

Top Non-Compliance Issues Noted During Multimedia Environmental Compliance Audits

1. Satellite Accumulation Areas are not properly identified and maintained (e.g. no appropriate signage, secondary containment, labels, waste determinations made, or proper training provided).
2. Hazardous Waste labels do not identify the hazardous constituents contained therein (e.g., Methanol, toluene, acetone) and the hazards posed (e.g., corrosive, ignitable, toxic and/or reactive).
3. No documentation of formal waste determination for regularly generated hazardous waste streams.
4. Failure to provide adequate secondary containment for all bulk oil storage containers with a capacity of 55-gallons or greater.
5. Drain disposal of chemicals. (e.g., solvents, laboratory chemicals).
6. Failure to keep hazardous waste containers closed at all times unless adding or removing wastes (e.g., open funnel in waste container).
7. Failure to prevent the potential pollution of stormwater runoff from various operations (e.g., vehicle washing, materials storage, construction activities).
8. Spent mercury containing fluorescent lamps not stored in closed boxes labeled with the words "UNIVERSAL WASTE – MERCURY CONTAINING LAMPS."
9. Improper operation of the solvent cleaning process (e.g., the lid on a degreasing station is left open when not in use, a summary of operating procedures are not posted on or near the station, and/or records of solvent consumption are not being maintained).
10. Failure to comply with training, inspection, reporting and record keeping requirements for one or more of the following:
 - Clean Air Act (e.g., failure to apply for a permit/license or include all sources on the permit)
 - Clean Water Act (e.g., failure to prepare a Stormwater Pollution Prevention Plan)
 - Emergency Planning Community Right-to-Know (e.g., failure to report all chemicals stored in quantities above the threshold planning quantity)
 - Oil Spill Control and Countermeasure (e.g., failure to implement a plan, conduct necessary training, inspections, and maintain records)
 - Resource Conservation Recovery Act (e.g., failure to clarify generator status, provide adequate training, document inspections, or maintain all required manifest, exception reports, and LDR records).

Source: www.sunysb.edu/ehs/environmental/epa/issues.shtml#