



FDEP Routine Compliance Inspection

A Guide by Broward County's Compliance Assistance Section

BROWARD STAFF





ROUTINE COMPLIANCE INSPECTION

- FDEP provides contracted counties/agencies with task assignment containing facilities to be inspected that year.
- Consists of facilities with aboveground tanks, underground tanks, or both.
- Verify compliance with current versions of Ch 62-761 & Ch 62-762 F.A.C.



ORGANIZING INSPECTION LIST

- Priority to sites with the most time since last inspection performed. Specifically USTs.
- Color coded spreadsheet between sites with USTs and ASTs.
- Check for potential unrequired inspections.
- Column for notes on each site or physical notepad.
- Multiple sites with same operator?

PRE-INSPECTION ACTIVITIES

SCHEDULING INSPECTION

- Check “Facility Information” page for contacts. Other databases? Property appraiser?
- Electronic communication activities? Phone calls?
- Information on past inspection reports?
- No response or old information? Drive to facility, document as a “Meeting Activity” under Annual Compliance Project.
- Log method of scheduling inspection. Email, phone, etc.

What to discuss during scheduling:

- Date and time of inspection (at least 5 business days to prepare).
- Facility must provide staff to assist with inspection.
- Required documents: Financial responsibility, annual operability testing, monthly visual inspections, etc.
- Get email, send confirmation.

PRE-INSPECTION ACTIVITIES

DATABASE REVIEW

- Cover Page – Access the FIRST Public Reports website and generate a copy of the facilities cover page.
- Past inspections? Pictures?
- Pattern with violations? AOCs? Enforcement?
- Get an idea of what exists on site based on information available to you.

Welcome to FIRST Public Reports

Thursday, March 28, 2019

Inspections

Areas of Concern and Violations Report

Cover Page Report

Journal Report

Percent Routine Compliance Completed Report

Inspections By County And Date Range

Inspector Activities Report

Compliance And Enforcement Activity By Date Range

PRE-INSPECTION ACTIVITIES

DAY OF INSPECTION

- FIRST Disconnected – Give yourself time to sync sites, in the event of an update.
- If any paperwork was provided before inspection, enter into FIRST.
- Outline for inspections? Prep narrative as best as possible.
- Confirm with contact that someone is available to assist with accessing equipment. If they are no longer available, re-schedule for as soon as possible.



BASIC INSPECTION PROCEDURES

- Physical inspection of tank systems.
- Records review.
- Exit interview.
- Data entry to FIRST.
- Close inspection (unless violations exist).
- Draft letter. Provide copy to facility representative(s).



PHYSICAL INSPECTION AST

- Purpose of system. Generator? Fueling?
- Observe physical condition of storage tank, piping, spill containment. Rusting? Color coded and labeled?
- Signs of leaking or spill?
- Multiple tanks? Indicate condition of each.
- What equipment is installed? Anything broken or alarming? Anything NOT turned on?
- Multiple devices that serve the same purpose?
- Annunciator installed?
- **PICTURES. TAKE THEM.**
- **QUESTIONS. ASK THEM.**

ABOVEGROUND TANKS



ABOVEGROUND TANKS



ABOVEGROUND TANKS



ABOVEGROUND TANKS



ABOVEGROUND TANKS





PHYSICAL INSPECTION UST

- Safety precautions: cones, vests, etc.
- Inspectors are not to open any components of tank system.
- Condition of tank compartments and equipment. Rust? Damage? Liquid?
- Take note of all equipment you see: Spill buckets, LLD, sensors, gauges, valves.
- Lids color coded?
- Release detection device? Operational? Alarms? Have rep print out status reports.
- What documentation do you expect to be available based on installed components?
- INF?
- **PICTURES. TAKE THEM.**
- **QUESTIONS. ASK THEM.**

UNDERGROUND TANKS



UNDERGROUND TANKS



UNDERGROUND TANKS



UNDERGROUND TANKS



UNDERGROUND TANKS





RECORDS REVIEW

- FDEP Placard, fees paid? Registration information accurate?
- Financial Responsibility, correct forms from packet? All tanks listed?
- Monthly visual inspections maintained? Consistent with what you see?
- Electronic print-outs? Include on report.
- Operability testing done on all applicable components? Overfill, release detection, integrity, cathodic protection.
- Operator training.
- Check for all records in-between inspections.
- Read through documents. Failed tests? Repairs made?
- Alarm history log?



EXIT INTERVIEW

- Discuss major points of inspection.
- Make clear if any violations exist. Distinguish between recommendations (AOCs). Let them know if inspection will be left open to give them a chance to comply.
- Ask them if they have any questions.
- Get signature.



