

**EXAMPLE ERGO FINDINGS RATINGS CONSISTENCY TABLE**

This table is a generalized framework to help in making consistent findings ratings decisions. It is not, nor is it intended to be, a complete list of possible findings that may be encountered and the ratings to be assigned to them. When rating findings, consideration must be given to site conditions, cumulative impacts, state and local requirements, any special emphasis areas specified by higher command, and other factors. MSCs may find consulting USACERL/PL-N (217-352-6511, ext 7667 or fax 217-373-7222) helpful when making rating consistency decisions affecting multiple districts.

**Significant:** A problem categorized as significant requires immediate attention. It poses, or has a high likelihood to pose, a direct and immediate threat to human health, safety, the environment, or the facilities’ mission. A storage tank found leaking to the environment during the assessment, for example, would likely be a significant deficiency.

**Major:** A major deficiency requires action, but not necessarily immediate action. Major deficiencies may pose a threat to human health, safety, or the environment. Any immediate threat, however, must be categorized as significant.

**Minor:** Minor deficiencies are usually administrative in nature, even though those findings might possibly result in a notice of violation. This category may also include temporary or occasional instances of noncompliance.

	<b>MINOR</b>	<b>MAJOR</b>	<b>SIGNIFICANT</b>
<b>Air Emissions</b>	Certification for personnel repairing HVAC systems expired 2 weeks ago. Personnel are scheduled to take recertification training in 1 week.	Open burning is occurring at the facility in a “burn barrel” on a regular basis. Facility managers are not obtaining and documenting burn permits. Burn conditions are not being checked prior to burning activity. <b>[Revised June 1998]</b>	Facility personnel were observed venting CFCs to the atmosphere while repairing a refrigeration unit.
<b>Cultural Resources</b>	Historic building has not been nominated for inclusion on the Federal Register. But there is no activity currently impacting the building.	Incomplete Section 106 analysis was conducted on a historic building undergoing interior renovation and reconstruction.	A grave site uncovered during construction activities was not reported and construction continued, further disturbing the grave site area.
<b>Hazardous Materials</b>	Current inventory of hazardous materials is incomplete. Not all	Facility does not implement DOD or other HAZCOMM program at a	Flammable solvents stored outside without secondary containment are

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	MSDSs are available for each hazardous material on site. MSDSs for materials no longer on site have been purged from files.	large multipurpose project with 30 employees who use numerous hazardous materials. <b>[Revised June 1998]</b>	leaking.
<b>Hazardous Waste</b>	One of five drums of hazardous waste are not labeled correctly but its contents are known. <b>[Revised June 1998]</b>	Five drums of hazardous waste are not labeled. Documentation on contents is not available. <b>[Revised June 1998]</b>	Container of hazardous waste is leaking onto the ground. <b>[Revised June 1998]</b>
<b>Natural Resources</b>	The Shoreline Management Plan has not been reviewed for 6 years. It must be reviewed every 5 years.	Corps project has allowed shoreline erosion to continue on the Point. It has impacted and will continue to impact a wildlife management area that contains valuable wetlands. <b>[Revised June 1998]</b>	Construction activity is adversely impacting known endangered species. There has been no prior consultation with the Fish and Wildlife Service or other agencies. <b>[Revised June 1998]</b>
<b>Pesticides Management</b>	Application records for restricted use pesticide application are incomplete. <b>[Revised June 1998]</b>	Personnel are applying a restricted use pesticide without being state certified.	Personnel are improperly applying a restricted use pesticide in a biologically sensitive area. The pesticide's label indicates it will have adverse biological impacts when used in this manner. There is evidence of adverse impact, including dead non-target animals and plants. <b>[Revised June 1998]</b>
<b>POL Management</b>	The SPCC plan does not reflect the change from one, 1000 gal aboveground storage tanks (AST) and one, 1000 gal UST to two, 1000 gal ASTs. <b>[Revised June 1998]</b>	Facility has no SPCC plan even though it exceeds the POL storage thresholds of 1320 gal aboveground and the tanks are stored near the lake in a location that poses a potential threat of a spill. <b>[Revised June 1998]</b>	Facility has a significant leak of gasoline from a pipe under the dock walkway, which is dripping fuel into the lake at an estimated rate of 0.5 gal/h. Leak has reportedly been occurring for over a week. <b>[Revised June 1998]</b>
<b>Solid Waste Management</b>	Many of the facility's trash cans do not have lids. <b>[Revised June 1998]</b>	Unregulated open dumping on facility lands is occurring at an accelerating pace and project staff	Bulk solid waste is being stored in a way that is attracting vermin to vicinity, including rats. Bulk solid

