

NPDES Compliance Inspection Manual

Appendix AR



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Appendix AR – National Multimedia Screening Inspection Worksheet

GENERAL INFORMATION

1. Inspector(s) Name _____ 2. Date _____

3. Facility Name/Address

4. Facility Contact(s)/Title(s)

5. Description of Facility Operations

SIC Code _____

Number of Employees _____

Operating Schedule

Major Products/Production Capacity

RCRA

Observations

1. Does the facility generate anything that looks like waste material that might contain hazardous constituents?

2. If so, describe what the facility says regarding the RCRA regulatory status of the waste material and their rationale for such determination. (e.g., have they made a RCRA waste identification and what was that determination? Have they determined the waste to be exempt from regulation and why?)

3. Describe the process that generates the waste material.

4. Do you see any containers of hazardous waste, land disposal units, lagoons, treatment units? Approximately how many?

5. Were any of the units that contain or handle hazardous wastes (containers, berms, dikes, tanks, piping, impoundments, etc.) in poor condition, unmarked, opened, leaking, cracked, corroded, or in a condition that would allow the release or potential release of hazardous

wastes? If yes, describe unit(s). Any actual or evidence of past releases observed? If so, describe waste (i.e., liquid, sludge, etc.) unit(s), and location.

6. Does the facility operate a boiler or industrial furnace which burns hazardous wastes? Was there any incineration of hazardous waste on-site?

7. Was there any evidence of spills, leaks, or discharges of hazardous wastes? If so, provide location and description.

Interview Questions/Records Review

1. If the facility is a generator of hazardous waste was there a notification of hazardous waste activity? What is the quantity (kilograms/month) of hazardous wastes produced? How are they produced?

2. What is the EPA Identification Number?_

3. What was the basis (i.e. test, knowledge of process and waste) for determining if the facility did or did not produce or handle hazardous wastes? Who made the determination?

UST

Observations

1. Are there any underground storage tanks? _____

2. Approximately how many? What are the contents? (Wastes, virgin petroleum, or chemicals)

3. What type of leak detection is used? When was it last used?

4. Is there any evidence of leaks, spills, broken piping, broken fill/vent lines, or leaking pump joints or valves? Provide location and description.

Interview Questions/Records Review

1. If the tanks are for virgin petroleum or chemicals (not wastes), are they registered with the state? Date of registration? Date of tank(s) installation?

SPCC

Observations

1. Does the facility have the capacity to store oil either in above or below ground tanks? How many gallons? Does any tank have a capacity of more than 660 gallons in a single tank or does the facility have a capacity of more than 1320 gallons in a number of tanks or a capacity of more than 42,000 gallons below the ground?

2. What type of secondary containment is used at the facility? Were there any deficiencies in the secondary containment (cracks, broken, dikes left open)? Is it adequate to contain the entire contents of the largest tank?

Interview Questions/Records Review

1. Does the facility have a certified (signed by a P.E.) plan? When was it last updated?

2. Has there been any major changes to oil storage at the facility since the last modification of the plan?

WETLANDS

Observations

1. Are there any wet areas near the facility with wetland-type vegetation (cattails, rushes, sedges) that have been disturbed by waste disposal, ditching, or filling?

Interview Questions/Records Review

1. Does the facility have a federal section 404 permit or any state or local permit authorizing the fill?

FIFRA

Observations

1. Does the facility produce pesticides? _____
2. Is the facility applying pesticides? _____
3. Where are the pesticides stored?

Interview Questions/Records Review

1. If the facility produces pesticides what is the establishment's registration number?

2. If the facility is applying pesticides what is the registration number of the pesticides?

AIR

Observations

1. Is there any asbestos on-site? _____

2. Is the facility undergoing or has the facility undergone any renovations or demolitions during the last 18 months which involve the removal or disturbance of asbestos-containing materials? Approximately how much asbestos (square feet or linear feet) was removed?

3. Does the facility have any coating or printing operations? Does the facility use any paints or organic solvents? What, if any, type of air pollution control is used? Was it operating?

