



Environmental Performance Assessment Workbook

Division of Compliance Assistance

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April 2006

ENVIRONMENTAL PERFORMANCE ASSESSMENT WORKBOOK

Table of Contents

| | |
|--|----|
| Introduction | 2 |
| Preparing for a Performance Assessment | 3 |
| Using this Document..... | 4 |
| Environmental Management Plan Evaluation | 5 |
| Facility Evaluation | 8 |
| Resource Management Evaluation..... | 13 |
| Comments and Observations..... | 15 |
| Corrective Actions..... | 16 |

Introduction

Thank you for your desire to protect and improve Kentucky's environment!

The Division of Compliance Assistance has prepared this tool to help organizations routinely assess their environmental processes and compliance. Being proactive and ensuring that the organization is meeting its environmental responsibilities will enhance the organization's reputation, instill a sense of pride among its employees, and can serve as a tool to maximize financial profits – a win for everyone in the Commonwealth.

This document is separated into three sections. Each section is designed to provide questions and information that will assist an organization gauge its progress in minimizing environmental impacts and focus the organization's efforts in achieving continual improvement.

The Environmental Management Plan Evaluation section in this workbook will help assess the quality of the organization's environmental management processes. Does the organization have an adequate Environmental Management Plan? Is it being implemented? Are routine processes in place that facilitate rapid corrective actions and minimize problems? This workbook should help answer these questions.

The Facility Evaluation Section will help the organization determine if it is adequately meeting its environmental responsibilities. Does the facility possess the necessary permits? Is waste properly stored and managed? Are your discharges meeting their permit limits? These are a few of the important questions that should be routinely asked to ensure that your organization stays in compliance with Kentucky's environmental standards.

The third section of this workbook, the Resource Management Evaluation Section, discusses the opportunities available to help an organization evaluate if it is effectively using its resources and working to continually protect Kentucky's environment. Recycling, efficiency, and pollution prevention can provide both financial and environmental opportunities and are strongly encouraged.

Keep in mind that this booklet is only a tool and is designed to help an organization begin to ask routine questions that will help improve performance. Because it is limited in its scope, this workbook will not verify compliance in all areas of Kentucky's environmental requirements and should not be construed as a comprehensive inventory of Kentucky's environmental requirements.

Call the Division of Compliance Assistance toll-free at (800) 926-8111 if you need assistance or have questions about any of the information provided in this workbook or any other environmental requirements that may apply to your organization. The Division has staff available to help you understand and address your environmental responsibilities. There is no charge for this service. We look forward to working with you!

Preparing for a Performance Assessment

It is important to properly prepare prior to beginning a Performance Assessment. A poorly planned assessment may result in erroneous information regarding the status of the organization. Achieving a clear and complete picture of the organization's environmental status is important if the organization hopes to use the assessment as a tool to identify its strengths and weaknesses and to continually improve its performance. An organization can maximize its preparedness by following these simple steps:

1. **Establish Support** – Ensuring that the organization's management is committed to the assessment process is critical. Not only is management needed to ensure that time and resources are provided for the assessment, management's commitment will be essential after the assessment is completed and corrective actions are identified.
2. **Communicate Commitment** – After management has committed to the assessment process, it is important to explain this commitment to the rest of the organization. When the rest of the organization understands management is committed to the process, they will be supportive as well.
3. **Assign Responsibilities** – Determine who will be responsible for conducting the assessment. Consider having a team of individuals participate to take advantage of different skills, perspectives, and ideas.
4. **Define Objectives** – Determine what the organization hopes to achieve as a result of conducting the assessment. Determine in advance the assessments scope and focus.
5. **Plan the Procedure** – Document the steps that will be followed when conducting the assessment. Establish a timeline and responsibilities.
6. **Communicate the Process** – Explain the assessment's objectives and procedure to the rest of the organization. This will help them identify the information that they need to contribute to the process and will give them time to make the information available.

