

# Preparing for a RCRA Hazardous Waste Inspection

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# Resource Conservation and Recovery Act (RCRA)

The [Resource Conservation and Recovery Act \(RCRA\)](#) gives EPA the authority to control hazardous waste from the "**cradle-to-grave.**" This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

<https://www.epa.gov/enforcement/resource-conservation-and-recovery-act-rcra-and-federal-facilities>

# RCRA Hazardous Waste Inspection Authority

Part 111 of the Natural Resources and Environmental Protection Act (NREPA), 1994, P.A. 451, as amended, and Section 3007(a), of the Resource Conservation and Recovery Act (RCRA)

The inspector may: (a) enter at reasonable times upon the premises where hazardous wastes are or have been handled, generated, stored, treated, transported from or disposed of; (b) request and be furnished information relating to such wastes; and (c) inspect and obtain samples of any wastes and samples of containers or labeling for such wastes.

# Who Gets Inspected?

- RCRA- Any Facility that generates Hazardous Waste
- Inspections are un-announced.



# Different Types of Inspections

- Scheduled Inspections
- License/ Permit Renewal
- Complaint initiated

# RCRA Inspections - It's not a matter of 'If', It's a Matter of 'When'



[www.targetfreedomusa.com](http://www.targetfreedomusa.com)

# Prepare so you are Prepared

prepare 

[pri-**pair**]

Spell  Syllables

[Synonyms](#) [Examples](#) [Word Origin](#)

[See more synonyms on Thesaurus.com](#)

verb (used with object), **prepared, preparing.**

1. to put in proper condition or readiness:  
*to prepare a patient for surgery.*

prepared 

[pri-**paired**]

Spell  Syllables

[Synonyms](#) [Examples](#) [Word Origin](#)

[See more synonyms on Thesaurus.com](#)

adjective

1. properly expectant, organized, or equipped; ready:  
*prepared for a hurricane.*

# Preparation for the Unexpected

\* Frequently used as a marketing tool.



<http://myhometruths.com/2015/08/preparing-for-the-unexpected-how-illness-and-death-can-affect-family-finances/>



stop,



drop,



and roll.

**Practice stop, drop, and roll with Cookie Monster.**

[http://www.kendallfire.com/Stop\\_drop\\_roll.html](http://www.kendallfire.com/Stop_drop_roll.html)

# Prepare!



## THE ZOMBIE APOCALYPSE

Scooby Doo and Velma are prepared, will you survive ?

motifake.com

[www.motifake.com](http://www.motifake.com)

Preparation for  
Zombies?  
Use your  
imagination!

# Preparation for a RCRA Inspection?



<http://warriorshepherd.com/blog/what-is-in-your-go-bag/>

# Step 1- Know Your Facility

- Know your facility
- Know your waste streams  
(Characterization & Risks)
- Keep/Organize complete records
- Train your staff
- Emergency Preparedness
- Manage Waste Properly

**Hello**  
my name is

Hazardous Waste Generator-  
"I'm responsible from Cradle to  
Grave, and Beyond"



# Hazardous Waste Management ≈ Common Sense?

1. SAFETY!!
2. NO Hazardous Waste Releases!
3. Characterize Waste Properly. If hazardous waste goes where shouldn't, that's a REAL problem. Proper management, transport, and disposal.
4. Waste Accumulation LQG 90day, SQG 180 day, etc. Plan accordingly!
5. Hazardous Waste Timeline, "Cradle to Grave, and Beyond"
6. Hazardous Waste, who's responsible?  
Everyone and anyone, connected in any way.

# Resources

## Waste/ Hazardous Waste/ Hazardous and Liquid Industrial Byproduct Management

<http://www.michigan.gov/deqwaste>

The screenshot shows the DEQ website header with navigation links: DEQ, Contacts, Permits, Online Services, Programs, Locations, and Mi.gov. The DEQ logo and "Department of Environmental Quality" text are prominent. A search bar is located in the top right. Below the header is a navigation bar with tabs for ABOUT THE DEQ, AIR, LAND, WASTE, WATER, and SUSTAINABILITY. The "WASTE" tab is selected.

