SC DEPARTMENT *of*
ENVIRONMENTAL
SERVICES

OCA Workshop - Building Compliance Confidence

October 27, 2026



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SERVICES

Inspection Readiness

October 27, 2026



Agenda

- Overview of Environmental Inspections: Purpose, Importance, Type and Best Practices
- What will the Department personnel look for during the inspection
- 7 steps to inspection readiness
- The inspection is finished – what happens next
- Most common deficiencies
- Voluntary Disclosure

Purpose of the Presentation

- This is a broad overview, to cover all types of environmental inspections that the Department conducts.
- Outlines key inspection requirements for all permitted facilities.
- Clarifies how compliance is a shared responsibility between the Department and facilities.



Why Environmental Inspections Matter

- Environmental inspections evaluate a facility's operations, equipment, and records to confirm compliance with applicable regulations. Strong compliance programs help facilities identify issues early, meet regulatory requirements, and prevent fines or penalties.
- Proactive compliance also safeguards employees and surrounding communities while strengthening the company's reputation with investors and stakeholders. By addressing potential risks before they escalate, facilities demonstrate responsibility and build trust with those they serve and partner with.



Different Types of Inspection

Surface Water

Underground Storage Tanks

Air Quality

Recreational Water

X-ray

Laboratory Certification

Resource Conservation & Recovery Act

Critical Zone Consistency

Drinking Water

Mining

Stormwater

Radioactive Waste

Risk Management Plan

Solid Waste

Hazardous Waste

Agriculture

On Site Wastewater

Wastewater

Dams

Radioactive Materials

Tanning

Mammography

Infectious Waste

The 4 Types of Environmental Inspections

1. Unannounced Inspections
2. Announced Inspections
3. Complaint-Driven Inspections
4. Follow-Up Inspections

- Each program has individual inspection requirements and frequencies.
- Whether a facility will have an announced or unannounced inspection depends upon which environmental program they are subject to.



During the Inspection: Best Practices



- Verify the inspector's credentials, agency and program.
- Assign inspection host to escort, take notes and provide records.
- Ensure employees know where permits, plans, and records are kept.
- Be transparent, cooperative, and professional.
- Provide factual answers, do not guess – follow-up if information is not immediately available.

What will the Department Personnel Look for During the Inspection

- Introductory discussion to explain the purpose of the inspection
- Records review
- Physical walkthrough of the facility
- Closing conference to discuss deficiencies and next steps



This image was created by Veronica Barringer with the assistance of artificial intelligence.

1. Valid Permits or Regulatory Coverage

- Ensure employees know where permits, plans, and records are kept.
- Permits and approval letters onsite or available for review.
- Permits requirements match actual site conditions.
- New equipment and processes are covered under a new permit or modification.



2. Required Operational Plans

Various Plans may be required based on the program or Permit:

- Stormwater Pollution Prevention
- Best Management Practices
- Fugitive Dust
- Operations and Maintenance
- Hazardous Waste Contingency
- Infectious Waste Management
- Shielding
- Training

These plans should be site specific and actively implemented, and updates made to ensure it continues to function as a living document.



This image was created by Stephanie Garrett with the assistance of artificial intelligence.

