How to Conduct an Environmental Compliance Audit

Liz Marsh, PE, CHMM

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fishbeck FACTS

Established in 1956

15 LOCATIONS

ALL IN ONE SERVICES

ARCHITECTURE/ ENGINEERING

INFRASTRUCTURE

ENVIRONMENTAL

CONSTRUCTION

600+ PROFESSIONALS

EMPLOYEE OWNED

280 SHAREHOLDERS

TOP **500** DESIGN FIRM IN THE NATION

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2. Steps for a Successful Audit

3. Considerations for Remote Auditing

Understanding Environmental Compliance Audits (or Evaluations)

Section 1

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What is an Environmental Compliance Audit?

01

Definition

An environmental compliance audit is a systematic examination of a facility's operations and processes to ensure compliance with environmental regulations and standards.

02

Importance

It helps companies identify potential environmental risks and ensure adherence to environmental laws.

Types of Audits Covered

Environmental Compliance Audit

Focuses on evaluating compliance with environmental regulations.

ISO 14001 Evaluation of Compliance

Ensures adherence to the ISO 14001 standard for environmental management.

Scope and Purpose

Defining the Audit Scope

Determining the facility and processes to be audited, the regulations to be considered, and the audit protocol to be used.

Purpose of the Audit

Understanding why the audit is being conducted and the importance of following internal procedures and policies.

Regulations and Policies

01

Regulatory Considerations

Understanding federal, state, and local regulations, as well as corporate policies that may impact the audit process.

02

Confidentiality and Self-Disclosure

Addressing the confidentiality of the audit and the potential need for self-disclosure of significant findings to regulatory agencies.

Steps for a Successful Audit

Section 2

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Pre-Audit Phase

Defining the Audit Plan

Establishing the purpose, scope, and plan, including physical boundaries, applicable regulations, and record reviews.

Online Research Tools

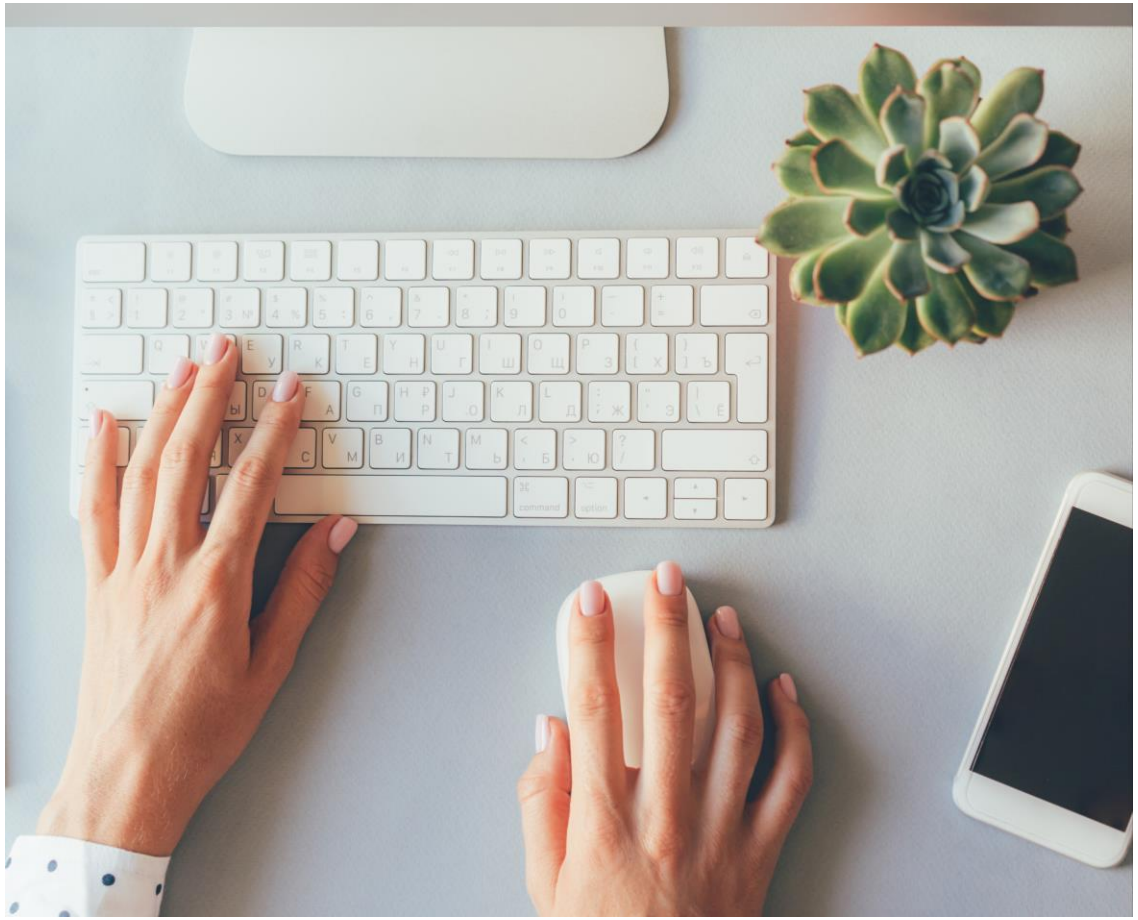
Utilizing online research tools for gathering information and considering the depth of records to review.

