

# Environmental Records- What Do You Need to Keep and How to Meet Deadlines Without Going Crazy

- You are now an HSE manager but have not any experience in the Environmental field. What do you do?
- What are general requirements that most sites will encounter relating to air, water, waste and energy?
- How do you meet deadlines?
- What kind of management system do you use to keep records and reports?

# Environmental Records- What Do You Need to Keep and How to Meet Deadlines Without Going Crazy- Cont'd

- Imagine you as a Health and Safety Professional getting a new job as an HSE Manager and not knowing anything about Environmental Requirements or what applies to the site. What is your next step.



**"The pollutant is in timed-release capsules so that cleanup costs are passed to future generations."**

# Assess Site For Air, Water, Waste, and Energy Issues

- Use outside consultant?
- Look at existing environmental files at the site if they exist.
- Use software package to assess site by asking questions. (Dakota)
- Talk to previous person who held this position if available.

# Use Outside Consultant

- Assess physical site
- Look at any files with the consultant
- Have them give you an estimate of time and material to get you in compliance
- Look at all media – air, storm water, waste water, drinking water, hazardous and non-hazardous waste
- Look any miscellaneous regs. that may apply- DOT, Asbestos, EPCRA?

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**"Our company may not have a perfect environmental record. On the other hand, you don't see any glaciers melting in our parking lot!"**

# Look at existing environmental files at the site if they exist.

- Look at hard copy and electronic files if they exist
- Plans, reports, inspection records?
- Communication to agencies and applicability memos to regulations.

# Use software package to assess site by asking questions. (Dakota)

- Check into a software package that will assess all media with a series questions and answers
- This info will help you determine tasks that need to be completed during the year related to Environmental requirements





CENTRAL REGION

R&D

Des Plaines R&D

- Des Plaines R&D - Air Quality
- Des Plaines R&D - Chemical and Physical Exposures
- Des Plaines R&D - Construction Safety
- Des Plaines R&D- EMS-ISO 14000
- Des Plaines R&D - EPCRA
- Des Plaines R&D - Equipment Safeguards
- Des Plaines R&D - Health & Medical Services
- Des Plaines R&D - PCB Management
- Des Plaines R&D - Security Assessment
- Des Plaines R&D- Solid and Hazardous Waste
- Des Plaines R&D- Spill Prevention Des Plaines R&D - Storage Tanks
- Des Plaines R&D - Transportation
- Des Plaines R&D - TSCA
- Des Plaines R&D- Water Quality
- Des Plaines R&D - Worker Safety



Des Plaines R&D - Solid and Hazardous  
Waste  
Solid and Hazardous Waste  
Conditionally-Exempt SQGs  
Small Quantity Generators  
Large Quantity Generators  
Permitted TSDFs  
Interim Status TSDFs  
RCRA Standardized Permit  
Remediation Waste Management Sites  
HW Transporters  
Universal Waste  
Medical/Biohazardous Wastes  
Non-hazardous Solid Waste  
Non-hazardous Solid Waste Summary  
Land Disposal  
Coal Combustion Residuals (Proposed)  
Radioactive Waste  
Used Oil

*Citations: Non-hazardous Solid*

Include subdomains *Click here to find out why Non-hazardous Solid Waste Summary applies*

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40 CFR 241.3(a)

40 CFR 241.3(b)

40 CFR 241.3(c)

40 CFR 241.3(c)(1)

40 CFR 241.3(d)(1)

40 CFR 241.3(d)(1)

40 CFR 241.3(d)(1) (ii)

40 CFR 241.3(d)(1)

40 CFR 241.3(d)(2)

40 CFR 241.3(d)(2)

40 CFR 241.3(d)(2) (ii)

40 CFR 241.3(d)(2)

40 CFR 241.3(d)(2)


40 CFR 257, Subpart B

40 CFR 62, Subpart

40 CFR 62, Subpart

Guide for Industrial Waste Management

IL Solid Waste IL Solid Waste Transporters



Des Plaines R&D - Solid and Hazardous Waste

B Solid and Hazardous Waste

Conditionally-Exempt SQGs

Small Quantity Generators

Large Quantity Generators

Inventory

Land Disposal Restrictions

Pollution Prevention

Manifests

    Exports/Imports

    Reporting

Off-site Transport

On-site Accumulation Permitted TSDFs

Interim Status TSDFs

RCRA Standardized Permit

Remediation Waste Management Sites

HW Transporters

Universal Waste

Medical/Biohazardous Wastes

Non-hazardous Solid Waste

Non-hazardous Solid Waste Summary

:Land Disposal

Coal Combustion Residuals (Proposed)

