Checklists Help Ensure Regulatory Compliance

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Both the Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA) require facilities to perform routine inspections. These requirements were established to protect the environment from damage and workers from injuries. Routine inspections are a good way to uncover problems, and inspection forms are one of the things that an OSHA or EPA compliance officer will ask to see during an inspection.

Companies use checklists to verify compliance because they are an easy way to document that processes are safe or that machinery, stored products or waste containers aren't leaking. Checklists can also identify equipment or conditions that require maintenance or service. They can be your first step at fixing faulty equipment or other problems.

Neither EPA nor OSHA require a specific type of form for routine inspections. Both offer free publications and compliance guidelines about conditions that should be included on checklists. Both also have compliance-assistance offices in every state that offer free assistance. You can even call them anonymously. Non-government help is available in many forms, including training manuals, in print and on CD, as well as on- or off-site training courses from many reputable vendors.

Some managers choose to inspect a defined area or process for several compliance issues at one time; others will inspect an entire facility for a specific compliance issue. Either method is acceptable, as long as regulatory requirements are met. By developing an inspection checklist, you can help ensure that inspections are thorough and address the entire facility. Get supervisors, maintenance workers and others involved in checklist development. Input from those who work with a process or maintain it regularly can typically help uncover problems or issues with equipment that may go unnoticed by someone who doesn't work with it regularly.

The first step to creating a thorough checklist is to identify your regulatory compliance requirements. Start with written environmental and safety plans. Regulatory permits should also be checked for facility-specific compliance requirements. These will help determine the scope of your inspections as well as their required frequency. Also, don't overlook state and local variances, which can be more rigorous than federal. For example, at the federal level, containers of hazardous waste must be inspected weekly. In some states, this requirement is superceded by semi-weekly or even daily inspections.

Multimedia inspections are becoming popular because they help manage multiple programs and can be a time- and space-saver for EHS managers. Both EPA and OSHA permit multimedia inspection forms, as long as both agencies' requirements are met.

Next, locate site plans, drawings or blueprints for your facility, including process locations and equipment, underground storage tanks, and drainage and containment areas. This will help you determine compliance needs for each area. For example, if you have an on-site laboratory, ear plugs may not be needed in that area, but you'll need to ensure that everyone's wearing safety glasses or goggles, that flammable liquids are properly stored, and that wastes are properly managed. If you have underground storage tanks, maintenance could mean confined-space entry. Is the required equipment maintained and ready? Are permits required for entry? Are the workers who perform the maintenance trained? Has their training been documented? Also:

• Are first-aid kits and eyewash stations in appropriate areas?

• Are spill-response supplies stocked and accessible?

• Are workers trained to use these items?

• Are workers trained to segregate waste streams?

• Are waste containers properly labeled?

• Have there been changes at your facility not reflected in the current site plan?

• If yes, do they present added compliance issues?

• Do noise level or air quality need to be monitored in this space?

• Are there new hazards or waste streams?

• Have office workers been trained on fire and evacuation procedures?

Checklists can be created easily by hand or using any standard spreadsheet program. If you use an electronic format, it can be printed out for use during an inspection. Whatever the method, the list must be available if a compliance officer visits, so back up anything saved on a hard drive or make paper copies for reference. Date inspection forms and provide an area for the inspector's name. Include additional space to document follow-up and the date when problems are corrected.

Checklists can help ensure that your facility is in compliance with all environmental, health and safety regulations. They help establish routines and verify that all necessary compliance elements are addressed. They won't solve problems, only identify them. However, by identifying problems, you will then be able to prioritize needed service or maintenance, and have a way to document that appropriate changes have been made and that follow-up has been completed.

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