Audit Plan

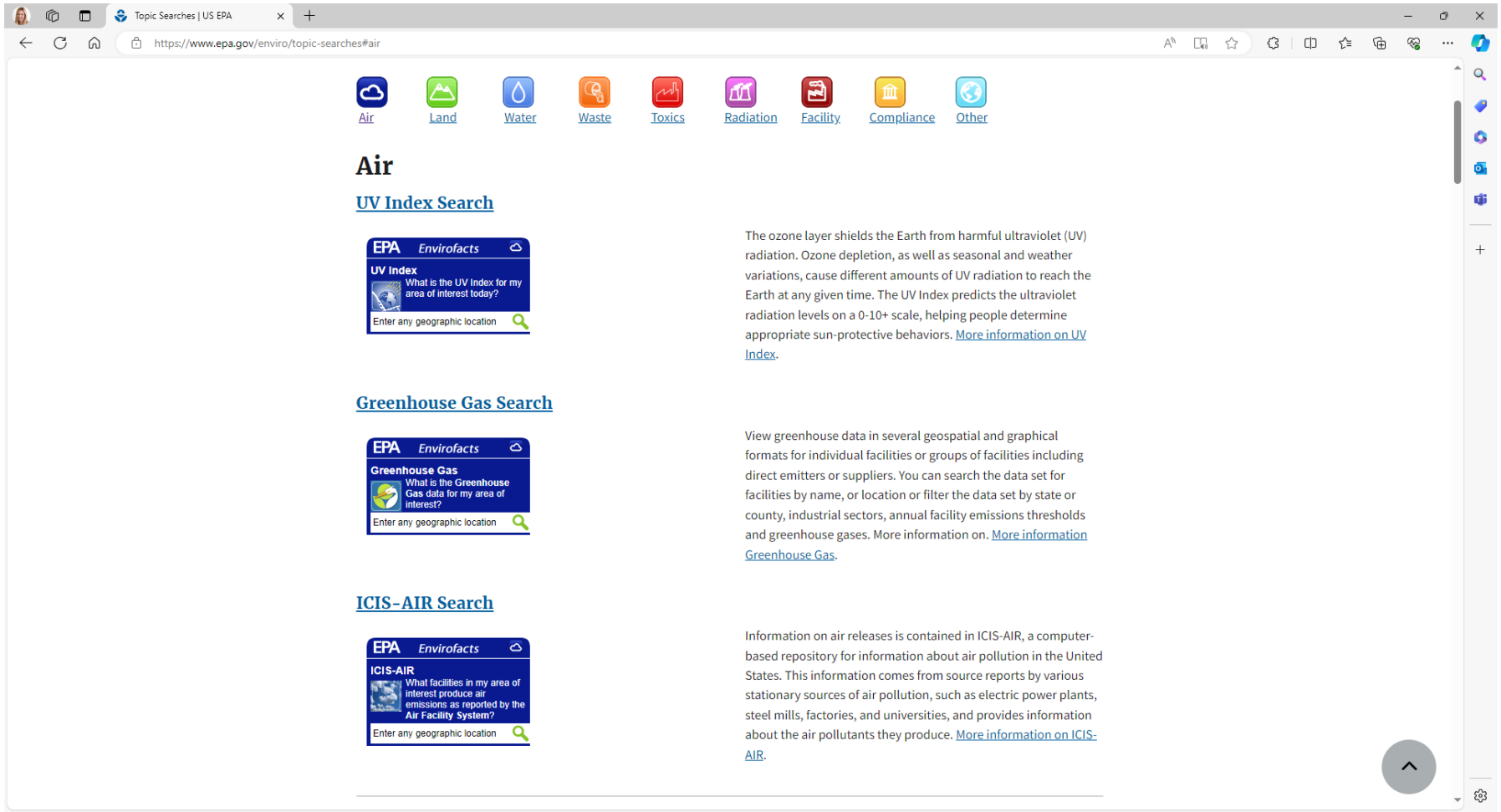
- How long will it take to walk site?
- What PPE is required?
- Will there be formal interviews of staff?
- Are records with one staff member or do other staff members need to be contacted/scheduled?
  - Training records are often with HR
  - Inspections/PM records are often with Maintenance
- Who will be invited to the opening meeting?
- Will you plan for lunch to be brought in?
- Who will be invited to the closing meeting?
  - Will closing be verbal only?
    - Usually preferred if conducting audit under Attorney/Client Privilege
- Audit Plan is a guide & often times not exact. Sometimes you just follow the “audit trail” and see where it takes you.

Online Research Tools

- The internet has lots of info about your facility even
  before an auditor or inspector steps on-site
  - Envirofacts (Envirofacts | US EPA)
  - ECHO (Enforcement and Compliance History Online | US EPA)
  - List of EGLE Air Sources (Source Master List Sorted By Source ID (state.mi.us))
  - EGLE Waste Data System (WDS) (Waste Data System (state.mi.us))
  - EGLE MiEnviro Portal (MiEnviro Portal (michigan.gov))



Envirofacts



Envirofacts

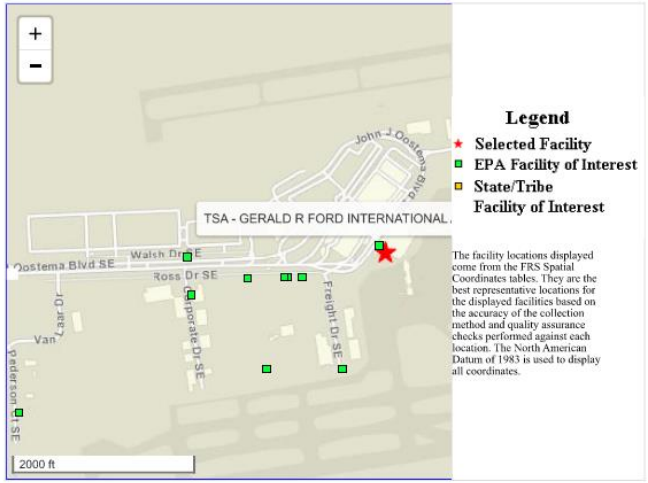
Related Topics: Envirofacts

FRS

FRS Facility Detail Report

TSA - GERALD R FORD INTERNATIONAL AIRPORT (GRR)

