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Lessons Learned: Common Gaps and Findings in Environmental Audits

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- 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



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



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



- 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







• Inaccurate/Incomplete Facility Plans:

- Operations and Maintenance (0&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



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











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





- Inaccurate/Incomplete Reporting
 - Monthly, Quarterly, Semi-Annual, Annual
 - Spill Reporting
- Inaccurate/Incomplete/UndocumentedTraining
- Inaccurate/Incomplete Records



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













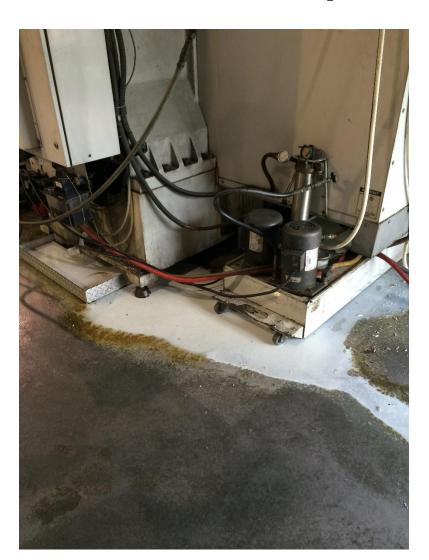
















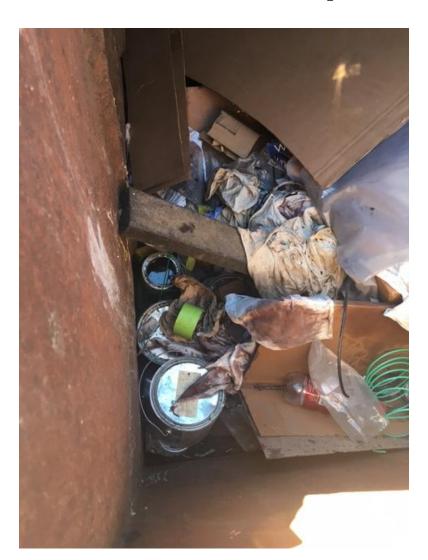






















Questions?





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