DATA ENTRY TO FIRST

FIRST Beta Environment



POST INSPECTION

FINALIZING REPORT

- Double check all information by generating a draft inspection report and reviewing.
- Violations exist? Use appropriate rule/code. Follow State timeline and procedures.
- Write up applicable letter if inspection being closed (Compliance Assistance Offer, In Compliance Letter, Return to Compliance Letter.)
- Provide inspection report to facility representative.

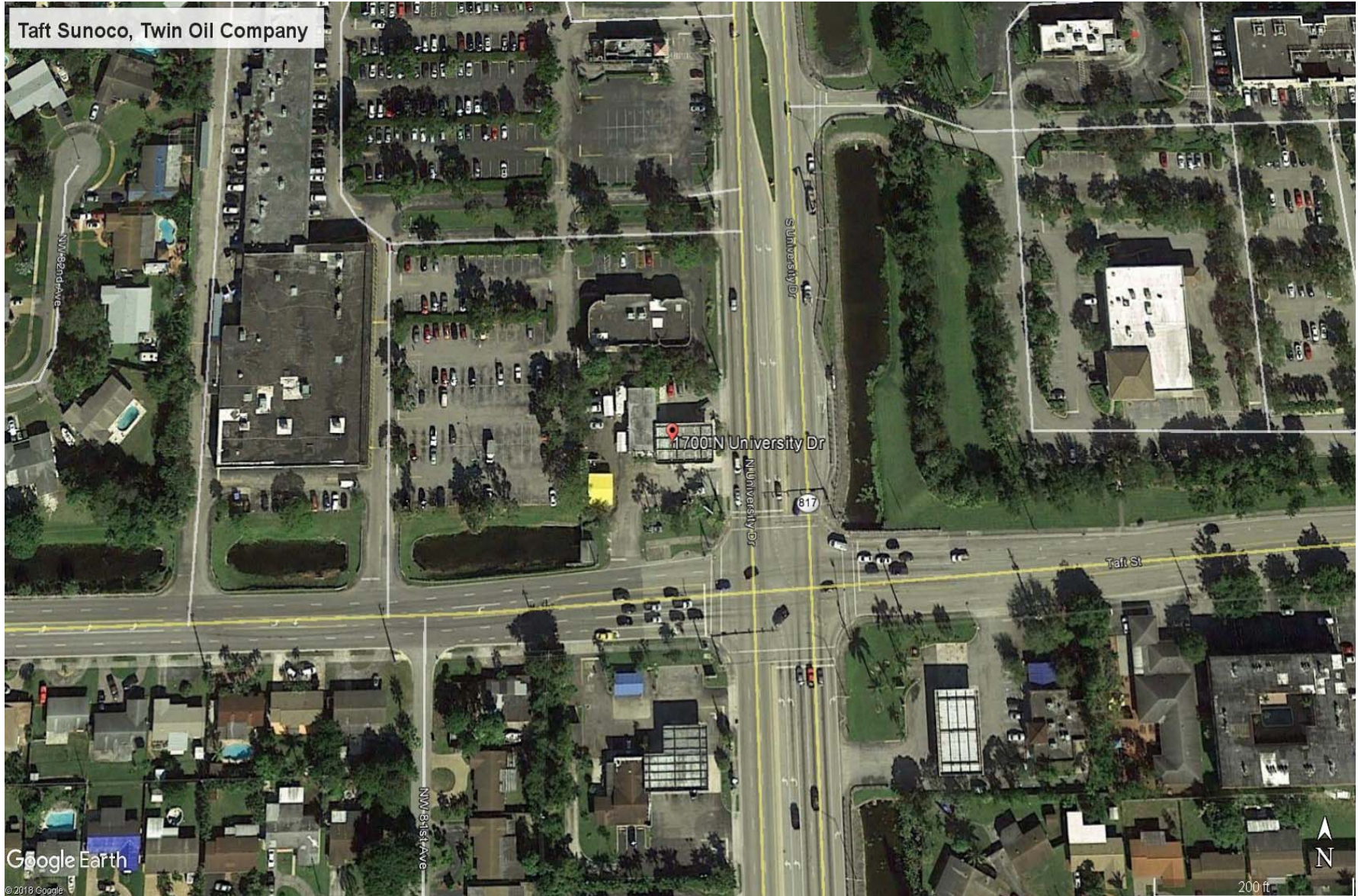


POST INSPECTION

SITE SKETCH & PHOTO

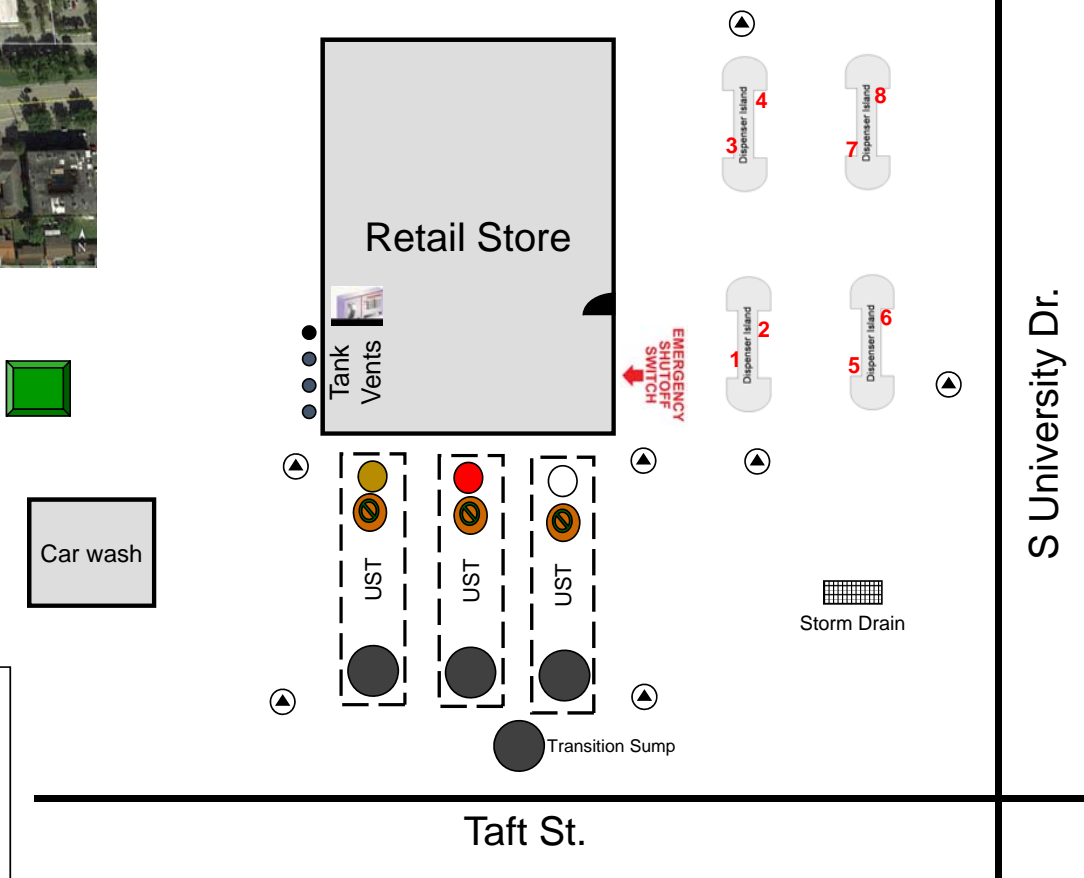
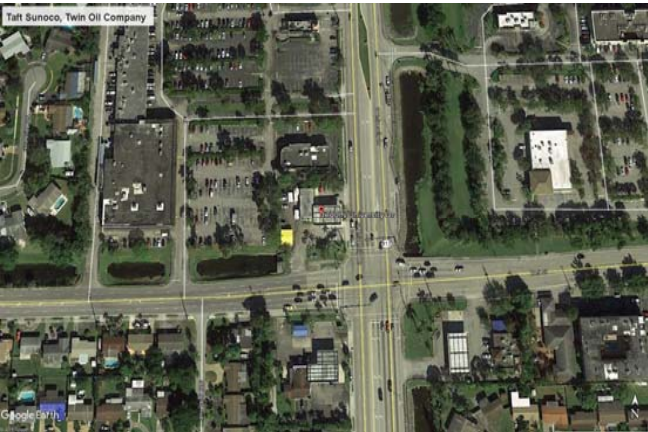
- Update site photograph.
- Aerial view.
- Should be oriented North.
- What to include: Local streets, main building, storage tank locations and short descriptions, containment areas, dispenser islands, vent stack, monitoring wells, storm drain locations, entrance to facility if large, Facility ID#, date last updated.

