Chapter 11
Environmental Auditing

Introduction

Environmental auditing is a valuable compliance and risk management tool available to Ohio's aggregate industry. The periodic review of your site's environmental performance allows you to identify and remedy potential compliance concerns and other longer-term concerns (issues requiring some form of clean up and/or remediation). An auditing program helps an operator control costs proactively that are associated with environmental compliance, rather than reactively. The practice of environmental auditing is a good business practice that the Ohio Aggregates and Industrial Minerals Association encourages its members to implement.

This guide is intended to provide the user with a general overview of environmental auditing and its usefulness to Ohio's aggregates industry.

It is paramount that any company that contemplates conducting an environmental audit seek the advice of competent legal counsel. There are many legal issues to consider when conducting an audit, which are not addressed in this chapter.

What is an Environmental Audit?

An environmental audit as defined in ISO 14000 is a systematic, documented verification process of objectively obtaining and evaluating audit evidence to determine whether specified environmental activities, events, conditions, management systems, or information about these matters conform with audit criteria, and communicating the results of this process.

The International Chamber of Commerce defines environmental auditing as, "a management tool comprising a systematic documented, periodic and objective evaluation of how well environmental organization, management and equipment are performing with the aim of contributing to safeguarding the environment by facilitating management control of environmental practices and assessing compliance with company policies which could include meeting regulatory requirements.

Environmental audits are generally performed on a routine or periodic basis. More frequent assessments may be appropriate at any facility that has been targeted for more frequent federal, state/province and/or local inspections, and/or been issued a notice of violation, or subject to some form enforcement proceeding since the last assessment.

The audit should be carried out following the ISO Standard 14011 on Environmental Auditing Procedures including a kick-off meeting, detailed inspection, interviews, document review as well as a closeout meeting with the plant management.

Why Implement an Environmental Auditing Program?

An environmental audit determines how well your business complies with environmental laws and regulations. Environmental audits are undertaken for a variety of reasons. An audit may relate to a strict compliance audit, where facility activities are reviewed against legislative requirements, or as part of a company's management system to ensure environmental best practice. Audits may cover a wide spectrum of environmental issues or be focused on a particular aspect such as air and water permits. There are potentially significant liabilities associated with auditing, therefore auditors must be experienced and fully conversant with environmental auditing requirements.

Audits have always been an important business tool, but now there are even more incentives to perform an environmental audit, especially in the aggregate industry. With increased awareness of the need for environment protection, the aggregate industry will need to rely increasingly on environmental audits. The principal aims are to ensure compliance with regulatory agencies, as well as to identify and evaluate potential liabilities, risks and hazards. This, in turn, will assist in assessing the viability of an operation with the inclusion of costs associated with reducing environmental risks and liabilities to acceptable levels. In general, the benefits of a successful environmental auditing program can be categorized as improving a company's financial position, compliance status, and stakeholder relations.

Below are examples of benefits that a successful environmental auditing program could generate:

Financial

Helps avoid fines by regulatory agencies
Identifies issues of non-compliance sooner versus later allowing for proactive financial planning
Lowers corrective action costs
Waste minimization opportunities realized, leading to reduced operating costs

Compliance

Reduced agency enforcement actions and penalties
Increased employee awareness of environmental standards and responsibilities

Stakeholder Relations

Improved employee relations and increased morale
Improved community image of the Company
Goodwill
Firms with sound environmental stewardship programs are desirable to investors

Planning the Audit

Defining Scope

An aggregate operation that wishes to conduct an environmental audit must have a clear idea of the objectives and goals of the audit and steps required to achieve them. It must be decided if a single area will be focused on, or if it will be an all-encompassing audit. (For example, will the air permit be evaluated or will the property in its entirety be audited?) The audit size should be scaled to the operator's needs and the resources available.

