

US EPA ARCHIVE DOCUMENT

ADEQ EMS Development Team
Questionnaire on Environmental Aspects of Activities, Products, and Services

Consider the questions listed below to determine their applicability. Where applicable evaluate whether an environmental aspect exists for the activity, product or service in question.

Applicable Definitions:

Activity - Activities offer the greatest possibilities for ADEQ to influence the environment because they are more prevalent than services or products. These activities include fieldwork; working in the office; driving to work, meetings, trainings, etc.; or any other activity that occurs at ADEQ.

Products - ADEQ does not make products in the conventional sense. However, rules and policy documents are produced and may have tangible environmental implications when they are implemented. Therefore, these rules and policies should be considered products when determining the influence we can have on the environment.

Services - ADEQ provides services to other governmental organizations and to external stakeholders, including industry, communities, or individuals. Some examples include convening work groups or Task Forces, the direct management of remediation sites (e.g. WQARF and UST State Lead), emergency response, and the emissions testing of automobiles.

General Questions:

1. Does an employee's job function or activity include:
 - An appreciable consumption of electrical energy or fuels?
 - An appreciable use of water?
 - The use of chemicals, radiological sources, or other hazardous substances?
 - An appreciable use of materials or natural resources?
 - A discharge to air, soil, water, and/or sewers?
 - The production of solid waste (e.g., scraps, refuse)?
 - The production of high noise levels, intense light, or dust?
 - The production of products or components that contain regulated substances (e.g., poly chlorinated biphenyls (PCB), or lead)?
2. Is an employee and his or her work area prepared for any accident or emergency?
3. Does an employee have adequate training and/or experience to avoid potential environmental consequences of his or her job function/activity?
4. Does an employee's job function/activity involve the use of material safety data sheets (MSDS)?
5. Do any other conditions or attributes of an employee's job function/activity pose a risk to the environment?

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Regulatory-related Questions:

Air Emissions

1. Does your area have any air emission permits? Do any processes have scrubbers, cyclones, filters, carbon absorption systems or other air abatement systems?
2. Does your area have any hazardous air pollutants (vinyl chloride, benzene, mercury)?
3. Does your area do any open burning?
4. Does your area use any products that may emit VOCs (Volatile Organic Compounds), such as solvents and paints?
5. Does your area emit fugitive dusts, mists or vapors (e.g., particulate matter from operations, exposed piles, storage tanks)?
6. Does the project have fuel-burning equipment (e.g., boilers, furnaces, generators) which may require permits or emit partially combusted fuels?
7. Does your area have any fleet operations (tail pipe emissions impact air quality)?
8. Have you identified all of the locations with air emissions and characterized the nature of these emissions? Does your area have any operations subject to the Chemical Accident Prevention Regulations (40 CFR 68).
9. Does your area have any frequent reportable air releases (example, air conditioner Freon losses)?

Non-Hazardous Waste Generation

1. Does your area generate any nonhazardous wastes from your operations such as scrap metal, pallets, rags, used oil, batteries, empty chemical containers, light bulbs?
2. How are these wastes disposed of? Are most of them recycled or sent to a landfill?
3. Are any of these wastes generated in large quantities?
4. Have you identified all of the sources of non-hazardous wastes and characterized the nature of these wastes? Have you assessed the disposal or recycling facility?
5. Does your area generate medical waste?
6. Are there any regulations impacting recycling, trash disposal, medical waste, nonhazardous remediation or construction debris, etc., including any special requirements from the disposal site?

Hazardous Waste

1. Does your area generate any hazardous wastes (hazardous wastes are typically those substances with high flammability, corrosivity, reactivity, or toxicity and which may require special disposal through contractors)? Examples of hazardous wastes include certain solvents and solvent soaked rags, used chemicals, etc.
2. How are the wastes disposed of (landfill, incineration, recycled)?
3. Have you considered the quality of your disposal contractor as a means of managing potential future liabilities?
4. Have you identified all of the sources of hazardous wastes and characterized the nature of these wastes? Does your area have any required waste reduction, waste minimization or pollution prevention plans?
5. Are you regulated as a TSD (Treatment, Storage, Disposal Facility), a large quantity generator, or a small quantity generator or as an exempt facility? Does the OSHA HAZWOPER standard apply to your waste handlers?