Taft Sunoco, Twin Oil Company








Google Earth

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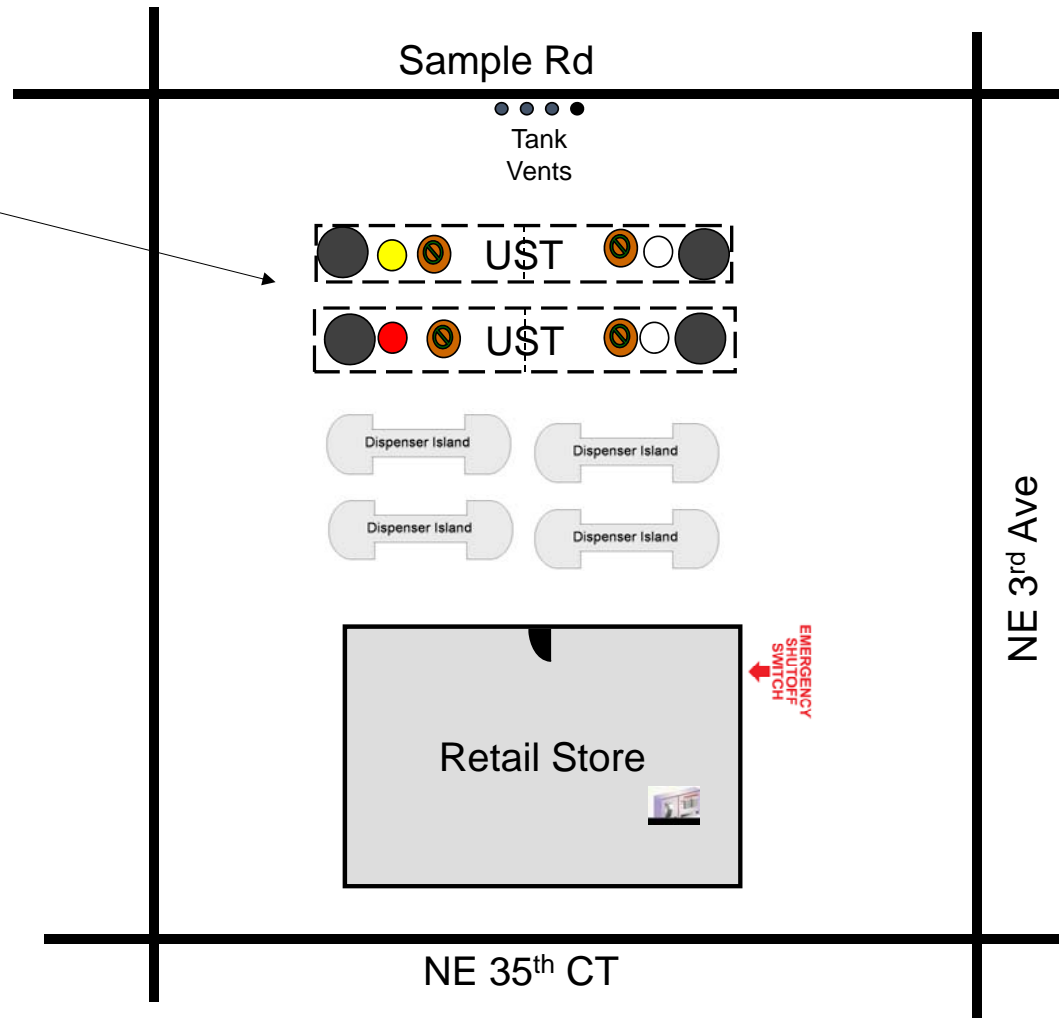
Legend

-  -- Release Detection
-  -- Assessment Well
-  -- Monitoring Well
-  -- Drum
-  -- Dumpster





Note: Sketch is not to scale

Facility Name: Example Station
 FDEP #:
 Date Last Reviewed: 03/28/2019

Two 12,000 gallon compartmented tanks



Legend

-  Assessment Well
-  -- Monitoring Well
- Any Red Object -- Hazardous Material
-  -- Drum
-  -- Dumpster

Note: Sketch is not to scale

Facility Name: Example Station 2
 FDEP ID#:
 Date Last Reviewed: 03/19/2019



TIPS & TRICKS

- “Template” for inspections – Have a basic outline to organize your site visit with.
- Consistent verbiage for violations.
- The more you know about a site, the more comfortable you’ll be.
- Don’t let yourself be rushed. Go at your own pace, not the facility representatives.
- Get your own set of dispenser keys from vendors, if possible. Some facilities might not be prepared for inspection.
- Equipment: Safety Shoes, Glasses, Flashlight, Bailer, Cones, Vest, Hard hat, Dip stick, Spray paint, Hooks for sumps.



QUESTIONS?

Contact dscott@broward.org, awhitaker@broward.org, or ekoenig@broward.org