On the left side, there is a vertical menu with the following items: Solid Waste, Hazardous Waste, Transporters, Radiological Protection, and Waste Compliance & Enforcement.

The main content area is titled "DEQ | WASTE" and features a "WASTE" logo. Below the logo, the text reads: "Protecting Michigan's Environment. Many products and by-products can pose a threat to our environment and human health if not handled or disposed of properly. The following DEQ programs deal with waste issues: Hazardous Waste, Liquid Industrial By-Products (formerly Liquid Industrial Waste), Medical Waste, Radiological Protection, Recycling, Scrap Tires, and Solid Waste. In these pages, you will find permit/license application forms, guidance documents, state, federal and local statutory and regulatory information; and grant and loan information available under these programs."

Below this text is a link for "Waste Compliance and Enforcement".

On the right side, there is a "Quick Picks" section with a list of links: How Do I Handle This Waste?, TSD Facilities, Dioxin Information, Uniform Manifest Information, Waste Data System (WDS), and Scrap Tire Market Development Grants.

At the bottom, there is a navigation bar with tabs for Announcements, Solid Waste, Hazardous Waste, Transporters, and Radiological Protection. The "Announcements" tab is selected, showing a list of links: Part 111 Receipt of Request for Site-Specific Land Disposal Restriction Treatability Variance, Part 121 Liquid Industrial By-Products (formerly Liquid Industrial Waste) Statutory Changes, Pharmaceutical Waste Tutorial, Introduction to Hazardous Waste Regulations Webinars, Hazardous Waste User Charges and Annual Invoice Packets, and Michigan Site Identification Form EQP5150 (Rev. 5/2010) and Directors (Rev. 7/2005). There is also a "Spotlight" section with a link to "Michigan Radiation Environmental Monitoring Program Report".

# Generator Responsibility

“Think about responsibility”

- What if “it” gets into the wrong hands?
- What if “it” is stolen?
- What happens if “it” is given away?
- What happens if an un-qualified person handles “it”?
- What happens if “it” harms children?
- What happens if “it” harms families?
- What if someone dies from “it”?
- What happens if the company is held responsible for “it” (unintended consequences)?
- What if an individual is held responsible for “it” (unintended consequences)?

# Think about Responsibility and Liability?

**Hazardous Waste**  
**FEDERAL LAW PROHIBITS IMPROPER DISPOSAL**  
 If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology or the Environmental Protection Agency

Accumulation Start Date: **VERY IMPORTANT** Generator Name:  
 Reportable Quantities (RQ): lbs Address:  
40 CFR Subchapter J, Part 302, Table 302.4  
 Manifest Document #: City:  
 Emergency Response Guide #: State:  
 EPA Waste Code(s) and/or Characteristic(s) Zip:  
 EPA ID #:

EPA/DOT Shipping Name: **P081**

Hazard Class:  
 UNNA #:    
 Packing Group (PG):

In the event of a spill or release of this hazardous waste, contact the US Coast Guard National Response Center at 1-800-424-6802 for information and assistance.



[thegunstorevegas.com](http://thegunstorevegas.com)

Waste code	CAS Registry #	Generic name	Reason
P078	10102-44-0	Nitrogen oxide NO <sub>2</sub>	(H)
P081	55-63-0	Nitroglycerine	(R) <sup>1</sup>

# Review

## How to Prepare for a RCRA Inspection?

1. Know Your Facility
2. Conduct Periodic Self Audits

Also: Consider **Responsibility** AND **Liability**

# RCRA Hazardous Waste Inspection- Extras

# Opening Meeting/ Records Review



## Records Review- Records >1 person!!!

- Site I.D. & Generator Status
- Waste Characterization
- LDR
- Biennial Report
- Training
- Emergency Preparedness
- Manifests and/or shipping documents
- Etc.

