

# What to Expect... When You're Inspected!

Preparing for a Hazardous Waste  
Inspection



- **Presented by:**

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# RESOURCE CONSERVATION RECOVERY ACT (RCRA)

With the passage of RCRA in 1976, Congress recognized the need to manage solid and HW in an environmentally sound manner. To achieve this goal, three programs exist under RCRA:

1. Subtitle D - Solid Waste
2. Subtitle C - Hazardous Waste
3. Subtitle I - UST



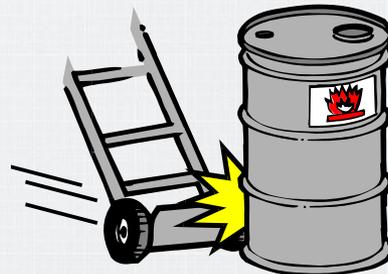
# RCRA SUBTITLE C HAZARDOUS WASTE PROGRAM

- Objective is to ensure that HW is handled in a manner that protects human health and the environment
- Subtitle C regulations apply to the generation, transportation, treatment, storage and disposal of HW



# STATES HAZARDOUS WASTE AUTHORIZATION

- States receive authorization from the EPA to implement RCRA HW programs
- State's HW management program must be no less stringent than EPA's



# WHY ARE YOU BEING INSPECTED?

- To evaluate a facility's compliance with hazardous waste regulations
- States are required to inspect a certain number of TSDs, LQGs and SQGs each year
- Investigation of a Complaint
- Respond to Releases



# 2015 INSPECTIONS

	Number of Generators	Inspected by the State	Inspected by EPA
Number of Generators in TN	3,505	593	16
Number of Generators in EPA Region 4	61,258	6,253	157



# CONDITIONALLY EXEMPT SMALL QUANTITY GENERATORS (CESQGs)

Generates less than 100 kg (220 lbs.)  
HW in a month

And

Accumulates less than 1000 kg (2,200 lbs.)  
HW on-site at any time



# SMALL QUANTITY GENERATORS (SQGs)

Generates greater than 100 kg (220 lbs.) and  
less than 1000 kg (2,200 lbs.)

HW in a month

OR

Accumulates greater than 1000 kg (2,200  
lbs.) but less than 6000 kg (13,200 lbs.)

HW at any time



# LARGE QUANTITY GENERATORS (LQGs)

Generates greater than or equal to 1000 kg  
(2,200 lbs.) HW in a month

OR

Generates greater than 1 kg (2.2 lbs.) of  
Acute HW in a month

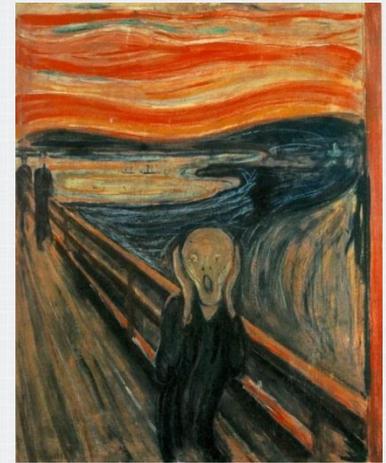
# TREATMENT STORAGE AND DISPOSAL FACILITIES (TSDFs)

- A Treatment, Storage, and/or Disposal Facility is defined as all contiguous land, and structures, other appurtenances, and improvement on the land, used for treatment, storing, or disposing of hazardous waste or for managing hazardous secondary material prior to reclamation.
- A Facility would either have a RCRA Permit or be governed by RCRA Interim Status for one or more units at the facility

# THE INSPECTORS ARRIVE

## They will:

- Be unannounced
- Present State/EPA credentials
- Request the facility contact person
- Have personal protection equipment
- Have a camera
- Take notes
- Request an area at the facility for an introductory meeting and record review



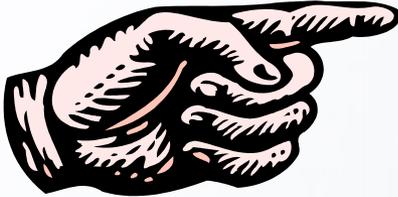
# THE INTRODUCTORY MEETING

## The Inspectors might ask:

- How many employees work here?
- What is the facility's purpose?
- What is the manufacturing process?
- How are wastes generated?
- Where are your wastes stored?
- What is your HW generator classification?
- Do you have any used oil or universal wastes onsite?