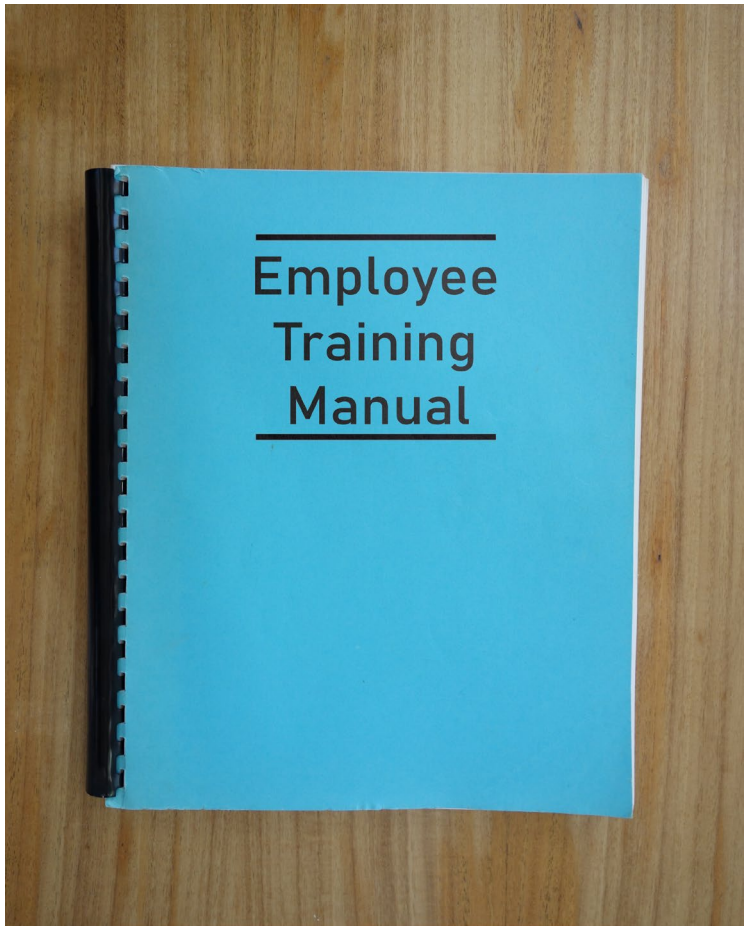
2. Pictures







3. Training



Several programs requires employees, including contractors and consultants to use equipment correctly or to obtain and maintain required certifications.

For example: Certified Erosion Prevention & Sediment Control Inspector (CEPSCI), Air Curtain Incinerators and X-rays

Inspectors are looking for:

- Training manual
- Training certificate
- Completeness
- Documentation on specific training

4. Inspection Logs & Corrective Action

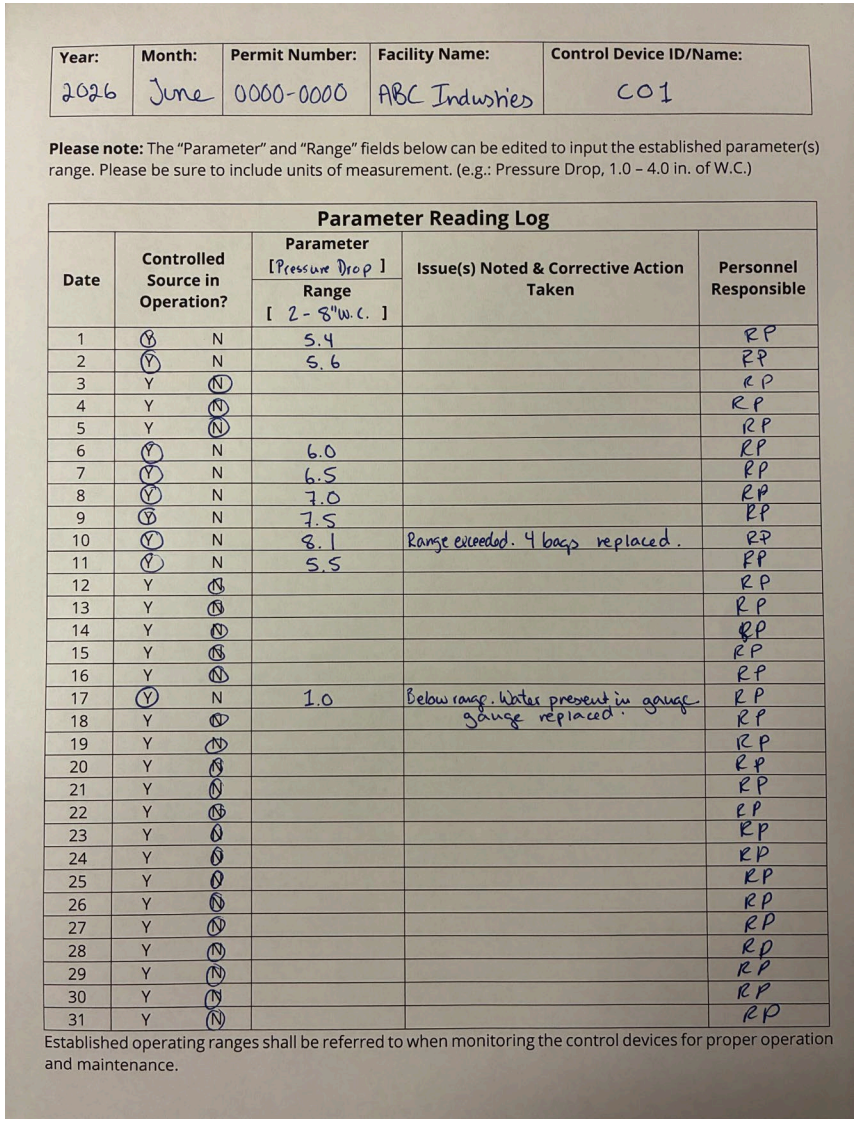
The Department will review records required by your permit to ensure that they are complete, accurate and up-to-date.

