Environmental Audit Questionnaire

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ENVIRONMENTAL AUDIT QUESTIONNAIRE

1	Facility General Information	Yes	No	N/A	Comments
1.1	Are there currently any known or suspected areas of soil contamination at the site?				
1.2	Are there currently any Underground Storage Tanks on the grounds that are unused, abandoned, or slated for removal?				
1.3	Does the facility have copies of or readily available access to current applicable regulations (Federal, State, and local)?				
2	**Document Control**	**Yes**	**No**	**N/A**	**Comments**
2.1	Are all environmental program records retained for the minimum periods specified by regulations and or company policy?				
2.2	For submission of all required reports and information to government agencies, are the following components present? ▪ A signed cover letter in standard business format, ▪ Copies made and retained of all documents as-signed and as-submitted, including the cover letter, and ▪ Use of certified mail return receipt (or an equivalent tracking mechanism).				
2.3	Is there adherence to the following recommended practices? ▪ Organized, indexed records in a central location known to key management staff, ▪ Complete labeling of each page of all paper records, ▪ Use of ink and not pencil for hand-written records, and ▪ Thorough and complete documentation of interpretations from regulatory agencies.				
3	**Facility Audit History**	**Yes**	**No**	**N/A**	**Comments**
3.1	Have there been any visits or audits during the past three years from environmental regulatory agencies (Federal, State, or local)?				
3.2	Have any fines, penalties, compliance orders, Notices of Noncompliance (NON), Notices of Violation (NOV), or other legal actions been assessed against the facility for environmental or pollution-related matters (Federal, State, or local)?				
3.3	Has the facility received complaints regarding odors, noise or other environmental concerns from nearby residents in the past three years? If Yes – Have all issues have been resolved.				
3.4	Have all items identified on previous audits been corrected?				

4	Waste Management — General	Yes	No	N/A	Comments
4.1	Is there a documented waste list that itemizes all "solid waste" generated by the facility and that characterizes each waste on the list as Hazardous, Universal or Non-Hazardous?				
4.2	Has the facility determined wastes being generated at the facility are considered hazardous wastes based upon your state regulations? Some examples will include paint wastes, some varnish wastes, paint filters, sand blast, oven ash				
4.3	Is the facility using laundered rags? If Yes – Does the State regulate launderable rags that could be classified as Hazardous Waste?				
4.4	Has the facility determined and documented whether or not the disposed/disposable rags/wipes are Hazardous Waste?				
4.5	Are aerosol cans punctured and their contents collected and managed as Hazardous Waste? If Yes – Has the facility documented whether or not the State considers the depressurizing of aerosol cans to constitute *treatment* of Hazardous Waste?				
4.6	Does the facility generate solder dross, Babbitt or other wastes that may contain lead or silver?				
4.7	Has the facility determined what kind or size of hazardous waste generator they are? For example is the facility a conditionally exempt small quantity generator, small quantity generator, large quantity generator				
4.8	If required, does the facility have a US EPA and/or State Hazardous Waste Identification Number?				
4.9	Does the facility accumulate Hazardous Wastes in satellite accumulation areas?				
4.10	Does the facility abide by the following Federal requirements for satellite accumulation? ▪ Maximum of 55 gallons of Hazardous Waste, ▪ At or near the point of generation, and ▪ Under the control of the operator of the process generating the waste.				

4.11	For all Hazardous Waste, is each container clearly marked with the words “Hazardous Waste?”				
4.12	Is the facility placing the start date on the label when the drums are moved from satellite collection areas to storage areas?				
4.13	Are all Hazardous Waste containers kept closed except when adding waste?				
4.14	Are weekly inspections conducted of all areas where Hazardous Waste containers are stored?				
4.15	Is Hazardous Waste stored in containers meeting US Department of Transportation (DOT) performance-oriented packaging standards and are those marking clearly marked on the container or drum?				
4.16	Is secondary containment provided for all liquid Hazardous Wastes?				
4.17	Are Hazardous Wastes stored on-site for less than 180 days for a small quantity generator or 90 days for a large quantity generator?				

