Approval Authority
Oversight
No comment
Main Point
“I’m from EPA . . . “

• “. . . I am here to help”
Who is involved?

- Permittee (POTW)
- State
- EPA
- 3rd Parties (citizens and environmental groups)
Oversight Mechanisms

• (EPA/Federal perspective)
• Annual Report
• File Review (paper audit)
• Inspection
• Audit
• Other
File Review

- Inspector will review all materials submitted since last review

- Annual Report
- Previous inspection reports
- Previous Audit Reports
- Correspondence
- (Any materials in the file)
Inspections and Audits

• Historically –

  • Inspections – one to two days, and more enforcement oriented

  • Audits – three to five days, and a mix of enforcement and compliance assistance
During the Inspection

• Inspection usually includes:
  • Inspector arrives and shows credentials (do not make him/her wait in the lobby)
  • May do a walkthrough of the plant
  • File review
  • Industrial site inspections
  • Interview of staff
  • Wrap-up
Some Philosophical Thoughts

- Why is the inspector at your site?
- Every inspector is different
- Inspector will have a schedule and it may or may not be flexible
- Inspection may be announced; inspection may be a surprise
Inspection Wrap-up & Later

• During the wrap-up, make sure any findings by the inspector are clear, and you get a copy
• After the inspector leaves, if there is anything to address – address it and document it
• When you get the report – if there is any need to respond, respond and do it in a timely manner
Audits

• Like inspections – only longer
• Audits focus more on Program Management
• Audits may also include compliance assistance opportunities

• Like inspection – get the findings during the wrap-up; followup as appropriate
Summary

- All enforcement actions are significant (some are just more significant than others)
- Clarify any and all findings
- Respond in a timely manner
- If you can correct a finding, do so quickly and document it
- The cards are stacked in Approval Authorities favor
Questions