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Energy Consumption

1. What are your sources of electricity/heating/cooling (fuel oil, natural gas, nuclear power, solar power)?
2. Does your area use a significant amount of electricity, fuel oil or natural gas in your operations?
3. Are your operations subject to fuel demand disruptions forcing the use of backup fuels?

Resource Use

1. Does your area use significant quantities of the following in your operations (including in your processes, products and packaging): paper, cardboard, plastics, metals, wood?
2. Does your area use significant quantities of water?
3. Does your area use virgin materials or recycled materials?
4. Do any of your contacts specify usage of recycled products?

Soil and Groundwater Contamination – Off Site

1. Are you currently responsible for any off-site investigation or remediation? Are all regulation, permit or consent order requirements (deadlines, reports, operation and maintenance, etc.) being met?
2. Does your area have accurate records of your waste disposal history?
3. Does your area have a process with legal, etc. to handle inquiries related to historical waste disposal and off-site contamination responsibility?
4. Do any of your employees fall under the OSHA HAZWOPER standard for site access?
5. Any contamination adjacent to or potentially impacting on residential property?

SARA (Superfund Amendment and Reauthorization Act) Reports

1. Does your area have to file any of the following reports: Tier 1 or 2 Notification, Form R, Supplier Notification, MSDS submittal? Does your area have an inventory system that identifies, within regulatory timeframes, new or increased usage requiring additional reporting?
2. Is your Local Emergency Planning Committee (LEPC) active and are you a member?
3. Based on your reporting are you a significant local chemical user/emitter?
4. Chemical Storage and Hazardous Material Management
5. Does your area store large quantities of chemicals (besides bulk tank storage)? Are chemicals stored outside?
 - a. Is your chemical storage segregated? Is containment provided? Is fire protection adequate?
 - b. Is the chemical storage regulated/permitted?
 - c. Does your area have a chemical management system that includes: control of; purchase (including preapproval by ESH) receipt, usage, internal distribution, shelf life, external shipment, waste collection; labeling; training?
6. Does your area have a spill response program including: plans (SPCC or other regulatory as well as internal), trained personnel (per OSHA HAZWOPER, etc.), equipment, reporting procedures (meeting ALL regulations), mutual support agreements?

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DOT Hazardous Materials

1. Does your area ship regulated hazardous materials (virgin or waste)? What frequency?
2. Does your area perform packaging and or completion of shipping papers? Does packaging meet all DOT standards (Performance Oriented Packaging)?
3. Does your area ship by air? Water? Land? Does your area ship over public roads between buildings? International shipments?
4. Are the chemical shipments you receive inspected for regulatory compliance?
5. Are your employees and managers responsible for packaging, shipping, receiving and waste handling properly trained to DOT requirements (as well as applicable EPA and OSHA requirements)?

Indoor Air Quality (IAQ)

1. Does your area assess indoor air quality?
2. Does your area have areas of excessive dust, fumes, mists, odors, etc.?
3. Does your area receive employee complaints about odors, indoor air quality, etc.?
4. Does your area have a program that includes: engineering review HVAC designs (for IAQ); preventive maintenance of HVAC systems for IAQ concerns; medical involvement in IAQ complaints; management and medical for IAQ issues?

Workplace Exposure to Chemicals

1. Does your area have employees working with hazardous chemicals (e.g., cleaning with solvents (benzene, trichloroethylene, perchloroethylene) or exposed to dust and fibers from construction activities (asbestos, lead, chromium or cadmium), etc.?
2. Have you assessed the level of exposure of employees to hazardous chemicals and materials? Is your assessment regularly updated?
3. Does your area have a chemical exposure control system to minimize employee exposures including: chemical usage review, workplace monitoring, employee training, exhaust systems (design, usage, maintenance and inspection), medical monitoring (where needed)?
4. Does your area have significant employee complaints, allergic reactions, etc?