Managing the Risks of Environmental Auditing

Another critical part of the environmental auditing process is to ensure the support and commitment of management. Where instances of non-compliance are identified, management must be committed to taking corrective action. Otherwise, if management has knowledge of a problem and fails to rectify it, they may be in a less advantageous position with regards to criminal liability should the particular issue be the subject of a critical review by a regulatory agency.

Although environmental audits are a recommended best practice, it should be noted that any business, which conducts an environmental audit risks public disclosure of the results. Because of the complex laws relating to confidentiality, there is no guarantee that confidentiality can be maintained. It must be realized that uncovering information through a compliance audit may trigger an obligation to report under the environmental laws, or an obligation to disclose under the securities laws. Failure to do so can subject both a business and its individual employees to fines and/or penalties. An operator should consult with their legal council regarding any specific issues.

Conducting an Audit

There are five objectives that typically define an environmental audit:

Verification of legislative and regulatory compliance
Assessment of internal policy and procedural conformance
Site Investigation
Identification of improvement opportunities
Report Generation

The results of these items should be summarized in a report for reference.

Verification of Legislative and Regulatory Compliance

Regulatory Review

Regulatory review entails the review of environmental laws and regulations, which govern areas to be addressed during the audit. Generally, there are three main levels of regulatory control including, federal, state, and local. The local regulations tend to be the most stringent and can be enacted by townships, towns, counties, or otherwise. At times, a state or federal regulatory agency may mandate that a regulatory agency at a local level administer policy. For example, at times a state agency such as the Ohio Environmental Protection Agency may rely on a county's Board of Health to regulate certain related activities such as air or water.

Records Review

A thorough review of all company and any available agency records should follow the regulatory review process. The records review process provides an environmental history of the site, which

can significantly reduce the time required for the site investigation if specific problem areas can be isolated.

Examples of the types of records that should be reviewed during this process include:

- Permits and documents related to permit compliance status
  (Examples: air permit, water permit (NPDES), industrial mineral permit (IM), fuel tank permit, explosive storage permit, homeland security facility security plans (facilities with Docks - new in 2004))
    - § Stormwater Pollution Prevention Plans (SWPPP) and Spill Prevention Control and Countermeasure (SPCC) plans
- Topographical maps and aerial photos
- Notice of violations
- Correspondence with regulatory agencies

It should be noted that records of suspected past violations and/or other issues of concern, such as underground storage tanks, may not be documented; therefore, the records file search cannot be regarded as a definitive determinant of a site's compliance/non-compliance. This is particularly important when looking for older records that may no longer be available or have not been transferred to an electronic forum.

Assessment of Internal Policy and Procedural Conformance

The internal policies and procedures put in place by management need to be evaluated for conformance. These programs might include such items as dust control procedures, energy management, water management, noise reduction, environmental information publicity and more. Although programs like this exist on paper, the audit is needed to ensure that the programs are actively followed and that required documentation, if any, is available and complete.

Interviews

Interviews should be conducted with site personnel, including employees who were involved with or have knowledge of past problems, and regulatory agency personnel involved with the administration of the regulations.

Site Investigation

An audit protocol (checklist) can be used to help guide the investigation. See Appendix B for a sample checklist. General EPA protocols can be found for each regulatory program at: **http://www.epa.gov/compliance/incentives/auditing/protocol.html**

The investigation should be conducted by a team composed of (at a minimum):
1. An environmental/regulatory specialist
2. Plant operations personnel
3. Plant management personnel

If the team confronts a specific issue and does not have the necessary expertise, a specialist should be consulted. The EPA has developed a series of profiles or notebooks containing

information on selected major industries. These notebooks focus on key indicators that holistically present air, water, and land pollutant release data. A profile has been developed for the Stone, Clay, Glass and Concrete Industry (1995) and can be found at: **www.epa.gov/compliance/resources/publications/assistance/sectors/notebooks**

Closeout Meeting

At the end of the site visit, an oral presentation of draft audit findings should be given to facility personnel on the last day of the audit. Numbered copies of the outline could be distributed at the closeout meeting for reference, then be collected after the meeting and counted to ensure confidentiality.

