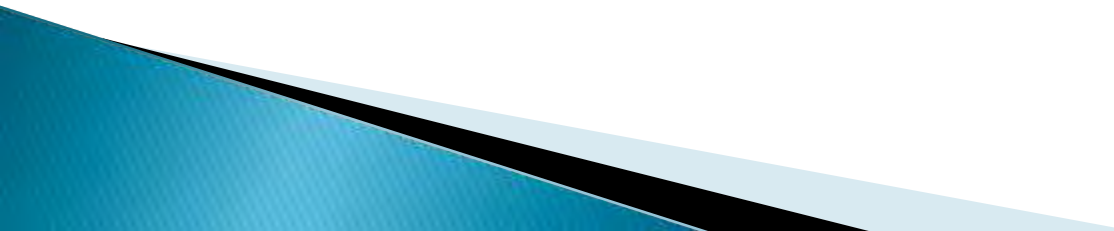


What to Expect in an Agency Inspection

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

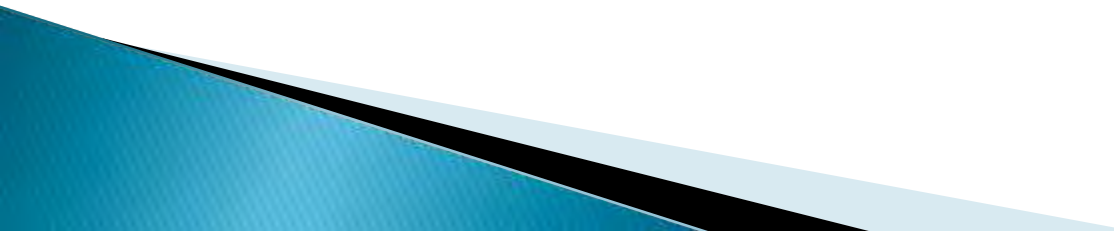
What To Expect in an Agency Inspection?

