

Surviving compliance inspections

aka the “mock inspection” presentation



Why do Inspections?



- ❖ To protect our environment and promote wise management of our air, land, and water
- ❖ To learn “what is happening out there”
- ❖ To help you prevent pollution
- ❖ To make sure Washington is meeting federal requirements

Why pick your facility?

- ❖ Facility with active RCRA site ID
- ❖ Scheduled
- ❖ Size/Generator Status
- ❖ Past History
- ❖ Complaints
- ❖ Referrals



What will we inspect?

❖ Records

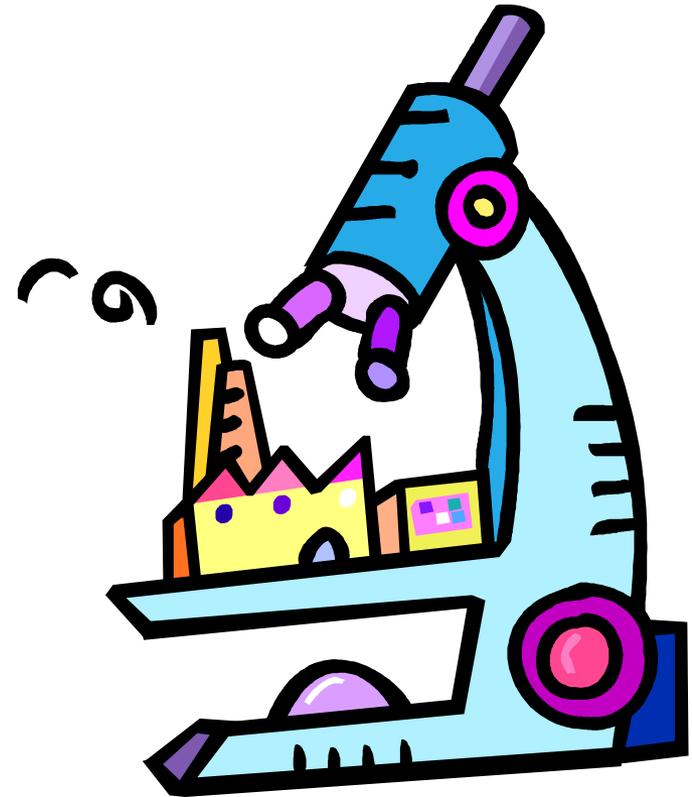
- Manifests
- Trainings
- Inspections
- Disposal and Discharge

❖ Production areas

❖ Accumulation areas

- Main and satellite

❖ “Bone Yards”



What Else To Expect?



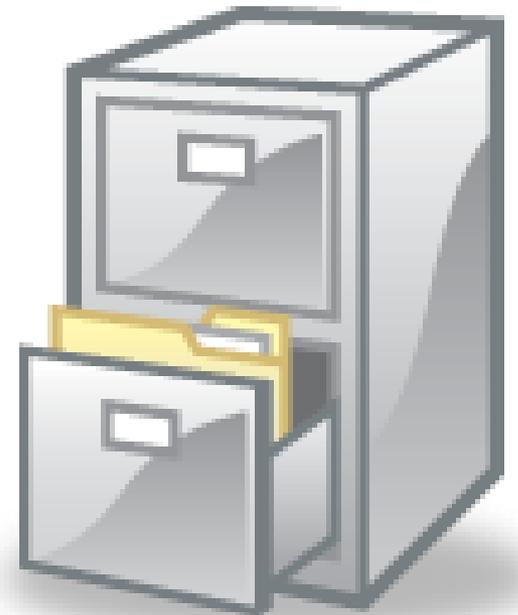
- ❖ Unannounced – no advance warning
- ❖ Legal authority to inspect during normal business hours
- ❖ ~ 2-3 hours long
- ❖ Inspector won't postpone – should at least be shown around site

Step one

- ❖ Inspector introduces her or himself
- ❖ Meets with site contact
 - Explains purpose of visit
 - Introduces backup/photographer
 - Clarifies purpose of photographs