# Waste Characterization: Analysis? or Knowledge?



[www.somervillenjk12.org](http://www.somervillenjk12.org) and  
[omgitsjoe.com](http://omgitsjoe.com)

# Characterization is Important!

29 MPG  
HWY



1985 CHEVETTE

29 MPG  
HWY



2014 CORVETTE

A TALE OF TWO 'VETTES

[jalopnik.com](http://jalopnik.com)

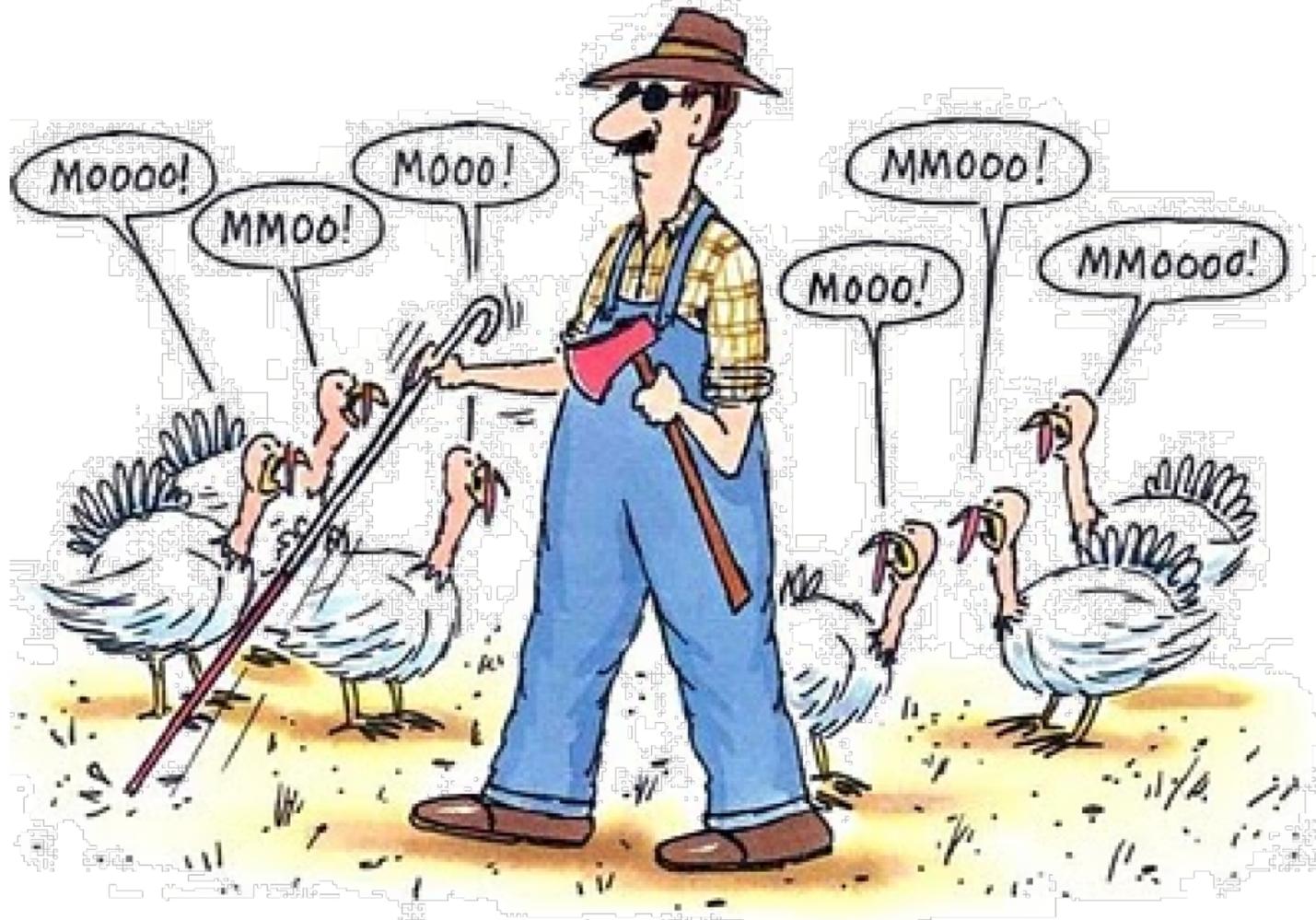


"Wait a minute! ... McCallister, you fool! *This* isn't what I said to bring!"

