

Preparing For and “Surviving” a US EPA Facility Inspection

Emergency Planning and Community
Right-To-Know Act, section 313

a.k.a. Toxic Release Inventory (TRI)

US Environmental Protection Agency
ECPRA/RMP Inspection Training
Scottsdale, AZ
Thursday, February 17, 2011

Purpose of Inspection

There are **two types** of Toxic Release Inventory (TRI) inspections

1. “Non-reporter”
2. “Data Quality”



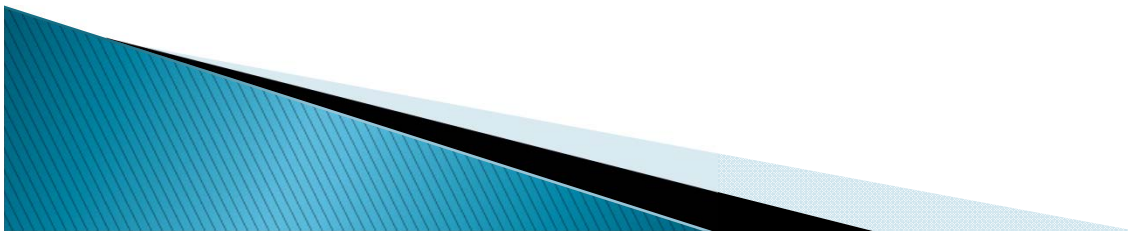
Non-reporter Inspection

Where it appears that

a facility did not report to TRI

but

may meet the TRI reporting criteria.

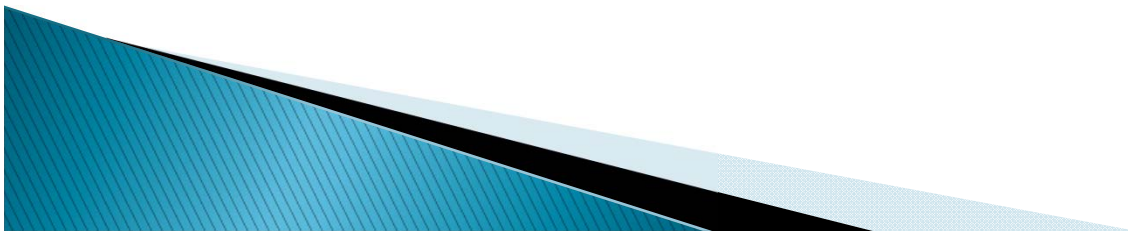


Data Quality Inspection

Where a facility has reported to TRI

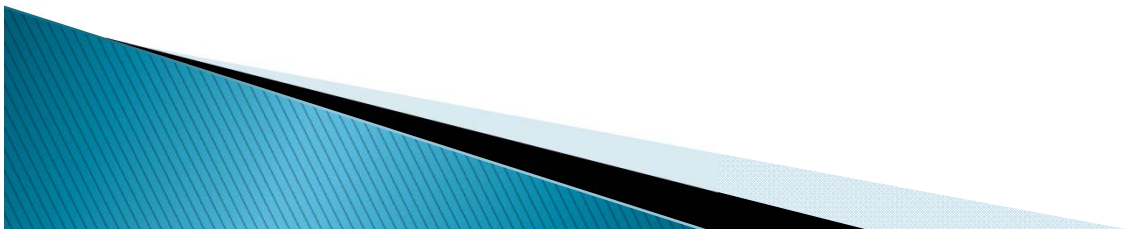
and EPA inspects

to review the quality of the data reported.



What Makes an Inspection Go Well

- ▶ **Organized records.** The first part of the inspection is a review of relevant records.
- ▶ A conference room with **large table** for records review.
- ▶ Having available a **facility representative who is familiar with TRI.**



Records For Review

- ▶ **Documents that support**
 - Facility “employee count”
 - North American Industry Classification System (NAICS) code
 - Chemicals used (e.g. annual inventory, MSDS)
- ▶ **Documents describing facility and process**
 - e.g. business plan, map, permits, manifests



Before the Inspection

- ▶ Facility generally receives **a call from EPA's TRI inspector**, which is followed by:
- ▶ **Official written notice of inspection** that provides the purpose of the inspection, date and time of inspection, and name of inspector(s).
- ▶ **A list of documents requested** for EPA review.
- ▶ Information regarding the facility's right to assert a **business confidentiality claim** under the provisions of 40 CFR 2.203(b).



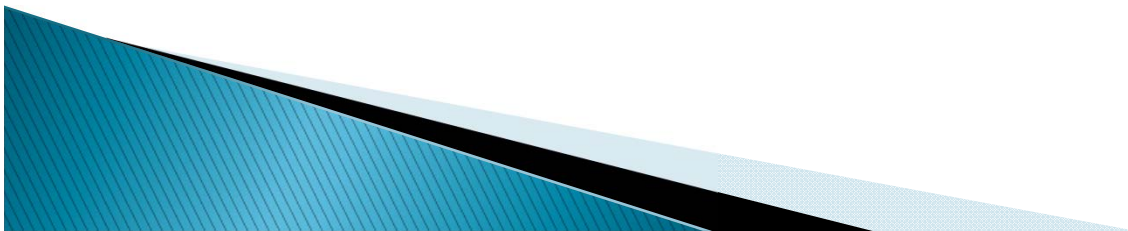
At the Inspection

1. Introductions and presentation of credentials
2. Purpose of inspection and what will occur
3. Interview of facility representative(s)
4. Document Review
5. Site Tour
6. Closing Conference



After the Inspection

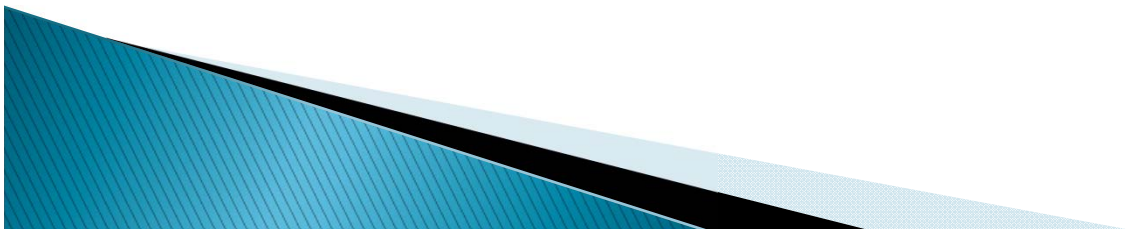
- ▶ EPA may need to **clarify information** provided via phone calls or emails.
- ▶ EPA may request **additional documents**.
- ▶ EPA will prepare an **inspection report**.



Length of Inspection

- ▶ Depends on size and complexity of facility
- ▶ Depends on amount of follow-up needed
- ▶ Depends on type of inspection

“Typical” inspection	Non-reporter	Data Quality
EPA at facility	3-4 hours	8-16 hours
Follow up calls	2-5	5-10
Time to complete inspection	1-6 months	6-12 months



For Additional Information

- ▶ EPA's TRI website: <http://www.epa.gov/tri>
- ▶ EPA's Enforcement and Compliance website:
<http://www.epa.gov/compliance/monitoring/inspections/index.html>
- ▶ Contact EPA Region 9's TRI Office
Maravilla.Pat@epa.gov or 415-947-4177
Frazer.Russell@epa.gov or 415-947-4220