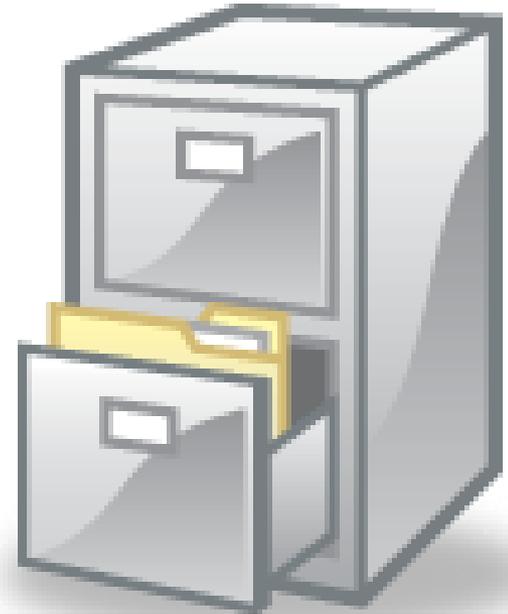
Records Review



Records Review – LQG

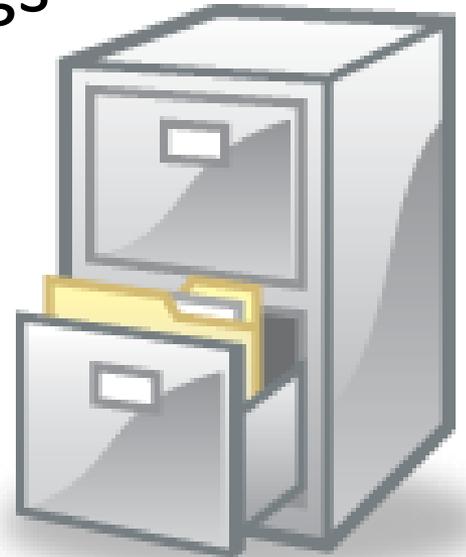
❖ Large Quantity Generators should have:

- Contingency Plan
- Weekly Inspections
- General Inspection Checklists
- Training Plans
- Manifests w/LDRs
- Designation Information
- TBG, Distillation, and Recycling Logs
- Other Disposal Information
- Discharge Information



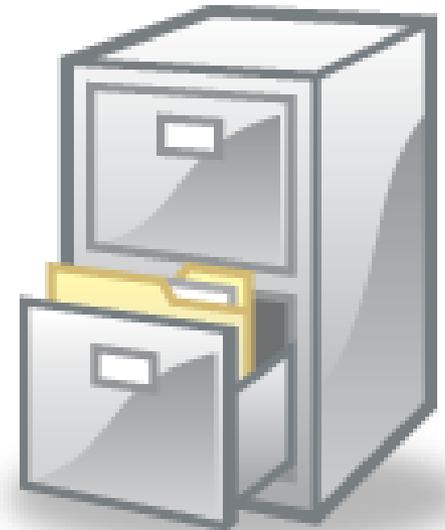
Records Review – MQG

- ❖ Medium Quantity Generators should have:
 - Designation records
 - Manifests with LDRs
 - Weekly inspection checklists
 - General inspections checklists
 - TBG, distillation and recycling logs
 - Other disposal information
 - Discharge Information



Records Review – SQG

- ❖ Small Quantity Generators are not required to have these records, but...
- ❖ Inspector may ask about:
 - Manifests
 - Types of training the employees get
 - Designation paperwork
 - Discharge authorizations



Common Problems – Manifests

❖ Top 3 problems

- Missing signatures, especially from receiving facility
- Not recorded on annual dangerous waste report
- Not on file at facility



Common Problems – Weekly and General Inspections

- ❖ Not doing inspections at all
- ❖ Missing weeks or months
- ❖ No list of what to inspect, or list incomplete
- ❖ Missing date
- ❖ Unsigned
- ❖ Problems not corrected
- ❖ Correction not recorded



Sample checklists in Attachments folder

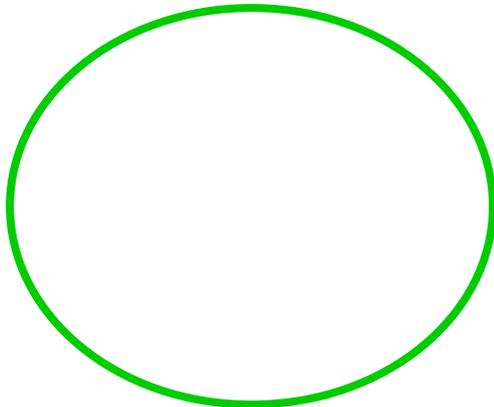
Common Problems – Plans

- ❖ Missing Training and Contingency Plans
- ❖ Not updated or reviewed to reflect changes to employees, processes, equipment, and wastes
- ❖ Too many pieces; kept by various people
- ❖ Don't meet the requirements



Good, Bad, and Ugly

- ❖ The next images are from real-life inspections – before and after.
- ❖ Look for “what’s wrong” and “what’s right.”
- ❖ The after image shows red boxes around what’s wrong and green circles around what’s right.