- ▶ 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

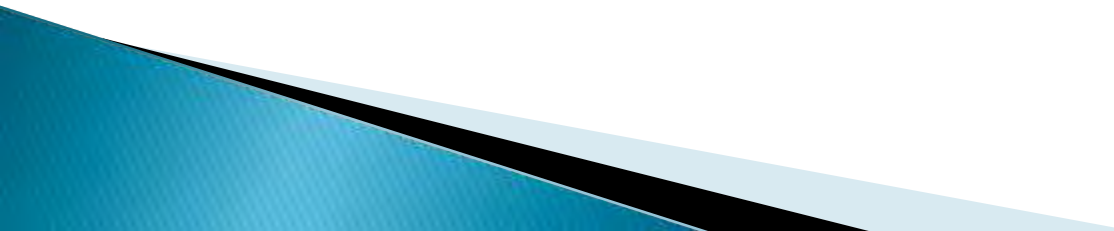
Types of Hazardous Waste Facilities

- ▶ 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
- 

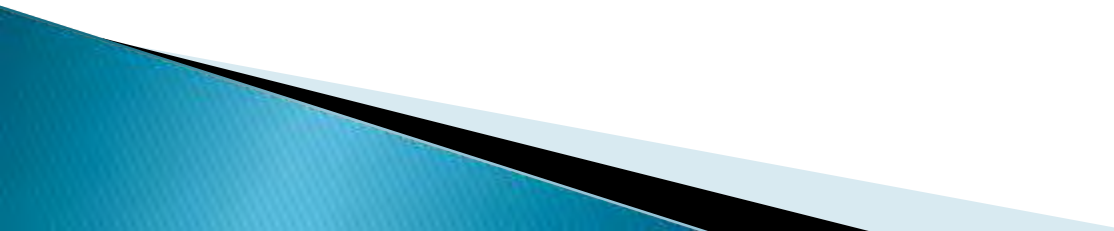
Facility Entry

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

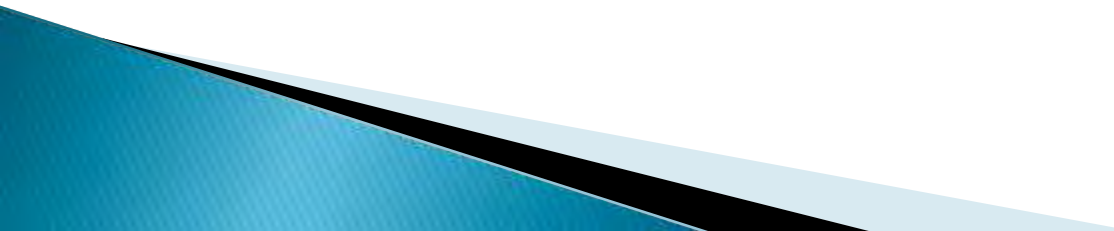
TWIC Requirements

- ▶ 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”

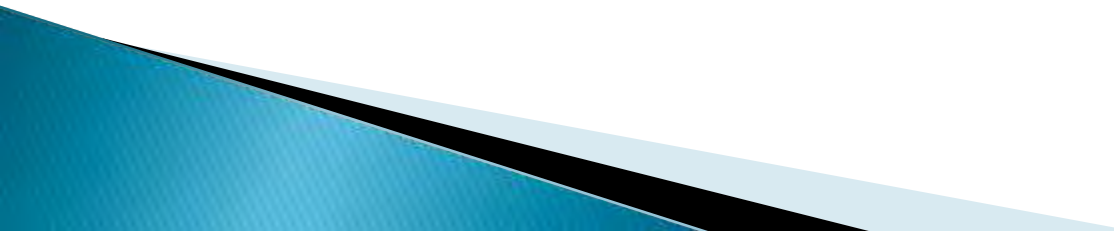
Opening Meeting

- ▶ 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
- 

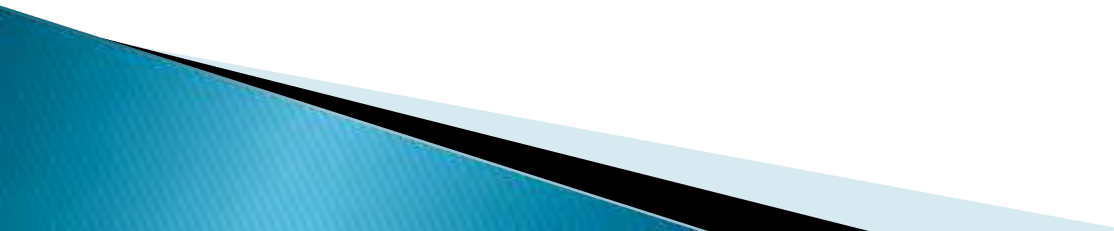
Records Requests

- ▶ Inspector may have a list of records to request
 - ▶ Records may be requested throughout the inspection, and after the on-site inspection
- 

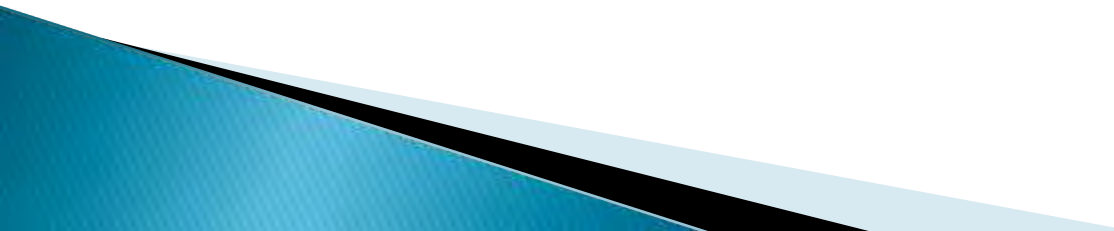
Title V – Common Requests

- ▶ Annual Compliance Certifications
 - ▶ Semi-Annual Monitoring Reports
 - ▶ Benzene NESHAP reports
 - ▶ Quarterly LDAR reports
 - ▶ Flare Records
 - ▶ Specific Condition Reports
- 