Inspectors are looking for:

- Accuracy
- Completeness
- Corrective action notations
- Missing data – always note the reason for gaps in data
- Reoccurring patterns in data without resolution



4. Pictures



Year:	Month:	Permit Number:	Facility Name:	Control Device ID/Name:
2026	June	0000-0000	ABC Industries	C01

Please note: The "Parameter" and "Range" fields below can be edited to input the established parameter(s) range. Please be sure to include units of measurement. (e.g.: Pressure Drop, 1.0 – 4.0 in. of W.C.)

Parameter Reading Log

Date	Controlled Source in Operation?		Parameter [Pressure Drop] Range [2 - 8" W.C.]	Issue(s) Noted & Corrective Action Taken	Personnel Responsible
1	(Y)	N	5.4		RP
2	(Y)	N	5.6		RP
3	Y	(N)			RP
4	Y	(N)			RP
5	Y	(N)			RP
6	(Y)	N	6.0		RP
7	(Y)	N	6.5		RP
8	(Y)	N	7.0		RP
9	(Y)	N	7.5		RP
10	(Y)	N	8.1	Range exceeded. 4 bags replaced.	RP
11	(Y)	N	5.5		RP
12	Y	(N)			RP
13	Y	(N)			RP
14	Y	(N)			RP
15	Y	(N)			RP
16	Y	(N)			RP
17	(Y)	N	1.0	Below range. Water present in gauge. gauge replaced.	RP
18	Y	(N)			RP
19	Y	(N)			RP
20	Y	(N)			RP
21	Y	(N)			RP
22	Y	(N)			RP
23	Y	(N)			RP
24	Y	(N)			RP
25	Y	(N)			RP
26	Y	(N)			RP
27	Y	(N)			RP
28	Y	(N)			RP
29	Y	(N)			RP
30	Y	(N)			RP
31	Y	(N)			RP

Established operating ranges shall be referred to when monitoring the control devices for proper operation and maintenance.

5. Monitoring, Testing, & Sampling Data



Inspectors will be reviewing for:

- Missed sampling events
- Incomplete or inconsistent data sets
- Improper sampling methodology
- Unreported exceedances
- Equipment maintenance and calibration

- Examples: Stack testing for air emissions, Wastewater calibrations and data, Stormwater monitoring

5. Pictures









6. Emergency Preparedness



Inspectors will verify that Emergency Plans are:

- Up-to-date and match site conditions
- Site specific

Confirm that Employees:

- Demonstrate knowledge
- Know who to contact

Review Drill and Training logs

6. Pictures





7. Physical Walkthrough of the Site



During the site walkthrough, Inspectors will:

- Verify overall structural and operational compliance
- Observe how permitted equipment is used and maintained
- Some programs view employees operating the equipment to verify proficiency
- Check for proper function, integrity and routine maintenance
- Conduct program-specific reviews
- Evaluate housekeeping indicators
- Identify current or potential compliance concerns
- Photographs

7. Pictures







7 Steps to Inspection Readiness



- Embed compliance into daily operations
- Conduct environmental audits at your facility
- An environmental audit is where you review permits, plans, records, and physical conditions of your facility and compare it to applicable permit conditions and regulations.

Step 1: Run Internal Audits and Mock Inspections

- Conduct practice audits that mirror real regulatory inspections, including document reviews, facility walkthroughs, and employee interviews to confirm procedural familiarity.
- Use permit requirements, past deficiencies, check lists, and guidance to anticipate what inspectors may request, helping teams understand inspection expectations and identify gaps early.
- Thoroughly document all findings and consider voluntary self-disclosure when audits reveal issues that could result in significant non-compliance.