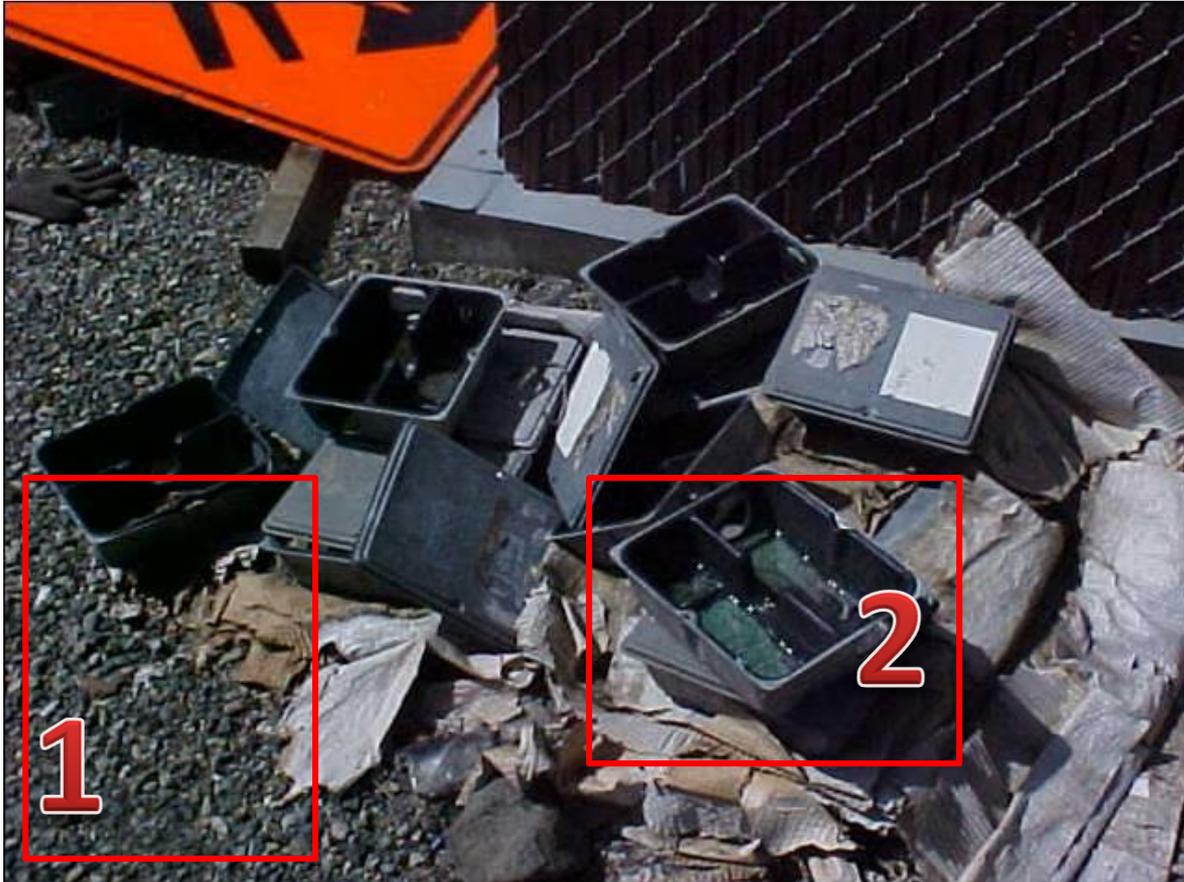


What do you see?



