

## Preparing Your Business for an Ohio EPA Inspection

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Presented by

Ohio EPA  
Small Business  
Assistance Office



## Preparing Your Business for an Ohio EPA Inspection

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- Inspection process
- Common violations
- Preparing for an inspection and avoiding problems

## Ohio EPA District Offices

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There are a number of different divisions in each district office, each with its own inspection staff.

- 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?

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Annual inspections (USEPA grant commitments)

- ✓ permitted facilities
- ✓ commercial hazardous waste facilities
- ✓ large hazardous waste generators

Complaint investigations

Special inspection initiatives

- ✓ dry cleaners
- ✓ companies near drinking water sources

## Pre-Inspection Process

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The inspector prepares for an inspection by:

- Reviewing existing files in the division.
- Talking with others in the division who inspected the company in the past.
- Talking with inspectors in other divisions to find out more about the company.



## What Happens During an Inspection?

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- Site entry/opening meeting
- Facility walk through
- Records review
- Exit meeting



## Site Entry and Opening Meeting

- Inspector will present identification and explain the purpose of the inspection.
- Inspector will want to discuss facility's operations.
- Inspector will identify the records that will be reviewed.

*Don't be surprised if the inspector arrives unannounced, especially if investigating a complaint.*

## Records Review

The inspector will look at records that relate to environmental compliance:

- permits, monitoring reports, data
- operating records
- inspection and training records
- waste shipping papers
- waste evaluation information

The inspector may ask to copy some records.



## Facility Walk Through

The inspector will walk through areas of the facility related to environmental compliance:

- process areas, control areas
- wastewater units, discharge points
- air emission sources, discharge points
- waste management areas
- outside areas

*The inspector may take photographs or samples during the inspection.*

## Closing Meeting

The inspector will hold a closing meeting to cover:

- findings of the inspection
- action items for company
- post-inspection procedures



*The inspector may not be able to summarize all the findings. Further review of issues may be needed.*

## Following the Inspection

The company will receive a written report after the inspection.



### Compliance Letter

- Means the company is meeting the requirements reviewed during the inspection.  
*This does not mean compliance with all Ohio EPA regulations.*

## Following the Inspection

The company will receive a written report after the inspection.

### Notice of Violation

- Description of violations
- What company needs to do to correct violations
- A timeframe to document violations have been corrected

*Inspection checklist may be included with report.*

## Common Inspection Violations Hazardous Waste

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Failure to evaluate all wastes

- no information on file verifying certain wastes are not hazardous
- certain waste streams not evaluated (solvent wipers, booth filters, fluorescent bulbs)
- unknown drum(s) of waste

## Common Inspection Violations Hazardous Waste

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Missing or incomplete records

- training logs not updated
- contingency plan not updates
- inspection records incomplete
- manifests incomplete

## Common Inspection Violations Hazardous Waste

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Container management problems:

- open drums
- no labels
- no accumulation dates
- storage for longer than allowed

## Common Inspection Violations Air Pollution Control

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- Failure to identify or obtain permits for emission units
- Not following permit conditions
  - ✓ not keeping records
  - ✓ not conducting monitoring
  - ✓ failure to submit reports

## Common Inspection Violations Water Pollution Control

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- Discharging wastewater without a permit
- Failure to obtain a permit-to-install for wastewater unit(s)
- Failure to conduct monitoring, keep records

## What Can You Do to Prepare for an Inspection?

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## Before the Inspection

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- Know what regulations apply to your business.
- Periodically review your operations to see if you are in compliance.
- Use inspection checklists or other resources to complete a self-audit of your compliance.

## Before the Inspection

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- Keep records and know where they are.
- Prepare list of permitted units and applicable requirements.
- Review permits and be prepared to show the inspector records required by your permits.

## Before the Inspection

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Have a plan of action for when an inspector shows up:

- Who will talk to the inspector if you're not there.
- Have a camera that works.
- Know how you will describe your operations to the inspector.

## During the Inspection

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- Know why the inspection is being done.
- Tell the inspector about safety requirements.
- 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.

## After the Inspection

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- Keep all inspection letters/reports.
- If you receive a Notice of Violation (NOV) don't ignore it or throw it away. Read it and follow-up.
- Respond to the NOV within the time requested. If you need more time to respond, discuss this with the inspector.



*Most companies that receive NOV's reach compliance without fines.*

## After the Inspection

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- Contact the inspector if you have questions or don't understand what the company needs to do to correct violations.
- If the facts in the NOV are wrong, talk with the inspector and follow-up with a letter.
- Don't cut off communication with the inspector -- they are still a technical resource for the company.

## Where Can I Get More Help?

Ohio EPA  
Small Business Assistance  
Office



- help small business owners understand and comply with the regulations
- all services are *free* and *confidential*

## Where Can I Get More Help?

SBAO Services:

- telephone hotline  
(800) 329-7518
- on-site assessments
- publications library
- compliance workshops



## Where Can I Get More Help?

Division of Air Pollution Control  
Small Business Assistance Office

For assistance in completing air permit applications.

(614) 466-4830

## Visit Our Web Sites

Small Business Assistance Office  
[www.epa.state.oh.us/other/sbao](http://www.epa.state.oh.us/other/sbao)

Small Business Assistance Program  
Division of Air Pollution Control  
[www.epa.state.oh.us/dapc/sba](http://www.epa.state.oh.us/dapc/sba)