5	Waste Manifests	Yes	No	N/A	Comments
5.1	Are Hazardous Waste manifests filled out properly and copies for the last three years available?				
5.2	Have the letters “RQ” been entered on the manifest either before or after the DOT Hazardous Material shipping description where required?				
5.3	Are manifests signed only by facility personnel who have been adequately trained to meet DOT and EPA requirements?				
5.4	Has a “Land Disposal Restriction” (LDR) notification been completed and sent to the Treatment, Storage, or Disposal Facility (TSDF) with the initial shipment of each Hazardous Waste stream? Have all “Land Disposal Restriction” notifications been retained for a period of at least three years?				
5.5	Has the required emergency response information been added to each manifest?				
5.6	Does the State require manifests on wastes that are not identified as Hazardous Waste under Federal regulations and if yes, is the facility complying with these rules?				
5.7	Are copies of the Hazardous Waste manifests signed and returned by the receiving facility and reviewed and compared with originals?				
5.8	If signed copies of Hazardous Waste manifests are not returned by the receiving facility within 35 days/45 days for a LQG or 60 days for a SQG, are the “Exception Reporting” requirements met?				

6	Universal Wastes	Yes	No	N/A	Comments
6.1	Does the State or local landfill have any restrictions or special requirements regarding the disposal of alkaline batteries? If Yes – is the facility handling them properly?				
6.2	For the following battery types when spent, are proper labeling, packaging, accumulation, disposal and record keeping provisions in place and in accordance with Hazardous Waste or Universal Waste regulations? ▪ Lithium, nickel-cadmium, button, lead-acid batteries that will not be *reclaimed*, other rechargeable batteries.				
6.3	For the following lamp types when spent, are proper labeling, packaging, accumulation, disposal and record keeping provisions in place and in accordance with Hazardous Waste or Universal Waste regulations? ▪ Fluorescent, Neon, High Intensity Discharge (HID), Metal Halide, High Pressure Sodium, & Mercury Vapor				
6.4	Has your state or regulatory authority considering used electronics as universal waste or are there other regulations governing the disposal of electronic scrap?				
6.5	Has the facility determined if the state or regulatory authority regulates any other material as universal waste?				
7	**Used Oil/Used Oil Absorbent**	**Yes**	**No**	**N/A**	**Comments**
7.1	Are all containers and tanks that hold used oil marked clearly with the words, “Used Oil?”				
7.2	Are there State or local regulations that are stricter than the Federal regulations in governing the management and disposal of used oil?				
7.3	With respect to used oil, is there any on-site burning, processing, or re-refining activities?				
7.4	Is any oil absorbent waste discarded with the trash?				
7.5	Has the facility determined and documented whether or not the waste qualifies as Hazardous Waste?				
7.6	Has the facility obtained documented permission from the landfill authority to dispose of the waste?				

8	Non-Hazardous Wastes & Special Wastes	Yes	No	N/A	Comments
8.1	Has the facility determined if the state has any special requirements for non-hazardous industrial wastes?				
8.2	Is the facility receiving adequate documentation of where nonhazardous wastes are being shipped to and in what manner it is being handled?				
8.3	For each industrial process waste that is mixed with general trash for disposal at the municipal landfill, is there documentation showing that the practice is allowed by the state and landfill authorities?				
8.4	Has the facility considered conducting audits of its hazardous and non-hazardous waste vendors, facilities of scrap metal buyers, and empty drum recyclers?				
8.5	Has secondary containment been provided for all liquid *waste* receptacles where spills could enter a floor drain or escape outdoors?				
8.6	Does the facility have in place a method of disposal of biohazard waste (blood contaminated items)				
9	**Waste Reporting**	**Yes**	**No**	**N/A**	**Comments**
9.1	If the facility is a large quantity generator was a biennial Hazardous Waste generator report for the past calendar year?				
9.2	Is the facility required to file any State or local Hazardous Waste generator reports?				