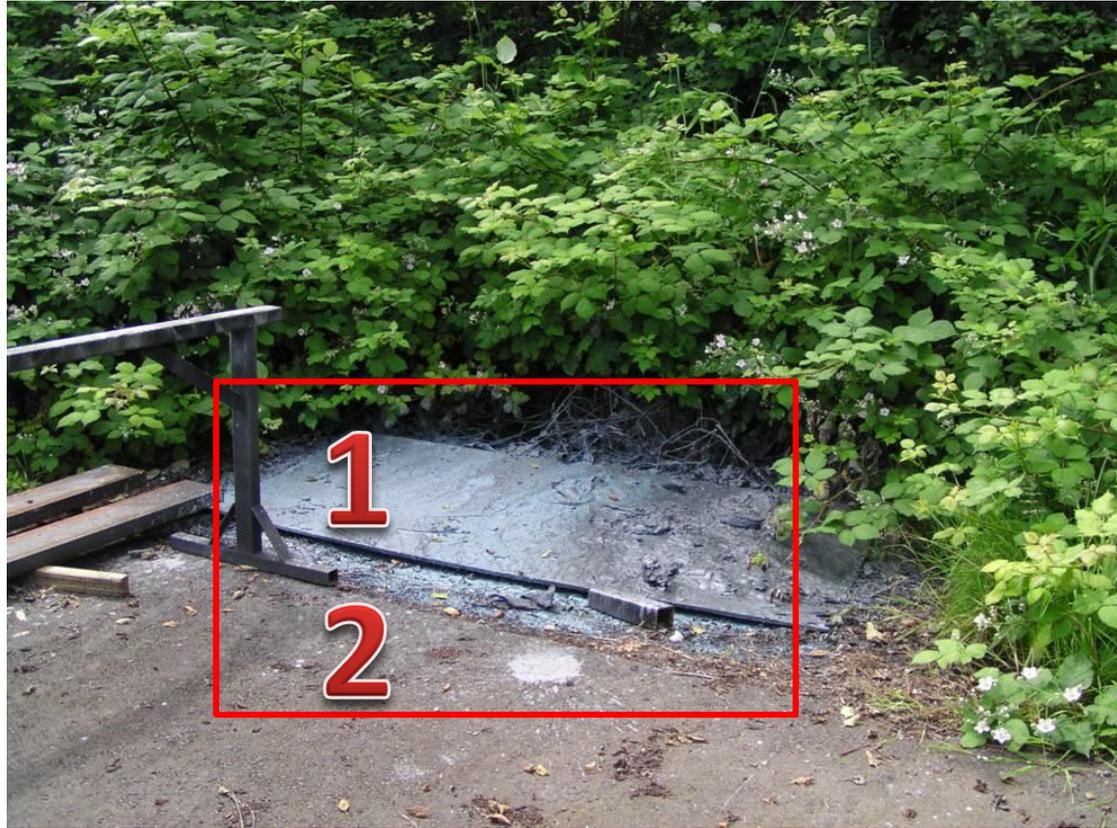
Rat traps!

Warfarin or strychnine



1. On gravel; no secondary containment
2. Broken open, allowing water to collect

Painting Before



1. Illegal disposal of paint to ground.
2. Typically only spot painting is allowed outside.

Painting After

1. Covered area for waste paint
2. Closed funnel
3. Secondary containment
4. No emergency communications
5. No risk labeling on containers

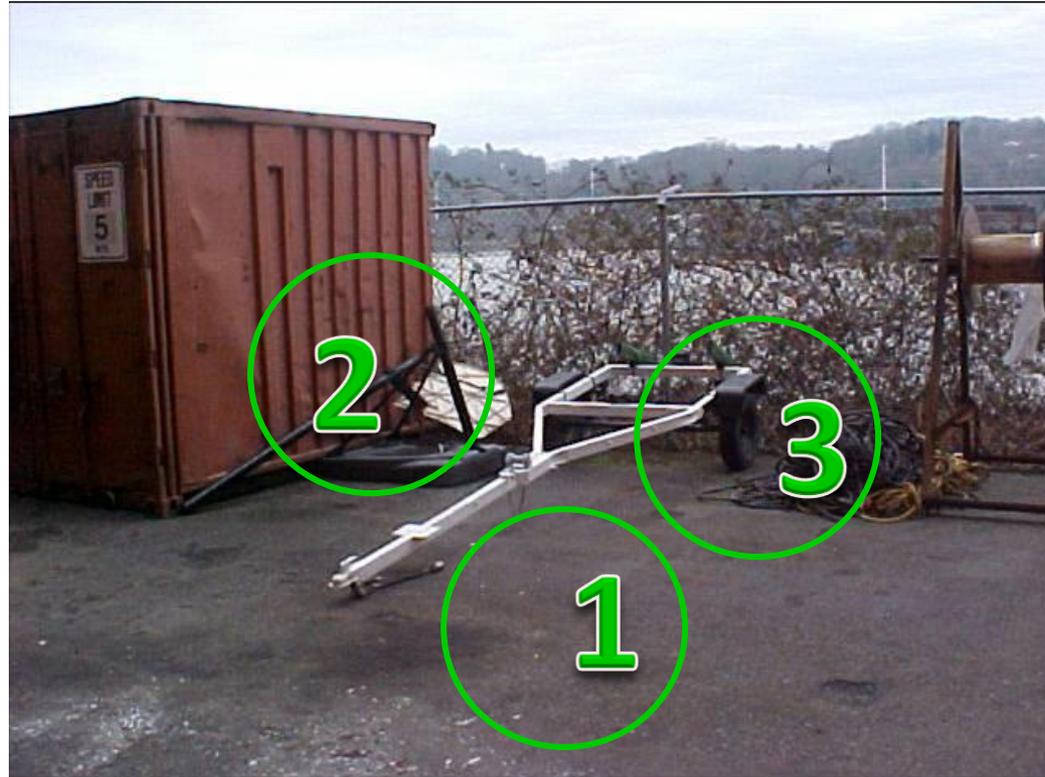


“Bone Yard” Before



1. Open fuel tank with water-contaminated fuel
2. Cylinders – empty or full? Tall one needs to be chained
3. Mystery blue drum
4. Junk may conceal more problems