Using this Document

The remainder of this document serves as a checklist for the user to follow when completing the Environmental Performance Assessment. Although many of the questions provided in these checklists lend to a yes or no answer, the user should also be prepared to ask questions such as “why?,” “who?,” or “when?” as they address each item. Being able to answer these questions will often lead an assessor to potential solutions when areas of deficiency are found.

When completing the checklists contained in this document, the user should apply the following key to record their observations. Items identified as “yes” will typically indicate that the organization has satisfactorily achieved the item and no further action is necessary. Questions answered with “partially,” “no,” or “unsure” may indicate that the organization needs to correct a problem or needs to conduct further evaluation.

| | |
|------------------|--|
| Yes | The organization has fully addressed the item. |
| Partially | The organization has addressed or marginally addressed the item but still has some discrepancies that could be corrected with minimal organizational, operational, or technical change and within a reasonable timeline. |
| No | The organization has not addressed or adequately addressed the item. |
| Unsure | The organization is unable to determine if this item has been adequately addressed |
| N/A | The question does not apply to the organization |

Perhaps the most important part of the assessment process is conducted after the evaluation is completed. Follow-up and corrective actions are critical if the organization wishes to improve its performance and minimize its environmental impacts. The Division of Compliance Assistance is available to assist organizations complete their assessment and identify the appropriate corrective actions that address areas of deficiency. The Division can be reached by calling (800) 926-8111.

Environmental Management Plan Evaluation

Environmental Management Plans describe the processes that an organization follows to minimize risks to the environment. By creating and implementing an Environmental Management Plan, an organization can assemble the critical components that ensure the organization maintains compliance with applicable environmental requirements and can generate continual improvements.

Each organization is unique and so are environmental management plans. Environmental Management Plans will often vary depending on the type of organization, the complexity of its processes, and the maturity of the organization in understanding its environmental responsibilities. Some Environmental Management Plans are only a few pages long and address only the highlights of an organization's environmental management approach. Other plans are very detailed and may even meet the international environmental management standards contained in ISO14001. Irrespective of the level of detail contained in an Environmental Management Plan, all plans should include the following, basic elements:

- Environmental Policy
- Planning
- Implementation and Operation
- Checking and Corrective Action
- Management Review and Commitment to Improvement

An Environmental Management Plan should not remain a static document. As changes to the organization occur, so should the organization's plan. The plan should be evaluated annually or biannually and then updated as necessary to ensure that it is able to meet the organization's needs. This section will walk the user through each of the five basic elements and will ask questions that will help evaluate the current quality of the organization's plan and determine if the plan needs to be updated or enhanced.

Environmental Policy

| | | | | | |
|--|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 1. Does the organization's environmental policy contain a commitment to compliance with Kentucky's environmental requirements? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 2. Does the environmental policy contain a commitment to continuous improvement? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 3. Does the environmental policy contain a commitment to preventing pollution? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 4. Has the environmental policy been communicated internally and is it available publicly? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

Planning

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|--|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 5. Does the organization have a procedure used to document all permit conditions or applicable federal, state, and local environmental requirements when there is no formal permit required? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 6. Does the organization routinely evaluate its activities, products, and services to determine the diverse ways that the organization can impact the environment? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 7. Does the organization set meaningful environmental objectives and targets? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 8. Do the organization's environmental objectives and targets address its most significant environmental impacts? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 9. Is the organization meeting its environmental objectives and targets? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

Implementation and Operation

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|--|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 10. Have roles, responsibilities, and authorities for ensuring compliance and improving performance clearly been defined? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 11. Have these roles, responsibilities, and authorities been communicated throughout the organization? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 12. Has the organization identified training needs and have all appropriate personnel received the necessary training? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 13. Does the organization effectively communicate its environmental information internally and to external stakeholders? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 14. Are all elements of the Environmental Management Plan documented and are records associated with the plan's implementation maintained by the organization? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 15. Does the organization have written operational procedures to ensure that equipment and other operations comply with environmental requirements? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 16. Does the organization have emergency procedures that identify and prevent the potential for accidents and mitigate the impacts of accidents that do occur? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

