



Environmental
Protection Agency

Preparing for an Ohio EPA Inspection



Preparing for an Ohio EPA Inspection

- ★ General inspection process
- ★ What air, water, and waste inspectors look for
- ★ Preparing for an inspection



General Inspection Process

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Ohio EPA Inspections

Different divisions in Ohio EPA have their own inspectors:

- ★ Surface Water
- ★ Drinking & Ground Water
- ★ Hazardous Waste
- ★ Solid & Infectious Waste
- ★ Air Pollution Control
- ★ Emergency & Remedial Response

A business may be inspected by different divisions/inspectors during the year.



How Are Inspections Selected?

- ★ Annual inspections (USEPA grant commitments)
 - ★ large permitted facilities
 - ★ commercial waste treatment facilities
 - ★ large quantity generators of hazardous waste
- ★ Complaint investigations
- ★ Special inspection initiatives (dry cleaners, salvage yards)

Most routine inspections are announced. Most complaint-driven inspections are unannounced.



Types of Businesses

- ★ Metal Finishing
- ★ Printing
- ★ Electronics
- ★ Pulp & Paper
- ★ Metal Fabrication
- ★ Animal Feeding
- ★ Chemical Formulation
- ★ Food Processing
- ★ Metal Casting
- ★ Painting and Coating
- ★ Equipment Servicing
- ★ Building Products



Inspection Process

Opening Meeting



Facility Walk-through



Records review



Closing meeting



Letter

Before the inspection, have a plan

- ★ Who will talk to the inspector.
- ★ Have a camera that works. The inspector may take pictures – you can request copies, too.
- ★ Know how you will describe your operations, wastes, discharges, etc. to the inspector.
- ★ Know where environmental compliance records are kept.

When the inspector arrives

- ★ Know why the inspection is being done.
- ★ Get inspector's business card.
- ★ Tell the inspector about safety requirements of your plant.
- ★ Answer the inspector's questions. Don't be confrontational. Don't guess or make things up. If you don't have an answer, say so.

Air Pollution Inspections



Opening Meeting

- ★ Routine inspection or complaint
- ★ Discuss facility processes
- ★ Describe records to review
- ★ Air permit status



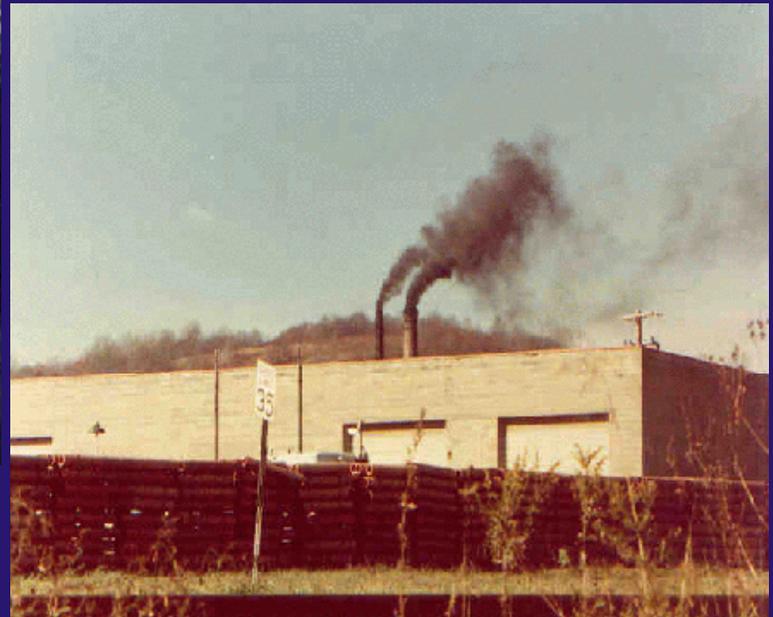
Air Pollution Walk Through

- ★ Check for visible emissions & off-property odors
- ★ Check records required by air permits
- ★ Check to see if everything that needs an air permit has one

What about “Testing the air”???