Radioactive Waste

Used Oil

15

Include subdomains

## Citations: Manifests +

[Click here to find out why Manifests applies](#)

40 CFR 262.20(a) ( 1)

40 CFR 262.20(c)

40 CFR 262.23(a)

40 CFR 262.23(b)

40 CFR 262.23(c)

40 CFR 262.23(d)

40 CFR 262.23(e)

40 CFR 262.23(f)

40 CFR 262.40(a)

40 CFR 262.40(b)

40 CFR 262.42(a)

40 CFR 262.42(c)

EPA Form 8700-22

IL Manifests

Close

*How Come: Manifests*

*Here's why. Close or Continue Analyzing Applicability*

ID# 1813:11 Event Log

Does the facility engage in ANY of the following activities:

- 1) Generates waste;
- 2) Treats, stores or disposes of waste; and/or
- 3) Transports wastes?

NOTE: For the purposes of this question, "waste" can include any hazardous waste, radioactive materials, used oil, medical waste, remediation, recyclable or nonhazardous waste/materials.

Yes

No  Add/Edit Explanation

ID# 1813:12 Event Log

Does the facility generate ANY solid waste?

NOTE: Before determining whether a facility generates hazardous waste, it must first be determined whether the facility generates waste that is considered a "solid waste" under RCRA regulations. Solid waste is any discarded material that does not appear on the list of exclusions in 40 CFR

261.4(a) or for which the facility has not been granted a variance under 40

CFR 260.30 and 40 CFR 260.31 or that is not excluded by a nonwaste determination under 40 CFR 260.30 and 40 CFR 260.34.

NOTE: On July 22, 2011 (76 FR 44094), EPA proposed to revise and clarify certain exclusions from the definition of solid waste for hazardous secondary materials intended for reclamation that would otherwise be regulated under Subtitle C of RCRA (Hazardous Waste Regulations).

Solid and Hazardous Waste

"Solid waste"

40 CFR 261, Subpart A

40 CFR 261.2

40 CFR 261.2(a)(1)

40 CFR 261.4(a)

40 CFR 260.30

40 CFR 260.31

40 CFR 260.34

40 CFR 261.38

40 CFR 261.39

40 CFR 261.40

68 FR 65586 (40 CFR 261.4(a)(22))

76 FR 44094 (40 CFR 260, 261, 266)

# Talk to previous person who held this position if available

- IF you can talk to the last person who was responsible for these items it is very helpful
- Historical
- Current requirements
- Where document, records and plans are located

Adventures in Leadership by Corey Sauer



Gary doesn't know that he's just getting a new desk.



# What Records and Reports do you need to submit to agencies?

- Based on your previous data collection, make up a list of records and reports that you will need to be in compliance.
- Separate records (inspections) from reports
- Identify them by media (Air, Water, Waste, and Energy)
- You made need SWPP, SPCC, RCRA training plans, and RCRA contingency plans

# How Do You Meet Deadlines?

- Task list
- If you have Microsoft Outlook put these items in as tasks for the year
- Allow enough for gathering data, sign-off, getting checks for fees, and enough time to send them certified mail
- Submit these completed tasks to your manager for accountability

