What to Expect in an Agency Inspection

Tammy Toups
LDEQ
Different Types of LDEQ Inspections

- Air Inspections
- Hazardous Waste Inspections
- Water Inspections
- Solid Waste Inspections
- Tire Inspections
- Just to name a few....
Unannounced Inspections

- All Inspection Division Inspections are Unannounced.
- Allowed to enter any facility with a LDEQ permit
What To Expect in an Agency Inspection?

- Air Inspections
- Hazardous Waste Inspections
Types of Air Permits

- Title V Permits (Part 70 Operating Permits)
  - Facility can have more than one.
- Minor Air Permits
Types of Hazardous Waste Facilities

- Treatment, Storage, and Disposal Facilities (TSD)
- Large Quantity Generators (LQG)
- Small Quantity Generators (SQG)
- Conditionally Exempt Small Quantity Generator (CESQG)
What An Inspector Will Do Prior to Entering a Facility

- Records Review
  - Reports
- Previous Inspections
  - Areas of Concern??
- Enforcement Actions?
- Permit Review
- Regulatory Review
Facility Entry

- Present LDEQ badge
- Explain the purpose of the visit
- Watch safety video, if necessary
- Will NOT sign a waiver for entry
TWIC Requirements

- LDEQ inspectors are not required to have a TWIC card
- **33 CFR 101.514** – State environmental officials … are not required to obtain a TWIC to gain unescorted access.
- Considered “Law Enforcement Officials”
Opening Meeting

- Explain the Type of Inspection Conducting
- Brief Overview of what the facility can expect
- Review the facility background/description
- Review facility permit
- Review any Enforcement Actions
Records Requests

- Inspector may have a list of records to request
- Records may be requested throughout the inspection, and after the on-site inspection
Title V – Common Requests

- Annual Compliance Certifications
- Semi-Annual Monitoring Reports
- Benzene NESHAP reports
- Quarterly LDAR reports
- Flare Records
- Specific Condition Reports
Title V – Common Requests

- Storage Tank Records
- Performance Test Results
- Engine/Generator Records
- Certifications
Hazardous Waste Common Requests

- Hazardous Waste Manifests
- Universal Waste Manifests
- Used Oil Manifests
- Contingency Plan
- Waste Minimization Plan
- Drum Storage Area Inspection Checklist
Hazardous Waste Common Requests

- Hazardous Waste Annual Report
- HW-1 Notification Form
- Employee Training Program / Certifications
- Tank Inspection records
- Groundwater Monitoring Plan
- Closure Plan
Title V Facility Inspection

- Emission Points
- Storage Tanks
- LDAR Team Calibration
- Infrared Camera
Hazardous Waste Facility Inspection

- All Permitted Storage Areas
- All <90 day storage areas
- All Hazardous Waste Tanks
- Satellite Areas
- All “Used Oil” Storage Areas
- All “Universal Waste” Storage Areas
Closing Meeting

- Review any Areas of Concern Noted During Inspection
- Discuss timeframe for requested records
- Leave a Field Interview Form with the Facility
Common Air Areas of Concern

- Self-reported permit deviations
- Not monitoring the flare properly
- Open-ended lines
- Visible Leaking Components
- Not Conducting Performance Testing
Common Hazardous Waste Areas of Concern

- Not having completed and final Hazardous Waste Manifest
- Incorrect Drum Labeling
- Waste Minimization Plan not Certified
- No separate Hazardous Waste Contingency Plan
- Manifest and Annual Report codes do not match
What Happens Next???

- No Areas of Concern
- Notice of Deficiency (NOD)
- Notice of Corrected Deficiency (NOCD)
- Enforcement
  - Compliance Order
  - Notice of Potential Penalty
Area of Concern
Area of Concern
Area of Concern
Area of Concern
Area of Concern
Area of Concern
Area of Concern
Questions??