Identification of Improvement Opportunities

Opportunities to improve practices that could lead to non-compliance, as well as, to improve the overall environmental performance of the facility can also be included as part of the audit.

Report

Upon completion of the site investigation, the audit team produces a report documenting its findings and recommendations. The report should be accompanied by information such as supporting lab data, maps, drawings, photos, etc.

Environmental Audit in Ohio: Disclosure Privilege and Immunity from Civil Penalties

Ohio's Environmental Audit Privilege Law provides that if an entity conducts a voluntary, timely (within 6 months), and thorough environmental audit of its operations, most of the information collected as part of the audit may be considered privileged not subject to disclosure to the State regulatory agency or the public. If this audit uncovers violations of any environmental laws or regulations, the entity can submit the information associated with the violation along with the description of the action that was or will be taken to correct the violation to the Director of the appropriate State agency [e.g., Ohio Environmental Protection Agency ("Ohio EPA"), State Emergency Response Commission ("SERC")]. The applicant must prove that reasonable diligence was taken to resolve the violation in a reasonable time in order to qualify for disclosure privilege and immunity to civil penalties. Also, a majority of the information obtained during the environmental audit will be considered privileged information not subject to disclosure if the provisions in Ohio Revised Code ("ORC") Sections 3745.70, 3745.71, and 3745.72 are followed and the circumstances qualify under the current law. Interpretation and execution of the privilege requires a thorough review and applicability determination. The law was recently extended as a result of the passage of HB 179. However, there is a gap from January 1, 2004 thru March 9, 2004 (HB 179 effective date) that the privilege and immunity provisions will not be available. Once in effect on March 4, 2004, the new law will extend the opportunity for the environmental audit privilege and immunity provisions until January 1, 2009.

The regulatory agency's influence on the drafting of this law is to ensure that the law is not used for inappropriate situations. There are a number of strings attached to these provisions that may not allow an entity to take any and/or full advantage of the law. The most common exception is the provision stating if the entity is required to submit the information to the State agency (i.e.,

by law, Director's final order or court order) for which the privilege and immunity would be desired from a voluntary environmental audit, the entity would not be able to obtain privilege or immunity due to this exception. A good example is that Title V companies cannot obtain the privilege or immunity due to their obligation under Title V annual compliance certification (Ohio Administrative Code Chapter 3745-77). In the past, several Title V entities in Ohio requested privilege/immunity and determined that due to its Title V required obligations these requests were not allowed under the law. There are other provisions that disallow the privilege, including:

> Any entity that makes the disclosure does not know or have reason to know that a government agency charged with enforcing environmental laws has commenced an investigation, enforcement action or issued any documentation that concerns a violation of such laws.
>
> The entity or person conducting the audit is able to use a narrow scope, but cannot be instructed as to the expected results.
>
> An entity that has committed significant violations that constitute a pattern of continuous or repeated violations of environmental laws, environmental related settlements, or environmental related judicial orders that arose from separate and distinct events within the last three years.
>
> An entity that properly discloses an environmental audit and requests immunity from civil penalties for violations discovered during this audit can not receive immunity for any economic benefit that was gained as a result of the violations. For example, any violation that is disclosed that takes considerable capital to correct and significant time to return to compliance will likely have a significant amount of economic benefit that may be pursued by the regulatory agency as civil penalties not entitled to immunity.
>
> No privilege or immunity will be provided to an entity for a specific violation that resulted in serious harm or in imminent and substantial endangerment to human health or the environment.

From 1997 (initial effective date) through 2001, 37 voluntary disclosures were submitted to State agencies (Ohio EPA – 34 and SERC – 3). Out of those submissions, 10 of the disclosures were found not to be entitled to privilege and immunity under the provisions of the law.