EPA Registry Id: 110017871784
5500 44TH STREET SE
GRAND RAPIDS, MI 49512-4093



Facility Registry Service Links:

- Facility Registry Service (FRS) Overview
- FRS Facility Query
- FRS Organization Query
- EZ Query
- FRS Physical Data Model
- FRS Geospatial Model

Report an Error

Environmental Interests

Information System	System Facility Name	Information System Id/Report Link	Environmental Interest Type	Data Source	Last Updated Date	Supplemental Environmental Interests
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM	TSA - GERALD R FORD INTERNATIONAL AIRPORT (GRR)	MIK289887432	VSQG (Y)	RCRAINFO		
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (ICIS-NPDES)	GERALD R FORD INTL AIRPORT-GR	MI0055735	ICIS-NPDES NON-MAJOR	ICIS		ICIS-ENFORCEMENT/COMPLIANCE ACTIVITY

Additional EPA Reports: MyEnvironment Enforcement and Compliance Site Demographics Facility Coordinates Viewer Environmental Justice Map Viewer Watershed Report

Standard Industrial Classification Codes (SIC)

Data Source	SIC Code	Description	Primary
NPDES	3728	AIRCRAFT PARTS AND AUXILIARY EQUIPMENT, NOT ELSEWHERE CLASSIFIED	
NPDES	4581	AIRPORTS, FLYING FIELDS, AND AIRPORT TERMINAL SERVICES	

Facility Codes and Flags

EPA Region:	05
Duns Number:	
Congressional District Number:	03
Legislative District Number:	
HUC Code/Watershed:	04050007 / THORNAPPLE
US Mexico Border Indicator:	
Federal Facility:	NO
Tribal Land:	NO

National Industry Classification System Codes (NAICS)

Data Source	NAICS Code	Description	Primar
RCRAINFO	92612	REGULATION AND ADMINISTRATION OF TRANSPORTATION PROGRAMS	

Alternative Names

Alternative Name	Source of Data
GERALD R FORD INTERNATIONAL AIRPORT (GRR	RCRAINFO
KENT CNTY DEPT OF AERONAUTICS	PCS
GERALD R FORD INTL AIRPORT-GR	NPDES PERMIT

Facility Mailing Addresses

Affiliation Type	Delivery Point	City Name	State	Postal Code	Information System
OWNER	5500 44TH ST SE	GRAND RAPIDS	MI	49512-4093	RCRAINFO
OWNER	5500 44TH ST SE	GRAND RAPIDS	MI	49512	RCRAINFO
OPERATOR	5500 44TH ST SE	GRAND RAPIDS	MI	49512-4093	RCRAINFO
OPERATOR	5500 44TH ST SE	GRAND RAPIDS	MI	49512	RCRAINFO
FACILITY MAILING ADDRESS	5500 44TH ST SE	GRAND RAPIDS	MI	49512-4093	RCRAINFO

Organizations

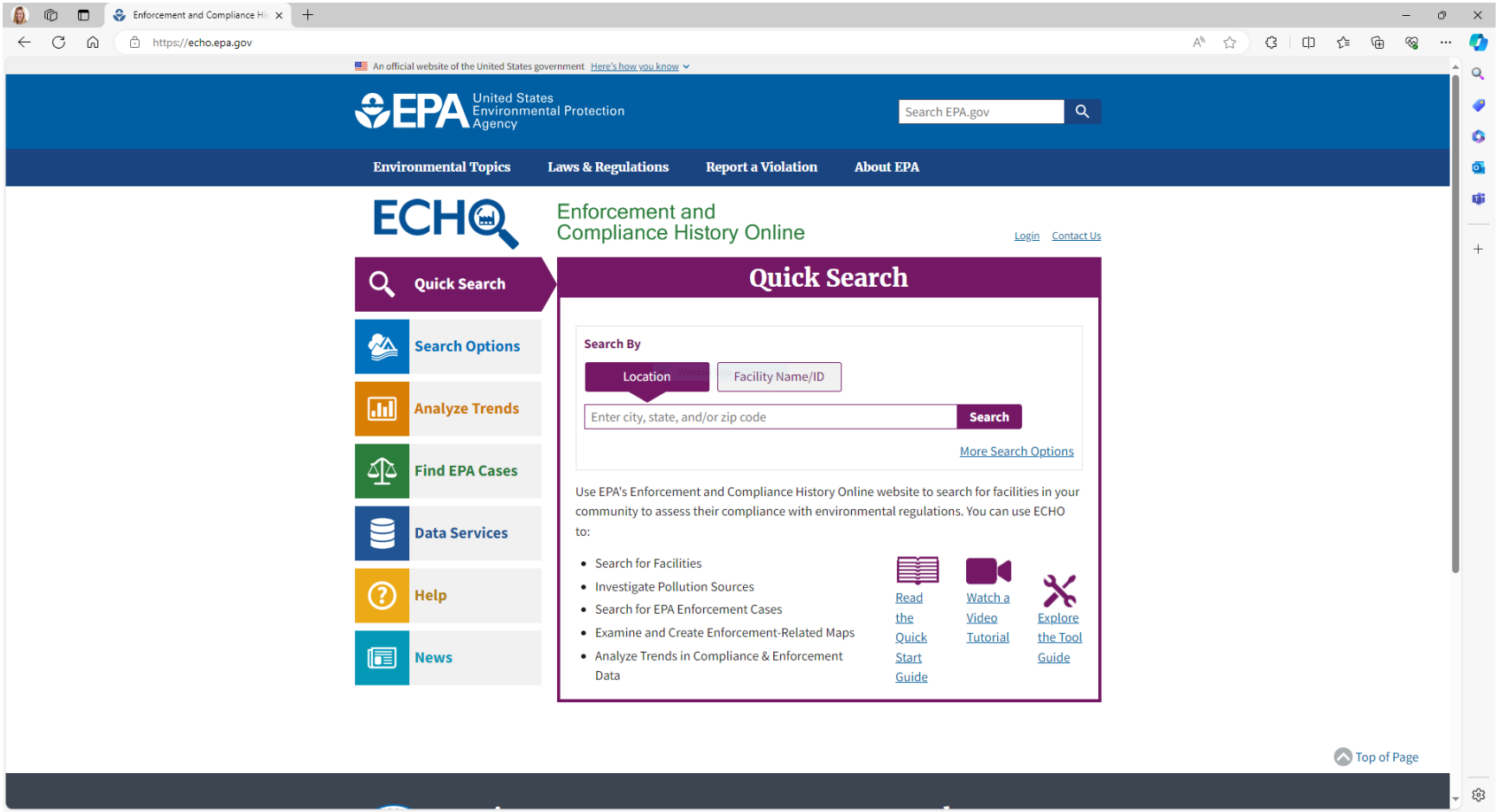
Affiliation Type	Name	DUNS Number	Information System	Mailing Address
OWNER	COUNTY OF KENT DEPARTMENT OF AERONAUTICS		RCRAINFO	View
OPERATOR	US TRANSPORTATION SECURITY ADMIN		RCRAINFO	
OWNER	COUNTY OF KENT DEPARTMENT OF AERONAUTICS		RCRAINFO	
OWNER	COUNTY OF KENT DEPARTMENT OF AERONAUTICS		RCRAINFO	View
OWNER	GERALD R FORD INTERNATIONAL AIRPORT AUTHORITY		RCRAINFO	View
OPERATOR	US TRANSPORTATION SECURITY ADMIN		RCRAINFO	View
OPERATOR	US TRANSPORTATION SECURITY ADMIN		RCRAINFO	View

