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Sent: Tuesday, June 28, 2016 5:27 PM
To: Troy.Smith@deq.idaho.gov
Cc: Burgess, Karen <Burgess.Karen@epa.gov>; Martich, Tara <Martich.Tara@epa.gov>; Roose, Rebecca <Roose.Rebecca@epa.gov>
Subject: EPA's Office of Compliance comments on the IPDES User's Guide to Permitting and Compliance

Hi Troy,

Thank you for the opportunity to comment on the *IPDES User's Guide to Permitting and Compliance*.

My office at EPA has one comment to make in this guide, which covers Section 9.3.1.1 (Pre-Inspection Preparation, pp. 131-132). The section spells out an intention to conduct announced inspections. However, we suggest that the guide explain the pros and cons between conducting announced and unannounced inspections, which can be spelled out using the following text:

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When the facility is not notified in advance, the inspector has an opportunity to observe normal facility operations, rather than a facility that has been prepared for an inspection. However, the inspector may miss interviews with unavailable personnel. The inspector may find that announced inspections are valuable when inspecting large or complex.

Advantages of notifying the facility include:

- The facility will more likely be ready for the inspection.
- The facility will make sure the proper personnel and records/reports are available.
- Facility entry will likely be smoother.

Disadvantages include the facility concealing or altering noncompliance. Notification is not appropriate if the inspection team suspects the facility has an illegal discharge or is not properly maintaining records.

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If you have any questions or concerns, please let me know.

Thanks,

Greg Savitske

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