

Guidance Document

Title: **Inspection Frequency Guide for Fixed and Mobile
Facilities/Operations**

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1.0 SUBJECT

Inspection frequency for various fixed and mobile facilities/operations.

2.0 OBJECTIVE

To conduct inspections appropriate to environmental priority, staff availability and legislative requirements.

3.0 LEGISLATION

General provisions of the *Environmental Protection Act SNL 2002 E-14.2* (Part XII) and the *Water Resources Act SNL 2002 W-4.01* and associated regulations, policies and guidance documents apply to this guidance document.

4.0 BACKGROUND

The Memorandum of Understanding between the Department of Environment and Conservation (ENVC) and the Department of Government Services (DGS) requires the DGS to conduct inspections of various operations on behalf of the ENVC.

Fixed and mobile facilities/operations require inspections to ensure compliance with regulations and certificate of approval conditions. This inspection frequency guidance document is intended for use by ENVC, and DGS staff as agents of the ENVC province wide.

5.0 INSPECTION PROTOCOL

5.1 Scheduled Inspections

The inspection frequency guide (Appendix A) lists the minimum inspection frequency for various facilities/operations *as required by the ENVC*. The number of inspections required per year are outlined. There are circumstances where a joint inspection by both Departments may be warranted. However, this guidance document is intended primarily for use by DGS Environmental Protection Officers.

5.1.a. Inspection Frequency:

The inspection frequency guide (Appendix A) is intended to assist staff with setting priorities and complying with legislative inspection requirements. It should be noted that the minimum inspection frequency listed may be substantially inadequate where there is significant environmental or public concern or where significant improvements or remediation activities are on-going. The table outlines both the inspection frequency required by ENVC and is set forth as a minimum inspection requirements.

In addition, the guide (Appendix A) outlines the estimated time required to inspect the facility/operation (includes the compilation of inspection reports), and the availability of inspection forms and standard approvals. Inspection frequency for most facilities/operations includes: one inspection for the proposal stage, annual or biannual inspections for the operational stage and one inspection for the closure stage. The guide outlines the inspection frequency for the operational stage of the facility/operation, unless otherwise noted.

5.1.b. Inspection Time:

The inspection time designated for the various types of facilities is estimated and does not include travel time. Inspection times are dependent on facility location, scale of the operation/facility, sampling requirements and circumstances encountered during the field inspection, i.e. violations and access to information/site. The estimated time refers to the time required per typical inspection. A facility or operation may require several inspections, or extensive follow up depending on the circumstances, therefore the actual time to inspect a facility/operation may be greater than the time estimated in Appendix A.

5.1.c. Inspection Forms:

Inspection forms are not available for all types of facilities/operations. In these circumstances, ENVC and DGS may mutually agree to suspend routine inspections pending the development of inspection forms, processes and guidance. In the interim, improvised inspection procedures may be used to ensure an inspection is conducted should one be required.

5.1.d. Standard Approvals:

Certificates of Approval (C of A's) are available for some facilities/operations. Compliance inspections should confirm the conditions outlined in the C of A are being followed.

5.2 Unscheduled Inspections (Demand)

There are other inspection activities which are completed by DGS which have not been included in the inspection frequency guidelines (Appendix A). These inspection activities occur *on a demand basis* and an inspection frequency can not be established. Time required to inspect and address issues related to these other inspections may be extensive and may involve several site visits, executive consultation, report writing and meetings. These include, but are not limited to the following:

- environmental emergency response;⁽¹⁾
- installation ⁽²⁾ & removal of storage tank systems ⁽³⁾;
- file audits ⁽⁴⁾;
- decommissioning of sites/facilities
- contaminated sites ⁽⁵⁾;
- septic system installations (septic systems greater than 1000 gallons)⁽⁶⁾;
- complaints;
- fish plants;
- remote sites (exploration camps, commercial and recreational facilities);
- quarry (initial site inspection or on a compliant basis);
- environmental assessment referrals*
- sawmills

** In accordance with the Memorandum of Understanding between ENVC and DGS, GSC staff are required to provide site specific comments and concerns under prescribed procedures and within established time limits.*