Visible stack emissions check = “Opacity”



EPA inspectors at “Smoke School” training to “read” stack plume opacity



Visible emissions of dust



Permit Records Check:

- ★ Paint and solvent usage, VOC content of materials
- ★ Fuel usage and fuel types
- ★ Material throughput, production rates
- ★ Pollution control equipment monitoring and maintenance
- ★ Emission test results (if required)



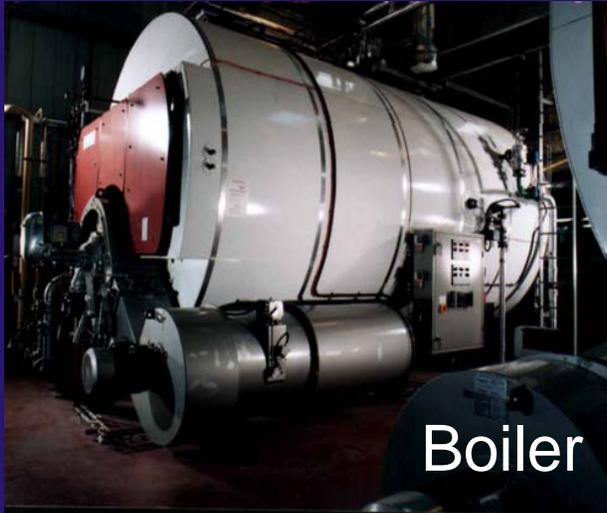
Checking for proper air permits

4 Rules of Thumb:

- ★ Something with a stack, vent, or dust collector
- ★ Something that uses solvents, paints, inks, or adhesives
- ★ Something that burns fuel
- ★ Something that causes smoke, dust or odors



Common Things Needing Air Permits



Boiler



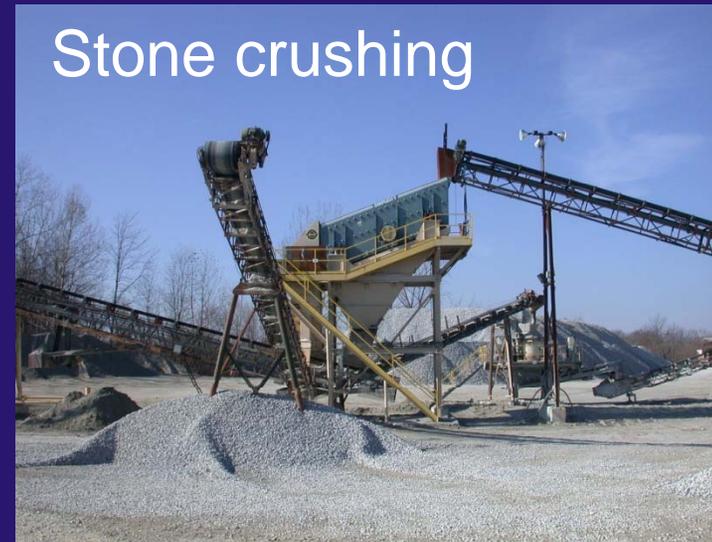
Printing press



Paint booth



Dry cleaner



Stone crushing

Does Everything Need an Air Permit?

NO, there are exemptions:

- ★ Permanent exemptions (OAC 3745-31-03)
List of 45+ types of equipment and processes that do not need an air permit.
- ★ Permit-by-rule option (OAC 3745-31-03(A)(4))
exempts 11 types of operations and facilities if they meet qualifying criteria and operating limits.

Does Everything Need an Air Permit? (cont.)

- ★ “De minimis” source exemption

(OAC 3745-15-05)

- ★ Emits less than 10 lbs/day of air pollutants, and
- ★ Less than 2000 lbs/yr of hazardous air pollutants
- ★ Can't be subject to federal rules
- ★ Requires emission calculations



Common Air Pollution Violations

- ★ Installing and operating equipment without obtaining proper air **permits**
- ★ Not maintaining records required by **permits**
- ★ Exceeding **permit** limits
- ★ Not maintaining air pollution control equipment



About Open Burning.....



Open Burning.....