0 FW:WhatToPutOnTheBag.pptx	Not Started	Fri8/23/2013	0%
Garbage Can in HSE	Not Started	Fri8/23/2013	0%
RE:HClmonitor in lab 323C	Not Started	Fri8/23/2013	0%
RE:DPWasteGuidelines_rev2012.doc	Not Started	Fri8/23/2013	0%
RE:Electronic recycling	Not Started	Fri8/23/2013	0%
Weekly Waste COllection Area Insp Checklist	Not Started	Fri8/23/2013	0%
RE:DPWasteGuidelines_rev2012.doc	Not Started	Fri8/23/2013	0%
Evaluate Water Use Reduction Opportunities	In Progress	Man 8/26/2013	75%
Records DP -Check list of records for your subject area...	In Progress	Man 8/26/2013	75%
Review and update controlled documents and records ...	In Progress	Man 8/26/2013	75%
DP Inspection and Inventory of secondary containmen...	Not Started	Fri8/30/2013	0%
Monitoring of HazWaste UST Contents: Print Report of...	Not Started	Fri8/30/2013	0%
RCRA Subpart BB Organic Emissions from HazWaste (...)	Not Started	Fri8/30/2013	0%
Monthly SCBA inspection	Not Started	Fri8/30/2013	0%
Inspect Spill and Emergency Response Kits	Not Started	Fri8/30/2013	0%
DP Title V Semiannual Monitoring Report	Not Started	Fri8/30/2013	0%
Riv/McC Quarterly Asbestos Removal Report	Not Started	Thu 9/5/2013	0%
Follow-up on assessment of asbestos condition of are...	Not Started	Fri9/6/2013	0%
Follow-up assessment of asbestos condition of areas t...	Not Started	Fri9/6/2013	0%
Update air emssions summaries	Not Started	Mon 9/9/2013	0%
DP Discharge Monitoring Report (NPDES Permit)	Not Started	Fri9/13/2013	0%
loP-Schedule Evacuation Drill	Not Started	Fri9/13/2013	0%
Send R&D HSE Highlights to Alice	Not Started	Sun 9/15/2013	0%
DP September Lab water separator sample	Not Started	Fri9/27/2013	0%
Enter August Environmental/Energy Metrics into HSER	Not Started	Fri9/27/2013	0%
RCRA Subpart BB Organic Emissions from HazWaste (...)	Not Started	Man 9/30/2013	0%
Monitoring of HazWaste UST Contents: Print Report of...	Not Started	Mon 9/30/2013	0%
DP Inspection and Inventory of secondary containmen...	Not Started	Mon 9/30/2013	0%
Inspect Spill and Emergency Response Kits	Not Started	Man 9/30/2013	0%
Monthly SCBA inspection	Not Started	Mon 9/30/2013	0%
DP Site Waste Inventory Plan:Revise and Update Annu...	Not Started	Tue 10/1/2013	0%
Send R&D HSE Highlights to Alice	Not Started	Tue 10/1/2013	0%
DP Discharge Monitoring Report (NPDES Permit)	Not Started	Tue 10/15/2013	0%
Riv/McC Quarterly Asbestos Removal Report	Not Started	Fri 10/18/2013	0%
DP Quarterly Asbestos Removal Report	Not Started	Fri10/18/2013	0%
Enter September Environmental/Energy Metrics into H...	Not Started	Fri10/18/2013	0%
DP October labwater separator sample	Not Started	Thu 10/31/2013	0%
SARA 302 Inventory Notification Reporting (Bimonthly)	Not Started	Thu 10/31/2013	0%
Monitoring of HazWaste UST Contents: Print Report of...	Not Started	Thu 10/31/2013	0%
Inspect Spill and Emergency Response Kits	Not Started	Thu 10/31/2013	0%
DP Inspection and Inventory of secondary containmen...	Not Started	Thu 10/31/2013	0%
Monthly SCBA inspection	Not Started	Thu 10/31/2013	0%
DP Cathodic Corrosion Protection Testing of HWUST	Not Started	Fri 11/1/2013	0%
Review non-haz facilities	Not Started	Fri 11/1/2013	0%
DP-Complete No Cost & low Cost Energy Audit Check...	Not Started	Mon 11/11/2013	0%
DP Discharge Monitoring Report (NPDES Permit)	Not Started	Fri 11/15/2013	0%
Enter October Environmental/Energy Metrics into HSER	Not Started	Wed 11/20/2013	0%
RCRA training plan update	Not Started	Fri 11/29/2013	0%
DP November lab water separator sample	Not Started	Fri 11/29/2013	0%
RCRA Subpart BB Organic Emissions from HazWaste (...)	Not Started	Fri 11/29/2013	0%
Monitoring of HazWaste UST Contents: Print Report of...	Not Started	Fri 11/29/2013	0%

# Setting Up a Regulatory Calendar

- Use these task lists to set-up your own calendar
- Most of your reports to agencies happen in the first half of the year.
- Print out the tasks at the first of each month to determine your work load

# What Kind of Management System do you use to keep lists of Records and Documents?

- Per ISO or RC 14001 there needs to be a way to keep track of Records and documents
- Document control is part of this requirement
- Where are these items located and where are the controlled copies? System needed
- Documents need to be printed on special paper to show that the copies are controlled.

