

5 Steps To Ace Your Next EPA Audit

A brief guide for improved remediation system compliance and operations



What happens when decades go by between regulatory audits of your system? This is just what happened at one of our industrial sites. Twenty-five years after the last inspection and with just two hours' notice, we helped our client pass its EPA audit with flying colors. Our project team shares their tips on how to fight complacency and achieve better performance at your remediation site.

1 Identify a Point Person

Name a single person to be responsible for ensuring maintenance activities and other records are documented and filed in accordance with the site management plan, health and safety, and regulatory requirements. Assigning "ownership" of the site operations helps to keep critical documents up-to-date, accessible, and ready for inspection and audit.

2 Centralize Document Storage

All Discharge Monitoring Reports, safety data sheets, manifests, lab data, training records, Delegations of Authority, and other critical data should be stored on site in a clearly marked filing cabinet. It helps to have documents organized by categories; for example, separating manifests by waste streams. Also, be sure to double up (even triple up) with electronic copies saved in a secure server accessible to all pertinent team members.

3 A Clean Site is a Happy Site

They say perception is everything, and an inspector may form an early opinion based on the appearance of the site. Keep the walkways and work spaces free of debris and clutter. Make sure drums and other waste containers, equipment, and tools are kept in their proper storage or staging area, and make sure all safety signage is clearly visible. Paying attention to details like these can also positively influence the team's attitude and morale.

4 Keep Waste Management and Minimization Plans Current

Make sure everyone on your site management team understands the Waste Management and Minimization Plan, and make it accessible to them at all times for easy reference. Routinely review this plan against federal and state waste management requirements (at least annually). Make updates accordingly.

5 Clearly Label Items and Equipment + Post Checklists

Make sure all equipment and items, such as waste drums, are clearly marked, labeled, and facing out for easy identification. Health and safety requirements should be posted on entry/exit doors. Checklists, both digital and hard copy, should be readily available for chemical management, CSD inspections, daily safety meetings, and other maintenance activities.

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