Conducting voluntary environmental audits is a prudent compliance tool for entities to consider. However, do not expect a "get out of jail free card" should violations be discovered. The current law may or may not benefit the entity that undertakes the voluntary audit. However, even if the law does not apply, a strong case can be made that the entity is in a much better position from future enforcement and high penalties if they police themselves by conducting environmental audits and promptly correcting and disclosing violations that may be found.

Appendix

Chapter 11

Environmental Auditing

Ø Helpful Contacts
Ø Audit Checklist

Appendix for Chapter 11

To get federal or state regulations you can use online data (Earth Law database), Internet search engines, or CD-ROM programs such as Enflex, BNA Environmental Reporter, RegScan, or FastRegs.

Here are phone numbers provided by EPA contractors that will lead you to regulatory information.

®Radon (202)475-9605
®RCRA (800)424-9346
®TSCA (202)554-1404
®FIFRA (800)858-7378
®SARA (800)535-0202
®SDWA (800)426-4791

**RCRA=Hazardous waste regulation
TSCA= Toxic Substances Control Act
FIFRA=Federal Insecticide, Fungicide, and Rodenticide Act
SARA= Superfund Amendments and Reauthorization Act
SDWA= Safe Drinking Water Act

Appendix for Chapter 11

Site Environmental Audit Checklist
Sample

Site Information

- Site name
- Site location
- Site General Manager
- Site Supervisor
- Person responsible for environmental compliance at this site:
  - Name
  - Title
  - Telephone
  - Fax
  - E-mail

Site Plan Showing Points of Environmental Discharge

General Site Description

Describe on-site operations.
Describe any related off-site operations and complete separate survey for each site.
Is any part of this site leased to another party? If so, identify area, tenant, type of operation, lease conditions, term of lease and complete a separate survey for each operation, if appropriate.
Is any part of this site leased from another party? If so, identify each area.

Site History

Which year was site acquired by operator?
What was prior use of this site (if known)?
Has this site received any community complaints in the past 3 years? If so, what action was taken?
Describe the operators relationship with the community in the past with respect to environmental, land use or other community matters.
Identify closed disposal sites on the property.
Identify any known contents of disposal site.
Identify any previous environmental testing of disposal sites.
Has the site or adjacent property been identified as requiring environmental remediation or upgrading? If so, describe.
Are there any known archaeological sites on the property? If so, describe.

AIR QUALITY	Follow up needed?
Has an air quality permit been issued for this facility? Permit Number(s):	
Date of issuance: Expiration:	
Are emissions being controlled on-site?	
Are entrance roads clean of debris?	
Are customers' trucks covered and free of loose stone and sand on their bodies?	
Are notices posted to cover loads and check tailgates?	
Are permit restrictions on production being met? How is this documented?	
Are permit restrictions on the sale of stone (such hours of sale or amounts) being met? How is this documented?	
Are permit conditions for water application rates for roadways being met? How is this documented?	
Are permit conditions for plant dust control being met, i.e., water sprays, bag houses, opacity limits? How is this documented?	
Do operators know opacity limits?	
Number of people at this facility certified to do opacity readings:	
Are permit restrictions for generators being met, i.e., amount of fuel consumed, opacity limits, etc.? How is this documented?	
Are inspections and maintenance of air pollution control equipment scheduled on a regular basis? How is this documented?	
Are all required records adequate, accurate, and readily available for inspection?	
What contingency plan is in place for malfunction of emission control equipment?	
Have all additions or modifications of this plant been permitted?	
Are there pending modifications?	
Are submittals to regulatory agencies done on a timely basis?	
WATER QUALITY	
Has a wastewater discharge permit (general or individual) been issued to this facility? Permit Numbers(s):	
Date of issuance: Expiration:	
Is process water being controlled and contained in sediment ponds?	
Does the final effluent from the sediment ponds appear to be free from floating solids, visible foam (only trace amounts allowed), and oil? How is this documented?	
Are inspections and maintenance of treatment systems and equipment scheduled on a regular basis? How is this documented?	
Are samples being collected, handled, and analyzed properly? How is this documented?	