Step 2: Review Permits and Plans

- Routinely review permits and plans.
- Confirm plans are accurate and up to date: SWPPP, SPCC, ERP, and Fugitive Dust, O&M, etc.
- Update permits and plans whenever equipment, processes or site conditions change.
- Document all updates to keep plans current and reliable.
- Catching changes earlier shows proactive compliance management.

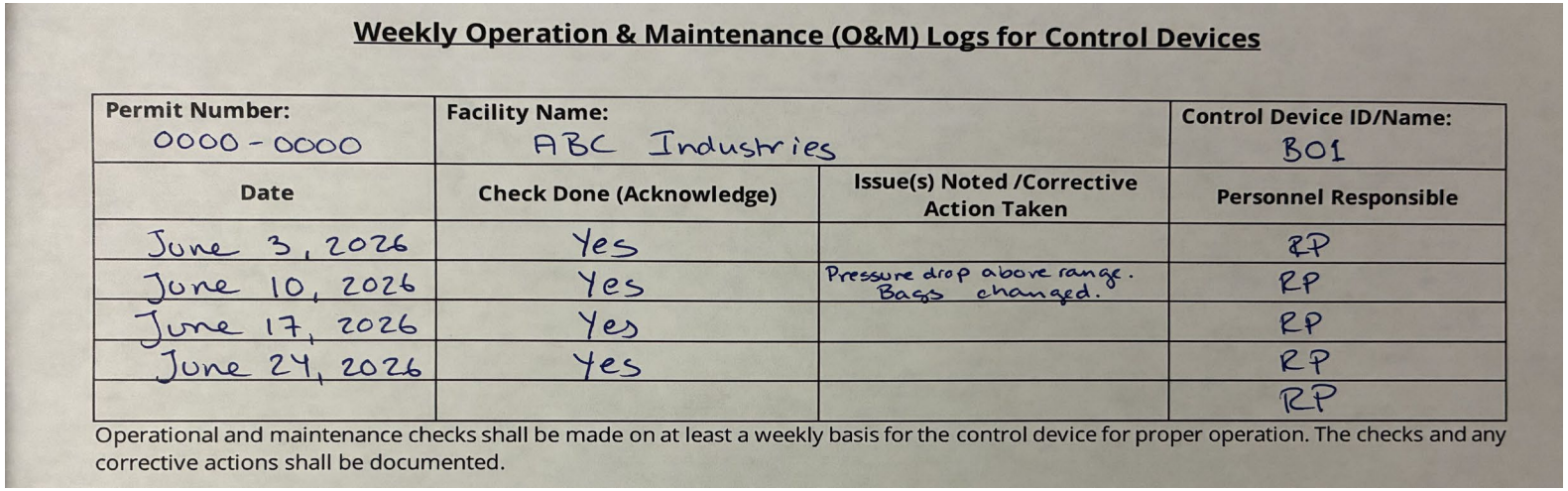


Step 3: Document Everything - Completely

- Documentation is essential: "If it's not documented, it didn't happen."
- Records should be complete, organized, and easy to access.
- Disorganized or missing records signal compliance weakness
- Never pre-fill, backdate, or recreate logs.
- Maintain records for all required retention periods.
- Keep a current master file of permits, approval letters, plans, operating records/logs and training records.
- Use an internal "pull test" to ensure records can be found quickly.