Contacts

Affiliation Type	Full Name	Office Phone	Information System	Mailing Address
REGULATORY CONTACT	MICHAEL CLOUD	616-285-6631	RCRAINFO	

Query executed on: APR-21-2024

ECHO


Enforcement and Compliance Hi
https://echo.epa.gov
An official website of the United States government Here's how you know
EPA United States Environmental Protection Agency
Search EPA.gov
Environmental Topics
Laws & Regulations
Report a Violation
About EPA
ECHO
Enforcement and Compliance History Online
Login
Contact Us
Quick Search
Search Options
Analyze Trends
Find EPA Cases
Data Services
Help
News
Quick Search
Search By
Location
Facility Name/ID
Enter city, state, and/or zip code
Search
More Search Options
Use EPA's Enforcement and Compliance History Online website to search for facilities in your community to assess their compliance with environmental regulations. You can use ECHO to:
Search for Facilities
Investigate Pollution Sources
Search for EPA Enforcement Cases
Examine and Create Enforcement-Related Maps
Analyze Trends in Compliance & Enforcement Data
Read the Quick Start Guide
Watch a Video Tutorial
Explore the Tool Guide
Top of Page

ECHO

Enforcement and Compliance Summary

Statute	CWA
Compliance Monitoring Activities (5 years)	–
Date of Last Compliance Monitoring Activity	02/08/2019
Compliance Status	Violation Identified
Qtrs in Noncompliance (of 12)	8
Qtrs with Significant Violation	3
Informal Enforcement Actions (5 years)	2
Formal Enforcement Actions (5 years)	–
Penalties from Formal Enforcement Actions (5 years)	–
EPA Cases (5 years)	–
Penalties from EPA Cases (5 years)	–
Statute	**RCRA**
Compliance Monitoring Activities (5 years)	–
Date of Last Compliance Monitoring Activity	–
Compliance Status	No Violation Identified
Qtrs in Noncompliance (of 12)	0
Qtrs with Significant Violation	0
Informal Enforcement Actions (5 years)	–
Formal Enforcement Actions (5 years)	–
Penalties from Formal Enforcement Actions (5 years)	–
EPA Cases (5 years)	–
Penalties from EPA Cases (5 years)	–

Regulatory Information

Clean Air Act (CAA): No Information

Other Regulatory Reports

Air Emissions Inventory (EIS): No Information

Compliance Monitoring History

Last 5 Years

Statute	Source ID	System	Activity Type	Compliance Monitoring Type	Lead Agency	Date	Finding (if applicable)
CWA	*MI0055735*	*ICIS-NPDES*	*Inspection/Evaluation*	*Base Program - Reconnaissance without Sampling*	*State*	*05/19/2022*	

Entries in italics are not included in ECHO's Compliance Monitoring Activity counts because they are not compliance monitoring strategy <https://www.epa.gov/compliance/compliance-monitoring-programs> *activities or because they are not counted as inspections within EPA's Annual Results* <https://www.epa.gov/enforcement/enforcement-data-and-results>.

