



**Missouri  
Department of  
Natural Resources**



# Environmental Assistance Visits (EAVs)

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# Director Childers' Philosophy



*“Department staff are expected to work cooperatively with anyone who has an environmental problem, throughout the process of solving it. We believe in offering our services up front to prevent problems through EAVs and other technical assistance avenues. Where problems occur, we will work with the parties involved to resolve the problems as quickly and productively as possible.”*

# Philosophy (con't)



*If a problem persists, the department must resort to stronger means to address it. Any problem that is not solved must be quickly elevated to the next stage so that threats to citizens' health and Missouri resources are eliminated promptly. Staff are directed to use the full range of compliance tools to solve environmental problems and address as many aspects of the problem as possible.*

# Philosophy (con't)



*Missouri's natural resources provide the basis for our economy, our enjoyment and our health and well being. Making sure we comply with the legally required environmental protection measures is the least each of us can do to help and sustain ourselves and our neighbors. I am sure you agree the environment we leave to our children should be the best we can make it.*

# Philosophy (con't)



*Pollution must end. Damages must be repaired.  
Penalties must be assessed fairly and assertively.  
No one should profit from pollution.*

*Missouri's environment is worth protecting and  
the department will carry out its role."*

# Initial Goals for EAVs



Director Childers wanted to assist permit applicants in understanding permit requirements.

- Pilot project done in late 2005.
- First called "Initial Assistance Visits."
- Targeted newly registered generators and permit applicants.
- Voluntary--requested by facility or offered by department.

# Results of 2005 Pilot Project



- 237 facilities contacted
- 189 (or 80%) accepted offer of assistance
- 188 EAVs performed
- 44% of visits identified areas of concern
- Only 2 sites had serious issues that warranted a full inspection.

# Pilot Project Customer Survey



- Provided at completion of visits with self-addressed stamped envelope.
- Various categories rated on a scale of 1-10 with questions such as:
  - Was the visit beneficial?
  - Was staff knowledgeable?
- Follow-up by Ombudsman Program to have all survey forms completed.

# Pilot Project Customer Survey



Average score

9.15

# Positive Results



- Director Childers impressed and discussed results with EPA.
- Department worked to increase number of sites eligible for an EAV.
- Fiscal Year 2007 goal was 3,800 EAVs in EPA-supported programs.
- Fiscal Year 2008 goal is 3,800 total EAVs.

# EAV Purposes



- Obtain timely, voluntary and long-term compliance.
- Better protect environment and public health.
- Use staff resources more effectively.
- Provide information and assistance to those needing or desiring the service.
- Supplement department's other inspection efforts.

# FY2007 EAV Results

(July 1, 2006 to June 30, 2007)



- 4,478 total done by Regional Office staff
- 4,130 in EPA-supported programs  
(exceeded goal of 3,800)
- 221 sites declined

# Who Performs the EAVs?



Regional Office staff conduct majority, but all department staff are available to perform assistance.

# Who May Receive a Hazardous Waste EAV?



- Newly registered hazardous waste generators
- Sites with:
  - new or reissued permits or certifications
  - permit modifications
  - transfers of ownership
  - change in manager, operator or other key personnel
  - significant changes in operational status, i.e., moving from small to large quantity hazardous waste generator

# What Is An EAV?



- An on-site visit with appropriate site representative.
- Focused on improving understanding of compliance requirements--not for making compliance determinations.
- Intended to improve the understanding of permits, registrations, certifications, reports or other similar requirements.

# What Is An EAV? (con't)



- An opportunity to:
  - Enhance environmental compliance with the regulations.
  - Provide a resource for assistance.

# When Is An EAV Performed?



- When offered by department
- When requested by site representative
- Usually with advance notice, but staff may stop by without prior scheduling to effectively use available time and travel

# How is Information About EAVs Disseminated?



- Telephone call
- Visit at facility
- Letters accompanying permits, registrations, etc.
- Web site and news releases
- Inquiries to the department

# Where Is An EAV Done?



- Usually on-site.
- In a face-to-face meeting at another location.
- By telephone to provide additional extensive guidance following on-site visit.

# Staff Preparation for an EAV



- Review file documentation, permits, registrations, etc.
- Develop understanding of operational processes and compliance requirements
- Compile relevant technical bulletins
- Locate facility on map and estimate driving time
- Schedule EAV

# On-Site EAV Procedures



- Entrance meeting
- Tour and observations
- Exit meeting

# Entrance Meeting



- Introductions
- Describe purpose, scope and objectives
- Describe actions taken when acute and/or significant violations are discovered
- Review permit conditions, documentation and records, Material Safety Data Sheets, waste determinations, etc.

