

## Project Description

Rogers & Callcott performed a multi-media environmental compliance audit for operations at a manufacturing facility in Greenville, SC. The intent of the audit was to assess regulatory compliance with applicable US EPA, state, and local regulations.

## Rogers & Callcott Services and Results

**Compliance Audit and Regulatory Review**– The compliance audit included a reconnaissance of the site, during which all manufacturing, waste storage, warehousing, quality control and product development testing, and maintenance areas were observed and evaluated. Topography and drainage features outside the facility were also evaluated to determine applicability of storm water permitting requirements. In addition to the site reconnaissance, Rogers & Callcott also conducted a review of applicable environmental files and held interviews with persons having knowledge of the facility. During the environmental audit, Rogers & Callcott evaluated regulatory compliance with respect to the following program areas:

- Hazardous Waste
- Universal Waste
- Community Right-to-Know Act (EPCRA)
- Clean Air Act
- NPDES Permits (Wastewater, Utility, and Storm Water)
- Spill Prevention, Control, and Countermeasures

**Audit Results and Client Benefits**– The facility was provided with an audit report that summarized observations made by Rogers & Callcott during the site visit with respect to these program areas. The report also provided recommendations for verifying and/or maintaining compliance in each of the respective program areas. There were numerous findings and/or deficiencies as a result of the compliance audit. Rogers & Callcott assisted the facility in resolving some of the issues.

- **Hazardous Waste** – Rogers & Callcott assisted the facility in submitting a voluntary disclosure to the South Carolina Department of Health and Environmental Control (SC DHEC) to self-disclose non-compliance items identified in the audit report.
- **Clean Air Act** - Rogers & Callcott assisted the facility in submitting emission calculations for air pollutant sources, which were necessary for obtaining coverage under the SC DHEC air permitting program.
- Overall, the facility benefited from being made aware of several issues that could have contributed to a non-compliance status if audited by a governmental agency. The facility was able to address many findings internally, while Rogers & Callcott assisted in resolving other issues at the state level.