Want you to be in compliance
- They’re a person too
Staff Training

• Familiarize with Permit Limits and Requirements
• Conducting any training required in plans or permits
• Record and document training
• Change something?
  – Do more training
  – Document that training
Records

- Hard copies of permits
- Where are records kept?
  - Electronic or Paper
  - Databases
- Who has access?
- Who is responsible for updates?
- What if they aren’t there?!
  - Develop a procedure
Records Review – Monthly

• Set up a system
• Monthly record keeping completed before the end of the next month
  – Downtime and permit limits
  – Production numbers and fuel usage
  – Lots of data – how is it organized?
• Conduct required inspections
  – Regular site walkthroughs
Do your plans look like this?

Update them!

Site specific plans –
• Malfunction Abatement Plan
• Startup Shutdown Malfunction Plan
• Storm Water Pollution Prevention Plan
• Fugitive Dust Plan

Is this plan being followed?

Contacts up to date?

Update them!
Records Review - Annual

- Internal Audit/Inspection
  - EPA Part 75 Field Audit Manual
- Read through your permit AGAIN
- Permit exemptions for equipment
  - New equipment on site
  - Old equipment retired or replaced
- Equipment maintenance and repairs
Day of Inspection

This is your first priority

- Cancel all your meetings
- Notify plant management
- All hands on deck – for questions

Yes, you have to let them in
After the Inspection

• Follow up with records requested
• Something not right?
  – Fix it!
• Expecting bad news?
  – Start bringing process into compliance now
  – Document everything
Hopefully, your next inspection will be a day at the beach
Thanks!

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