

What to Expect During a RCRA Compliance Inspection

Presenter: Terry Dedon, ES Staff

Louisiana Department of Environmental Quality

Surveillance Division

Why are Hazardous Waste Compliance Inspections (CEIs) Conducted???

A faint, light-colored illustration of a landscape is visible in the background. It depicts a winding path or stream in the foreground, a large tree on the left, a building with a chimney on the right, and a tall, thin structure in the center. The entire scene is rendered in a soft, muted green and blue color palette.

Hazardous Waste

Title 33 Part V. Hazardous Waste Regulations

40 CFR 260 – 282

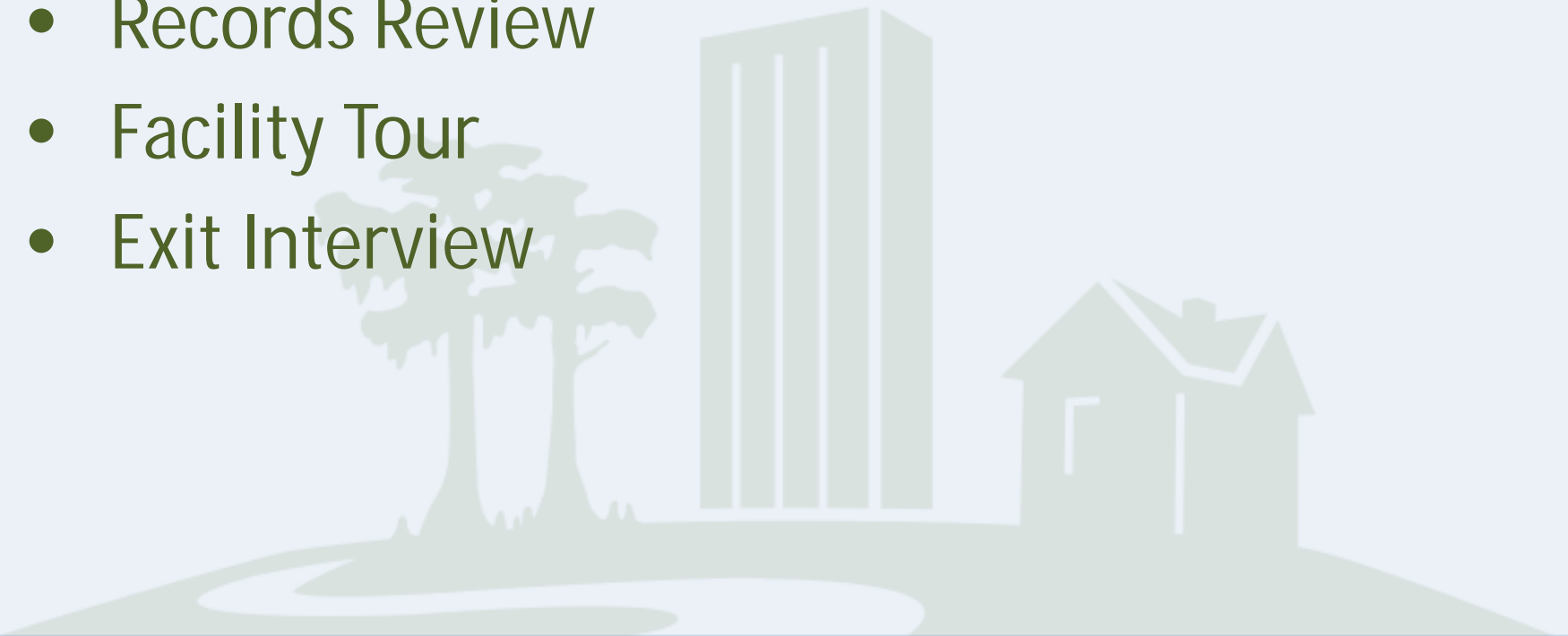
A faint, light-colored illustration of a landscape is visible in the background. It includes a winding path or stream in the foreground, a large palm tree on the left, a cluster of tall, thin buildings in the center, and a small house on the right.