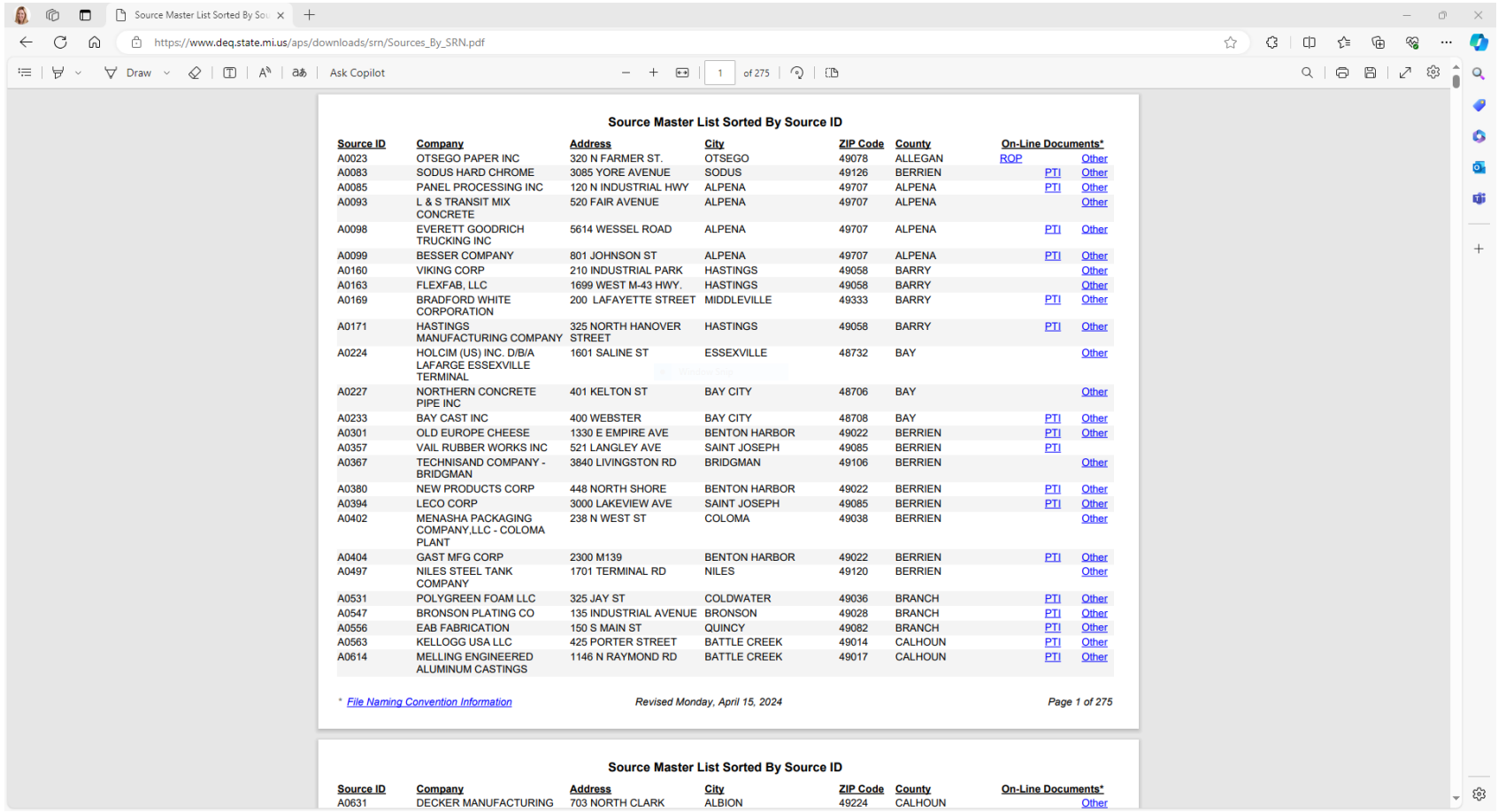
Compliance Summary Data

Statute	Source ID	Current SNC (Significant Noncompliance)/HPV (High Priority Violation)	Current As Of	Qtrs with NC (Noncompliance) (of 12)	Data Last Refreshed
CWA	MI0055735	No	12/31/2023	8	04/19/2024
RCRA	MIK289887432	No	04/20/2024	0	04/19/2024

Three-Year Compliance History by Quarter

Statute	Program/Pollutant/Violation Type				QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	QTR 13+
	CWA (Source ID: MI0055735)				01/01-03/31/21	04/01-06/30/21	07/01-09/30/21	10/01-12/31/21	01/01-03/31/22	04/01-06/30/22	07/01-09/30/22	10/01-12/31/22	01/01-03/31/23	04/01-06/30/23	07/01-09/30/23	10/01-12/31/23	01/01-04/19/24
	Facility-Level Status				Significant Category I Noncompliance	Significant Category I Noncompliance	No Violation Identified	Violation Identified	Significant Category I Noncompliance	Violation Identified	Violation Identified	Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	Violation Identified
	Quarterly Noncompliance Report History				Effluent Non-monthly Average Limit	Effluent Non-monthly Average Limit	Resolved	Other Violation	Effluent Non-monthly Average Limit	Reportable Noncompliance	Reportable Noncompliance	Reportable Noncompliance	Resolved				
	Pollutant	Disch Point	Mon Loc	Freq													
CWA	BOD, carbonaceous (5 day, 20 C) <effluent-charts#mi0055735/80082> <https://epa.gov/effluent-charts#mi0055735/80082>	011 - A	See Comments	NMth									65%				
CWA	BOD, carbonaceous (5 day, 20 C) <effluent-charts#mi0055735/80082> <https://epa.gov/effluent-charts#mi0055735/80082>	011 - A	Effluent Gross	NMth	268%			65%	389%			35%	100%				76%