10	Emergency Preparedness For Hazardous Waste	Yes	No	N/A	Comments
10.1	Are the following provisions available for emergency preparedness and prevention? ▪ Spill clean-up materials. ▪ Portable ABC fire extinguishers. ▪ Adequate aisle space (for access to containers of Hazardous Waste).				
10.2	Has the facility made, or attempted to make: ▪ Arrangements to familiarize police, fire, and emergency response teams with the facility and its Hazardous Waste operations. ▪ Agreements with emergency response contractors as appropriate.				
10.3	If the facility is large quantity generator has a written Hazardous Waste Contingency Plan been prepared?				
10.4	Has the facility submitted a copy of the Hazardous Waste Contingency Plan and all revisions to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services? (LQG rule)				
10.5	Has the Hazardous Waste Contingency Plan been implemented and the proper training conducted and documented?				
10.6	If the facility is a Small Quantity Generator of Hazardous Waste, has the following emergency response information been posted “by the telephone?” ▪ The name and telephone number of the Emergency Coordinator; ▪ Location of fire extinguishers and spill control material, and, if present, fire alarm; and ▪ The telephone number of the fire department, unless the facility has a direct alarm.				
10.7	Are “salvage drums” (overpack containers) kept in inventory in case of leaking drums?				

11	Shipment of Hazardous Wastes and Hazardous Materials	Yes	No	N/A	Comments
11.1	Are all containers of Hazardous Waste and DOT Hazardous Materials labeled and marked before shipping in accordance with DOT or other regulatory requirements?				
11.2	Are placards available on-site for Hazardous Materials being shipped from the facility, and are the placards offered to the transporter at the time of pickup of the materials?				
11.3	Does the facility maintain a current copy of the "Hazardous Materials Certificate of Registration" for the company if required?				
11.4	Does the facility offer Hazardous Materials for transportation in amounts that require placarding? If Yes – Does the facility have a security plan in place?				
12	**Waste Minimization**	**Yes**	**No**	**N/A**	**Comments**
12.1	Does the facility have a documented waste minimization program? Note – required for a large quantity generator, recommended for a small quantity generator				

13	Water Discharge Permits	Yes	No	N/A	Comments
13.1	Does the facility discharge *any water of any sort* to the outside (including cooling water, wash water, process water, compressor condensate, wastewater, etc.) or to surface water run-off vectors including a ditch, storm sewer, river, groundwater, etc.? If yes has an NPDES permit been obtained from Federal/State authorities? If NO – Has the facility verified and documented the exemption?				
13.2	Does the facility have any processes subject to industrial *point source categorical standard* for discharge either to surface water or to a municipal sanitary sewer? If yes - Does the facility meet industrial point source categorical standards for processes subject to such standards?				
13.3	Does the facility discharge industrial process wastewater or cooling water to a municipal sanitary sewer and Publicly Owned Treatment Works (POTW)?				
13.4	Is the facility required to have a discharge permit? If NO – Has the facility verified and documented the exemption? .				
13.5	If the facility is required to have a permit are all the conditions of the permit clearly understood and complied with by the facility?				
13.6	If the facility is not required to have a discharge permit does the facility have a copy of the local Sewer Use Ordinance, and is the facility compliant with all the requirements?				

14	Storm Water	Yes	No	N/A	Comments
14.1	Has the facility been exempted by SIC code from potential regulation by Federal storm water regulations? Note: Most EASA service centers will be exempt from stormwater requirements if they are not listed as a manufacturer by SIC code.				
14.2	Are there any State or local requirements for storm water permitting or storm water protection that exceed Federal requirements? If Yes – if yes, is the facility compliant with those regulations?				
14.3	Is there any potential for oil to be discharged outside, such as via condensate from either an air compressor or an HVAC unit that's located in an area with a lot of oil or coolant mist in the air.				
14.4	Is the facility required to or has the facility obtained a storm water discharge permit?				
14.5	Are all permit conditions being met? ▪ Sampling and analysis ▪ Reporting ▪ Emissions limitations ▪ Storm Water Pollution Prevention (SWPP) Plan ▪ Filing the SWPP Plan with the permitting agency ▪ Other permit requirements				
14.6	Are all requirements of the SWPP Plan being met, including: ▪ Training ▪ Team development ▪ Annual review ▪ Other				

15	Spill Prevention and Reporting	Yes	No	N/A	Comments
15.1	Does the facility have a written spill and accidental release reporting procedure? If Yes – Does the procedure provide for notification of outside governmental agencies when such a spill requires such notification?				
15.2	Have management personnel been trained in when and how to report a spill to an outside agency?				
15.3	Has secondary containment been provided for all containers and tanks that hold liquids other than straight water when the likelihood exists that spills or leaks could make their way to the environment or to the outside?				
15.4	Does the facility maintain an adequate supply of spill response and cleanup materials and are they inspected regularly to assure they are maintained?				

