

**DTE Energy**



*DTE Energy Services*

# **Company Air / Multimedia Inspections Case Study**

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# **Company Air / Multimedia Inspections Case Study**

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- **The Inspection**
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  - Information requests
  - Notice of Violation / Notice of Non-Compliance
- **Example Inspections and Results**

# Preparing for Inspections

- **Facility should be ready at any time**
  - **Know your permit / plan / compliance obligation!**
  - **Know your inspector**
    - **Do they understand your facility?**
    - **Do they have the ‘Gotcha!’ mentality?**
    - **Are they willing to work with the facility on issues identified?**
  - **Records in order and personnel on site know where to locate them**
  - **Personnel should have working knowledge of the compliance requirements and how these translate to plant operations / maintenance**
  - **Facility needs to be clear on compliance requirements and operate in this manner continuously**

# The Inspection

- **Introductions**
  - Personnel should know who to contact when an inspector arrives, for example Plant Manager and/or Environmental Manager
- **During the Inspection**
  - Dedicate the inspection time to the inspector
  - You should know what the inspector needs to see before they ask to see it (records, plant operations/tour, etc)
  - Talk through any issues identified during the inspection (permits do not always reflect the ‘real world’ of plant operations)
  - Make sure to exhaust all avenues to determine compliance with requirements

# The Inspection

- **Close Out Meeting**
  - **Facility management (for example Plant Manager) is included in the close out meeting**
  - **Clearly identify the compliance status with the inspector (in/out of compliance or questions that require follow up)**
  - **Understand the process from the inspector's view (compliance status letter issued or follow up report)**

# Post Inspection

- **Information Requests**
  - Sometimes follow up information is needed/requested by the inspector in order to determine compliance status
  - Prefer this route to the inspector issuing NOV or NON
- **Notice of Violation / Notice of Non-Compliance**
  - Oh no! Not where you want to end up
  - If you do find yourself here, respond to any NOV / NON letters quickly
  - Clearly state your corrective actions and how the facility will ensure this will not occur again
  - It is possible that you do not agree with the NOV / NON, respond respectfully and state your case plainly
  - Depending on the agency (local, state or EPA) may end up with a fine and / or consent decree (these are negotiable!)

## **Example Inspections and Results**

- **Inspections as a result of a citizen complaint**
  - Realize that the inspector has an obligation to look into the matter
  - Citizen complaints are typically smell, noise or dust – your facility sticks out so it must be coming from there!
  - No need to be defensive or point the finger somewhere else, review operations to determine if the facility is potentially the cause of the complaint
  - If you know your facility is having an issue that could affect the neighbors consider communicating this to the regulator. This can help the regulator when receiving citizen complaints.

## **Example Inspections and Results**

- **Routine Inspections**
  - **Usually more records review intensive than response to citizen complaints**
  - **Include plant tour**
  - **Even though you are always prepared for an inspection, you should know the inspection schedule (for ex: annual or more/less frequent)**

# Company Air / Multimedia Inspections Case Study

- **Wrap Up / Questions**