Boneyard After

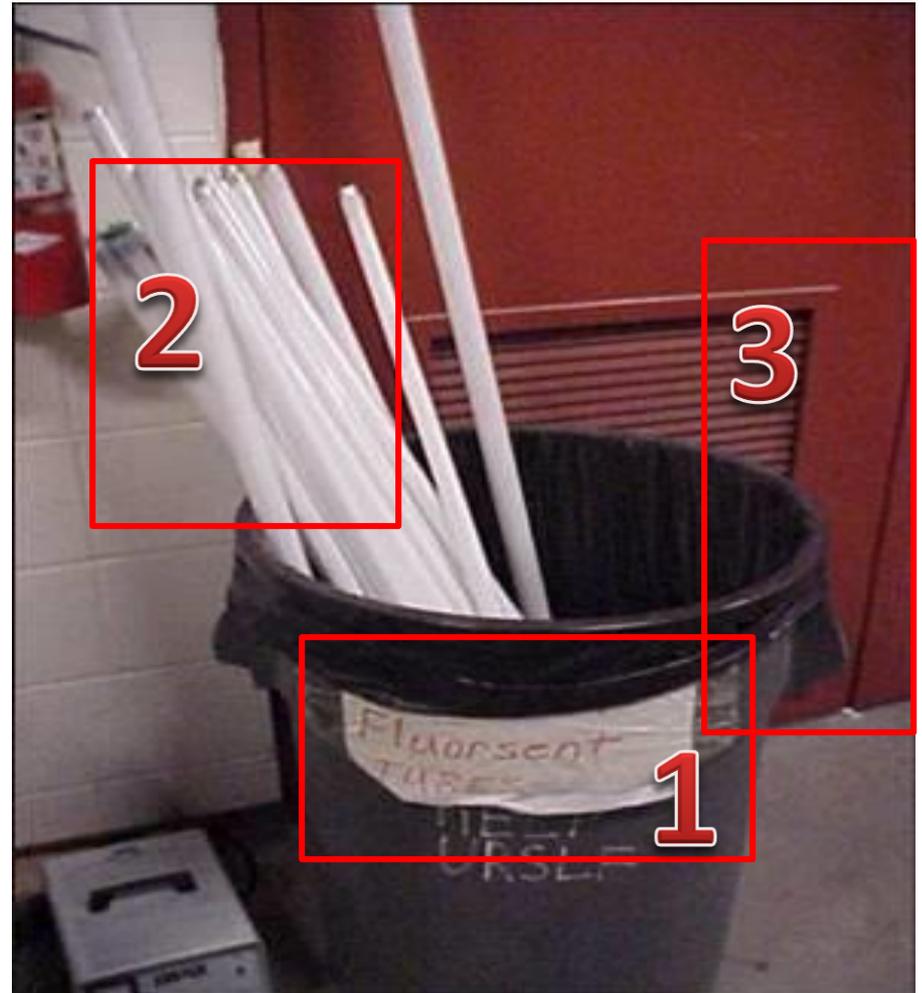


1. All the junk is gone – inspector may ask to see the records showing how the waste was disposed.
2. Found a basketball hoop!
3. Found a space to park the boat trailer.