[www.creekbank.net](http://www.creekbank.net)

# Characterization is Important!

# Characterization is Important!



[www.davidmelamed.com](http://www.davidmelamed.com)

# Typical Hazardous Waste Manifest

Generator I.D.  
MIK, MID, MIR, etc. followed  
by 9 numerical digits  
e.g. MIK000000000

Generator

Actual Volumes Required;  
Multiple Waste Codes  
e.g. D001 Ignitability; F002  
Spent Solvents; D007  
Chromium

Transporter

Licensed Treatment Storage and  
Disposal Facility (TSD) or  
Designated Facility

Please print or type. (Form designed for use on efile (12-gift) hardware.)

**UNIFORM HAZARDOUS WASTE MANIFEST**

1. Generator ID Number: 000061119 FILE

2. Page 1 of 3

3. Emergency Response Phone

4. Generator's Name and Mailing Address

5. Generator's Site Address (if different than mailing address)

6. Generator's Phone

7. Transporter 1 Company Name

8. Transporter 2 Company Name

9. Designated Facility Name and Site Address

10. Facility's Phone

9a. HM	9b. U.S. DOT Descriptor (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. LHS Wt./Vol	13. Waste Codes
		No.	Type			
1						
2						
3						
4						

14. Special Handling Instructions and Additional Information

15. GENERATOR/SHIPPER'S CERTIFICATION: I hereby declare that the contents of this document are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled (classified, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this assignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste transportation statement identified in 40 CFR 263.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator/Shipper's Printed Typed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

16. International Shipments  Import to U.S.  Export from U.S. Part of shipment: \_\_\_\_\_ Date leaving U.S.: \_\_\_\_\_

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed Typed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

Transporter 2 Printed Typed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

18. Discrepancy

18a. Discrepancy (check one):  Quantity  Type  Residue  Partial Reaction  Full Reaction

18b. Alternate Facility (if Generator): \_\_\_\_\_ Market Reference Number: \_\_\_\_\_ U.S. EPA ID Number: \_\_\_\_\_

18c. Signature of Alternate Facility (if Generator): \_\_\_\_\_ Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, storage, and recycling systems)

1	2	3	4

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18b.

