Preparing for MOECC Site Inspections

OHMPA Spring Operations Seminar

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Overview

1. What Prompts a MOECC Site Visit
2. How to Prepare for the Inspection
3. What to Do and Not Do During the Inspection
4. Inspection Follow-ups
What Prompts a MOECC Site Visit

• Complaints
• Recent ECA application submission
• Follow-up from a previous inspection that resulted in action items
• Curiosity
How to Prepare for a MOECC Site Inspection

Often the MOECC will contact you and schedule the visit.

• Do not panic! It’s about being prepared.

• Clarify the purpose/scope of the visit, who will be attending and how long the visit will be.

• Consider working with your consultant to prepare for the site visit.
How to Prepare for a MOECC Site Inspection

Several days before the visit:

• Complete a detailed site inspection.
• Review your current ECA equipment list and conditions.
• Make sure someone who is knowledgeable about facility operations and permitting requirements will be available to meet with the MOECC and lead a site tour.
• Consider having your consultant attend.
How to Prepare for a MOECC Site Inspection

• Make sure required documentation has been developed and is readily available:
  ✓ Operations and Maintenance Manual
  ✓ Fugitive Dust Management Plan
  ✓ Complaints Procedure
  ✓ Training records
  ✓ ESDM Report and AAR (if required)
How to Prepare for a MOECC Site Inspection

• Other documentation which you may want available if applicable:

✓ Waste Manifests
✓ Sewage Discharge Surcharge Agreement
✓ ECAs for sub-contractors using portable crushers / screens / soil trommels
✓ PTTW
How to Prepare for a MOECC Site Inspection

The day before the site visit:

• Advise employees of the site inspection. The MOECC may ask them questions about their training.
• Decide who will talk about what and plan the tour route.
• Arrange for a space to have a discussion.
How to Prepare for a MOECC Site Inspection

The day of the site visit:
• Complete a final site inspection 2 hours before the visit.
• Set up the “discussion room”. Look ready and organized.
• Have a note pad, pen and camera for your use.
• Initiate the visit in the “discussion room”.
• Complete visitor safety training.
During the Site Inspection

• Be polite and friendly (only your consultant can be firm if needed).

• Do not volunteer information. Only answer the questions asked.

• If you do not know the answer, do not guess. Indicate you will respond to the question after the site visit.
During the Site Inspection

• Make note of any observations and/or requests the MOECC makes.
• Keep copies of any documents, samples or photos the MOECC takes. If possible, email requested documents to the MOECC after the meeting.
• If possible, do not commit to any deadlines during the meeting.
During the Site Inspection

• Exchange contact information.
• Ask when you can expect a copy of their inspection report.
• If action items were identified during the visit, briefly review those action items and their timing before the MOECC leaves (or shortly after their visit).
After the Site Inspection

• Follow-up with the MOECC to confirm any action items identified during the visit and timing to complete.

• Review the inspection report carefully.

• If any errors are identified in the report, follow-up with the MOECC promptly.
After the Site Inspection

• If there are several action items from the inspection the MOECC may request an Action Plan be prepared, or you may offer to prepare an Action Plan.

• Consider reviewing the wording and commitments in the Action Plan with your consultant before submitting it to the MOECC.

• Note, the MOECC may schedule a 2\textsuperscript{nd} site visit if needed.
Questions?

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