16	Spill Prevention Control and Countermeasure (SPCC) Plan	Yes	No	N/A	Comments
16.1	Does the facility store, or have the potential to store, a total of 1320 gallons of oil in above ground containers or equipment reservoirs whose individual volumes are 55 gallons or greater? If Yes – Does the facility have a written SPCC plan?				
16.2	Has the SPCC Plan been reviewed, approved, and signed by the owner or top manager?				
16.3	Does the SPCC Plan contain a "Certification of the Applicability of the Substantial Harm Criteria"?				
16.4	Does the SPCC Plan meet the requirements of 40 CFR 112.7 & 112.8? Note: If the facility is unsure of these requirements, it is recommended that an environmental professional audit your current plan for compliance.				
16.5	Has the Plan been reviewed at the five year anniversary of either its creation or the last required review date, and has the review been documented in the manner prescribed by SPCC rules?				
16.6	Have all "oil handling personnel" been trained annually, as required, in the following topics? ▪ The operation and maintenance of equipment to prevent discharges ▪ Discharge procedure protocols ▪ Applicable pollution control laws, rules, and regulations ▪ General facility operations ▪ The contents of the SPCC Plan				

17	New Chemical Acquisition	Yes	No	N/A	Comments
17.1	Does the Environmental Coordinator review and approve the usage of all new chemicals to establish the environmental impact of the facility?				
17.2	Are affected personnel trained to know that the Environmental Coordinator must approve the use of new chemicals, and is the training documented?				
18	**Polychlorinated Biphenyls (PCBs)**	**Yes**	**No**	**N/A**	**Comments**
18.1	Has a survey been done to ascertain whether or not the facility has any: ▪ Oil-filled transformers, capacitors, circuit breakers, rectifiers, voltage regulators, switches, or other oil-containing electrical equipment. If Yes – Was the survey documented?				
18.2	Has the PCB content been established and documented for all oil-filled electrical equipment and specialized hydraulic or heat-transfer systems by either: ▪ Testing, ▪ Documentation from the equipment manufacturer, or ▪ Applying the assumptions found at 40 CFR 761.2?				
18.3	Are there oil-filled transformers on site that are not property of the company? If Yes – Have they been tested or has the owner provided other information as to their PCB status?				
18.4	Does the facility have any fluorescent light ballasts that were manufactured prior to July 2, 1979? If Yes – ▪ Are the ballasts screened for PCB content prior to disposal, and ▪ Have the personnel responsible for screening been trained in the screening method and has the training been documented?				
18.5	Is all equipment reviewed for potential PCB-containing items prior to scrapping?				
18.6	Is there a list of all equipment and materials at the facility that require PCB marking per regulatory requirements?				
18.7	Does the facility ever work on any equipment that may have PCBs? If yes, then a PCB audit should be conducted.				

19	Asbestos	Yes	No	N/A	Comments
19.1	Are there any plans for demolition and/or renovation at the facility in the foreseeable future? If Yes – 1. All suspect materials must be tested by a certified inspector for asbestos prior to demolition, including all roofing and vinyl flooring materials, and 2. If asbestos is found, the facility must hire an asbestos abatement professional to ensure that the management of the asbestos containing material complies with all requirements and regulations.				
19.2	If the facility was built prior to 1981, has a certified inspector conducted a documented survey for asbestos containing material (ACM)? If NO – Are the following materials treated as presumed asbestos containing material (PACM)? ▪ Thermal system insulation ▪ Sprayed on and troweled-on surfacing materials ▪ Asphalt and vinyl flooring and associated mastic				
19.3	Is there ACM or PACM at the facility? If Yes – Are records maintained that show the presence, location, and quantity of ACM and PACM at the facility?				
19.4	Does the facility have a designated Asbestos Coordinator?				
19.5	Has the Asbestos Coordinator been trained to the AHERA Awareness (Class IV) level, which is detailed at 29 CFR 1926.1101 (k)(9)(vi)?				
19.6	Does the facility have a written Operations and Maintenance (O&M) Plan? If Yes – Have all requirements of the plan been fulfilled, and is there documentation to prove it?				
19.7	Is all ACM and PACM properly identified with labels that say, “Danger, Contains Asbestos Fibers, Avoid Creating Dust, Cancer and Lung Disease Hazard”?				
19.8	Do all asbestos contractors conduct their work in accordance with all regulations and the company Procedures?				