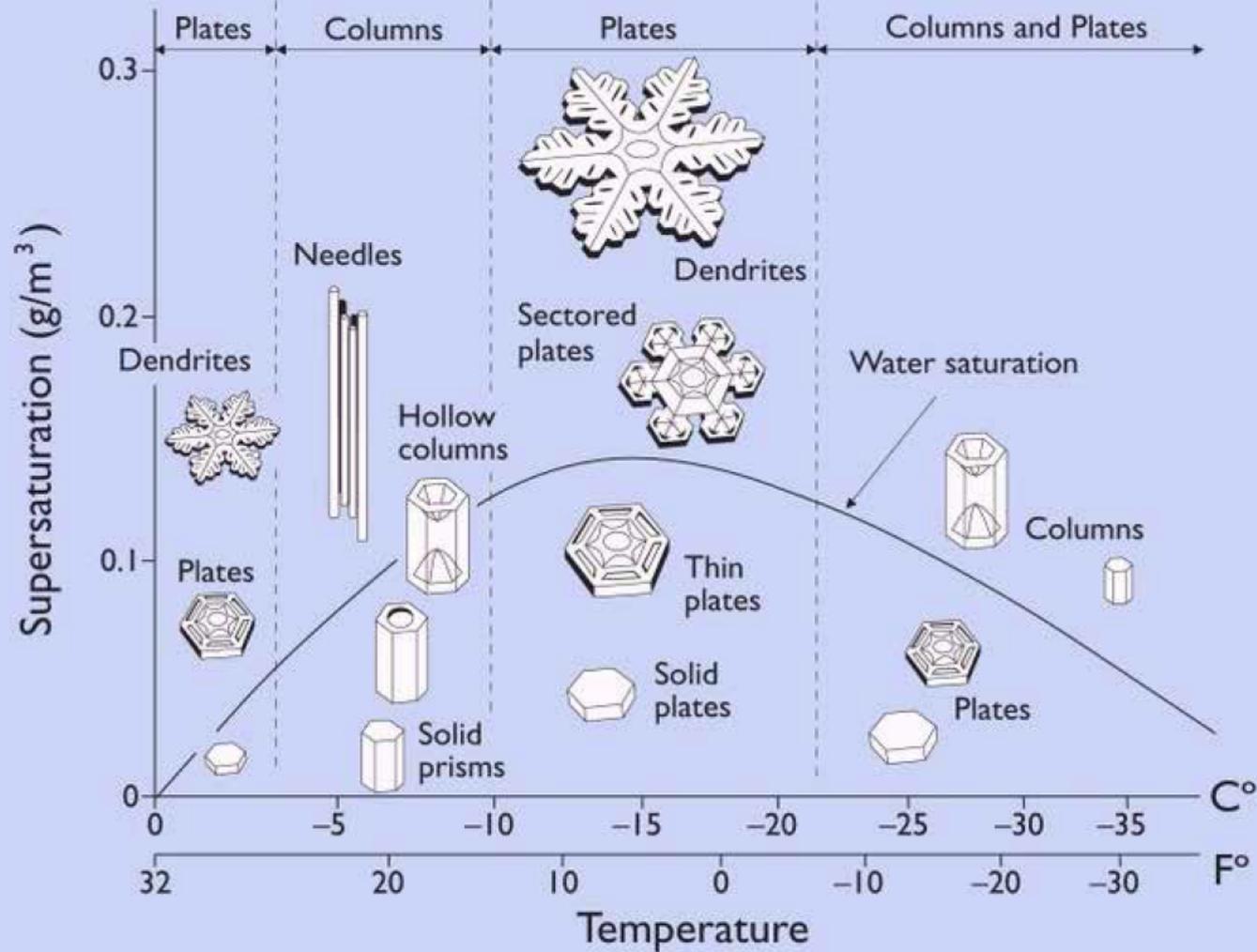
Printed Typed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

# LDR- Land Disposal Restriction

- Simply put – An LDR establishes treatment standards (therefore disposal requirements) for Hazardous Waste.
- Also of Note relating to LDR:
  - [Disposal Prohibition](#)
  - [Dilution Prohibition](#)
  - [Storage Prohibition](#)
- The generator is responsible for having an LDR for each hazardous waste stream.



**LDR's**

[www.pbs.org](http://www.pbs.org)

