



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

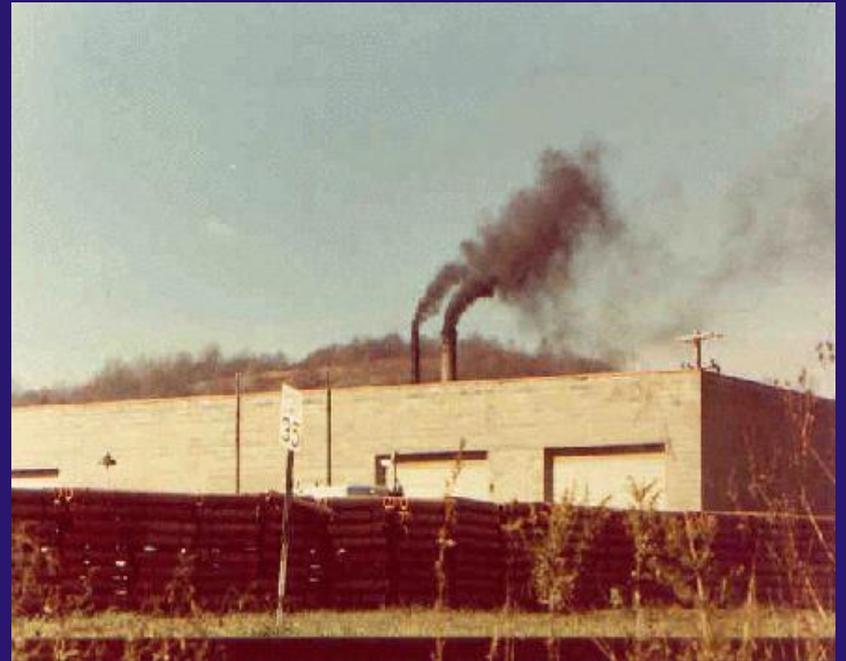
- ★ Routine inspection or complaint
- ★ Discuss facility processes
- ★ Describe records to review
- ★ Air permit status



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





Visible stack emissions



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)



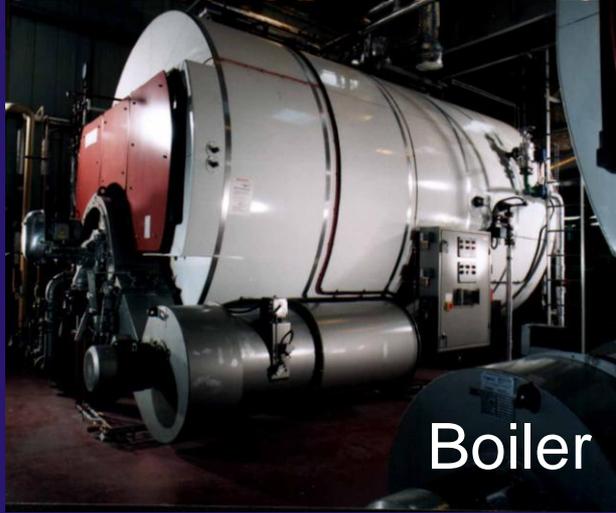
Checking for proper air permits

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



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 Inspections

Mike Sapp

Division of Surface Water



Surface Water Inspections

- ★ Different Types of Inspections
 - Compliance Evaluation Inspection (CEI)
 - Reconnaissance Inspection (RI)
 - Industrial User Inspection (IU)
 - Compliance Sampling Inspection (CSI)
- ★ Common Goal – Assess compliance with terms and conditions of NPDES permit or indirect discharge permit
- ★ Sampling?



Opening Meeting

- ★ Personnel

- Environmental coordinator
- Treatment system operators
- Maintenance personnel

- ★ Discussion of Changes Made Since Previous Inspection

- Waste streams
- Treatment system modifications



Opening Meeting

- ★ Upcoming changes to waste streams or treatment system?
 - Increase in volume of waste stream
 - Change in chemistry

- ★ Problems?



Facility Walk Through

- ★ Expect a process-based survey
- ★ Focus on material use, water use, wastewater generation
- ★ Conveyance systems - drains, sumps, pits, pumps, sanitary and storm sewer lines, site drainage and outfalls
- ★ Also review ancillary operations (e.g. material handling, maintenance)



Some Examples



Spent Solutions

Cooling Water



Equipment Cleaning

Process Solutions



Rinsewaters



Some Examples



Facility Walk Through

- ★ Review operation of facility equipment and on-site wastewater treatment devices or systems
- ★ Examine permit records (e.g. mgt. plans, equipment calibrations and sample results)
- ★ Effluent flow meter and sampler location
- ★ May set-up a compliance sampling event



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 permit
- ★ 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



Be Prepared:

- ★ 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

The image shows an outdoor storage area for hazardous waste. In the foreground, there are several large metal drums. One is black, one is white with black stripes, and several others are heavily rusted and have peeling paint. The drums are situated on a gravel or dirt surface. In the background, there is a chain-link fence and more drums, some of which are also rusted. The overall scene suggests a hazardous waste management facility.

Jim Sferra

Division of Hazardous
Waste Management

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





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



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)

- ★ 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