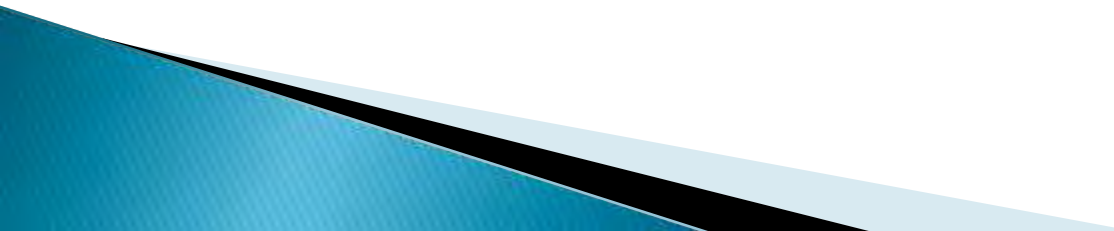
Title V – Common Requests

- ▶ Storage Tank Records
 - ▶ Performance Test Results
 - ▶ Engine/Generator Records
 - ▶ Certifications
- 

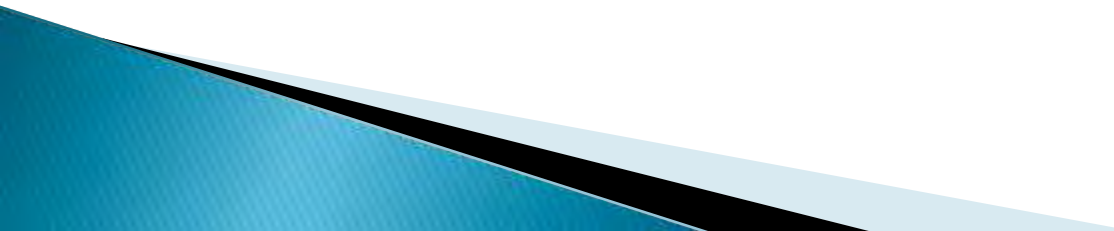
Hazardous Waste Common Requests

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

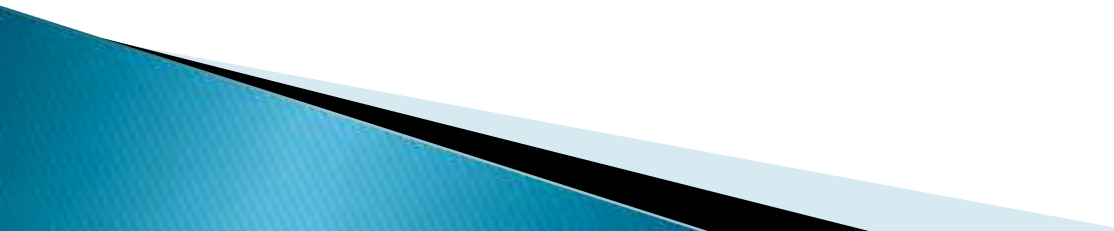
Hazardous Waste Common Requests

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

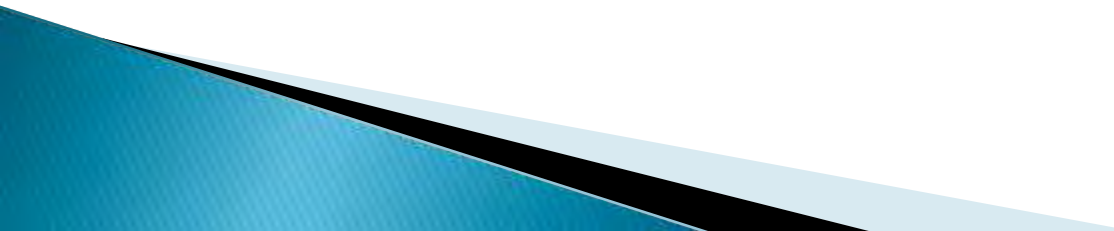
Title V Facility Inspection

- ▶ Emission Points
 - ▶ Storage Tanks
 - ▶ LDAR Team Calibration
 - ▶ Infrared Camera
- 