- ★ Cannot burn waste as means of disposal:
 - ★ materials containing rubber, grease, or asphalt, or made from petroleum (tires, plastics, insulated wire, etc.), garbage, and dead animals.
- ★ Can be burned with permission:
 - ★ ceremonial or fire training fires
 - ★ wilderness/wildlife management fires
 - ★ landscape & agricultural wastes (outside of restricted areas only)
- ★ Call local Ohio EPA office with questions

Be prepared:

- ★ Identify your air pollution sources and determine if they are exempt or need a permit.
- ★ Keep air permits and required records in an accessible location; computer records are OK.
- ★ Be aware of any visible emissions and/or odors from your facility.
- ★ Maintain air pollution control equipment.
- ★ Cease any open burning.



Wastewater

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Surface Water Inspections

- ★ Different Types of Inspections

- Compliance Evaluation Inspection (CEI)
- Reconnaissance Inspection (RI)
- Compliance Sampling Inspection (CSI)
- Industrial User Inspection (IU)

- ★ Common Goal – Assess compliance with terms and conditions of NPDES permit or indirect discharge permit



Compliance Evaluation Inspection

- ★ A CEI is an inspection that encompasses review of operation and maintenance schedules for the WWTP equipment, types of process control analytical tests to improve/maintain effluent limit discharges, in-house laboratory procedures and/or contract laboratory information, sampling/chain of custody protocol, effluent compliance history reviewed on site as well as review of any new or replaced facility equipment that could impact the WWTP, discharge site (stream) review.

Reconnaissance Inspection

- ★ A RI is geared towards compliance with the permit at the time the inspector is on site. A general overview of all aspects are documented with respect to change. If the facility has not changed any thing from the previous CEI, then further review of each aspect is not performed. If the facility did make any changes that would impact the discharge, then it would be reviewed and documented. Discharge location and visual inspection of the discharge documented.



Compliance Sampling Inspection

- ★ A CSI, is a combination of performing a CEI with a sampling event. During a CSI we will set up 24-hour composite samplers at the outfall. After the samples are analyzed for your NPDES permit parameters, we will compare our analytical results from the time period sampled to what the facility reported to us. This is a check on your in-house sampling, and testing procedure. If you send your samples to an outside lab, and the comparison is poor, you are responsible. It is up to the facility to ensure the data is accurate before you send the data to Ohio EPA.

CSI Walkthrough

- ★ Generally, the sampler will be set up at the outfall before the CSI
- ★ Any grab samples will be taken at the time of pick-up (24 hr)
- ★ Stream samples will be taken if a bioassay is also performed.



CSI Walkthrough cont.

- ★ Wastewater treatment plant (WWTP) staff may ask to split the sample collected by Ohio EPA to determine the accuracy of their lab results as compared to ours.
- ★ Likewise, at the time of grab or stream samples, the WWTP staff will accompany Ohio EPA to sample at the same time, under the same conditions.



Industrial User Inspection

- ★ Review of the lab reports to check for sampling of the pollutants and the chain of custody to insure proper sign-off. Update the facility contacts and any changes in production or to the plant since the last inspection, i.e., new machines, new assembly line, number of employees, # shifts per week, etc
- ★ Determine if there are any issues with the WWTP and any inventory of critical parts, i.e., pumps, filters, chemicals. I will ask about raw materials and chemicals used in the process.

Industrial User Inspection cont.

- ★ Check if there are any total toxic organics (TTOs) generated or stored at the facility, review the spill prevention, containment and countermeasure (SPCC) plan as well as the storm water pollution prevention plan (SWP3) and check the latest update.
- ★ Last but not least the flow measurement device and pH monitor latest calibration will be determined.



Industrial User Inspection Walkthrough



- ★ We will physically follow and inspect every end of pipe discharge location.
- ★ We may even ask to view a facility blueprint or sewer map.
- ★ We will inspect the outfalls for : Oil, Foam, Color, Solids, Odor, Turbidity



Industrial User Inspection Walkthrough cont.

- ★ Riparian impacts,
- ★ Stream modification, and
- ★ Any stream filling that may have been done.

Expect Questions....

