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## How to Ace an Inspection: Russell McLaren (Entergy) Arkansas Environmental Federation Meeting Presentation

## 10/12/2018

Mr. Russell McLaren undertook a presentation at the October 4th Arkansas Environmental Federation Convention titled:

"How to Ace an Inspection" (Presentation)

Mr. McLaren serves as Entergy's ARES Water Lead.

The topics addressed in the Presentation included:

- Inspectors
- Types of Inspections
- How Do I Ace an Inspection
- How to Stay "Audit Ready"

The Presentation noted that Arkansas Department of Environmental Quality ("ADEQ") District Inspectors have multifaceted job duties. These are noted to include:

- Permit compliance evaluation inspections for facilities with National Pollutant Discharge Elimination System (NPDES) permits
- Stormwater inspections (construction and industrial sites)
- Permit compliance inspections for subsurface or no-discharge facilities
- Investigating citizens' complaints
- Responding to spills
- Investigating fish kills (related to environmental causes)
- Collecting routine water samples from a network of sampling stations for ambient water quality of the waters of Arkansas

Water inspections include:

- NPDES Industrial Permits
- NPDES General Stormwater
- NPDES General Stormwater Construction

To ace an inspection, Mr. McLaren suggests one should:

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- Prepare
- Cooperate/Defend
- Respond

Under each of these headings multiple suggestions are provided. For example, he notes that under "Prepare," it is important to "Know Your Permit." By way of an additional example, under the term "Cooperate/Defend" he suggests that it is important to "Respectfully Defend Your Position."

As to staying "Audit Ready," Mr. McLaren notes:

- Entergy Arkansas Inspection Directive
- Always be a "Good Actor"
- Review the ADEQ Inspection Forms
- Know the Inspection Evaluation Areas
- Know the Details

A key suggestion is reviewing ADEQ inspection forms. Such review would include:

- Compliance Evaluation Forms
- Look at Previous Inspection Reports
- Look at other Inspection Reports on ADEQ Website

Mr. McLaren also suggests understanding (knowing) the inspection evaluation areas, which include:

- Permit
- Records/Reports
- Operation and Maintenance
- Sampling
- Flow Measurement
- Laboratory
- Effluent/Receiving Waters
- Sludge Handling/Disposal
- Facility Site Review

Each of the three categories of NPDES permit (i.e., NPDES industrial, NPDES stormwater, and construction stormwater) and various issues associated with each of these three types of permits should be reviewed and a laundry list associated with each is provided.

A copy of the Mr. McLaren's slides can be found here.