What We Inspect

- How Wastes are Classified
 - Waste Determinations for both solid and hazardous waste
 - Hazardous Waste Generation and Management
 - Containers, Tanks, Waste Piles, Landfill Management
 - Processes that generate the waste
 - Emergency Planning
 - Records
- 
- A faint, light-colored illustration of a landscape is visible in the background. It includes a house with a chimney, several trees, and a tall, rectangular building. The illustration is positioned behind the list of inspection items.

The Inspection Will Include:

- Pre-Inspection Conference
- Records Review
- Facility Tour
- Exit Interview



Pre - Inspection Conference

- Present credentials
- State the reason for the visit
 - Scheduled / Routine Compliance Evaluation
 - Incident / Complaint Investigation
- Opening conference with facility representatives
- Records needed will be requested during the opening conference
- Discussion of the physical tour of the facility will be conducted during opening conference

Review of Records and Reports

- Map/Plot plan
 - Locations of all accumulation areas and tanks.
 - Locations of all waste operation points and satellite accumulation areas.
 - P&IDs and overall facility maps to show process
- HW-1 notification form (most recent update)
- HW Annual Report (most recent)
- Waste determinations and profiles documentation (both solid and hazardous)
- Hazardous waste manifests (3 years or since last CEI)
 - Associated land ban notices (initial and latest)
 - Discrepancy and exception reports

Review of Records and Reports cont.

- Universal Waste manifests/shipping tickets (used batteries, fluorescent lamps, etc.)
- Waste Minimization Plan – PE Certified
- Used oil manifests/shipping records
 - Analyses or other information showing that used oil that is burned for energy recovery meet the specifications for used oil fuel



Review of Records and Reports cont.

- Employee training records for hazardous waste handlers (including contractors that handle hazardous waste)
 - Job Titles
 - Job Descriptions
 - Written description of the type and amount of training given
 - Outline of training program
 - Individual employee training records
 - RCRA vs. OSHA

Review of Records and Reports cont.

Contingency Plan (And Revisions)

- Plan must be designed to minimize hazards to human health and the environment from fires, explosions, or release of hazardous waste or hazardous waste constituents.
- Reportable releases since the last inspection or within the last 2 years
- Records of incidents when the plan was implemented



Review of Records and Reports cont.

Air emission records for hazardous waste units

- List of units subject to chapter 17 subchapters A, B, and C
- A: applies to process vents associated with distillation, fractionation; thin-film evaporation, solvent extraction, or air/steam stripping operations that manage hazardous wastes with organic concentrations of at least 10 ppmw
- B: applies to equipment that contains or contacts hazardous wastes with organic concentrations of at least 10 percent by weight.
- C: applies to tanks, containers, and surface impoundments that treat, store, or dispose of hazardous waste that contain a volatile organic concentration of more than 500 ppmw

Review of Records and Reports cont.

Air Emission Records Continued

- LDAR Records
- Calibration logs for monitoring equipment



Review of Records and Reports cont.

- Inspection records
 - Tanks
 - Daily inspections of unit, secondary containment and ancillary equipment
 - Documentation that tank(s) are emptied at least once every 90 days (for 90-day storage tank) and annually for permitted tanks
 - Annual visual internal inspections (90-day storage tank)
 - Tank Certification
 - Container storage areas (weekly)

Facility Tour

- Identification of the types of wastes managed on-site
 - Hazardous Waste Generations Points
 - Identify each generation point
 - Observe operations at each generation point
 - Has the facility identified all waste streams?
 - Has the facility performed a proper waste determination?
 - Identification and inspection of all permitted TSD units



Facility Tour

- Hazardous Waste Management Units
 - Permitted Containers and Container Storage Areas (containment)
 - Tanks and Containment
 - Satellite and Central (90-day) Accumulation Areas
 - Landfill
 - Waste Piles
 - Units in post-closure
 - Groundwater Monitoring Wells
 - Drip Pads
 - Boilers and Industrial Furnaces
 - HW Incinerator
- 
- A faint, light-colored illustration serves as a background for the lower half of the slide. It depicts an industrial or environmental facility with a tall, multi-story building, a smaller house-like structure, and a winding path or stream in the foreground. There are also some trees on the left side of the illustration.