- ★ **What is the daily water use and wastewater generation volume?**
- ★ **Do you have the Material Safety Data Sheets?**

Industrial and Businesses that would have an IUI

- ★ Metal Finishing
- ★ Printing
- ★ Electronics
- ★ Pulp & Paper
- ★ Metal Fabrication
- ★ Animal Feeding
- ★ Chemical Formulation
- ★ Food Processing
- ★ Metal Casting
- ★ Painting and Coating
- ★ Equipment Servicing
- ★ Building Products



Wastewater Discharges



Spent Solutions

Large Municipal WasteWater



Equipment Cleaning

Process Solutions



Rinse waters



More Examples



APC Blowdown

Purge/Flush Wastes



Small Municipal Wastewater



Storm water

Common Wastewater Violations

- ★ Unauthorized indirect or direct wastewater discharges without a permit
- ★ Discharging process wastewater to a septic system, dry well, cesspool or other “injection well”
- ★ Installing new wastewater treatment equipment without a PTI
- ★ Failure to apply for and obtain a storm water permit



Common Wastewater Violations

- ★ Failure to provide periodic sample results
- ★ Failure to provide notification for exceeding permit limits
- ★ Failure to ensure proper sampling (preservation, type, method, records)
- ★ Failure to operate/maintain/calibrate wastewater treatment equipment



Prepared for an Ohio EPA Wastewater Inspection?

- ★ Understand your permit and water use
- wastewater generation practices
- ★ Know locations of sewers and drains
and where they go
- ★ Have records available documenting
treatment, management and disposal
of waste streams
- ★ Avoid surprises
- ★ Communicate problems



Hazardous Waste Inspections



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Waste Management

Inspections

- ★ Planned Inspections – Target certain industry type, LQG's, etc.
- ★ Multimedia Inspections – With other Ohio EPA Divisions
- ★ U.S. EPA lead Inspections
- ★ Joint Inspections
- ★ Complaint Investigations



Hazardous Waste



Universal Waste



Used Oil



Opening Meeting

- ★ Routine inspection or complaint
- ★ Facility processes
- ★ Waste generation
- ★ Waste disposition



Conditionally Exempt
Small Quantity Generator



Less Regulations

Large Quantity Generator



More Regulations

Common Violations

Failure to Evaluate Waste

Characteristic:

Ignitable
Corrosive
Toxic
Reactive

Listed:

Various process wastes
Commercial chemical products
F, K, P, and U wastes





Consequences...



Common Violations

Illegal Treatment



Common Violations

Improper Storage



Common Violations

Illegal Disposal



Common Violations



Labeling

Container Condition



Common Violations

Illegal Disposal



Common Violations

Improper waste evaluation, treatment,
storage, and disposal



Common violations

Record keeping



Manifests
Inspection Logs
Training Records



Common Violations

Consequences...



Common Violations

Consequences...



Closing Meeting

- ★ Results of inspection
 - ★ Violations or compliance
 - ★ Actions required to return to compliance
 - ★ Any further actions by Ohio EPA
 - ★ Opportunities for waste reduction



Helpful Tips

- ★ Housekeeping
- ★ Labeling
- ★ Resolve violations quickly
- ★ Meet deadlines
- ★ Keep open lines of communication



After the Inspection

The company will receive a:



Compliance Letter

- ★ Means the company is meeting the requirements reviewed during the inspection.
This does not mean compliance with all Ohio EPA regulations, just the inspector's division.

After the Inspection

Or the company will receive:

Notice of Violation (NOV) Letter

- ★ Description of violations
- ★ What company needs to do to correct violations
- ★ A timeframe to correct the violations

Inspection checklist may be included with report.



After the Inspection

- ★ DO contact the inspector if:
 - ★ You have questions about the NOV
 - ★ The facts in the NOV are wrong
 - ★ You don't understand what the you need to do to correct violations
 - ★ You have questions on the enforcement process or need more time to respond



After the Inspection

DO NOT

- ★ Ignore or throw away the NOV!
- ★ Wait until the last day to respond to the NOV
- ★ Cut off communication with the inspector -- they are a resource for helping you resolve violations



Enforcement Reminders

- ★ Ohio EPA inspectors cannot issue fines
- ★ Most violations are resolved locally without legal actions or fines
- ★ Long, progressive process - starts with local office and ends with HQ or Attorney General
- ★ You typically have opportunities to settle

Take steps to avoid enforcement



Questions?

