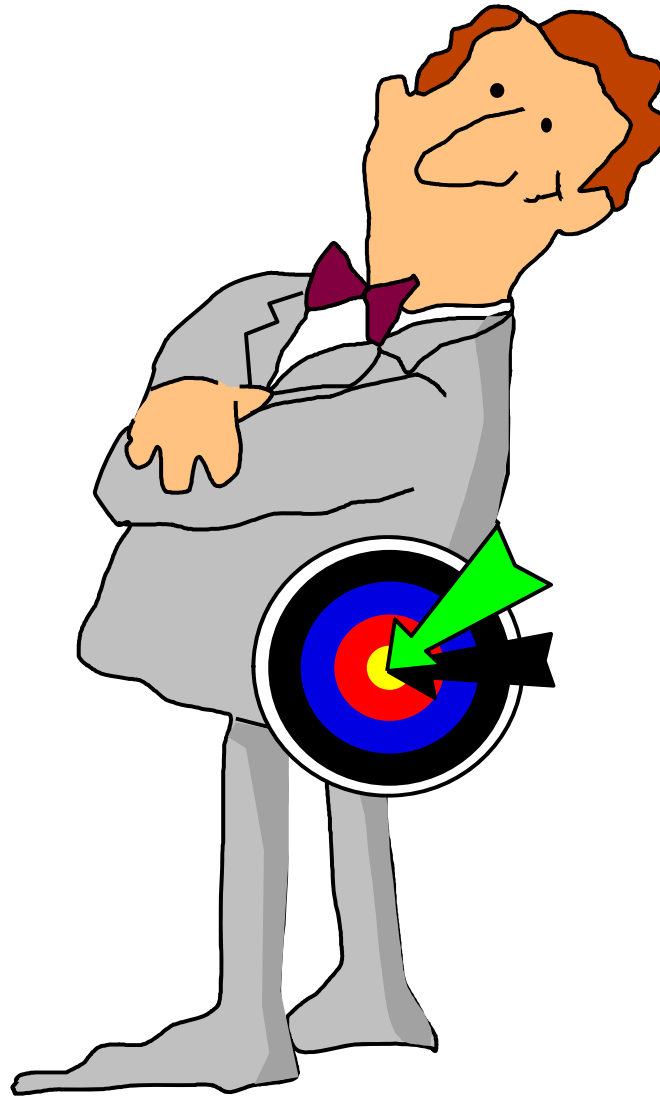


# Approval Authority Oversight

**No comment**



# Main Point



# “I’m from EPA . . .”

- “. . . I am here to help”

# Who is involved?

- Permittee (POTW)
- State
- EPA
- 3<sup>rd</sup> 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