

How to Prepare for an Inspection and Navigate Enforcement

An aerial photograph of a large industrial facility, possibly a water treatment plant, with several large buildings and a winding road. A hand is holding a magnifying glass over one of the buildings, symbolizing inspection. The sky is clear and blue, and there are trees and a body of water in the background.

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How to **ALWAYS** be prepared for an inspection!



2 Rs

Relationships



Record Keeping



Relationships

Management

Major project coordination
Help implement changes to procedures/policy
Support for environmental program

Operations Staff

Do the work to keep your facility in compliance
Know when things go wrong
Come to you with questions
Go say hi, they probably have a question

Inspector

Reach out if you have ANY questions
Want you to be in compliance
They're a person too

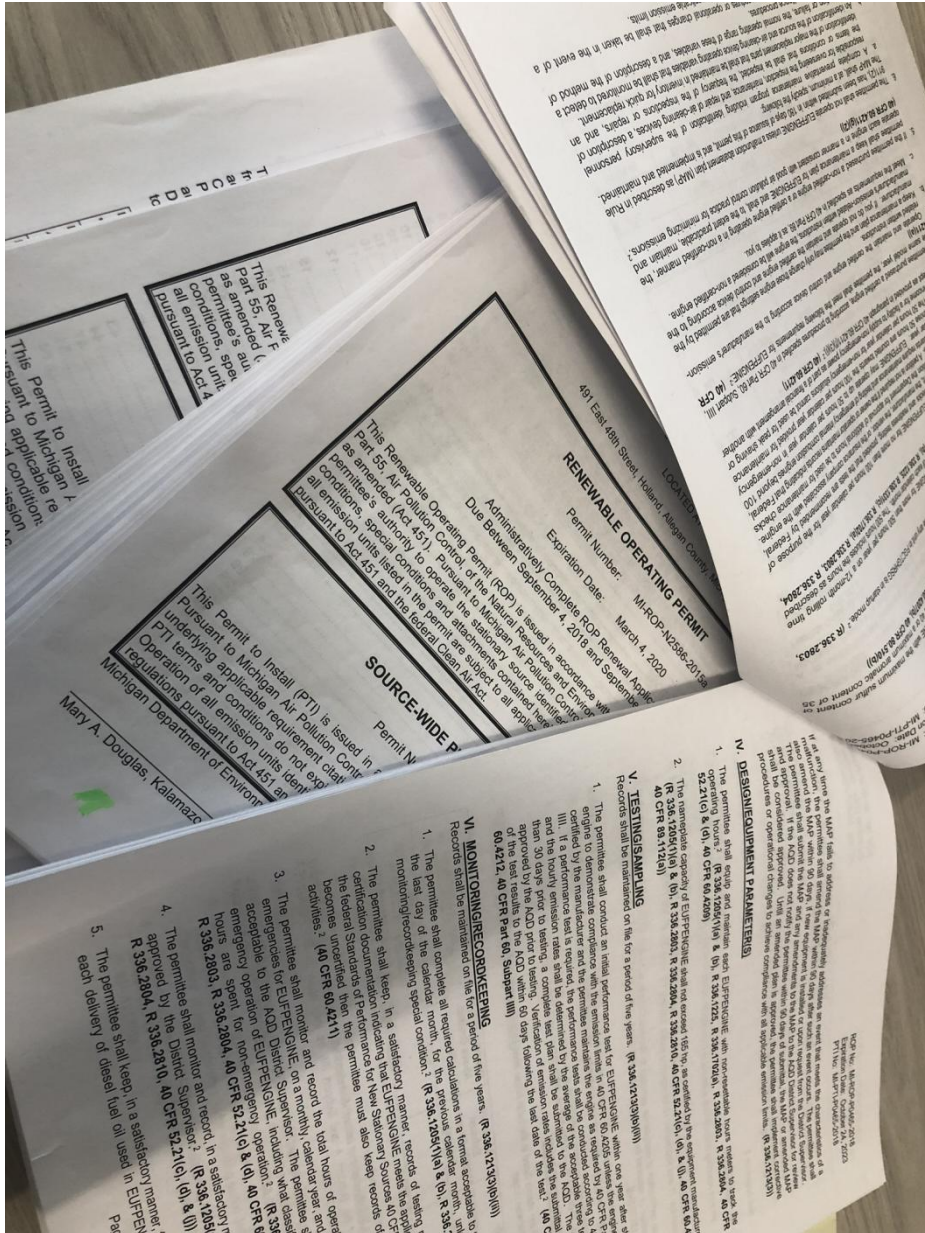
Staff Training

- Familiarize with Permit Limits and Requirements
- Conducting any training required in plans or permits
- Record and document training
- Change something?
 - Do more training
 - Document that training



Records

- Hard copies of permits
- Where are records kept?
 - Electronic or Paper
 - Databases
- Who has access?
- Who is responsible for updates?
- What if they aren't there?!
 - Develop a procedure



Records Review – Monthly

- Set up a system
- Monthly record keeping completed before the end of the next month
 - Downtime and permit limits
 - Production numbers and fuel usage
 - Lots of data – how is it organized?
- Conduct required inspections
 - Regular site walkthroughs



Do your plans look like this?