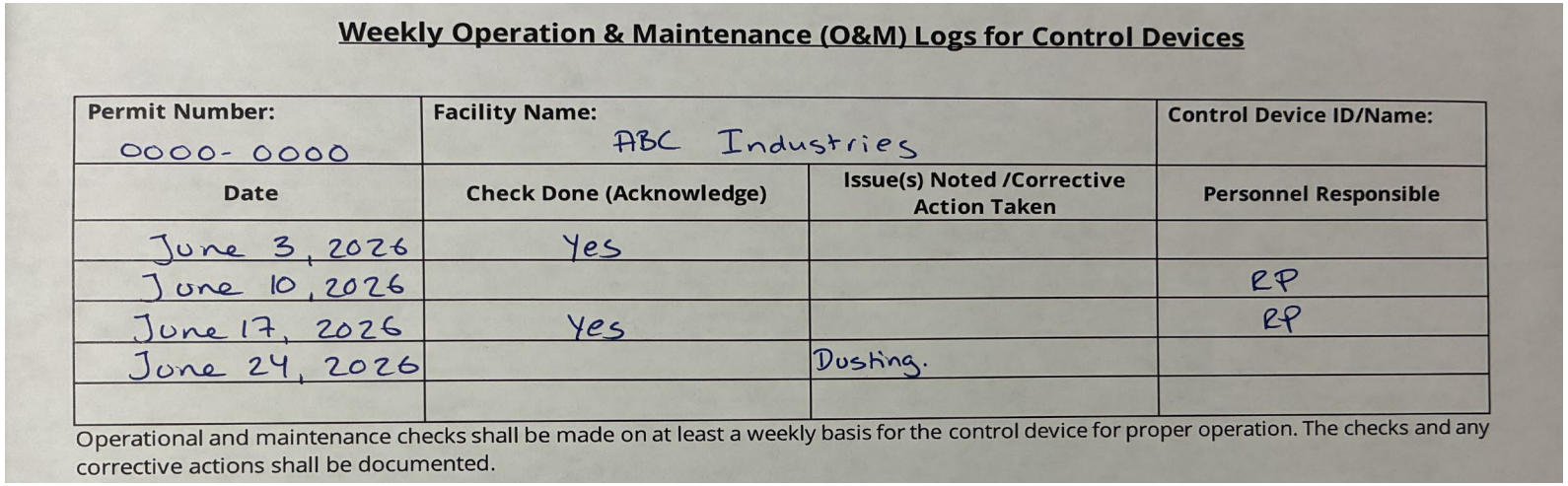
Step 3: Pictures



Weekly Operation & Maintenance (O&M) Logs for Control Devices

Permit Number: 0000-0000	Facility Name: ABC Industries		Control Device ID/Name: B01
Date	**Check Done (Acknowledge)**	**Issue(s) Noted /Corrective Action Taken**	**Personnel Responsible**
June 3, 2026	Yes		RP
June 10, 2026	Yes	Pressure drop above range. Bags changed.	RP
June 17, 2026	Yes		RP
June 24, 2026	Yes		RP
			RP

Operational and maintenance checks shall be made on at least a weekly basis for the control device for proper operation. The checks and any corrective actions shall be documented.



Weekly Operation & Maintenance (O&M) Logs for Control Devices

Permit Number: 0000-0000	Facility Name: ABC Industries		Control Device ID/Name:
Date	**Check Done (Acknowledge)**	**Issue(s) Noted /Corrective Action Taken**	**Personnel Responsible**
June 3, 2026	Yes		
June 10, 2026			RP
June 17, 2026	Yes		RP
June 24, 2026		Dusting.	

Operational and maintenance checks shall be made on at least a weekly basis for the control device for proper operation. The checks and any corrective actions shall be documented.

Step 4: Inspect Physical Site Conditions Regularly

- Walk the site like an inspector would.
- Compare written procedures to actual practices.
- Check key compliance items: storage, containment, emergency equipment, control devices, BMPs, signage.
- Watch for simple issues: damaged containers, missing labels, poor housekeeping, failing equipment, missing signs.
- Address visible issues early to prevent violations.
- Use routine walkthroughs to strengthen preparedness.



Step 4: Pictures





Step 5: Review Monitoring Data for Anomalies

- Review monitoring records for trends, limits exceedances, and data gaps.
- Investigate any deviations or inconsistent results.
- Check equipment performance, calibration, sampling methods, and operational or weather impacts.
- Ensure maintenance and calibrations are performed in accordance with manufacturers specifications, regulations and permitting requirements.
- Document and explain anomalies and corrective actions.





Step 6: Close and Verify all Corrective Action

- Document root cause, corrective action, and follow-up for every deficiency.
- Use before-and-after photos to show corrective actions.
- Repeat deficiencies signal unresolved root causes or ineffective follow-up.
- Strong documentation supports long-term compliance and regulatory confidence.



