

Agency Inspections During the COVID-19 Era

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Agenda

Brief update on agency inspections during COVID-19.



COVID-19 Inspections

During COVID-19 Agency inspections are still occurring, albeit a bit differently than in the past.

There is a focus to minimize time on site

Some inspections are being done entirely remotely, and others are a hybrid approach



Regional EPA FRP OSCM Exercises

Region V currently undertaking a pilot program for all other regions for virtual exercises.

- Off-Site Compliance Monitoring Exercises are being conducted in lieu of GUIE Drills.**
- They are still “unannounced”. EPA sends an E-mail to site indicating that they “may be selected for a OSCM” and provided the week of the drills. E-mail contained sections of the FRP that will be focused on**



Regional EPA OSCM Exercises

Virtual Response Consisted of the following:

- **Based on 2,100-gallon release (small scale release)**
- **Assumes release reaches waterway**
- **EPA provides plant a few minutes following call to “begin response”**
- **Plant discusses who is responsible for on site response and who is making notifications.**
- **Plant makes notifications including spill response contractor**



Regional EPA OSCM Exercises

Day of exercise, EPA sends a calendar invite for a Teams meeting to conduct drill.

- **First part of meeting was to discuss FRP and ensure that QI's were familiar with plan and where to find information.**
- **Second part is the virtual response exercise**



Regional EPA OSCM Exercises

- **Plant to document all calls made, time of call, and name of person spoken to**
- **When calling response contractor, they will need to provide documentation of time to mobilize to site.**
- **Be prepared to discuss boom deployment areas for entire planning distance**
- **OCSCM exercises do NOT reset the 3-year clock for GUIE drills since no boom deployed. EPA did provide option for plants to mobilize and deploy if they wanted**



State Inspections

Routine Inspections still occurring via Hybrid approach

State will notify site of inspection and request documentation.

State will usually facilitate a call to discuss the documents requested and make sure the right documents are being provided



State Inspections

Site inspection to discuss any questions from the document review and to gather additional or missing information

Site visit will also include site walkthrough for the specific area of interest



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