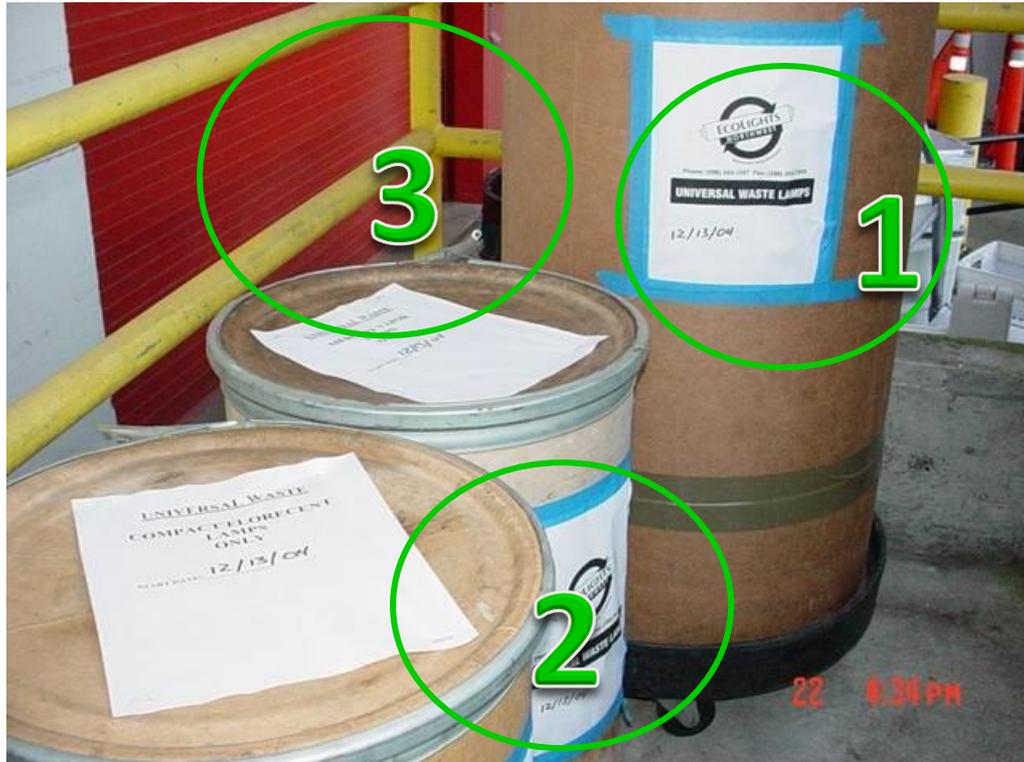
Lamp Recycling Before

1. Wrong label, and no date
2. and 3. Lamps not protected – and door swings toward barrel

How long does a generator have to get rid of a lamp?



Lamp Recycling After



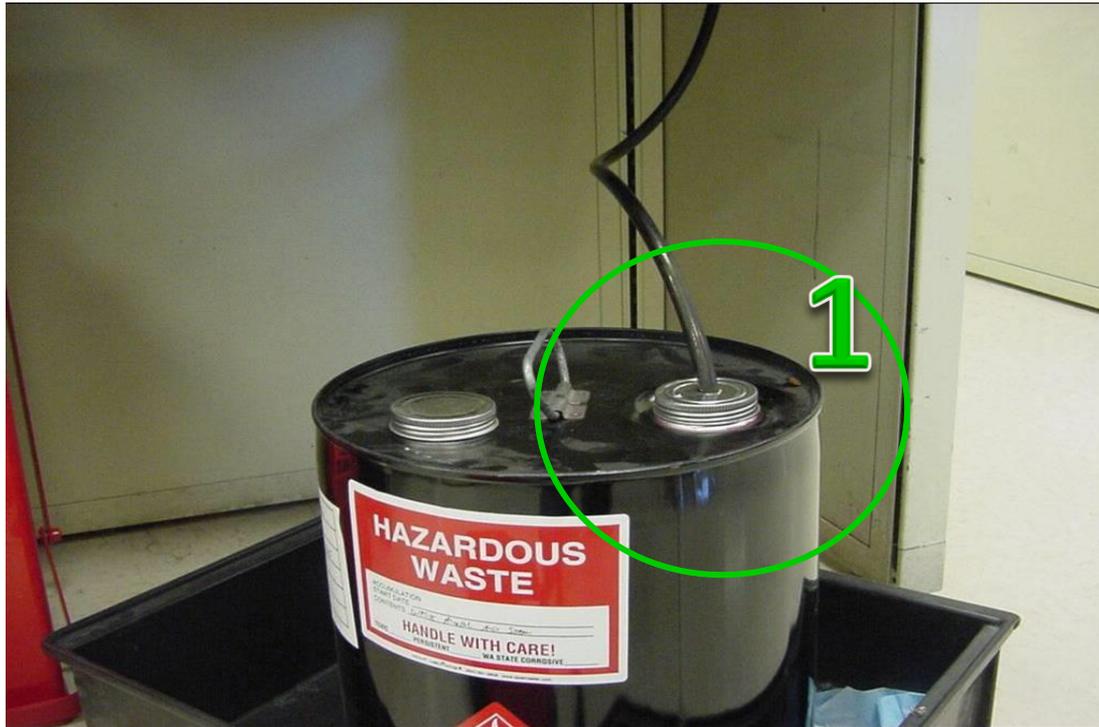
1. Correct labels – uses word “lamps” and date
 2. Protective containers – waste vendors sell them
 3. Protected location
- You can keep lamps onsite for one year.