EGLE Sources List



Source Master List Sorted By Source ID

https://www.deq.state.mi.us/aps/downloads/srn/Sources_By_SRN.pdf

Draw | Ask Copilot | 1 of 275

Source Master List Sorted By Source ID

Source ID	Company	Address	City	ZIP Code	County	On-Line Documents*	
A0023	OTSEGO PAPER INC	320 N FARMER ST.	OTSEGO	49078	ALLEGAN	ROP	Other
A0083	SODUS HARD CHROME	3085 YORE AVENUE	SODUS	49126	BERRIEN	PTI	Other
A0085	PANEL PROCESSING INC	120 N INDUSTRIAL HWY	ALPENA	49707	ALPENA	PTI	Other
A0093	L & S TRANSIT MIX CONCRETE	520 FAIR AVENUE	ALPENA	49707	ALPENA		Other
A0098	EVERETT GOODRICH TRUCKING INC	5614 WESSEL ROAD	ALPENA	49707	ALPENA	PTI	Other
A0099	BESSER COMPANY	801 JOHNSON ST	ALPENA	49707	ALPENA	PTI	Other
A0160	VIKING CORP	210 INDUSTRIAL PARK	HASTINGS	49058	BARRY		Other
A0163	FLEXFAB, LLC	1699 WEST M-43 HWY.	HASTINGS	49058	BARRY		Other
A0169	BRADFORD WHITE CORPORATION	200 LAFAYETTE STREET	MIDDLEVILLE	49333	BARRY	PTI	Other
A0171	HASTINGS MANUFACTURING COMPANY	325 NORTH HANOVER STREET	HASTINGS	49058	BARRY	PTI	Other
A0224	HOLCIM (US) INC. D/B/A LAFARGE ESSEXVILLE TERMINAL	1601 SALINE ST	ESSEXVILLE	48732	BAY		Other
A0227	NORTHERN CONCRETE PIPE INC	401 KELTON ST	BAY CITY	48706	BAY		Other
A0233	BAY CAST INC	400 WEBSTER	BAY CITY	48708	BAY	PTI	Other
A0301	OLD EUROPE CHEESE	1330 E EMPIRE AVE	BENTON HARBOR	49022	BERRIEN	PTI	Other
A0357	VAIL RUBBER WORKS INC	521 LANGLEY AVE	SAINT JOSEPH	49085	BERRIEN	PTI	
A0367	TECHNISAND COMPANY - BRIDGMAN	3840 LIVINGSTON RD	BRIDGMAN	49106	BERRIEN		Other
A0380	NEW PRODUCTS CORP	448 NORTH SHORE	BENTON HARBOR	49022	BERRIEN	PTI	Other
A0394	LECO CORP	3000 LAKEVIEW AVE	SAINT JOSEPH	49085	BERRIEN	PTI	Other
A0402	MENASHA PACKAGING COMPANY,LLC - COLOMA PLANT	238 N WEST ST	COLOMA	49038	BERRIEN		Other
A0404	GAST MFG CORP	2300 M139	BENTON HARBOR	49022	BERRIEN	PTI	Other
A0497	NILES STEEL TANK COMPANY	1701 TERMINAL RD	NILES	49120	BERRIEN		Other
A0531	POLYGREEN FOAM LLC	325 JAY ST	COLDWATER	49036	BRANCH	PTI	Other
A0547	BRONSON PLATING CO	135 INDUSTRIAL AVENUE	BRONSON	49028	BRANCH	PTI	Other
A0556	EAB FABRICATION	150 S MAIN ST	QUINCY	49082	BRANCH	PTI	Other
A0563	KELLOGG USA LLC	425 PORTER STREET	BATTLE CREEK	49014	CALHOUN	PTI	Other
A0614	MELLING ENGINEERED ALUMINUM CASTINGS	1146 N RAYMOND RD	BATTLE CREEK	49017	CALHOUN	PTI	Other