Illinois	Environmental	Asbestos Abatement Act	Department of Public Health	105 ILCS 105
Illinois	Environmental	Commercial and Public Building Asbestos Abatement Act	Department of Public Health	225 ILCS 207
Federal	Safety	Employee Emergency Plans and Fire Prevention Plans	OSHA	29 CFR 1910.38
Federal	Emergency Response	HAZWOPER	OSHA	29 CFR 1910.120
Federal	Emergency Response	Medical and First Aid	OSHA	29 CFR 1910.151
Federal	Fire Protection	Portable Fire Extinguishers	OSHA	29 CFR 1910.157
Federal	Other	NFPA (National Fire Protection Association) Codes	Various, including but not limited to NFPA, ANSI, API, CGA, ASTM	29 CFR 1910.6 Incorporation by Reference
Federal	Environmental	Clean Air Act	US EPA	40 CFR
Federal	Environmental	Protection of Stratospheric Ozone	US EPA	40 CFR Part 82
Federal	Environmental	Discharge of Oil or Hazardous Substances	US EPA	40 CFR Part 110-117
Federal	Environmental	Oil pollution prevention/SPCC	US EPA	40 CFR Part 112
Federal	Environmental	NPDES Permit Program	US EPA	40 CFR Part 122
Federal	Environmental	Identification/Listing of Hazardous Waste	US EPA	40 CFR Part 261
Federal	Environmental	Generator Requirements	US EPA	40 CFR Part 262
Federal	Environmental	TSD Requirements (including 90 day storage)		40 CFR Part 264
Federal	Environmental	Interim Status Standards For Owners And Operators Of Hazardous Waste Treatment, Storage, And Disposal Facilities	US EPA	40 CFR Part 265

Federal	Environmental	Land disposal restrictions	US EPA	40 CFR Part 268
Federal	Environmental	Waste permit requirements (including program - signatory authorities)		40 CFR Part 270
Federal	Environmental	Universal waste requirements	US EPA	40 CFR Part 273
Federal	Environmental	Used oil requirements	US EPA	40 CFR Part 279
Federal	Environmental	Corrective action (including underground storage tanks)		40 CFR Part 280
Federal	Environmental	Emergency Release Reporting	US EPA	40 CFR Part 302
Federal	Environmental	Emergency Planning and Notification	US EPA	40 CFR Part 355
Federal	Environmental	Emergency Planning and Notification	US EPA	40 CFR Part 355
Federal	Environmental	Community Right to Know	US EPA	40 CFR Part 370
Federal	Environmental	Community Right to Know	US EPA	40 CFR Part 370
Federal	Environmental	Toxic Chemical Release Reporting	US EPA	40 CFR Part 372
Federal	Environmental	Toxic Chemical Release Reporting	US EPA	40 CFR Part 372
Federal \ State	Environmental	State Permit Programs	US EPA \ IEPA	40 CFR Part 51
Federal	Environmental	New Source Performance Standards	US EPA	40 CFR Part 60
Federal	Environmental	Risk Management Plan	US EPA	40 CFR Part 68
Federal	Product Stewardship	Import & Export		40 CFR Part 707