# Entrance Meeting (con't)



- Explain expectation of compliance
- Discuss applicable regulatory requirements
- Focus on specific questions or information requested by representative

# Tour and Observations



- Conduct walk-through evaluation.
- Discuss any options for reduced regulatory requirements and possible improvements.
- Explain regulatory requirements specific to site and operations.
- Discuss significant violations and corrective actions needed.
- If acute violations discovered, terminate EAV.

# Exit Meeting



- Provide departmental contacts.
- Ask if additional information is needed.
- Compliment positive efforts and compliance.
- Reiterate areas needing improvement.
- Obtain signature and provide copy of EAV form to site representative.

# EAV Form



- Outlines any significant areas of concern as well as any areas of good compliance effort.
- Provides an overview of discussions.
- Lists technical bulletins provided (may provide a blank inspection checklist).
- Contains site representative's signature.
- Is printed for site representative.



**FACILITY INFORMATION**

FACILITY NAME		TRACKING NUMBER	FACILITY ID
FACILITY ADDRESS			REGION
CITY	STATE MO	ZIP CODE	COUNTY

**FACILITY CONTACT**

NAME	TITLE
TELEPHONE NUMBER	E-MAIL ADDRESS

**GENERAL INFORMATION**

TYPE OF PERMIT, LICENSE, CERTIFICATION OR REGISTRATION	DATE ISSUED	PERMIT/ID NUMBER	
INSPECTOR(S) SCHEDULING/CONDUCTING EAV	DATES OF INITIAL CONTACT		
VISIT WAS <input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Failed to make Contact	DATE SCHEDULED	TIME SCHEDULED	
<input type="checkbox"/> ASKED FACILITY TO HAVE PERTINENT DOCUMENTS	DATE CONDUCTED	START TIME	FINISH TIME

**CHECKLIST**

- Provided copy of permit, license, certification or registration if facility contact does not have one readily available
- Reviewed conditions/requirements
- Walked through facility
- Provided information
- Discussed options for possible reduced regulatory requirements
- Provided contact information for the inspector
- Areas of concern and success noted
- Environmental Assistance Visit changed to inspection due to acute violations

It is the responsibility of the permit holder to comply at all times with all permit terms and applicable laws and regulations. Areas of concern are intended to highlight for the permit holder particular circumstances where reasonable steps should be taken to assure such compliance.

PRINTED NAME OF FACILITY CONTACT	SIGNATURE <i>Sign Here</i>	DATE
PRINTED NAME OF INSPECTOR	SIGNATURE <i>Sign Here</i>	DATE

LOCATIONAL DATA	
UTM EASTING	UTM NORTHING
HORIZONTAL COLLECTION METHOD	ESTIMATED POSITION ERROR OR PDOP
REFERENCE POINT	COORDINATE DATA SOURCE

**ADDITIONAL COMMENTS**

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IMAGE 1	IMAGE 2

# Procedures for Acute Violations



- Acute violations are immediately or imminently harmful to the environment or human health.
- The inspector will inform the facility of the violation and:
  - Terminate the EAV
  - Issue a Notice of Violation
  - Conduct a compliance inspection according to applicable inspection procedures.

# Procedures for Acute Violations (con't)



- If a hazardous substance release is observed or suspected, the inspector will inform the potentially responsible party of their reporting requirements and call the Environmental Emergency Response Section telephone number at (573) 634-2436.

# Hazardous Waste Acute Violations



- Visible evidence that hazardous waste is released onto the ground (soil) and cannot be immediately cleaned up.
- Hazardous waste is released to waters of the state.
- Hazardous waste is burned on-site.

# Hazardous Waste Acute Violations (con't)



- Ignition source is in area that stores ignitability characteristic hazardous waste.
- Incompatible hazardous wastes are stored in the same container, tank or secondary containment structure, or hazardous wastes are not compatible with the containers that hold them.

# Significant Violations



- Are defined for each media.
- Will be documented on form.
- Should be corrected promptly.
- May become acute violations if not corrected.

# Exclusions for EAVs



- Site/facility already in enforcement.
- Multiple requests for same or similar issues and facilities.
- Other

# EAVs to Assist – Not Avoid Compliance



Businesses that manage hazardous waste need to be knowledgeable about regulatory requirements.

# Follow-up Inspections



- EPA is reviewing list of EAVs performed and may conduct follow-up inspections.
- DNR will conduct follow-up and will expect compliance.
- Site/facility must implement timely and reasonable efforts to comply.
- DNR will conduct an inspection if environmental impacts discovered or citizen concerns received after an EAV

# For More Information



- Field Services Division Operations Manual  
[www.dnr.mo.gov/services/opsmanual.htm](http://www.dnr.mo.gov/services/opsmanual.htm)
  - EAV Written Procedures - Chapter 2
  - Lists both acute and significant violations
- Compliance and Enforcement Manual
  - Coming Soon