* File Naming Convention Information

Revised Monday, April 15, 2024

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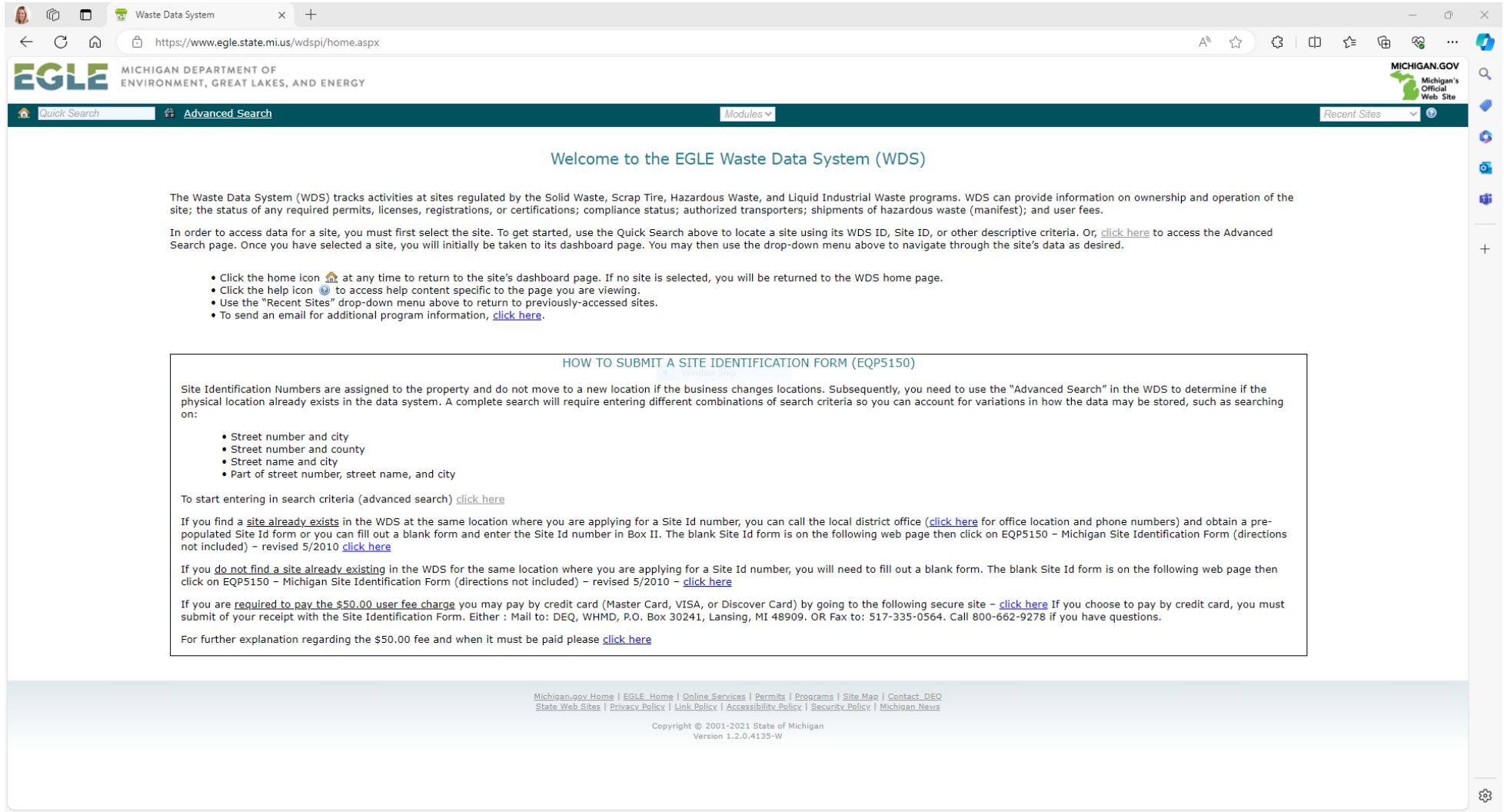
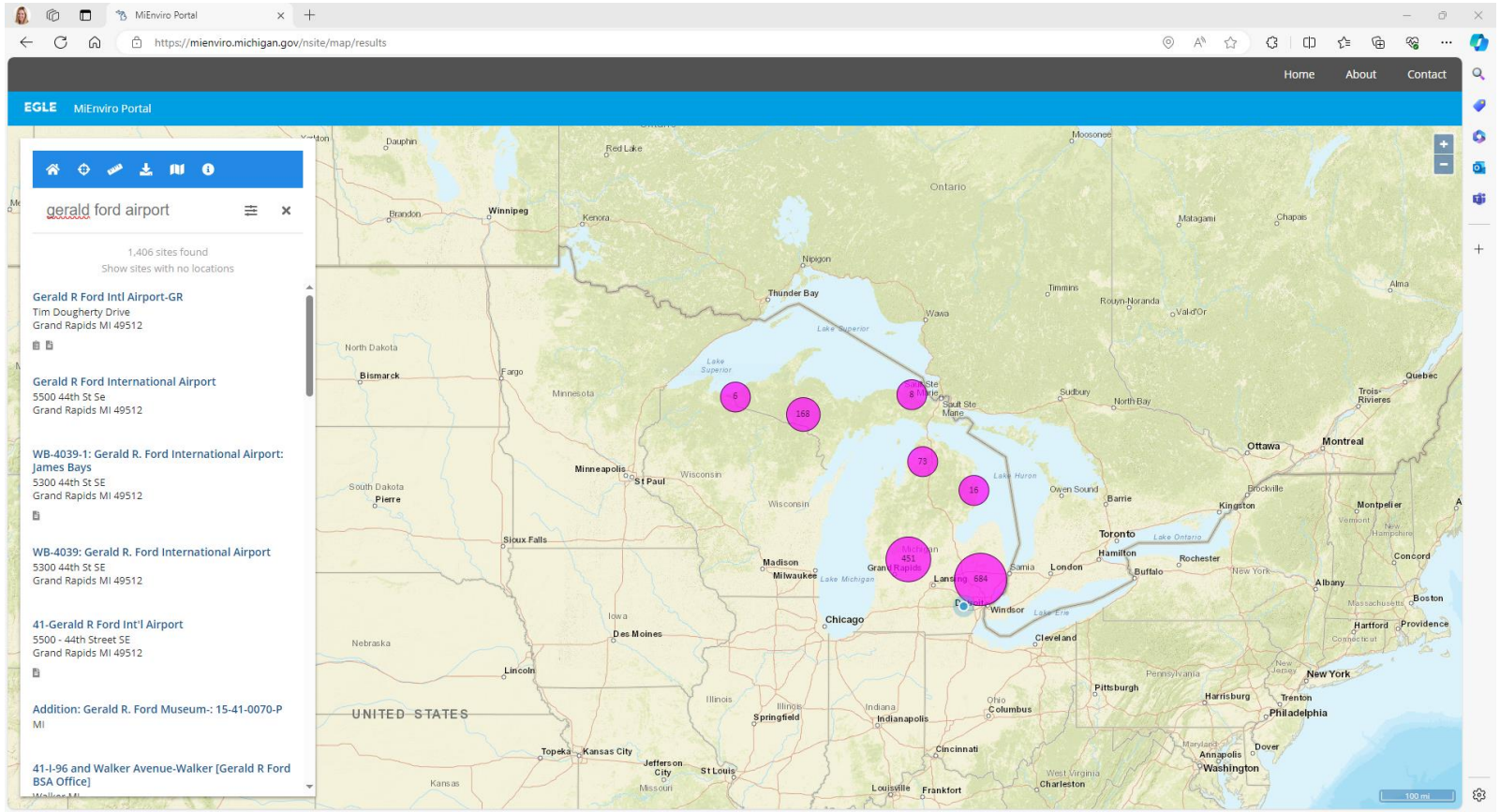
Source Master List Sorted By Source ID

Source ID	Company	Address	City	ZIP Code	County	On-Line Documents*
A0631	DECKER MANUFACTURING	703 NORTH CLARK	ALBION	49224	CALHOUN	Other