International	Transportation	GHS Regulations	Each country is responsible for writing national legislation adopting the GHS criteria by 2008	GHS - Globally Harmonized System of Classification and Labeling of Dangerous Goods
International	Transportation	Dangerous Goods Regulations	International Civil Air Organization (ICAO)	IATA 45th Edition (updated annually)
International	Transportation	International Maritime Dangerous Goods Code (IMDG)	International Maritime Organization (IMO)	IMDG 2004 Edition (updated bi-annually)
City	Environmental	Air Pollution, Noise and Vibration, Discharge Waters and Sewage Systems, Scrap and Waste Materials		McCook Environmental Control Ordinance - Ordinance # 0206
Local	Environmental	Indirect Discharge	Metropolitan Water Reclamation District (MWRD) of Greater Chicago	MWRDGC User Charge Ordinance
Local	Environmental	Indirect Discharge	Metropolitan Water Reclamation District (MWRD) of Greater Chicago	MWRDGC Sewage and Waste control ordinance
International	Environmental	Montreal Protocol	United Nations	N/A
International	Transportation	IAEA Regulations (radioactive materials)	International Atomic Energy Agency (IAEA)	Regulations for the safe transport of radioactive materials (1996 edition)
Illinois	Environmental		PCB/IEPA	Subtitle A: General Provisions
Illinois	Environmental	Title V Air Permit	PCB/IEPA	Subtitle B: Air Pollution
Illinois	Environmental	NPDES Permit	PCB/IEPA	Subtitle C: Water Pollution
Illinois	Environmental		PCB/IEPA	Subtitle F: Public Water Supplies
Illinois	Environmental	Waste Generator Permit	PCB/IEPA	Subtitle G: Waste Disposal
Illinois	Environmental		PCB/IEPA	Subtitle H: Noise
Illinois	Environmental		PCB	Subtitle I: Atomic Radiation
Illinois	Environmental		PCB	Subtitle J: Clean Construction or Demolition Debris
Illinois	Environmental		PCB/IEPA	Subtitle M: Biological Materials
Illinois	Environmental	Environmental Regulations for the State of Illinois	Illinois Pollution Control Board	Title 35 of the Illinois Administrative Code



Federal	Product Stewardship	TSCA Inventory & Inventory Update Rule		40 CFR Part 710
Federal	Environmental	Refrigerant Technician Certification, Protection of Stratospheric Ozone, Recycling & Emissions Reduction	US EPA	40 CFR Part 82 Subpart F
Federal	Environmental	Drinking water standards	US EPA	40 CFR Parts 141-143
Federal	Environmental	Potentially Responsible Party (PRP) Liability	US EPA	40 CFR Parts 303-312
Federal	Environmental	Pre-treatment standards	US EPA	40 CFR Parts 400-471
Federal	Environmental	Air toxics standards (NESHAPS)	US EPA	40 CFR Parts 61-63
Federal	Environmental	Title V Permit Programs	US EPA	40 CFR Parts 70-71
Federal	Transportation	Hazardous Materials Regulations	Pipeline Hazardous Materials Safety Administration (PHMSA) / DOT	49 CFR Parts 100 - 185
Federal	Transportation	AAR Tank Car Spec (M-1002)	AAR (IBR into 49CFR)	49 CFR 171.1 (IBR List)
Federal	Transportation	Motor Carrier Regulations	Federal Motor Carrier Safety Admin (FMCSA)	49 CFR Parts 40, 325, 350, 355-399
Federal	Security	Dept of Homeland Security Appendix to Chemical Facility Anti-Terrorism Standards	DHS	6 CFR Part 27
Federal	Environmental	Federal Insecticide, Fungicide, & Rodenticide Act (FIFRA) of 1972		7 U.S.C. s/s 136 et seq. 40CFR Parts 150-189
Illinois	Environmental	Asbestos Abatement for Public and Private Schools and Commercial and Public Buildings in Illinois	Department of Public Health	77 Ill. Adm. Code 855
Illinois	OpSafety	Illinois Boiler and Pressure Vessel Code	Office of the State Fire Marshal	Boiler and Pressure Vessel Safety Act [430 ILCS 75/1 - 75/16]
Federal	Security	International - Chemical Weapons Convention		Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on Their Destruction (the "CWC", or the "Convention")

# Records Retention Policy

- Most compliance records require to have at least three years retention.
- Please review your companies records retention policy for more information
- Make sure that you have room for all your files in your office or close by
- Have a system set-up to have all documents , permits and plans scanned and put into electronic files

Action	Task	Source	Title	Category	Sub-Category	Review Interval	Documentation Type
Reporting	y	27 CFR Part 20	Specially denatured alcohol report to BATF	E N V	Waste	When needed	Formatted report.
Inspection	y	40 CFR 112.5(b)	Update/revise site SPCC Plan (every 3 years or sooner as needed by site structural changes.	E N V	Water	Every 3 years	Letter in report format.
Reporting	y	40 CFR 261.4(e)	Treatability Studies report to IL EPA	E N V	Waste	When needed	Letter in report format.
Inspection	y	40 CFR 262-265.174	Inventory & inspection of site RCRA hazardous wastes.	E N V	Container Management	Weekly-Every 7 Days	Inspection checklist.
Testing	y	40 CFR 265.1085	Cathodic corrosion protection testing of hazardous waste underground storage tank (HWUST)	E N V	Waste	Annual	Letter in report format.