Step 6: Pictures





Step 6: Pictures

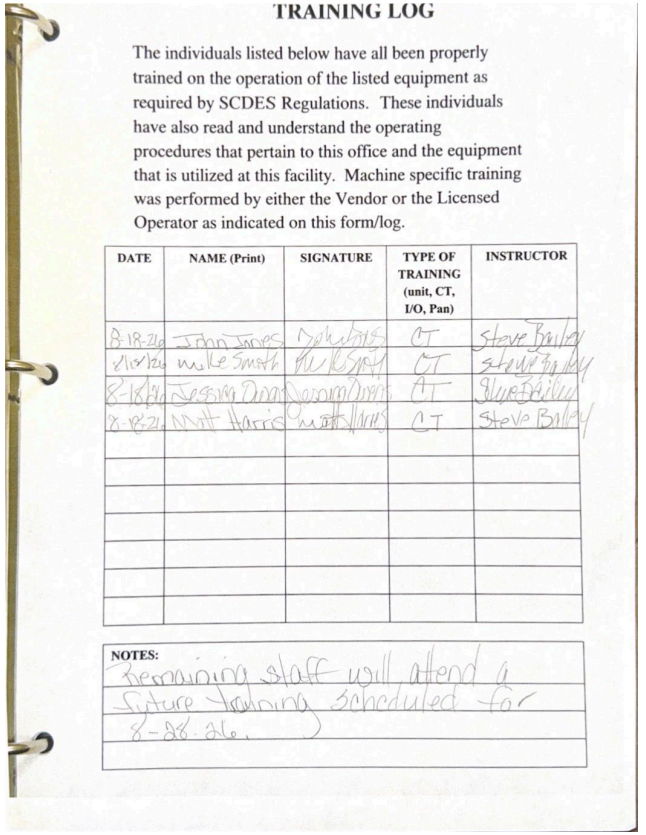




Step 7: Prepare Your Employees

Inspectors will speak with employees to assess how well procedures are understood and followed.

- Employees should be able to explain duties, routine tasks, emergency steps, and locate records and equipment.
- Prepare staff so they communicate confidently during inspections.



TRAINING LOG

The individuals listed below have all been properly trained on the operation of the listed equipment as required by SCDES Regulations. These individuals have also read and understand the operating procedures that pertain to this office and the equipment that is utilized at this facility. Machine specific training was performed by either the Vendor or the Licensed Operator as indicated on this form/log.

DATE	NAME (Print)	SIGNATURE	TYPE OF TRAINING (unit, CT, I/O, Pan)	INSTRUCTOR
8-18-21	John Jones		CT	Steve Bailey
8-18-21	Mike Smith		CT	Steve Bailey
8-18-21	Jessica Davis		CT	Steve Bailey
8-18-21	Matt Harris		CT	Steve Bailey

NOTES: Remaining staff will attend a future training scheduled for 8-28-21.

The Inspection is Finished – What Happens Next?

- Inspection reports will document onsite observations and any additional information provided afterwards.
- Inspectors and facilities should ask clarifying questions to ensure accuracy.
- Facility responses must clearly explain how requirements are being met.
- Keep discussions cooperative and focused on factual information, not regulatory debates.
- Finalized inspection reports will be provided by mail, email, and/or ePermitting, and should be reviewed carefully.

Now What? - Facility Response

- Facilities can formally address identified deficiencies with clear, well-supported responses.
- Gather evidence, clarify misunderstandings, and compare items against permit and regulatory requirements.
- Document corrective actions taken or planned, even when disputing a deficiency.
- Demonstrating good-faith efforts reinforces credibility and commitment to compliance.

Most Common Deficiencies

Most deficiencies occur due to system breakdowns, not deliberate intent. Most often the result of staff turnover and gaps in training.

- Record keeping
- Installing new equipment without permit coverage
- Failure to maintain equipment and gauges
- Failure to conduct calibrations
- Poor container management
- Off-site impacts
- Operating without Permit coverage
- Employee Training



Environmental Audit Privilege and Voluntary Disclosure Act

- Encourages facilities to conduct internal environmental self-audits.



- Provides limited protection from civil penalties when violations are voluntarily disclosed and corrected.
- May qualify for immunity from civil/administrative penalties once violations are corrected and certified by SCDES.