Checking and Corrective Action

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| 17. Does the organization regularly monitor, measure, and record its key operations that may have an impact on the environment? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 18. Does the organization have effective procedures in place for monitoring and measuring, on a regular basis, its key environmental performance measures (e.g., waste generation, water and energy use, emissions, material use)? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 19. Does the organization routinely audit its conformance to its Environmental Management Plan and does it routinely audit its compliance with environmental requirements? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 20. Does the organization have adequate change management procedures for investigating, correcting, and preventing nonconformance and noncompliance? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

Management Review and Commitment to Improvement

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|---|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 21. Does the organization's top management routinely review the effectiveness of the Environmental Management Plan and are the findings of the review documented and discussed? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 22. Does top management proactively support environmental efforts and provide adequate resources to accomplish environmental goals? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

Facility Evaluation

A Facility Evaluation is one type of evaluation that can help an organization appraise its environmental performance and compliance with its environmental responsibilities. Conducting routine facility evaluations is a critical part of identifying potential areas of non-compliance, verifying the implementation of corrective actions taken to correct past problems, reducing an organization's environmental liability, and maximizing the organization's success.

It should not be expected that this evaluation tool will guarantee full compliance with all of an organization's environmental requirements. This section only provides basic questions that are applicable to most facilities. The questions highlight many of the areas of concern that are frequently identified during Department for Environmental Protection inspections and allow the user to identify areas where improvement or additional evaluation is necessary. There may be other requirements that apply to a facility that are not contained in this document. If there is a question that does not apply to the organization, simply skip it and move on to the next question. This section is organized as follows:

- Air Quality Requirements
- Waste Management Requirements
- Water Quality Requirements
- Other Operating Practices for Successful Compliance

Air Quality Requirements

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|---|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 1. Has the facility obtained a permit from the Division of Air Quality and is the facility aware of the permit's terms and conditions? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 2. Has the facility completed an inventory of its actual and potential air emission points? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 3. Has the facility determined if one or more chemicals listed on EPA's inventory of 188 hazardous air pollutants are used in any of its processes? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 4. Does the facility prepare and submit its Semi-Annual Monitoring reports to the Division for Air Quality? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 5. Does the facility prepare and submit an Annual Compliance Certification to the Division for Air Quality? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 6. Does the facility appropriately maintain records related to its air emissions and operations as required by its permit? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

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|---|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 7. Does the facility have established procedures to ensure proper notification for air related events, including excursions, startups, shutdowns, and malfunctions? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 8. Does the facility notify the Division for Air Quality whenever new emission points are added or substantial changes to the facility's process occur? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 9. Does the facility take steps to minimize emissions, including its fugitive emissions? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 10. Does the facility implement practices to avoid odor problems off site? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 11. Does the facility comply with Kentucky's open burning regulations? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 12. Does the facility comply with the 112(r) requirements for hazardous-chemical emergency prevention and preparedness? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

Waste Management Requirements

Hazardous Waste

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|---|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 13. Is the facility registered as a hazardous waste generator and does the registration list the correct waste streams? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 14. Has the facility performed a hazardous waste determination on all waste streams and have records been maintained that document the determination? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 15. Are all personnel responsible for managing hazardous waste trained in hazardous waste handling and emergency response procedures? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 16. Are all hazardous waste containers properly labeled, dated, closed, maintained in good condition, and inspected weekly? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 17. Are all hazardous wastes stored on-site for no longer than the maximum accumulation timeframes? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 18. Does the facility use a registered hazardous waste transporter to ship hazardous waste offsite? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 19. Are all hazardous waste shipments documented on a Uniform Hazardous Waste Manifest and Land Disposal Restrictions (LDR) form? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

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|---|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 20. Are all hazardous wastes shipped off-site sent to a permitted hazardous waste facility? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 21. Are all records pertaining to emergency preparedness, employee training, waste shipments, annual reports, and required facility inspections maintained at the facility? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 22. Does the facility have a RCRA permit or interim status for all on-site treatment, storage, or disposal units? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