EGLE WDS


Waste Data System
https://www.egle.state.mi.us/wdspi/home.aspx
EGLE
MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
MICHIGAN.GOV
Michigan's Official Web Site
Quick Search
Advanced Search
Modules
Recent Sites
Welcome to the EGLE Waste Data System (WDS)
The Waste Data System (WDS) tracks activities at sites regulated by the Solid Waste, Scrap Tire, Hazardous Waste, and Liquid Industrial Waste programs. WDS can provide information on ownership and operation of the site; the status of any required permits, licenses, registrations, or certifications; compliance status; authorized transporters; shipments of hazardous waste (manifest); and user fees.
In order to access data for a site, you must first select the site. To get started, use the Quick Search above to locate a site using its WDS ID, Site ID, or other descriptive criteria. Or, click here to access the Advanced Search page. Once you have selected a site, you will initially be taken to its dashboard page. You may then use the drop-down menu above to navigate through the site's data as desired.
• Click the home icon at any time to return to the site's dashboard page. If no site is selected, you will be returned to the WDS home page.
• Click the help icon to access help content specific to the page you are viewing.
• Use the "Recent Sites" drop-down menu above to return to previously-accessed sites.
• To send an email for additional program information, click here.
HOW TO SUBMIT A SITE IDENTIFICATION FORM (EQP5150)
Site Identification Numbers are assigned to the property and do not move to a new location if the business changes locations. Subsequently, you need to use the "Advanced Search" in the WDS to determine if the physical location already exists in the data system. A complete search will require entering different combinations of search criteria so you can account for variations in how the data may be stored, such as searching on:
• Street number and city
• Street number and county
• Street name and city
• Part of street number, street name, and city
To start entering in search criteria (advanced search) click here
If you find a site already exists in the WDS at the same location where you are applying for a Site Id number, you can call the local district office (click here for office location and phone numbers) and obtain a pre-populated Site Id form or you can fill out a blank form and enter the Site Id number in Box II. The blank Site Id form is on the following web page then click on EQP5150 – Michigan Site Identification Form (directions not included) – revised 5/2010 click here
If you do not find a site already existing in the WDS for the same location where you are applying for a Site Id number, you will need to fill out a blank form. The blank Site Id form is on the following web page then click on EQP5150 – Michigan Site Identification Form (directions not included) – revised 5/2010 – click here
If you are required to pay the $50.00 user fee charge you may pay by credit card (Master Card, VISA, or Discover Card) by going to the following secure site – click here If you choose to pay by credit card, you must submit of your receipt with the Site Identification Form. Either : Mail to: DEQ, WHMD, P.O. Box 30241, Lansing, MI 48909. OR Fax to: 517-335-0564. Call 800-662-9278 if you have questions.
For further explanation regarding the $50.00 fee and when it must be paid please click here
Michigan.gov Home | EGLE Home | Online Services | Permits | Programs | Site Map | Contact DEQ
State Web Sites | Privacy Policy | Link Policy | Accessibility Policy | Security Policy | Michigan News
Copyright © 2001-2021 State of Michigan
Version 1.2.0.4135-W

MiEnviro



- Public can use Site Map Explorer
- Remember both Air & Water info are listed separately for same site

Conducting the Audit

Opening Meeting, Site Walk, and Record Review

Exploring the importance of the opening meeting, site walk, and records review as key components of the audit process.

Tales from the Field & Recommended Best Practices

Highlighting common audit findings and recommendations to be best prepared for an audit.

Site Walk

- I prefer Site Walk first
- Sometime sites are so large you break this up into different events
- Open & honest about what you are seeing
- Ask questions – don’t assume
- Point out findings & discuss so facility can learn

Records Review

- Make sure to put everything back the way you found it – unless you ask facility contact if they want help with organization
- Organized records give an auditor great confidence that the site is in compliance
- Open & honest about what you are seeing
- Ask questions – don't assume
- Point out findings & discuss so facility can learn

Tales from the Field

- Read your permits!
- Read your plans!
- Make sure hazardous waste, universal waste, and LIB containers are labeled and closed!
- Keep required permit & plan records!
  - Typical audit finding is air recordkeeping not completed on-time or at all
  - Missing training and inspections are also a typical audit finding
- If a process meets an exemption, document why!
- Air permits do not follow equipment from state to state!

Recommended Best Practices

- Maintain a good filing system
- Visit the shop floor often
- Do whatever you can to make sure shop floor data entry isn't on paper
- Make sure you have a good Management of Change process that includes environmental considerations
- Subscribe to regulatory updates, attend conferences or have a good consultant

Post-Audit Activities

01

Pre-Closing Meeting and Closing Meeting

Discussing the significance of pre-closing and closing meetings, including the reporting of preliminary findings and best practices.

02

Reporting

Discuss who will receive the report, when, and what report will look like.

Closing Meeting

- Try and compliment facility for their hospitality and taking time out of their busy workday
- Point out best management practices you saw
- Break down findings into:
  - Air
  - Water
  - Waste
  - Chemicals
- Know your audience
  - Are they EHS professionals who already know the regulations?
  - Are they other staff who need more of an explanation?
- If you still need to look into a potential finding, discuss during closing
  - Not good to add a finding to a report when you didn't discuss at all while on-site
- Encourage facility to work on corrective actions before they receive the report

Reporting

- Discuss with client/attorney any finding which may warrant self disclosure under an audit policy?
  - Different policies for federal & state
- Preferred to Send Draft first
  - Maybe there was a misunderstanding?
  - Or client found something after you left
    - I usually only give them until I write the draft report to find additional documentation
  - Send as soon as possible (within a week) so the audit findings are fresh in your mind & the facility personnels' mind
- Finalize draft
  - Sometimes clients/attorneys don't want finalization
- Destroy documentation per client's policy?

Considerations for Remote Auditing

Section 3

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Remote Auditing Overview

Remote Auditing Overview

Understanding the concept of remote auditing and its increased relevance in the context of the recent pandemic.

Pros and Cons

Exploring the advantages and limitations of remote auditing as a tool for conducting environmental compliance audits.

Thank you!

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