Are discharge monitoring reports on-site?	
Does the effluent meet the permit limits for turbidity, pH, TSS, etc.?	
Are all required records adequate, accurate, and readily available for inspection?	
What contingency plan is in place for malfunction of wastewater control equipment?	
Have all additions or modifications of this plant been permitted?	
Are there pending modifications?	
Are submittals to regulatory agencies done on a timely basis?	
Is storm water also regulated under this permit?	
STORMWATER	
Has a storm water discharge permit been issued to this facility? Permit Numbers(s):	
Date of issuance: Expiration:	
Does the facility have a storm water management (pollution prevention) plan?	
Date of Plan: Does the plan need to be amended? By when?	
Are best management practices being employed to control storm water? How is this documented?	
Are samples being collected, handled, and analyzed properly? How is this documented?	
Are storm water discharge monitoring records on-site?	
Does the effluent meet the permit limits for turbidity, pH, TSS, etc.?	
Are all required records adequate, accurate, and readily available for inspection?	
What contingency plan is in place for malfunction of storm water control equipment?	
Are submittals to regulatory agencies done on a timely basis?	
List where silt fence is needed:	
List where rip rap is needed:	
List where ground cover is needed:	
List where sediment pond maintain is needed:	
WATER RESOURCES	
Non-potable Has a water withdrawal permit (surface or groundwater) been issued to this facility? Permit Numbers(s):	
Date of issuance: Expiration:	
Does the facility have a water conservation plan?	
Date of Plan: Does the plan need to be amended? By when?	
Are well monitoring / pumping volume records on-site? How is this documented?	

Are all required records adequate, accurate, and readily available for inspection?	
Are submittals to regulatory agencies done on a timely basis?	
Potable Has a drinking water permit been issued to this facility? Permit Numbers(s): Registered Well(s):	
Date of issuance: Expiration:	
Does the facility have a drinking water testing program?	
Are samples being collected, handled, and analyzed properly? How is this documented?	
Does the drinking water meet the limits for all required testing parameters? How is this documented?	
Are inspections and maintenance of treatment systems and equipment scheduled on a regular basis? How is this documented?	
Are submittals to regulatory agencies made on a timely basis?	
What contingency plan is in place for malfunction of the drinking water control equipment?	
Is bottled water provided at this facility?	
Are non-potable water sources posted?	
SURFACE MINING PERMIT	
Has a mining permit been issued to this facility? Permit Number(s):	
Number of permitted acres: Number of disturbed acres:	
Is permitted area flagged or marked off?	
Does facility have a mining land use plan? Date of plan:	
Is the facility complying with the plan? How is this documented?	
Is ID# and contact name in office or on sign?	
Are any changes planned?	
Are submittals to regulatory agencies done on a timely basis?	
ARMY CORP OF ENGINEERS PERMITS/ ESA / SITE OF ARCHEOLOGICAL SIGNIFICANTS	
Has the ACOE issued a permit for this facility? Type permit: Permit Number:	
Effective Date: Expiration Date:	
Are regulated wetlands/"waters of the state" on this site?	
Are these in current/future mining areas?	
Are best management practices employed to protect stream buffers and maintain barge facilities? How is this documented?	
Have endangered or threatened species been identified on this site?	