4. Were there any odors? What process was the source of the odors? Describe the odors.

5. Were there any visible (opaque smoke) emissions? What process was the source? Was there any fugitive (not from a stack) emissions? Was the air pollution control equipment, if any, operating? Describe source.

Interview Questions/Records Review

1. If asbestos was removed was notification provide to the State and EPA?

2. If the facility has coating or printing operations are they water based or organic solvent based?

3. Does the facility handle/emit any of the National Emission Standards for Hazardous Air Pollutants (NESHAP) chemicals other than asbestos (mercury, beryllium, vinyl chloride, benzene, arsenic, radionuclides)? Describe process.

4. Has the facility added new or expanded existing processes in the last two years? Was it permitted by EPA of the State?

TSCA-PCBs

Observations

1. Did the facility have or does it have any PCB electrical equipment? What equipment (type and quantity) is on-site?

2. Does the facility have a PCB equipment storage area for disposal or reuse? Describe the storage area (i.e. concrete pad, walls, roof, curbs).

3. Are there any labels/markings on the PCB equipment?

4. Is there any leaking PCB electrical equipment? Describe.

5. Does the facility have any hydraulic systems? Any leaking?

Interview Questions/Records Review

1. If the facility has PCB electrical equipment was it tested? What were the test results?

2. If the facility has any hydraulic systems when were they tested for PCBs? What were the test results?

WATER-NPDES

Observations

1. Does the facility use water in its manufacturing process?

2. Does the facility discharge to a stream, municipal sewer, or use subsurface disposal?

3. What process(es) generate wastewater? Is the wastewater treated? Is the effluent clear? Does the treatment plant appear to be maintained (look for rust, dry basins, abandoned equipment, etc.)?

4. Where does the storm water drain to?

5. Where do floor drains discharge?

Interview Questions/Records Review

1. How is the treatment plant's sludge disposed? How is it tested?

EPCRA

Interview Questions/Records Review

1. Were there any chemical releases in excess of the reportable Superfund quantities (see below)? Who was provided the notification? Was it oral or written?

2. Does the facility manufacture, process, or use any toxic chemicals in a quantity greater than 10,000 lbs./yr.? Identity them. Are any of them section 313 chemicals³⁶?

3. If the answer to question 2 is yes, has the facility submitted the toxic chemical release form (R)?

4. Does the facility have the Material Safety Data Sheets on-site and were they submitted to the State Emergency Response Commission (SERC) and/or the Local Emergency Planning Committee (LEPC)?

5. Has the facility submitted the Emergency and Hazardous Chemical Inventory forms to the LEPC and SERC?

³⁶ The chemicals subject to these requirements can be found in EPA publication number 560/4-92-011, January 1992, "Title III, List of Lists".

SDWA-UIC

Observations

1. Are there any discharges other than sanitary waste (i.e. industrial wastes) into or onto (including drain fields) the ground? Is an on-site septic disposal system used? Describe the discharges and disposal system.

Interview Questions/Records Review

1. Does the facility have or has it had any wells (dug, drilled or driven), dry wells, leachfields, or septic systems? Did they receive(d) commercial or industrial waste (liquid and/or solid), cooling water, or drainage from roof drains, floor drains, or parking lots? If yes, give a description.

2. Does the facility have a permit? _____

3. What is the current status of wells (active, abandoned, under construction, repairs)?

4. If the wells are inactive what was the date they were last used?

SDWA-PWS

Interview Questions/Records Review

1. What is the facility's source of drinking water? Does the facility have a private well? How many people does it serve?

2. Is the water sampled and analyzed for contaminants? Are the results reported to the state or EPA?

ENVIRONMENTAL ASSESSMENT

1. Is there any evidence of environmental impacts that haven't been addressed? Possible examples include:

- additional evidence of spills, leaks
- vegetation damage in the surrounding area
- odors in the surrounding neighborhood
- neighborhood covered with "dusts"
- poor water quality in streams near the facility.

2. Were there situations of possible excessive occupational exposure that should be referred to OSHA?