Lab Waste Before Satellite Accumulation Area



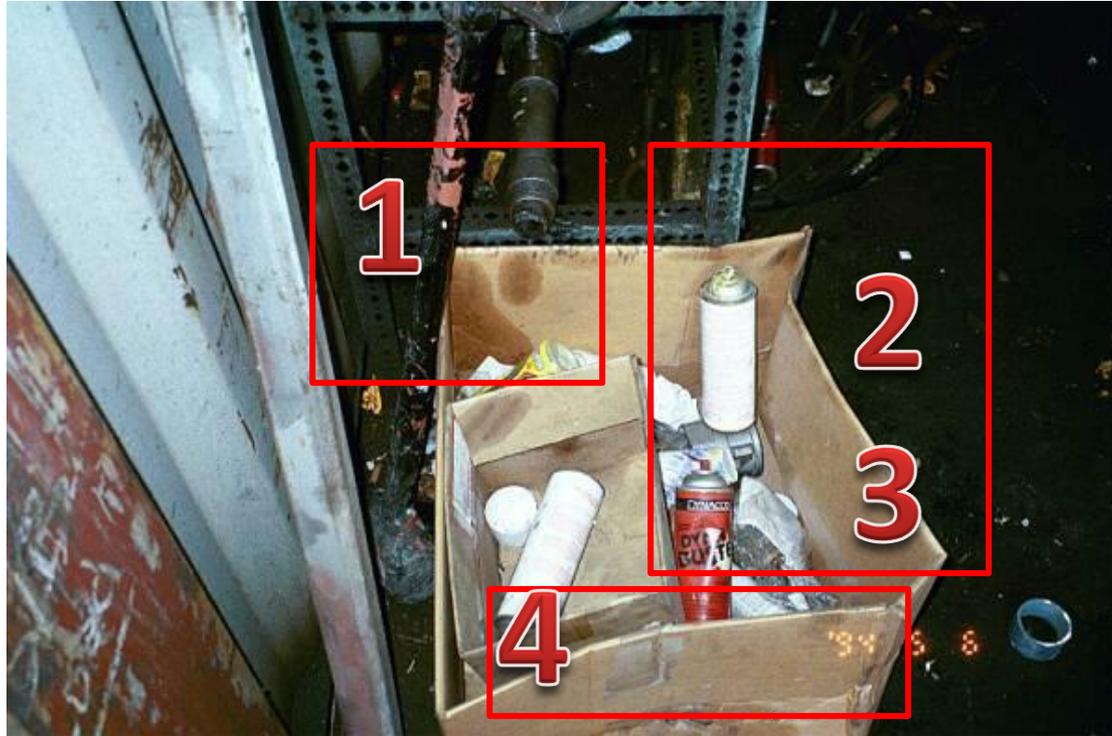
1. Open container – cap should be closed, except when adding or removing waste.
2. Trash in containment box
3. Good labeling for hazardous waste and risk
4. Secondary containment – good to have, but not required for SAA

Lab Waste After Satellite Accumulation Area



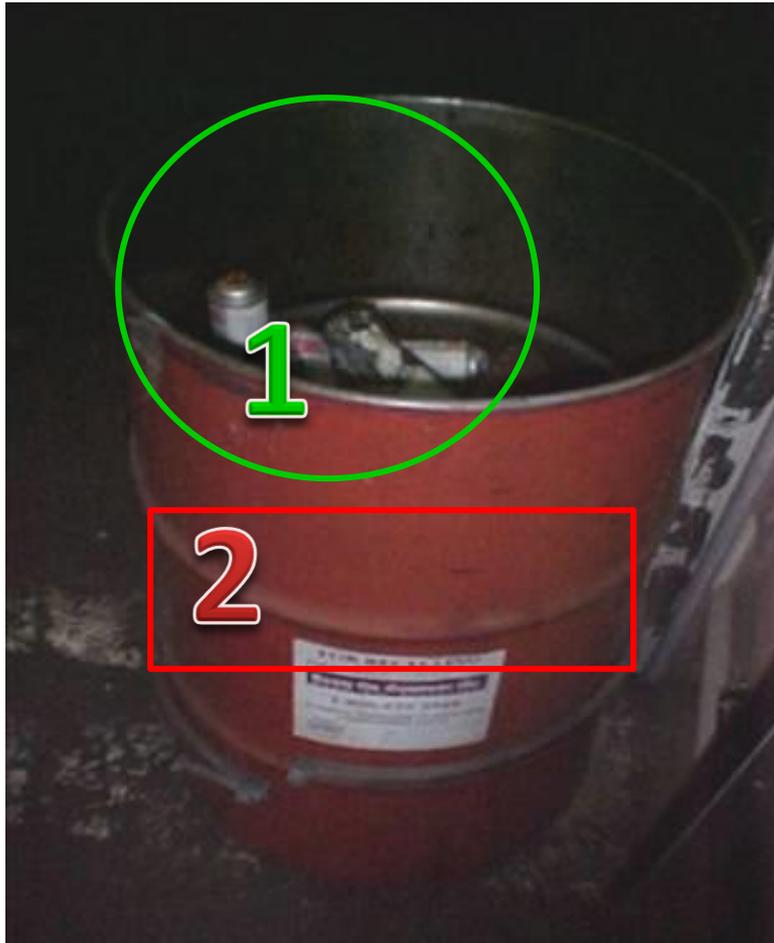
1. Fixed a tube permanently to a cap so it can't come loose. Also protects employees from fumes.