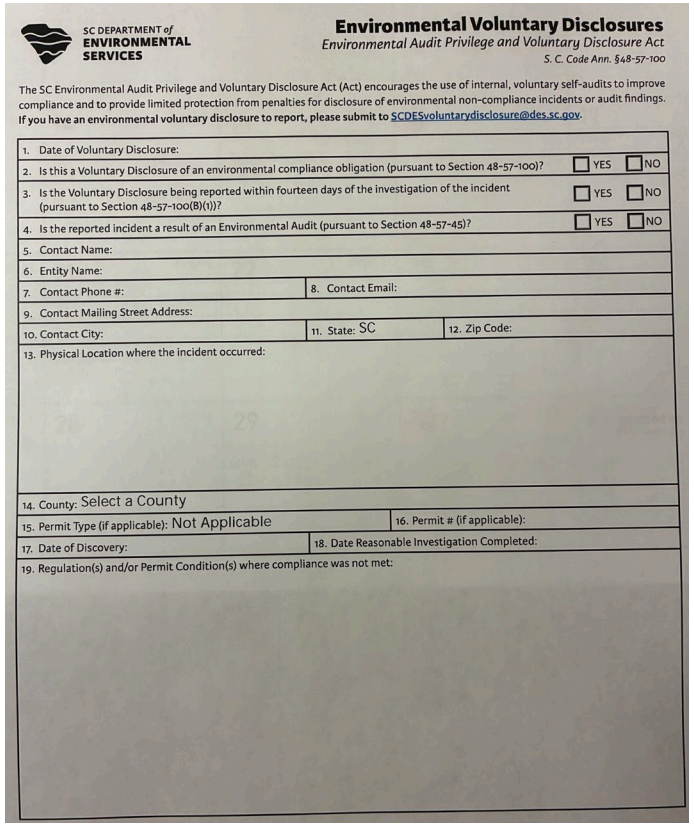
Voluntary Disclosure Criteria

- What Makes a Disclosure “Voluntary”
- Disclosure occurs within **14 days** of completing a reasonable investigation.
- Disclosure is submitted to the **appropriate regulatory agency**.
- Facility begins corrective action **promptly and diligently**.
- Facility **cooperates fully** with the agency’s investigation.
- Facility **pursues compliance** and corrects violations within a reasonable timeframe.

- What makes a Disclosure "Not Voluntary"
- The violation was **intentional, willful, or criminal**.
- The violation caused **significant environmental or public health harm**.
- The violation is already required to be reported under specific permit conditions
- A similar violation occurred within **1 year** and previously received immunity.
- Noncompliance gave the facility a **substantial economic advantage**.

How to Submit a Voluntary Disclosure

- https://des.sc.gov/VoluntaryDisclosureAct



SC DEPARTMENT of ENVIRONMENTAL SERVICES

Environmental Voluntary Disclosures

Environmental Audit Privilege and Voluntary Disclosure Act

S. C. Code Ann. §48-57-100

The SC Environmental Audit Privilege and Voluntary Disclosure Act (Act) encourages the use of internal, voluntary self-audits to improve compliance and to provide limited protection from penalties for disclosure of environmental non-compliance incidents or audit findings.
If you have an environmental voluntary disclosure to report, please submit to SCDESvoluntarydisclosure@des.sc.gov.

1. Date of Voluntary Disclosure:
2. Is this a Voluntary Disclosure of an environmental compliance obligation (pursuant to Section 48-57-100)? ☐ YES ☐ NO
3. Is the Voluntary Disclosure being reported within fourteen days of the investigation of the incident (pursuant to Section 48-57-100(B)(1))? ☐ YES ☐ NO
4. Is the reported incident a result of an Environmental Audit (pursuant to Section 48-57-45)? ☐ YES ☐ NO
5. Contact Name:
6. Entity Name:
7. Contact Phone #:
8. Contact Email:
9. Contact Mailing Street Address:
10. Contact City:
11. State: SC
12. Zip Code:
13. Physical Location where the incident occurred:
14. County: Select a County
15. Permit Type (if applicable): Not Applicable
16. Permit # (if applicable):
17. Date of Discovery:
18. Date Reasonable Investigation Completed:
19. Regulation(s) and/or Permit Condition(s) where compliance was not met:

Questions?



SC DEPARTMENT *of* ENVIRONMENTAL SERVICES

Get in touch

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