Are these currently being "protected" from harm?	
Have archeological sites been identified in current/future mining areas?	
Are these sites currently "protected" from disturbance?	
ABOVEGROUND AND UNDERGROUND STORAGE TANKS	
Aboveground Has an aboveground storage tank been permitted or registered at this facility? Permit or Registration Number(s):	
Date of issuance: Expiration:	
Does the facility have a "PE stamped" spill prevention, control, and countermeasure plan for petroleum products?	
Date of Plan: Does the plan need to be amended? By when?	
Does the facility have a spill plan for chemical storage?	
Date of Plan: Does the plan need to be amended? By when?	
Is secondary containment provided for all aboveground tanks?	
Are inventory records maintained?	
Is Phase II gasoline vapor recovery provided where required?	
Are tanks equipped with anti-siphon and overfill protection?	
Are inspections and maintenance of storage systems and equipment scheduled on a regular basis? How is this documented?	
Is inspection follow up adequate?	
Is the effluent from fuel containment dikes or treatment systems free of oil sheen and periodically tested to verify TPH, etc. levels? How is this documented?	
Is the effluent from other chemical containment dikes free of product? How is this documented?	
Are drain valves maintained in locked position except during monitored release?	
Are spills cleaned up when they occur?	
Are adequate spill supplies available in an accessible location?	
Are all required records adequate, accurate, and readily available for inspection?	
Are submittals to regulatory agencies done on a timely basis?	
What contingency plan is in place for malfunction of control equipment?	
What type of security system is in place to prevent outside persons from tampering with aboveground tanks?	
What measures are taken to prevent vandalism to tanks?	
Underground Has an underground storage tank been permitted or registered at this facility? Permit or Registration Numbers(s):	
Date of issuance: Expiration:	
Are the tanks and piping equipped with corrosion prevention, release detection and overfill protection? How is this documented?	

Are tests done as required if the tanks and/or piping are cathodically protected? How is this documented?	
Are UST inventory records routinely reconciled (stick vs. meter)? How is this documented?	
Are tank tightness tests performed as required? How is this documented?	
Are unused tanks properly closed in place or removed as required? How is this documented?	
For tanks that were closed, have samples being collected, handled, and analyzed properly? How is this documented?	
Are all required records adequate, accurate, and readily available for inspection?	
What contingency plan is in place for malfunction of control equipment?	
Is the facility participating in a “trust” fund to assist with leaking tank clean up costs?	
Are submittals to regulatory agencies done on a timely basis?	
Is used oil in properly labeled container?	
Is used oil being properly manifested?	
What is the MOE/EPA Registration I.D. # of used oil hauler?	
Is a solvent rinse basin available for parts cleaning at this facility?	
What is procedure for disposal of solvent at this facility?	
What is the name of the solvent?	
What is the approximate maximum number of pounds on site at any time?	
Is waste solvent being properly manifested?	
Name and telephone number of waste solvent hauler:	
Are there other potential hazardous wastes?	
Are hazardous waste containers being properly dated and labeled?	
Are hazardous wastes properly manifested?	
Are hazardous waste volumes sufficient for the facility to be determined a small or large quantity generator? How is this documented?	
Is this facility served by municipal sewerage treatment?	
Are there pre-treatment standards?	
Are these standards being met? How is this documented?	
Does the facility have an approved septic system?	
Does the facility have a holding tank for gray water or sewerage?	
Are holding tanks emptied regularly?	
Is there a contract for solid waste pick up?	
Is final disposal in a suitable landfill?	

Name and telephone number of solid waste hauler:	
What is the MOE/EPA ID number for the solid waste hauler?	
What is contained in the spare materials yard(s)? Transmissions? Rear ends? Engine oil or antifreeze drums? Transfer cases? Air conditioners? Transformers?	
Are there PCB transformers at this facility?	
Are inspections and maintenance of the transformers scheduled on a regular basis to prevent leakage? How is this documented?	
Are all required records adequate, accurate, and readily available for inspection?	
Are submittals to regulatory agencies done on a timely basis?	
Is there a program to remove these transformers with non-PCB type? Describe:	
Are there asbestos containing materials at this facility?	
Are inspections and maintenance of these materials scheduled on a regular basis to prevent particle from becoming airborne? How is this documented?	
Are all required records adequate, accurate, and readily available for inspection?	
Are submittals to regulatory agencies done on a timely basis?	
Is there a program to remove these materials? Describe:	
Are there lead containing materials at this facility?	
Are adequate precautions taken to prevent environmental contamination? How is this documented?	
Is there a program to remove these materials? Describe:	
Are CFCs or other refrigerants being properly collected and disposed?	
CHEMICAL HANDLING	
Are Material Safety Data Sheets (MSDS) available for all chemicals for industrial use?	
Are all containers labeled?	
Are pesticides, herbicides, or rodenticides used at this facility?	
Are adequate precautions taken to prevent unwanted environmental consequences?	
NOISE	
Are there restrictions on noise levels at this facility?	
Does the facility meet these levels? How is this documented?	
CONTRACTORS	