Noise

1. Are there areas or operations near which it is difficult to communicate in normal tones?
2. Are there areas where employees are required, or chose, to use hearing protection?
3. Have you assessed the different workplaces on-site for high (>85 dBA-TWA) noise levels to determine if employees need to be placed in a hearing conservation program?

Respiratory Protection

1. Are there any areas or operations which may require the use of a respirator (e.g., paint operations, parts degreasing, grinding, confined spaces, emergency response)? Are there areas or operations where employees choose to wear respirators or dust masks?
2. Does your area have a program to control the proper use of respiratory protection (air purifying respirators including dust masks and atmosphere supplying respirators including SCBA) including: training, fit-testing, medical evaluation, storage, control of untrained users?

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3. Does your area have any supplied air respirators? If so, have you fully evaluated the air supply?

Ozone Depleting Substances (ODSs)

1. Does your area use ozone depleting chemicals (chlorofluorocarbons, halons, hydrochlorofluorocarbons, methyl chloroform, carbon tetrachloride)?

NOTE: ODS are often used in refrigeration equipment, air conditioning units, fire protection systems and as solvents.

2. Does your area maintain an inventory of equipment containing ODSs which identifies any with ODS amounts exceeding any regulatory (release RQs, registration) thresholds?

3. Are you phasing out the use of regulated ODS?

4. Have you verified ODSs are not present in any processes or as components of other chemicals?

5. Does your area have to report ODS releases? Does your area control ODS containing equipment?

6. Is maintenance of ODS-containing equipment done by certified technicians?

7. Does your area own ODS recycling equipment? Is it registered with the EPA?

TSCA (Toxic Substances Control Act)

1. Does your area import or export chemicals or equipment which may contain chemicals, including supply or repair kits or batteries? Equipment of concern may include printers, copiers.

FIFRA (Federal Insecticide, Fungicide and Rodenticide Act)

1. Are any pesticides, etc., used on your site?

2. Does your area use/apply pesticides, etc.?

3. Are any of these pesticides, etc., considered for industrial or special use, as opposed to commercial products?

4. Are there any regulations over this usage requiring: registration, reporting, certification of applicators, etc.?

Asbestos

1. Has there been a survey and condition assessment of potential asbestos sources on-site?

2. Does your area employees work with asbestos containing materials? Are they properly trained, certified, monitored, etc.?

3. Is employee notification of asbestos presence or construction required?

4. Is asbestos material disposal proper? Does your area maintain disposal records?

Radiation

1. Does your area have any sources of ionizing radiation (e.g., flow sensors, volume sensors, x-ray machines, laboratory equipment such as gas chromatograph)?

NOTE: Certain ionizing radiation may result in cell damage, and may be a carcinogen or a reproductive hazard.

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2. Does your area have any sources of non-ionizing radiation such as RF or microwaves (radar), infrared radiation (heated metals), ultraviolet radiation (from electric welding arcs)?

NOTE: Certain non-ionizing radiation may result in burns.

3. Are your radiation sources assessed, monitored, registered, interlocked, labeled, etc., to provide needed controls?

Reproductive Hazards

1. Does your area use chemicals which may be considered reproductive hazards (e.g., lead, cadmium, certain pesticides, radiation)?

2. Have you communicated these possible hazards to personnel who may be exposed to these chemicals?

Wastewater Discharges

1. Does your area have any wastewater permits?

2. Does your area have any wastewater treatment operations (e.g., oil/water separators, neutralization systems, settlers)?

3. Does your area discharge anything besides sanitary wastes to a publicly owned treatment works? (e.g., drains from laboratory sinks, utility sinks, and maintenance areas.)

Storm-water and Flood Control/Dams

1. Is it possible for storm-water to come into contact with any equipment, tanks, containers, or other vessels used for the storage of chemicals that could potentially contaminate storm-water?

2. Does your area do any vehicle maintenance or washing where wash water or oil could run-off with storm-water?

3. Does your area have any wastewater, cooling water or other potentially contaminated water discharging into storm-water? Any contaminated roof (HVAC Chemicals) or building footer (groundwater) drains?

4. Does your area have a storm-water permit or have storm-water included in a wastewater permit?