Inspection	y	40 CFR 265.10B5(c) RCRA subpart CC	Inspection of safety related vapor containment devices on HWUST	ENV	Waste	Annual	Inspection checklist.
Reporting	y	40 CFR 265.13 - Facility Standards	Revision/Updating of Site Waste Inventory Plan [(WIP)	ENV	Waste	Annual-Every 365 Days	Formatted report.
Training	y	40 CFR 265.16	RCRA, Emerg Notification, Spills refresher trainina.	ENV	Waste	Annual	Intranet Report.
Monitoring	y	40 CFR 265.195(a)	Monitoring of Haz Waste UST contents.	ENV	Waste	Daily	Printed Report
Monitoring	y	40 CFR 761	PCB Testing in Transformers	ENV	Emergency Preparedne ss	Annual	Analytical Report
Inspection	y	40 CFR Part 112.7(e)(8).	Inspection and inventory of secondary containment /diked areas for SPCC Plan	ENV	Water	Weekly	Inspection checklist.
Testing	y	40 CFR Part 60 subpart Kb	Vapor pressure testing of HWUST contents	ENV	Waste	Every 6 Months	Formatted report.

Permitting	y	Cook Co. Dept of Environ! Control, section 5.	Operations & Maintenance Permit (Asbestos)	ENV	Waste	Annual	Formatted permit request.
Reporting	y	Cook Co. Dept of Environm'l Control Ordinances, section 10.4.	Quarterly Asbestos Removal Report	ENV	Waste	Quarterly	Letter in report format.
Inspection	y	Cook Co. Dept. of Environm'l Control Ordinances, section 5.	Inspection and certification for operation of the boilers.	ENV	Air	Annual	Certificate of Operation
Posting	y	EPCRA Section 302 Extremely Hazardous Substances, CERCLA Hazardous Substances, EPCRA Section 313 Toxic Chemicals, CAA 112(r) Regulated Chemicals For Accidental Release Prevention	Consolidated List of Chemicals • Subject to the Emergency Planning and Community Right-To-Know Act (EPCRA) and Section 112(r) of the Clean Air Act	ENV		Check every 60 days	
Sampling	y	MWRD Sewage & Waste Control Ordinances/Appendix B	Sampling and documentation of numerous parameters from Expansion Line/API in parking lot (bldg 8)	ENV	Water	Monthly	Inspection checklist.
Reporting	y	MWRD Solid Waste Control Ordinances Article V, Section 3.	Facility Classification Questionnaire	ENV	Classificati on	When needed	MWRD Formatted Questionnaire
Monitoring	y	MWRD User Charge Ordinances/Appendix B	Documented water submeters weekly reading in Bldg C (east and west)	ENV	Water	Biannual	Computer printed report.

Calibration	y	MWRD User Charge Ordinances/Appendix B	Water submeters calibration in bldg C (east and west)	ENV	Water	When needed	Letter in report format.
Sampling	y	MWRD User Charge Ordinances/Appendix C.	RD920 User Charge Sampling	ENV	Water	Annual	Formatted report.
Reporting	y	MWRD User Charge Ordinances/Appendix C.	RD925 User Charge Certification Statement & Report	ENV	Water	Annual	Formatted report.
Sampling	y	NPDES Permit 40 CFR Part 122, Title 35 Illinois Admin Code (IAC) Subtitle C.	Sampling and analysis for TOC, pH, FOG, BOD and documented retention pond discharge volume	ENV	Water	Monthly	Formatted report.
Reporting	y	Title 32 IAC 620.30	IONS Survey	ENV	Waste Survey		Formatted report.
Reporting	y	Title 32 IL Admin. Code 609.65	Transportation Permit Tracking Application [(Radioactive Waste)Eti	ENV	Waste	When needed	Electronic and paper format
Monitoring	y	Title 35 IAC 725.950(e)	RCRA Subpart BB- organic emissions from hazwaste operations list	ENV	Air	Monthly	Letter document to file.
Reporting	y	Title 35 IAC Subpart G	IL State special waste generator report	ENV	Waste	Annual	Formatted report.
Reporting	y	Title 35 IAC Subtitle B, 40 CFR Parts 63 et al.	Monitoring and reporting of various sources of air emissions and site emissions (boilers, tanks, lab hoods, paint use, engine labs)	ENV	Air	Annual	Formatted report.
Reporting	y	Title 35 IAC Subtitle B, 40 CFR Parts 63 et al.	Title V Permit Annual Compliance Certification Report	ENV	Air	Annual	Report
Reporting	y	Title 35 IAC Subtitle G	IL State hazardous waste generator re_Q_ort	ENV	Waste	Annual	Formatted report.
Inspection	y	Title 35 IAC Subtitle G and 40 CFR Parts 260-265	Inspect 90-day accumulation areas (HWSA & HWCA).	ENV	Waste	Weekly- Every 7 Days	Inspection checklist.