Solid Waste Management

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|---|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 23. Are all solid wastes shipped off-site for disposal sent to a properly permitted solid waste facility? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 24. Does the facility routinely evaluate its solid waste streams to seek ways to recycle and recover materials from the waste? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 25. Does the facility properly collect, document, and dispose of waste streams that have unique requirements, such as used oil, universal wastes, waste tires, or special wastes? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 26. Does the facility maintain its waste disposal records? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

Underground Storage Tanks

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|---|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 27. Are all regulated underground storage tanks at the facility registered with the Division of Waste Management and have all annual registration fees been paid? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 28. Are all underground storage tanks and their associated piping constructed of non-corrodible material or have corrosion protection? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 29. Does the facility perform an approved method of release detection on its tanks and piping? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 30. Does the facility have adequate overfill prevention equipment installed on its underground storage tanks? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 31. Does the facility have adequate containment to prevent spills when the product delivery hose is attached and detached from the tank during delivery? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

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|--|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 32. Do Underground Storage Tanks otherwise comply with 401 KAR Chapter 42? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
|--|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|

Water Quality Requirements

Wastewater Discharges

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|---|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 33. If the facility discharges wastewater to the Waters of the Commonwealth, does the facility have a Kentucky Pollutant Discharge Elimination System (KPDES) permit? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 34. Are the facility's production, maintenance and environmental staff familiar with the requirements of the facility's KPDES permit? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 35. Has the facility established quality control measures to ensure accurate and timely submittal of Discharge Monitoring Reports (DMRs) to the Division of Water? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 36. Does the facility develop and implement best management procedures that address risk assessments, action plans, housekeeping, record keeping, emergency response, and training? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 37. Does the facility ensure the presence of a certified wastewater operator? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 38. If the facility discharges industrial wastewater to a municipal wastewater system, does the facility have a permit or obtained permission from the wastewater system for the discharge? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 39. Does the facility schedule and perform routine maintenance replacements and upgrades of environmental control equipment? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

Stormwater Discharges and Spill Prevention

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|--|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 40. Has the facility obtained a permit from the Division of Water for regulated stormwater discharges? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 41. Has the facility developed and implemented a best management plan that reduces the risk of pollution in its stormwater discharges? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 42. Does the facility routinely evaluate its stormwater management controls to ensure that they are properly maintained? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

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|--|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|
| 43. Does the facility routinely train it staff on their role in implementing the facility's best management practices and permit requirements? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 44. Is each area used for loading, unloading, storing, or processing materials properly protected so that if an accidental spill occurs, it will not result in a discharge to the environment? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |

Groundwater Protection Plans

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| 45. Has the facility prepared and implemented a groundwater protection plan? | YES <input type="checkbox"/> | PARTIALLY <input type="checkbox"/> | NO <input type="checkbox"/> | UNSURE <input type="checkbox"/> | N/A <input type="checkbox"/> |
|--|---------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------|

Other Operating Practices for Successful Compliance

Irrespective of the governing program, there are key practices that can be followed to maximize a facility's compliance. Becoming familiar with these practices will assist everyone in the organization carry out their role in achieving and maintaining environmental compliance.

- ✓ Make sure that the proper approvals/permits/plans have been obtained for the facility
- ✓ Properly operate and maintain the facility
- ✓ Good housekeeping should be directly and specifically linked to environmental protection and safety
- ✓ Implement a change management system that allows the organization to evaluate how changes in its processes can impact the facility's compliance
- ✓ Implement Best Management Practices and review/change them as conditions change
- ✓ Cross-reference emergency plans (security, spill, fire, earthquake, severe weather, safety, business continuity) keeping them as simple as possible (even make them one plan). Read them, train on them, use them as an aid for compliance and revise them after use with lessons learned
- ✓ Ensure that employees are properly trained and kept current in their environmental responsibilities
- ✓ Report in accordance with regulatory requirements for air quality, water quality and waste management
- ✓ Provide the proper operator certification for the type of facility being operated
- ✓ Maintain records in one place for quick accessibility
- ✓ Be proactive instead of reactive
- ✓ When questions arise, ask, don't assume or wait

