

Proactive Measures Taken to Prepare Facilities for Regulatory Inspections

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Discussion on proactive measures that are used to prepare facility personnel to handle and navigate a Clean Water Act (CWA) related regulatory site inspection. Rail facilities falling under CWA regulations may be inspected at any time by federal, state, and local regulatory agencies. Presentation will discuss the site inspection process, coordination between various stakeholders at the facility (railroad departments, contractors operating at the site, consultants), identification of common compliance issues, and various methods used to ensure readiness for the inspection. Case study will focus on a Virginia facility to examine the process of preparing for a regulatory site inspection, completing the regulatory inspection, and the final outcome from the inspection.

Wastewater from an active rail yard in Virginia is collected and routed to an on-site wastewater treatment facility (WWTF). Treated effluent from the WWTF is discharged to the local municipal sewer system and authorized under an Industrial Wastewater Discharge (POTW) Permit. The local regulatory authority (permitting agency) conducts an annual site inspection to assess permit compliance. To better prepare for these site inspections and to ensure environmental compliance, the facility has taken several proactive approaches including providing routine environmental awareness training to personnel, conducting routine internal audits, and implementing recordkeeping strategies. Prior to the inspection, coordination and communication with the different railroad departments, as well as any outside contractors operating at the facility, is made to improve readiness. As a result of these proactive measure, facility personnel are well educated on environmental regulations and compliance requirements and are able to successfully navigate through the regulatory inspection to produce a favorable outcome.