# USEFUL TIPS



- Designate a contact person at the facility
- Be aware of your HW generator status
- Be aware of areas at the facility where waste accumulates and is stored

# THE FACILITY WALKTHROUGH

## The Inspectors will examine:

- Areas where wastes are accumulating (Satellite Accumulation Areas)
- 90 and 180-day storage areas for HW
- Permitted activities
- Laboratories and Maintenance Shops
- Used oil accumulation and storage areas
- Universal waste storage areas – e.g., fluorescent lamps and batteries

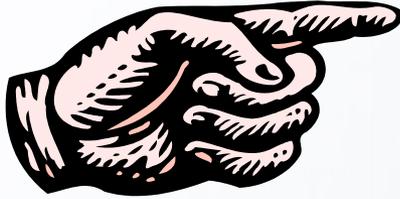


# THE FACILITY WALKTHROUGH

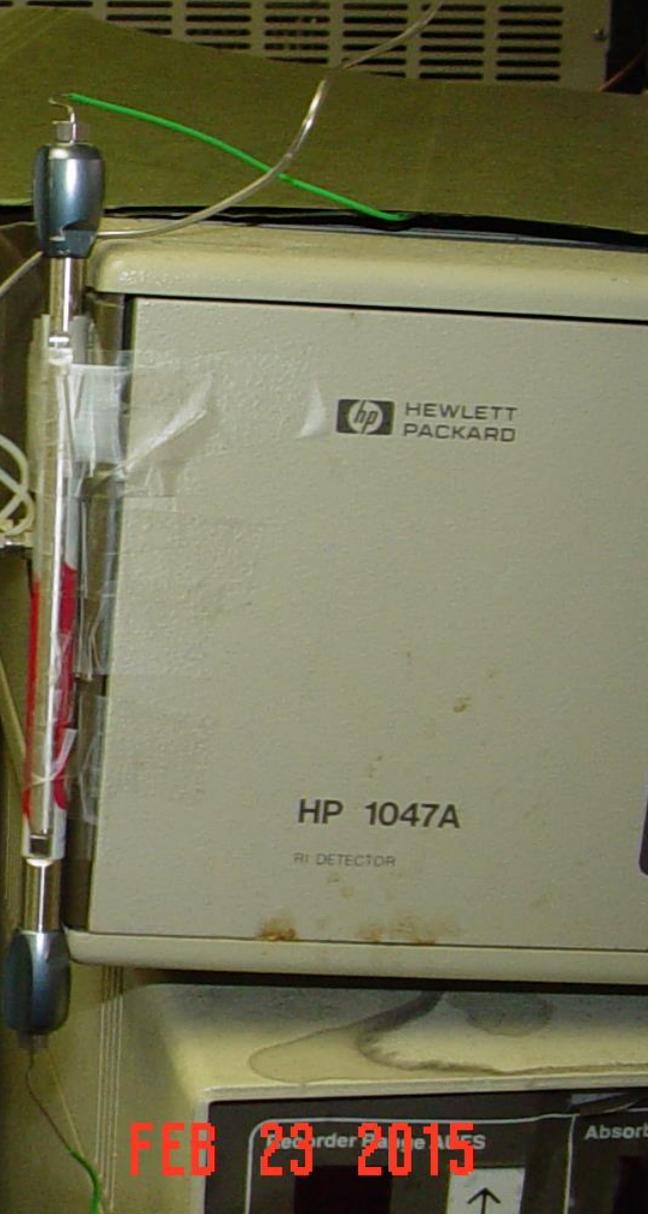
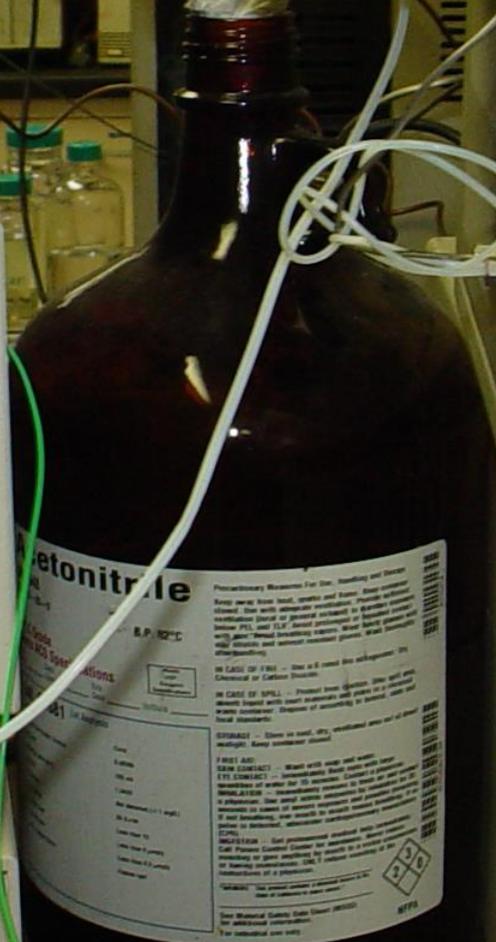
## The Inspectors will:

- Follow the manufacturing process
- Examine labeling and dating on containers
- Examine the condition of containers
- Request information regarding container contents
- Examine spills and stains
- Walk around the outside of the facility
- Take photos to document conditions

# USEFUL TIPS



- Stay with the inspector at all times
- A map of the facility can be a useful reference
- Keep product and waste containers separated
- If a violation is observed, try to address it during the inspection



FEB 29 2015



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PHILIPS

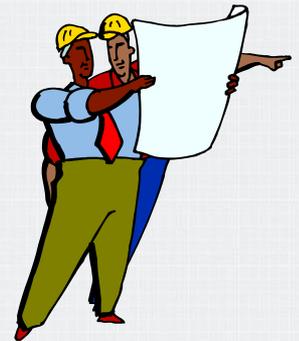


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# THE RECORD REVIEW

## The Inspectors will examine:

- Hazardous waste manifests and shipping documentation for universal waste and used oil
- Inspection logs of HW storage areas
- Facility contingency plan or posting of emergency contact information

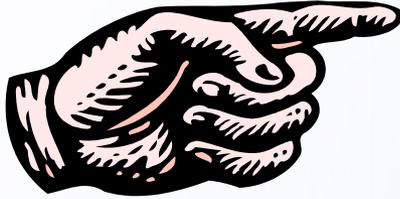


# THE RECORD REVIEW

## The Inspectors will examine:

- Personnel training
- Hazardous Waste Reduction Plan
- Hazardous Waste Reports (from Biennial to Quarterly depending on which state your facility resides in)

# USEFUL TIPS



- Maintain easily accessible HW records for three years
- Be aware of generator status for previous three years
- Inspectors may request copies of HW records
- Organization may get you a Gold Star



# THE EXIT MEETING

## The Inspectors will:

- Summarize what was observed during the inspection
- Discuss any violations observed or other issues
- Discuss any outstanding request for information
- Answer any questions



# INSPECTION RESULTS

The results of the inspection generally conclude in one of three scenarios:

1. The inspection team toured the facility and did not note any violations
2. There were some violations noted and a quick response should bring them back into compliance
3. The violations were more serious and warrant a referral to enforcement

# THE INSPECTION REPORT

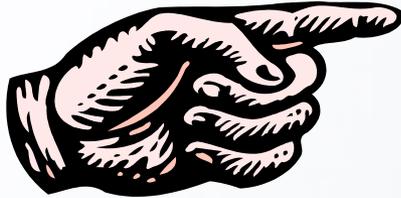
- A report of inspection findings will usually be completed within 60 days
- The report will reflect identified violations/concerns
- Any unresolved violations will require a response within 30 days
- EPA and State correspondence is accessible to the public

# ENFORCEMENT PROCESS

## Facility Response to State/EPA letter

- The inspector will review the facility's response to determine if all violations have been addressed
- An unannounced follow-up site visit may be conducted to verify compliance
- Once all violations have been addressed, the facility receives a Return-to-Compliance letter

# USEFUL TIPS



- Photos can be used to document corrected violations
- If a violation cited was paperwork-related, provide a copy of the document that demonstrates compliance
- If unsure how to correct a violation, contact the inspector for guidance

# ENFORCEMENT PROCESS

**A facility may be referred for Enforcement by the inspector if:**

1. Violations could potentially cause harm to human health and/or the environment
2. Violations are not corrected
3. Violations substantially deviate from regulatory requirements

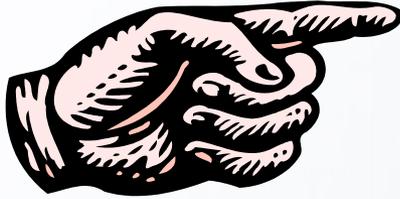


# ENFORCEMENT PROCESS

The Enforcement Section will review the information submitted by the inspector and determine the appropriate course of action



# USEFUL TIPS



- If you have questions during or after an inspection - ask
- Feel free to contact State Agency or EPA personnel for regulatory guidance - anytime

To locate an  
Environmental Field Office  
in your area:

**1-888-891-TDEC (8332)**

**<http://tennessee.gov/environment>**

Or to Contact the Federal EPA:

**<https://www.epa.gov/aboutepa/about-epa-region-4-southeast>**



# ANY QUESTIONS