Monitoring	y	Title V Air Permit	Title V Monitoring Plant Emissions Records	ENV	Air	Annual	Excel File
Reporting	y		Title V Semi-Annual Monitoring Report	ENV	Air	Semi-Annual	
Reporting	Y		Waste Minimization Plan	ENV	Waste	As needed	Formatted report.
Reporting	y		subpart CC certification HWUST	ENV	Waste	Annual	Letter document to file.
Reporting	y		DOT Medical Waste	OTHER		Every three years	
		Cook County Department of Environmental Control, Chapter 30 Environment, Article VI Asbestos and Related Substances	DOT Security Plan awareness	OTHER		everythreeyears	
Reporting	y	40CFR	DOT Security Plan	OTHER		everythreeyears	

# Listing records, plans, permits for Agency Inspections

- Based on listings, prepare others to respond to unannounced inspections by outside agencies
- Show at least two people what to do if an inspector comes on-site
- There should access to hard copies of permits and plans






## Response to Situation:

1. Proceed to the guardhouse and introduce yourself.
  - a. Provide your business card (also provide one from the Environmental Engineer)
2. Check the inspector's credentials, and ask the nature of the visit.
  - a. Is the inspector here for Air, Water (storm water, waste water), or Waste?
  - b. Obtain business card from the inspector - name, phone number and e-mail address.
3. Explain to the inspector that the Environmental Engineer is out of the office and you are the only one on site.
4. Ask if this inspection can be done at a later date.
5. If the response is no, call the Environmental Engineer.
6. If the Environmental Engineer is not available, proceed with the inspection and answer the questions to the best of your ability.

The inspector will most like want to see;

1. Air Inspection
  - a. Title V permit- book shelf
  - b. Semi-Annual Compliance reports (contains log sheets of plant pollution control device readings)- bottom drawer under Air
  - c. Annual Compliance Certificate- bottom drawer under Air
  - d. Annual emissions Summary- bottom drawer under Air
  - e. Title V emission calcs (excel spreadsheets per plant) -electronic under Environmental DP - air
  - f. Whatever else that they may want such as requires of PMs, etc.- N/A
2. Stormwater inspection
  - a. NPDES permit- book shelf
  - b. eDMR- on book shelf and bottom drawer under water and wastewater
  - c. Stormwater pollution plan (part of ERP)- N/A
  - d. Spill Prevention Control and Countermeasures plan (part of ERP)-book shelf
  - e. Class K operators certificates- N/A
  - f. Secondary Containment Inspections- my desk current, bottom drawer - Water
  - g. Spill Kit inspections- my desk current, bottom drawer
  - h. Storage and Drum Storage Area Inspections- my desk and bottom drawer
3. Wastewater inspection
  - a. Discharge authorization- N/A
  - b. User Charge sampling reports RD-920- bottom drawer

- 
- c. Compliance sampling reports RD-115- N/A
  - d. Spill Prevention Control and Countermeasures plan (part of ERP) - also meets requirements of Slug Discharge Plan- plan on books
4. Waste
- a. Waste manifests- 2013 on desk, bottom drawer prior
  - b. RCRA Permit- N/A
  - c. 8700-12 notifications- in front of left file drawer at desk d.
  - d. Waste Inventory Plan- two books on book shelf by door.
  - e. RCRA Training Plan- book on book shelf by door
  - f. Weekly waste inspections- 2013 on desk, bottom drawer prior- waste
  - g. Weekly waste inventory- 2013 on desk, bottom drawer prior-waste
  - h. Annual Hazardous waste report- bottom drawer waste



Please contact me at

[robert.wachsmuth@honeywell.com](mailto:robert.wachsmuth@honeywell.com) for any  
questions