19.9	Is any company employee handling, treating, removing, or disturbing ACM or PACM (i.e. ?				
19.10	Does the facility have a written employee training program, including training records?				
19.11	Are all affected persons trained on an annual basis, and is the training documented?				
19.12	Have all building occupants (employees, contractors, etc.) been informed of the presence of ACM and PACM in the building, and has the communication been documented?				
19.13	Have housekeeping personnel been informed of the presence of ACM and PACM in the building, and has the communication been documented?				
19.14	Are housekeeping activities conducted in an area which contains ACM or PACM? If Yes – Have all housekeeping personnel been instructed in the health effects of asbestos, locations of ACM and PACM, how to recognize ACM/PACM damage or deterioration, and proper housekeeping procedures such as those located at 29 CFR 1910.1001 (k)(7) for the care of asbestos-containing flooring material?				
20	**Underground Storage Tanks (USTs)**	**Yes**	**No**	**N/A**	**Comments**
20.1	Does the facility have any on-site underground storage tanks (USTs)—including non-Federally regulated oil tanks, flow through process tanks, or machine pits?				
20.2	Have any USTs have been removed from the facility? If YES – Has all proper closure documentation been completed, including updates of registration?				
20.3	Have registrations been filed for all USTs that are required to be registered?				
20.4	Do the tanks meet the EPA-mandated performance standard for: ▪ Leak detection, ▪ Corrosion protection, and ▪ Spill/overfill protection?				
20.5	Is there a removal schedule for any remaining USTs? If NO – Is there justification for the continued existence of USTs?				

21	Air Emissions	Yes	No	N/A	Comments
21.1	Does the facility have the potential to emit, prior to any pollution controls (afterburners, filters etc.): ▪ 10 tons per year (TPY) of any one Hazardous Air Pollutant (HAP), ▪ 25 TPY of a combination of HAPs, or ▪ 100 TPY of any regulated air pollutant?				
21.2	Does the facility have any visible emissions other than steam? If Yes – Check permitting for your state or regulatory agency				
21.3	Has the facility applied for and received the proper permits for all sources that require a permit? If No – Has the facility documented that its ovens, varnish tanks, paint systems are not required to be permitted by the regulatory agency?				
21.4	If no permits are required has the facility determined if air regulations still exist even for non-permitted sources?				
21.5	Are the specific and general conditions of all permits being met? Including requirements for: ▪ Emission limits ▪ Testing ▪ Record keeping ▪ Reporting ▪ Air pollution episode plans ▪ Malfunction, abatement, or preventive maintenance programs for air pollution control equipment				
21.6	Are there any non-permit or other requirements placed upon the facility, such as might be mandated to maintain a permit exemption? Including: ▪ Emissions limitations ▪ Operational requirements, such as: 1. Filters on paint booths 2. Minimum temperature requirements for afterburners				
21.7	Are there any air pollution control devices at the facility? If Yes – Is there a documented preventive maintenance program for all air pollution control equipment?				

22	Risk Management Plan (RMP)	Yes	No	N/A	Comments
22.1	Does the facility store any air toxic or flammable chemical listed at 40 CFR 68.130 in a quantity above the associated Threshold Quantity? If Yes – Has the facility: ▪ Registered with the EPA; ▪ Developed and submitted an RMP; ▪ Held a public meeting where applicable; and ▪ Submitted an updated/revised RMP when required, including within 5 years of the first submission?				
23	**Employee Training**	**Yes**	**No**	**N/A**	**Comments**
23.1	Does the facility have a written training plan for environmental training that: ▪ Specifies, by job title, training requirements and frequencies; and ▪ Covers all regulatory and company requirements?				
23.2	Do training records include: the employee's name, job title/function, date of training, title of the training session, signature of the employee, name of the trainer, and an outline of the training? If Yes – ▪ Are training outlines detailed enough to show all significant training points, and ▪ Does training documentation clearly specify which training outlines and materials are used with which training sessions?				
23.3	Has Environmental Awareness training been provided for all employees that details general environmental requirements and liabilities, and has the training been documented?				
23.4	Has training been provided for all new or reassigned employees—at the time of hire or reassignment—in all required training sessions?				
23.5	Has training been given to all employees who handle, manage, or generate Hazardous Waste and/or Non-Hazardous Wastes?				