Site specific plans –

- Malfunction Abatement Plan
- Startup Shutdown Malfunction Plan
- Storm Water Pollution Prevention Plan
- Fugitive Dust Plan

Is this plan being followed?

Contacts up to date?

Update them!

Records Review - Annual



- Internal Audit/Inspection
 - EPA Part 75 Field Audit Manual
- Read through your permit AGAIN
- Permit exemptions for equipment
 - New equipment on site
 - Old equipment retired or replaced
- Equipment maintenance and repairs



**KEEP
CALM
AND**

**STOP WHAT
YOU'RE DOING**

Day of Inspection

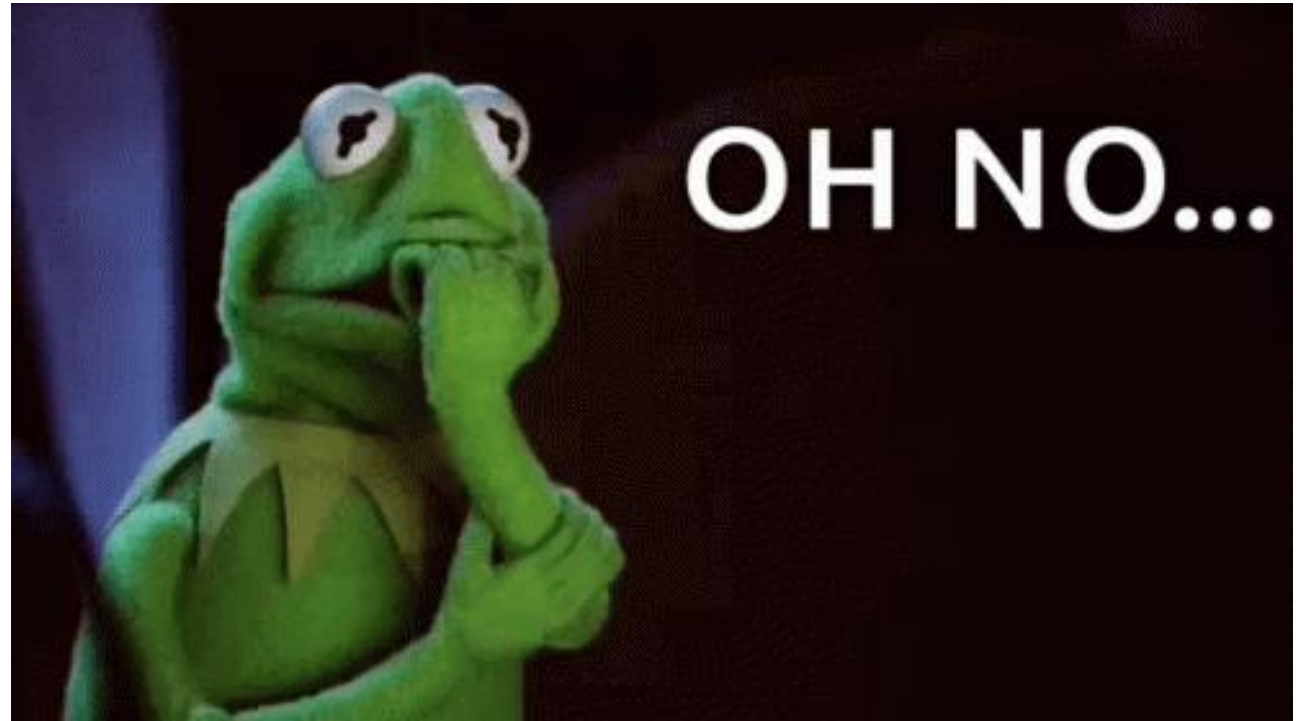
This is your first priority

- Cancel all your meetings
- Notify plant management
- All hands on deck – for questions

Yes, you have to let them in

After the Inspection

- Follow up with records requested
- Something not right?
 - Fix it!
- Expecting bad news?
 - Start bringing process into compliance now
 - Document everything



Hopefully, your next inspection will be a day at the beach



Thanks!

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