Resource Management Evaluation

Compliance with Kentucky's environmental requirements is not the only means to protect and improve Kentucky's environment. Voluntary efforts, such as pollution prevention, recycling, energy efficiency, and water use reductions play a critical role in environmental stewardship. The great thing about these types of voluntary activities is that they not only help protect Kentucky's environment, they can provide tangible economic and social savings to the organization that implements them. Examples of benefits often associated with voluntary efforts include:

- Reducing the organization's regulatory burden
- Enhancing the organization's image
- Promoting a safe work environment and increasing employee pride
- Reducing storage, handling, disposal, energy, water, and other operating costs
- Increasing process efficiency
- Enhancing working relationships with the organization's stakeholders

The likelihood of identifying options for reducing resource use, maximizing water and energy efficiency, and reducing waste is directly related to understanding the relationships between the organization's operations, inputs, and outputs. Enlarging the organization's understanding of these relationships will generate ideas that can lead to pollution prevention opportunities, energy savings, lower water consumption, and potential changes in raw materials use. Resource Management Evaluations can help in this effort.

The amount of time and effort that is needed to conduct a Resource Management Evaluation will often vary depending on the size and type of the organization. A team approach is often used to maximize the ability of the organization to fully assess complicated waste streams, analyze multiple kinds of equipment, and calculate the costs and benefits of potential adjustments. In addition, organizations may want to consider requesting assistance from a third party that can conduct an independent evaluation and look at the organization's processes from a new perspective.

When conducting a Resource Management Evaluation, an organization will typically follow four basic steps:

- Preview the organization's operations, raw material usage, chemical usage, business practices and waste streams;
- Conduct a walk-through of the organization's processes to verify assumptions and to gather data regarding the organization's current inputs, outputs and wastes;
- Document the organization's findings;
- Identify opportunities for improvement; and
- Implement changes and measure improvements.

To help the organization conduct its Resource Management Evaluation and to identify ways to reduce inputs, reduce expenses, and reduce the impact of the organization on the environment, a series of questions is included below. Reviewing these questions should generate ideas and possible improvements that can be integrated into the organization's evaluation.

- What are the organization's current processes?
- Why does the organization perform its process in this way?
- What are the consequences of completing each process as currently designed?
- What inputs are required to complete each of the processes?
- Are there ways to reduce these inputs without negatively impacting each process output?
- How much does the organization spend on waste disposal, energy use, and water use, and other related costs?
- What wastes are generated from each process, and how much is generated?
- Which wastes are classified as hazardous? What makes them hazardous?
- What input materials are used that generate waste streams?
- How efficient is each process?
- Are recyclable wastes recovered or are they mixed in with other process wastes?
- What types of housekeeping practices are used by the organization to limit waste?
- What types of process controls does the organization use to improve process efficiency?
- Have you worked with suppliers to identify waste minimization opportunities in the supply chain?
- Has the organization evaluated its products to determine their future environmental impacts?
- Are employees trained to routinely identify opportunities to minimize waste?
- Does the organization's management encourage routine evaluations and support efforts that will minimize environmental impacts?



Free Compliance Assistance!

1-800-926-8111

Did you know that the Department for Environmental Protection now offers free compliance assistance? This new program has already helped hundreds of entities. The service is free and is available to all individuals, communities and businesses.

We want to help you succeed in achieving compliance

If you have questions concerning your environmental requirements or our services, please contact the Division of Compliance Assistance toll-free at 1-800-926-8111.

Other Resources for Compliance and Technical Assistance

- Kentucky Division for Air Quality (Air Issues)(502) 573-3382
- Kentucky Division of Waste Management (Waste Issues).....(502) 564-6716
- Kentucky Division of Water (Water Issues).....(502) 564-3410
- Kentucky Pollution Prevention Center (Pollution Prevention).....(502) 852-0965
- Kentucky Business Environmental Assistance Program (Air Issues)(800) 562-2327