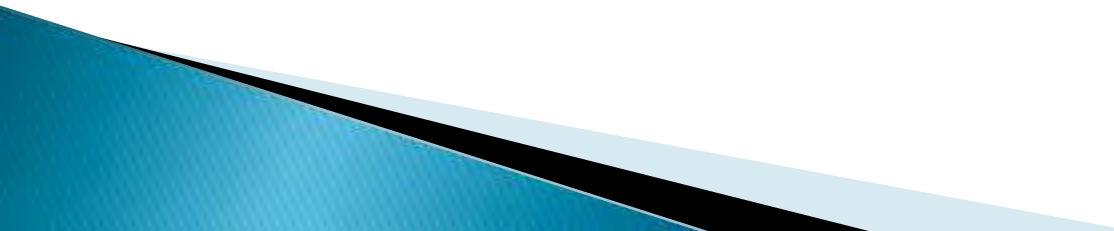
Hazardous Waste Facility Inspection

- ▶ 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
- 

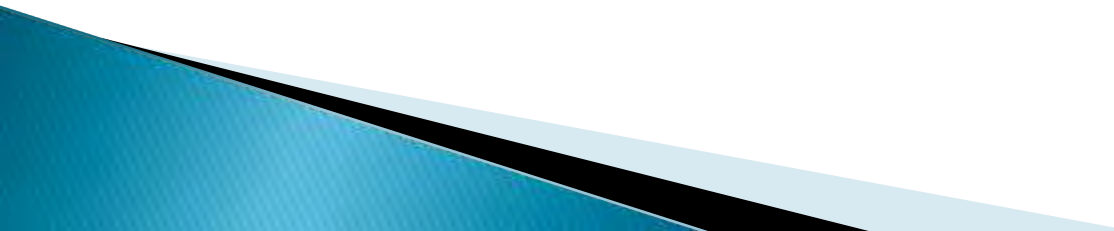
Closing Meeting

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

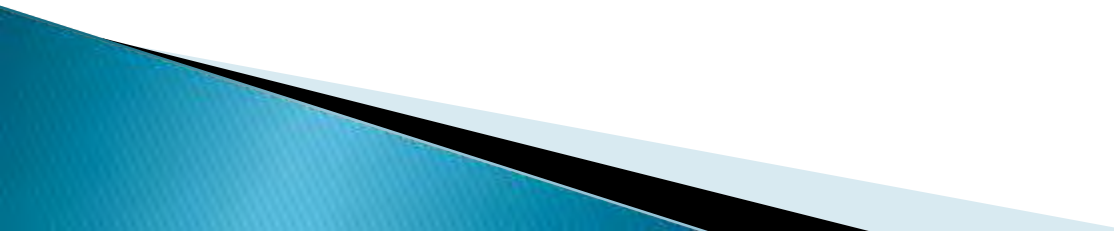
Common Air Areas of Concern

- ▶ 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

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

ACCUMULATION START DATE _____ E.P.A. WASTE NO. F001

D.O.T. PROPER SHIPPING NAME RD, waste paint related

AND stencils, 3, un01243, PKU

U.N. OR N.A. NO. 1243

GENERATOR NAME _____

ADDRESS 8 Industrial Park Rd.

CITY _____ STATE 27 173

E.P.A. I.D. NO. _____ MANIFEST DOCUMENT NO. _____

**HAZARDOUS WASTE
HANDLE WITH CARE**

Area of Concern



Area of Concern



Area of Concern



Area of Concern



Questions????