

# Midwest Environmental Compliance Conference

OVERLAND PARK MARRIOTT | KANSAS

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## Lessons Learned: Common Gaps and Findings in Environmental Audits

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**Consulting Services Manager**



# **Lessons Learned: Common Gaps and Findings in Environmental Audits**

- **Nikki Chavez, CHMM, Consulting Services Manager, iSi Environmental**
- **13 years experience in EHS regulatory compliance**



# **Lessons Learned: Common Gaps and Findings in Environmental Audits**

- **Why conduct an environmental audit?**
  - **Company/Corporate Requirement**
  - **Certification Standard (ISO) Requirement**
  - **Purchase a New Company/Facility**
  - **Proactive vs Reactive Approach**
  - **History of Noncompliance**
  - **Vulnerability**

# **Lessons Learned: Common Gaps and Findings in Environmental Audits**

- **What areas are typically covered in an environmental audit?**
  - **Air**
  - **Waste Water/Storm Water**
  - **Solid/Hazardous Waste**
  - **Spill Prevention**
  - **ASTs/USTs**
  - **DOT**
  - **EPCRA**

# **Lessons Learned: Common Gaps and Findings in Environmental Audits**

- **More specifically:**
  - **Permits/Registrations/Notifications**
  - **Plans**
  - **Inspections**
  - **Tracking**
  - **Reporting**
  - **Training**
  - **Recordkeeping**
  - **Container Management**

# **Lessons Learned: Common Gaps and Findings in Environmental Audits**

## **■ Typical Audit Approach:**

- Facility Data Gathering**
  - Pre-Audit and/or Post-Audit**
- Facility Walkthrough/Process Review**
- Records Review**
- Final Report**



# Common Gaps and Findings in Environmental Audits

## ■ Inaccurate Permits/Registrations/Notifications:

- Spraying
- Blasting
- Emitting
- Generating
- Collecting
- Storing
- Disposing
- Dumping
- Discharging



# **Common Gaps and Findings in Environmental Audits (continued)**

- **Inaccurate/Incomplete Facility Plans:**
  - **Operations and Maintenance (O&M) Plans**
  - **Work Practice Implementation Plans (WPIP)**
  - **Storm Water Pollutions Prevention Plans (SWP3)**
  - **Spill Prevention, Control and Countermeasure (SPCC) Plans**
  - **Facility Response Plans (FRP)**
  - **Emergency Response Action Plans (ERAP)**
  - **DOT Security Plans**
  - **Hazardous Waste Contingency Plans**



# **Common Gaps and Findings in Environmental Audits (continued)**

- **Missing/Incomplete Facility Inspections:**
  - **Air**
  - **SWP3**
  - **SPCC**
  - **FRP**
  - **DOT**
  - **Hazardous Waste**

# Common Gaps and Findings in Environmental Audits (continued)



# Common Gaps and Findings in Environmental Audits (continued)



# **Common Gaps and Findings in Environmental Audits (continued)**

- **Missing/Incomplete Facility Tracking:**
  - **Air Emissions**
    - VOC
    - HAP
    - PM
  - **Waste Generation**
  - **Tier II**
  - **Form R**



# **Common Gaps and Findings in Environmental Audits (continued)**

- **Inaccurate/Incomplete Reporting**
  - **Monthly, Quarterly, Semi-Annual, Annual**
  - **Spill Reporting**
- **Inaccurate/Incomplete/Undocumented Training**
- **Inaccurate/Incomplete Records**



# **Common Gaps and Findings in Environmental Audits (continued)**

- **Poor Day-to-Day Facility Management**
  - **Air**
  - **Storm Water**
  - **SPCC**
  - **Waste**
  - **DOT**

# **Common Gaps and Findings in Environmental Audits (continued)**



# Common Gaps and Findings in Environmental Audits (continued)





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# Common Gaps and Findings in Environmental Audits (continued)



# Common Gaps and Findings in Environmental Audits (continued)



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# Questions?



# **Lessons Learned: Common Gaps and Findings in Environmental Audits**

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