Appendix A

Inspection Frequency Guide				
Facility or Operation	Required Inspection Frequency (# per year)	Estimated time per Inspection, including Report (hours)	Inspection Form Available (Y/N)	Approval Available (Y/N)
The Storage and Handling of Gasoline and Associated Products & Used Oil Control Regulations - Related Inspections				
Asphalt Plants				
a. fixed	a. 1	2	Y	Y
b. mobile	b.1 ⁽⁷⁾	2	Y	Y
Bulk Plants	1	3	Y	Y
Used Oil Return Facilities	1	3	N	Y
Service Stations	1	3	Y	Y
Petroleum Hydrocarbon Treatment Facility (Bioremediation, thermal, other)	2 ⁽⁸⁾	3	Y	Y
Waste Management - Related Inspections				
Licensed Waste Disposal Sites (WDS)	2	2	Y	Y
Livestock Operations (> 5 animal units)	1	2	Y	Y
Poultry Operations (>5 animal units)	1	2	Y	Y
PCB and Hazardous Waste Storage Facilities	2	2	Y	Y
Scrap Yards	1	2	N	N
Special Waste Sites/Treatment Facilities				
Asphalt Storage (for Recycling)	1	1.5	N	N

Inspection Frequency Guide				
Facility or Operation	Required Inspection Frequency (# per year)	Estimated time per Inspection, including Report (hours)	Inspection Form Available (Y/N)	Approval Available (Y/N)
Composting (Restricted) ⁽⁹⁾	2 ⁽⁸⁾	2	N	Y
Composting (Unrestricted) ⁽¹⁰⁾	1	2	N	Y
Sewage Sludge/Septic Waste Treatment facility ⁽¹¹⁾	2 ⁽⁸⁾	2	N	Y
Used Tire Collection Site/Storage ⁽¹²⁾ (Not located at a WDS)	2	2	N	N
Waste Transfer Stations a. Hazardous b. MSW	a. 2 ⁽⁸⁾ b. 2 ⁽⁸⁾	2 2	N N	Y N

Appendix B

Endnotes:

- (1) The inspection of an environmental emergency may involve multiple site visits. Time commitments and staff involvement vary according to the environmental incident.
- (2) Since the tank registration process, an inspection under the *Storage and Handling of Gasoline and Associated Products Regulations, NLR 58/03* is not mandatory but may be required.

Heating Oil Storage Tank System Regulations, NLR 60/03 require the inspection of a heating oil storage tank system with a capacity of 2500 litres or less, however, this inspection is conducted by a licensed inspector (licensed by ENVC) not DGS. Leakage from systems under these regulations will require investigation by DGS.
- (3) Tank removal inspections may involve multiple site visits.

Aboveground and underground storage tank systems of capacity of 2500 litres or less may also require an inspection. Note that this may include heating oil storage tank systems that have been disconnected from the heating appliance. These inspections are normally conducted by DGS upon request.
- (4) File audits are conducted by ENVC and DGS as requested.
- (5) Contaminated site inspections generally require three inspections; initial, cleanup/ remediation and closure stage. Complex or large scale remediation projects for contaminated sites may require several inspections throughout various stages of remediation, depending on the particular circumstances.
- (6) This type of inspection is conducted during the installation of the system/facility.
- (7) Inspection of temporary (mobile) asphalt plants, will include consist of three inspections at these stages 1) pre-operational, 2) operational and 3) closure.
- (8) Joint inspection by ENVC and DGS shall be conducted for the commissioning inspection of the facility/operation. Thereafter, DGS will conduct inspections as required with technical support from ENVC may be deemed necessary.

- (9) Restricted compost means this compost has restricted use. Compost may require some control when deemed necessary by the province, e.g. composted sewage. (Reference: Canadian Council of Ministers of the Environment, Guidelines for Compost Quality, CCME 106 e March 1996)
- (10) Unrestricted compost means compost that can be used in any application, such as agricultural lands, residential gardens, horticultural operations, the nursery industry, and other businesses. (Reference: Canadian Council of Ministers of the Environment, Guidelines for Compost Quality, CCME 106 e March 1996)
- (11) Guidance Document GD-PPD-011 (Guide for the Preparation of Waste Treatment and Liquid Waste Collection Approvals) indicates inspections by GSC shall be conducted during the approval, construction and start up operations. Inspections should also be conducted during normal operations of the waste treatment facility. A minimum of twice annually is required by DOEC.
- (12) Refer to The Guidelines for the Establishment and Operation of Facilities for the Outdoor Storage of Tires GD-PPD-018.