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ENVIRONMENTAL SITE ASSESSMENT

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An environmental site assessment is conducted to:

- (1) evaluate environmental conditions, compliance, and stewardship at a facility,
- (2) identify opportunities and methods for improvement, and
- (3) help establish priority for implementation of improvements.

A successful site assessment can be conducted when armed with three things.

- (1) A general knowledge of applicable regulations.
- (2) A theoretical goal of zero emissions from all activities and operations at the facility.
- (3) Common sense.

An accurate and comprehensive evaluation of the facility is obtained through a critical examination of the facility and open, honest discussion with the facility's owner/manager and key personnel, such as the environmental manager. Remember that you and the facility personnel act as partners in this endeavor and each party needs information from the other.

Be considerate of the owner/manager's time and sensitive to his/her constraints: administration (board of directors), financing, property siting and size, existing construction, customer needs, seasonality of the business, and staff capability. In many cases, the biggest constraint faced by the owner/manager is lack of knowledge of what is required and what improvement option is "best" for the facility. In most cases, there will be some negotiation between the owner/manager over what is preferable at their facility at the time. The object is to present reasonable, economical, and "do-able" solutions to the facility's problems so that corrective action can be accomplished in a logical progression of steps.

The steps in conducting a site assessment are:

- (1) Arrange the visit at a mutually agreeable time since assessments require about six hours at the site. Investigation objectives from the perspective of both the investigator and facility owner/manager should be clarified before the site visit. One or more members of the facility's management staff should be available for the entrance and exit interviews and to provide a guided tour of the facility.

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To create a cooperative atmosphere and allow open discussion about existing and potential environmental problems, the owner/manager should be assured that the investigation is non-regulatory, that the information is confidential, and that implementation of the recommendations is at the option of the facility's management. If these items cannot be assured, inform the owner/manager beforehand.

Photographs of the site are very useful in documenting findings, planning modifications and new construction, and preparing a report. Therefore, carry a camera and film when you visit a site. However before taking any pictures, make sure that you obtain permission from the owner/manager and tell him/her how the photos will be used. The first picture should be of the facility's identification sign to provide ready information about where the pictures were taken.

- (2) Conduct an entrance interview. This is used to introduce each person and provide some necessary information about their background and job, describe the rationale for the assessment, reiterate confidentiality and responsibility issues, and elicit background information about the property, employee training, and known or suspected environmental problems. An assessment questionnaire form, such as provided by TVA, is very useful in asking questions and recording notes. If appropriate, you might request a brief tour through the facility to familiarize yourself with the general layout and operations prior to asking facility-specific questions.
- (3) Assess the facility's environmental documentation. The end of the entrance interview can be used to inquire about environmental documentation. Gaps in, or lack of, appropriate environmental documentation are generally identified through discussion alone, however in some instances a brief review of the facility's environmental documentation may be of benefit to the investigator. This is especially true when documentation is good.
- (4) Tour the facility in its entirety with a facility representative, preferably a manager, who can answer your questions as they arise. This will also help the facility since that person can ask questions about how their operations and structures compare to other facilities, as well as allow them to obtain information about recommended operational methods and structures and best management practices. Examine, inquire, discuss, photograph, and note both good items and bad items. Go around the property border and inside every building. And be prepared for the unexpected.
- (5) Conduct an exit interview. Discuss "good, the bad, and the ugly," in that order. Compliment the facility management and personnel for positive items, then note primary problem areas and provide some indication of items that can be taken care of immediately with only slight procedural change or simple and inexpensive facility modifications. Finally, discuss recommendations for correcting larger and more costly problems. Also indicate when the report of findings and recommendations will be sent and to whom it should be sent.
- (6) Provide a confidential report noting findings, recommendations, and summarizing items in a three-level prioritized list: improvements which are relatively inexpensive and easy to implement; improvements which require more time and more money; and major improvements

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requiring substantial time and money. Reports of findings can be made verbally during the exit meeting, afterward by letter (2-10 pages), or in a detailed formal report. If a formal report is prepared, include in the appendix any applicable information that the owner/manager may need, but can not easily obtain. Include copies of significant photographs in or with the report. Before you finalize the report, make sure that a knowledgeable coworker thoroughly reads the report and notes any corrections that are needed to improve interpretation of findings, recommendations, and readability. As a group, try to develop a specific report format and standard wording for section introductions and problem definitions. This will greatly simplify the preparation of reports. Also, develop a collection of standard attachments and share these with coworkers.

The visits to sites and detailed discussions with facility personnel can be very rewarding, not only because you are helping implement corrective actions and prevent pollution, but also because each facility will have solved a production problem, a construction problem, or an operational activity in a unique way. Accumulate this information and pass it on to others. As information about regulations is accumulated from calls or contacts with state environmental and EPA personnel, let your coworkers know. Participate in information sharing and technology transfer, and build networks that allow you to do your job more effectively and more efficiently. Above all, don't be afraid to admit ignorance and ask questions. It's better to give knowledge-based advice, than erroneous advice.

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