



DRAFT

Environmental Compliance and Pollution Prevention Audit

Preliminary On-Site Audit Findings Report

This document has been developed by Massport and Camp Dresser & McKee and is intended to be used as a means of communicating compliance findings and a list of outstanding information to be provided by the tenant. Massport reserves the right, upon review of this document, to revise, amend or delete any of the findings or material contained herein. Further, Massport reserves the right to provide subsequent comments and/or direction regarding any of the findings contained herein.

Massport expects the highest standard of care at its facilities. Tenants are required to operate their businesses in full compliance with all applicable regulations and to respond without delay to all outstanding matters.

I. Basic Information	
Tenant _____	Massport Location _____
Mailing Address _____	Person(s) Interviewed _____
City, State, Zip _____	_____
Telephone # _____	_____

II. Auditing Information	III. Operations
Date of Audit _____	<input type="checkbox"/> Fueling
Massport Representative(s) _____	<input type="checkbox"/> Vehicle or Aircraft Maintenance
Audit Team Leader _____	<input type="checkbox"/> Vehicle Washing
Inaccessible Areas, if any _____	<input type="checkbox"/> Hazardous Materials Storage
Sub-Tenants _____	<input type="checkbox"/> Hazardous Waste Storage
_____	<input type="checkbox"/> USTs <input type="checkbox"/> ASTs
General Comments _____	<input type="checkbox"/> Air Conditioning/Refrigeration Maintenance
_____	<input type="checkbox"/> Other _____
_____	_____

Note: If a check mark is placed in a shaded box, a corrective action is required depending on the issue.

IV. Applicable Regulatory Areas and Compliance Matters			
Hazardous Waste Management	Yes	No	N/A
What is the facility's waste generation status (VSQG, SQG, or LQG)?			
Based on the amount of waste accumulated and review of manifests does generation status seem appropriate?			
Are accumulation area(s) in good order (clean and neat, free of spills)?			
Are labels/signs complete? (e.g. hazardous waste, type of waste, hazard associated with waste)			
Are drums/containers stored in a protected, safe location?			
Is the on-site accumulation within SQG limits (1,500 gal. in tanks, 550 gal. in containers)?			
Is on-site accumulation within LQG limits (>550 gal. in containers or > 1,500 gal. in tanks)?			
Has the accumulation time exceeded regulatory limits?			

IV. Applicable Regulatory Areas and Compliance Matters (cont.)			
Hazardous Waste Management	Yes	No	N/A
Are containers in good condition?			
If no, describe them.			
Are the containers compatible with the waste?			
Are the containers tightly closed (bungs sealed and bolt ring secured)?			
Is there an adequately demarcated waste storage area(s)?			
Is secondary containment in use where required/warranted?			
Is spill response equipment available adequate and easily accessible?			
Are oil filters reportedly drained for at least 12 hours prior to disposal?			
Any "green" products or products of concern in use? If yes, explain.			
Are toxic use reduction measures implemented (e.g., alternative degreasers)? Explain.			
Storage Tanks	Yes	No	N/A
Are there any ASTs?			
Describe volume and contents.			
Are there any USTs?			
Describe volume and contents.			
Does MPA tank data match with records and tanks observed on site?			
If no, describe differences.			
Have the tanks been permitted by Massport fire rescue department?			
Are permits current? Provide expiration date(s).			
Are the USTs equipped with secondary containment, spill and overflow protection and leak detection?			
Are the ASTs equipped with secondary containment?			
Are automated inventory records available on-site?			
Are tank sticking records available on-site?			
Have USTs been upgraded to meet current regulations			
Describe any deficiencies.			
Is tenant aware and making provisions for the 1998 UST regulatory requirements?			
If required, has tank tightness testing been conducted?			
Are FP-290 records maintained on-site?			
Is stage II vapor recovery equipment required for gasoline dispensing facilities?			
If yes, has it been installed?			
Note: Auditor - please refer to EMCON's "Storage Tank Management Record Retention Requirements" (4/25/97).			
Air Emissions	Yes	No	N/A
Do the heating units have a combined BTU value exceeding 10M BTU?			
Does the tenant conduct solvent metal degreasing?			
Is welding performed on-site?			
Does the facility have any ozone depleting substances on-site (e.g. freon)?			
Have personnel who perform refrigerant work been certified by EPA?			
Are personnel using EPA-certified equipment?			

Water Quality	Yes	No	N/A
Are the floor drains clean and free of debris and stains?			
Are the floors washed? If yes, describe procedure for collecting and disposing of washwater.			
Are the storm drains clean and free of debris and stains?			
Are all drains and areas in compliance with MWRA and state plumbing code?			
Are there any oil/water separators on-site?			
Has the O/WS(s) been inspected and maintained regularly? Note the date of last inspection and cleaning.			

Records Review	Yes	No	N/A
Does the Material Safety Data Sheet (MSDS) file appear complete and accurate?			
If spill prevention control and countermeasure plan (SPCC) is required, is it available and up to date?			
Are UST inventories checked daily and reconciled monthly?			
Are UST records in order?			
Are manifests properly managed? (e.g. copies legible, copies 3 & 8 or 1 & 4 as applicable together, correct EPA # used)?			
Does the tenant have the following inspection records:			
Hazardous waste accumulation area?			
Waste oil accumulation area?			
Satellite accumulation area?			
Biannual inspection log?			
Oil/water separators, storm sewer and catch basins?			
Does the tenant have the following training records on file? <input type="checkbox"/> Spill <input type="checkbox"/> HW <input type="checkbox"/> SWPPP			
If applicable, have the following reports been prepared and sent to the proper agencies?			
• Biennial hazardous waste report			
• Tier II report			
• TUR plan			
• Forms R&S			

Housekeeping	Yes	No	N/A
Is there excessive staining or other evidence of improper practices?			
Excessive amounts of absorbent material on floor?			
Are drip pans being used?			
Are products and virgin materials labelled/stored properly?			
Is excessive debris, drums or other waste stored outside?			
If yes, is it protected from stormwater?			
Excessive staining around fueling area?			
Any evidence of improper disposal in the dumpster?			
Are batteries properly stored?			

<i>Other</i>	<i>Yes</i>	<i>No</i>	<i>N/A</i>
Are fluorescent tubes recycled?			
Describe recycling activities.			
Pollution prevention/toxic use reduction initiatives implemented? Describe.			

V. Describe Any Urgent Condition(s) Requiring Emergency Action

<i>VI. Outstanding Information</i>	<i>To be Provided/Completed by:</i>	<i>Date:</i>
<i>A. List any outstanding information/documentation that the tenant is requested to supply to document compliance: (See address below)</i> _____		

<i>B. List any information/guidance documents that MPA/CDM will supply or has supplied to the tenants:</i>		

VII. Outstanding Information

List below the most critical noncompliance condition(s) encountered that warrants immediate attention and rectification by the tenants. _____

Received by: _____ Date: _____
 Tenant Representative - Print

_____ Date: _____
 Tenant Representative - Signature

Auditor: _____ Date: _____

Please send any correspondence to:
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