Are contract drillers, blasters, mechanics, strippers, etc. following safety and environmental regulations and company policies?	
Are environmental clauses written into contracts?	
Are company policies and guidelines made available to contractors?	
Are company regulatory requirements made available to contractors, i.e., mining land use plans to stripping contractors?	
Do contract drillers maintain good dust control?	
Do contractors handle wastes properly?	
Do contract strippers follow best management practices for sediment and erosion control?	
Are there current work clearance/hold harmless certificates on file for these crews?	
COMMUNITY	
Is the facility adequately screened from the community?	
Is the facility actively involved in the community? Describe programs:	
Are all blasts monitored? How is this documented?	
Do blast records reveal any problems?	
Are close proximity blasting guidelines being followed at this facility?	
Are historic structures in the immediate vicinity?	
Does this require any modifications to the operations, i.e. reduced blasting limits?	
Has the facility received any complaints during the previous three years? List:	
Describe procedure for addressing an environmental complaint:	
Have the local fire department/emergency response team toured the facility?	
Are community right-to-know reports and MSDS submitted to state and local authorities?	
ZONING	
Are local zoning or conditional use restrictions in place for this facility?	
Is the facility complying with these restrictions? How is this documented?	
Are required reports submitted on a timely basis?	
TRAINING	

Do employees know the environmental policy and how it pertains to their jobs?	
How is the environmental policy communicated?	
Are employees aware of the environmental impacts of the operations and their role in minimizing these impacts?	
Do the employees know the consequences of not following company policies?	
Are employees trained on site-specific spill prevention, control and counter measures plans?	
Are employees trained on how to clean up spills of fuels and other hazardous materials?	
Is training provided on safe handling of hazardous materials used at workstations?	
Are employees informed where Material Safety Data Sheets are kept at the plant?	
Are instructions given to employees on when and how to use protective equipment?	
Are instructions given to employees on who to notify in the event of an emergency?	
Has management received crisis management training?	
Are training records maintained? How is this documented?	
DOCUMENTATION	
Are forms for regulatory or other compulsory reporting "controlled" to ensure correct version is used?	
Are record maintenance policies documented and followed?	
Are records used for regulatory or other compulsory reporting protected from damage or loss?	
Are current copies of environmental permits maintained at the facility?	
Are pertinent environmental regulations readily available?	
ENFORCEMENT ACTIONS	
Have there been any Notices of Violation or other enforcement actions during the previous three years? Describe:	
Are there any open notices of violation?	
Is the facility meeting their compliance schedule? How is this documented?	
MONITORING AND MEASUREMENT	
Are the seismographs used to monitor blasts calibrated? How is this documented?	
Are the pH meters used for regulatory reporting calibrated? How is this documented?	
Are analytical balances used for regulatory testing calibrated? How is this documented?	

Are personnel performing NSPS Subpart OOO testing certified? How is this documented?	
Are other equipment used for regulatory or compulsory monitoring calibrated? How is this documented?	
ENVIRONMENTAL PERFORMANCE INDICATORS	
Have site-specific environmental goals been set? Describe:	
Are environmental programs in place to assist in meeting these goals?	
Are there any resources that are needed to accomplish these goals?	
Are corporate key environmental performance indicators being tracked at this facility?	
Are other pollution prevention or environmental enhancement activities occurring at this facility? Describe:	
Are there other resources or support needed by the facility to ensure environmental compliance and ongoing improvements? List:	