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<b>Storage Tank Management</b>	UST fill pipe is not painted the correct color according to state regulations.	<p>have made no effort to deal with it. <b>[Revised June 1998]</b></p> <p>Aboveground storage tank with capacity for more than 660 gal does not have secondary containment.</p> <p>Underground storage tank does not meet Dec 1998 requirements. Facility reports they will not be able to meet the deadline and will be out of compliance. <b>[Revised June 1998]</b></p>	<p>waste is located immediately adjacent to a children's playground. <b>[Revised June 1998]</b></p> <p>Aboveground storage tank with a capacity over 660 gal is leaking and does not have secondary containment. The release from the tank is migrating to a nearby waterway. <b>[Revised June 1998]</b></p>
<b>Toxic Substances Management</b>	Inspection of the two in-service PCB transformers greater than 500 ppm PCB is performed once every 4 months instead of the required once every 3 months.	No inspections were conducted for in-service PCB transformers greater than 500 ppm PCB.	<p>PCB transformers (greater than 500 ppm) are located next to a public walkway where tours are conducted. There is evidence of leakage of PCB transformer oil on the walkway. <b>[Revised June 1998]</b></p> <p>Friable asbestos containing waste insulation is removed from pipe casings without being wetted and bagged. The wastes are disposed of via the public dumpster rather than being properly labeled, bagged, and sent to a proper landfill. <b>[Revised June 1998]</b></p>
<b>Wastewater Management</b>	Facility is meeting the monitoring and discharge limitations of its NPDES permit, but failed to send in the last quarterly report. <b>[Revised June 1998]</b>	Facility is only monitoring its effluent wastewater for three of the five constituents required in its NPDES permit. <b>[Revised June 1998]</b>	Personnel were observed washing/degreasing maintenance equipment with a pressure washer using powerful solvents and detergents over a stormwater grate. The stormwater collection system discharges directly to a creek. The resulting discharge creates an

**MINOR**

**MAJOR**

**SIGNIFICANT**

**Water Quality Management**

Sources of non-potable water are marked but are not marked with the language required.

A public drinking water system at the facility classified as a noncommunity system has not been tested quarterly for coliforms in accordance with state standards. **[Revised June 1998]**

emulsion and a sheen on the surface. **[Revised June 1998]**

A public drinking water system at the facility classified as a community system failed its most recent coliforms testing. No “Do Not Drink Water” signs were posted at the public drinking water fountains, facility personnel were not notified, and no followup tests were taken. **[Revised June 1998]**

**Management Practices**

**Management Practice:** Management practice (MP) items are organizational recommendations, not regulatory requirements. MPs may be judged as positive or negative, however, they cannot be considered deficiencies. It is important to note, however, that the term Management Practice is also used as a Reference and/or a Citation. **[Revised June 1998]**

**Positive:** Ms Schell, the ECC at ABC project, found and implemented an off-the-shelf computerized recordkeeping system. This initiative now enables project personnel to quickly retrieve all compliance data potentially needed by a regulatory inspector and also assists in meeting reporting deadlines.

**Negative:** (HW.1.2.C) The project practice of purchasing excess materials (i.e., MEK) in bulk has led to the unnecessary generation of hazardous wastes. Since bulk purchases are purchased as a lot, three, 55 gal drums of MEK were purchased for the project degreaser. According to facility records, the average consumption of solvent for the degreaser is approx. 25 - 30 gal/yr. The unused MEK has expired. The project is paying a higher cost for disposal than if they had purchased smaller quantities, used a less hazardous substitute, or utilized the services of a solvent provider/recycler.