23.6	If the facility is a Large Quantity Generator has the following been documented—by job title—for all personnel involved with the handling or management of Hazardous Waste? (LQG rule) ▪ List of Hazardous Waste duties/responsibilities. ▪ A description of the amount and type of introductory and continuing training in Hazardous Waste management. ▪ Listing of all personnel filling each job title.				
23.7	Are there people at the facility who are considered DOT HazMat Employees by virtue of their being involved in DOT's "cycle of transportation" of Hazardous Materials? In other words, does anyone: ▪ Transport Hazardous Materials over the highway, ▪ Unload Hazardous Materials from a transportation vehicle, ▪ Prepare Hazardous Materials (i.e., varnish samples, hazardous waste) or associated paperwork for shipment, or ▪ Load Hazardous Materials onto a transportation vehicle?				
23.8	Are all HazMat Employees trained once every three years, and is the training documented, a written test given, and taught by a qualified instructor?				
23.9	Is the facility required to have a security plan for DOT Hazardous Materials? If Yes – Has training on the security plan been provided to all HazMat Employees, and does the training conform to regulatory requirements?				
23.10	Are there permit specific training requirements at the facility for any air, water, or waste permits and if so has such training been completed and documented?				
23.11	Are contractors trained to know that waste(s) may not be discarded at the facility without the express and specific approval of the site's Environmental Coordinator?				

24	Ozone Depleting Substances (ODS)	Yes	No	N/A	Comments
24.1	Does the facility have any refrigeration equipment, including chillers, air conditioners, or HVAC units?				
24.2	Do facility employees perform maintenance/repair work on refrigeration equipment? If Yes – Are the employees EPA certified and does the facility have a copy of each technician's certification?				
24.3	Do contractors perform maintenance/repair work on refrigeration equipment? If Yes – Are the contractors EPA certified?				
24.4	Does any of the refrigeration equipment contain a circuit with more than 50 pounds of a refrigerant consisting in whole or in part of a Class I or Class II ODS? If Yes – Does the facility have a documented leak repair and monitoring program in compliance with regulatory requirements?				
24.5	Are there any containers of Class I or Class II ODSs at the facility? If Yes – Are the containers labeled in accordance with regulatory requirements?				
25	**Emergency Planning for Extremely Hazardous Substances**	**Yes**	**No**	**N/A**	**Comments**
25.1	Does the facility have any Extremely Hazardous Substances (EHS) in excess of the Threshold Planning Quantities (TPQ) (i.e., sulfuric acid in electric forklift batteries)?				
25.2	If yes above, has notification to the State Emergency Response Commission been made?				
25.3	If yes above has an Emergency Coordinator been designated and their identity given to the Local Emergency Planning Committee?				

26	Chemical Inventory Reporting	Yes	No	N/A	Comments
26.1	At any one time during the previous calendar year, did the facility store either of the following? ▪ Any hazardous chemical for which an SDS is required, in an amount equal to or greater than 10,000 lbs.; or ▪ Any Extremely Hazardous Substance in an amount equal to or greater than its Threshold Planning Quantity, 500 lbs., or 55 gals., whichever is lower.				
26.2	Has an SDS (or alternative list) been sent to the following agencies for each chemical that exceeds the thresholds indicated in the previous question—within three months of either: (1) first using the chemical, or (2) discovery of significant new information concerning the chemical? ▪ Local Emergency Planning Committee ▪ State Emergency Response Commission ▪ Local Fire Department				
26.3	Was an Emergency and Hazardous Chemical Inventory Form (“Tier I” or “Tier II” report) submitted in any of the past three years?				
26.4	Does the State have any requirements for reporting that are more stringent than the Federal regulations?				
26.5	Does the facility have 10 or more full time employees, and is the facility classified in SIC codes 2000-3900? If NO to either one – Audit questionnaire completed.				
26.6	If yes to the above question, are there any Toxic Chemicals listed in 40 CFR Part 372 that were *processed*, *manufactured*, or *otherwise used* at the facility in excess of applicable threshold values? If NO – Document exemption and stop. Audit questionnaire completed.				
26.7	Was a Form “R" submitted in any of the past three years?				