Generator and Permitted Unit Issues We Commonly See

- Labeling Issues
- Open Containers
- Satellite Accumulation Containers Located Outside Laboratories
- Secondary Containment for tanks and containers

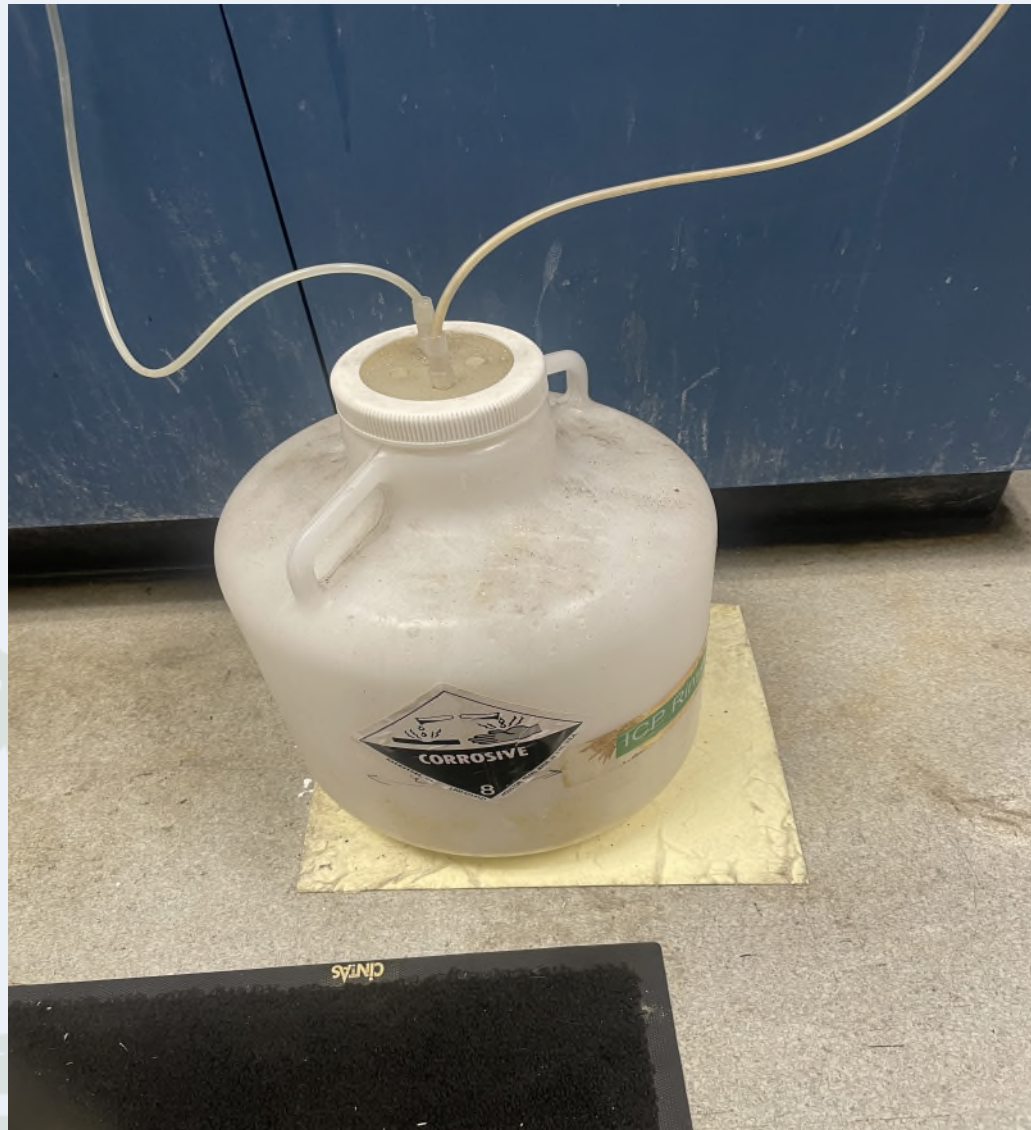






















Questions?

- Terry Dedon
- Email: terry.dedon@la.gov
- Phone: 225.219.3600
- Jimbo Earles
- Email: jimbo.earles@la.gov
- Phone: 318.487.5657