Aerosol Cans Before



1. Poor containment
2. Only empty cans can go in the garbage.
3. Are all these items compatible waste?
4. No label on container

Aerosol Cans After



1. Better container
2. Still no Hazardous Waste or risk labels, or an accumulation start date

Barrel could be considered secondary containment, if it is intact.

MQG?

This business says they are a medium quantity generator. What do you think?



Close-up of drums

(open containers?)



MQG? Before

(Too many problems to show individual boxes)

1. Could be more than MQG
2. No aisle space
3. Open containers
4. No secondary containment
5. No cover for storage area
6. Few, if any, HW or risk labels
7. Accumulation dates not visible
8. Product labels still on drums
9. Poly drums mixed with metal drums – may indicate incompatibles



MQG? After

Better, but:

1. Secondary containment not large enough
2. No signage – “Danger” “Keep out” or “Authorized personnel only”
3. No emergency equipment – fire extinguisher, spill kit, etc.
4. No emergency communications device.



Problem Drums

1. Bottom seam pinched on right-hand drum.
2. Signs of overfilling – heat expanded the liquid in the back drum, causing the o-ring to seep.
3. Can't see labels



Do not store food with chemicals!
It may not be against the regs, but it is
against common sense!



What happens next?

❖ Inspector:

- Holds exit conference with facility
- May make followup calls
- Sends facility the inspection report
 - Narrative of what was seen
 - Photos, if taken
 - Compliance certificate



COMPLIANCE CERTIFICATE

Sample compliance certificate

Instructions: Return this Completed Form or Request an Extension -- Use this form to report if the action(s) needed to achieve compliance, identified during the inspection on **December 23, 2003** have been completed. Complete the shaded portion of the table and mail a copy of this form to **Katherin M. McArthur** by **March 12, 2003** at the following address: Washington Department of Ecology, Hazardous Waste and Toxics Reduction Program, Attention: **Katherin M. McArthur, 15 West Yakima Ave., Suite 200, Yakima, WA 98902.**

An extension of the deadlines to achieve compliance may be requested. Please make a request in writing, including the reasons an extension is necessary and proposed date(s) for completion, and send it to **Katherin M. McArthur** before the date specified above. Ecology will provide a written approval or denial of your request.

*If you have any questions about information in this Compliance Report, please call:
Katherin M. McArthur at (509) 454-4329*

The problems identified below must be corrected in order to be in compliance with Washington Dangerous Waste Regulations (Chapter 173-303 WAC), or other environmental laws or regulations. Please indicate the date each action is completed, or check the box under "Not Completed" and initial each item. Include any comments explaining the actions taken on a separate piece of paper.

Violation cited

1

1) WAC 173-303-522(2)(a): The special requirements for generators recycling spent antifreeze were not met.

Problem summary

2

Within two days of receipt of this letter, label containers of spent antifreeze as "spent antifreeze". Accumulate antifreeze in a manner to prevent releases to the environment. This includes but is not limited to storing wastes in compatible containers, on impermeable surfaces, or in secondary containment structures.

Initial that problem has been fixed

Deadline to fix

3

Compliance Item	Corrective Measures Deadline	Date Completed	Initials
WAC 173-303-522(2)(a)	January 14, 2004		

4

2) WAC 173-303-201(2)(a) as referenced by 170(3): Dangerous waste was accumulated on-site in excess of 180 days.

Within 60 calendar days of the receipt of this letter, provide copies of completed manifests documenting disposal for all waste that has been on-site for more than 180 days.

Will I get fined?

- ❖ Normally, “NO.”
- ❖ Just fix the problems and let Ecology know
 - Ecology can provide technical assistance
- ❖ Penalties are possible if:
 - Damage to human health and the environment
 - Future inspections show the same problems
 - Generator refuses to get into compliance
- ❖ Formal Enforcement can be:
 - Administrative order to comply
 - Penalty – up to \$10,000/day