# LDR Help-26 pages

<https://www.epa.gov/sites/production/files/2015-09/documents/ldr05.pdf>

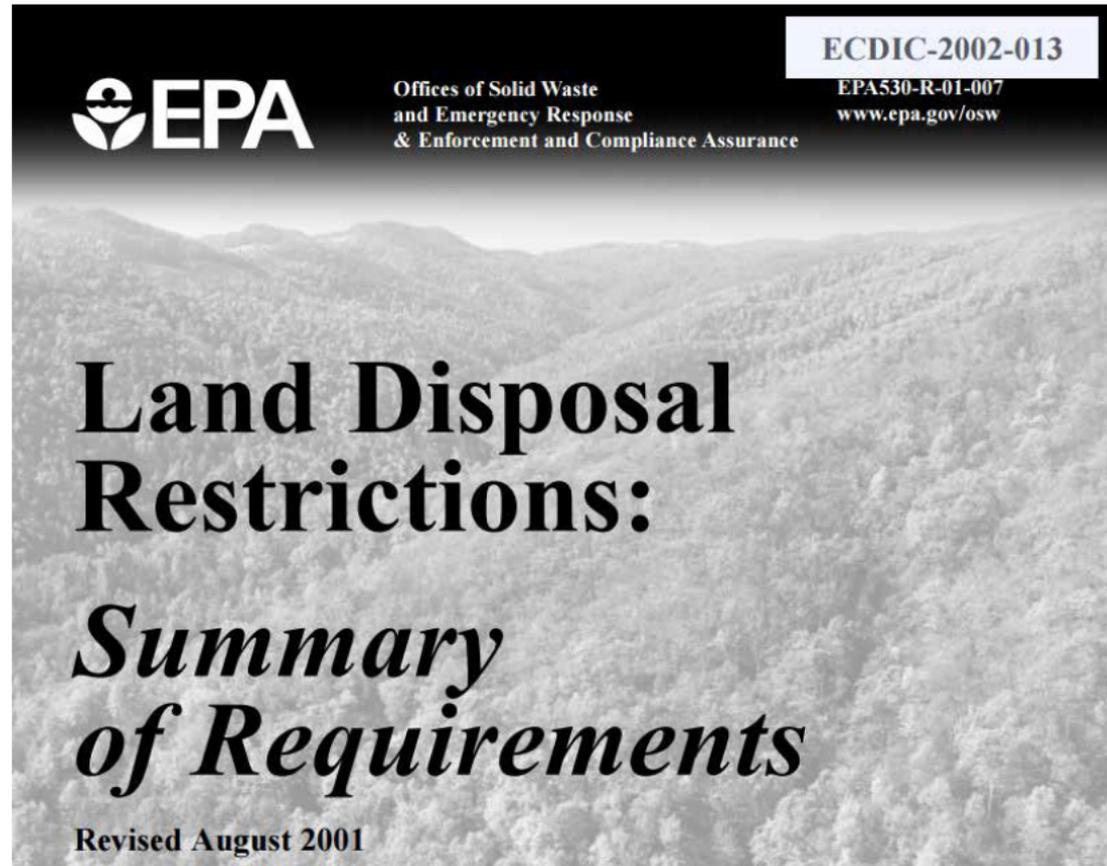
RCRA  
Training Module

Solid Waste and Emergency Response  
(5305W)  
EPA530-K-05-013

Introduction to  
**Land Disposal  
Restrictions**  
(40 CFR Part 268)

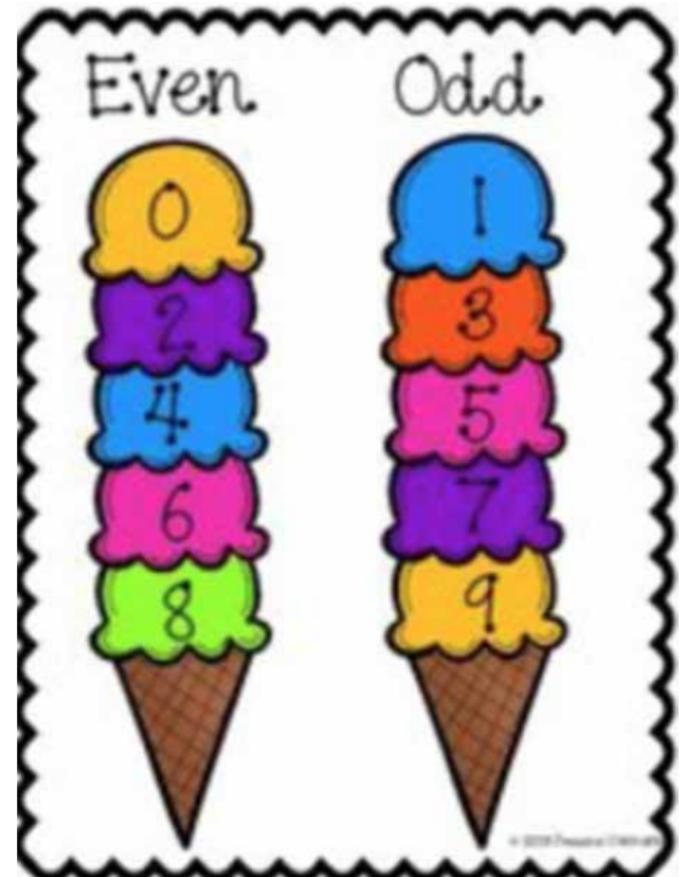
# LDR help- 119 pages

<https://www.epa.gov/sites/production/files/documents/lisressumm-rpt.pdf>



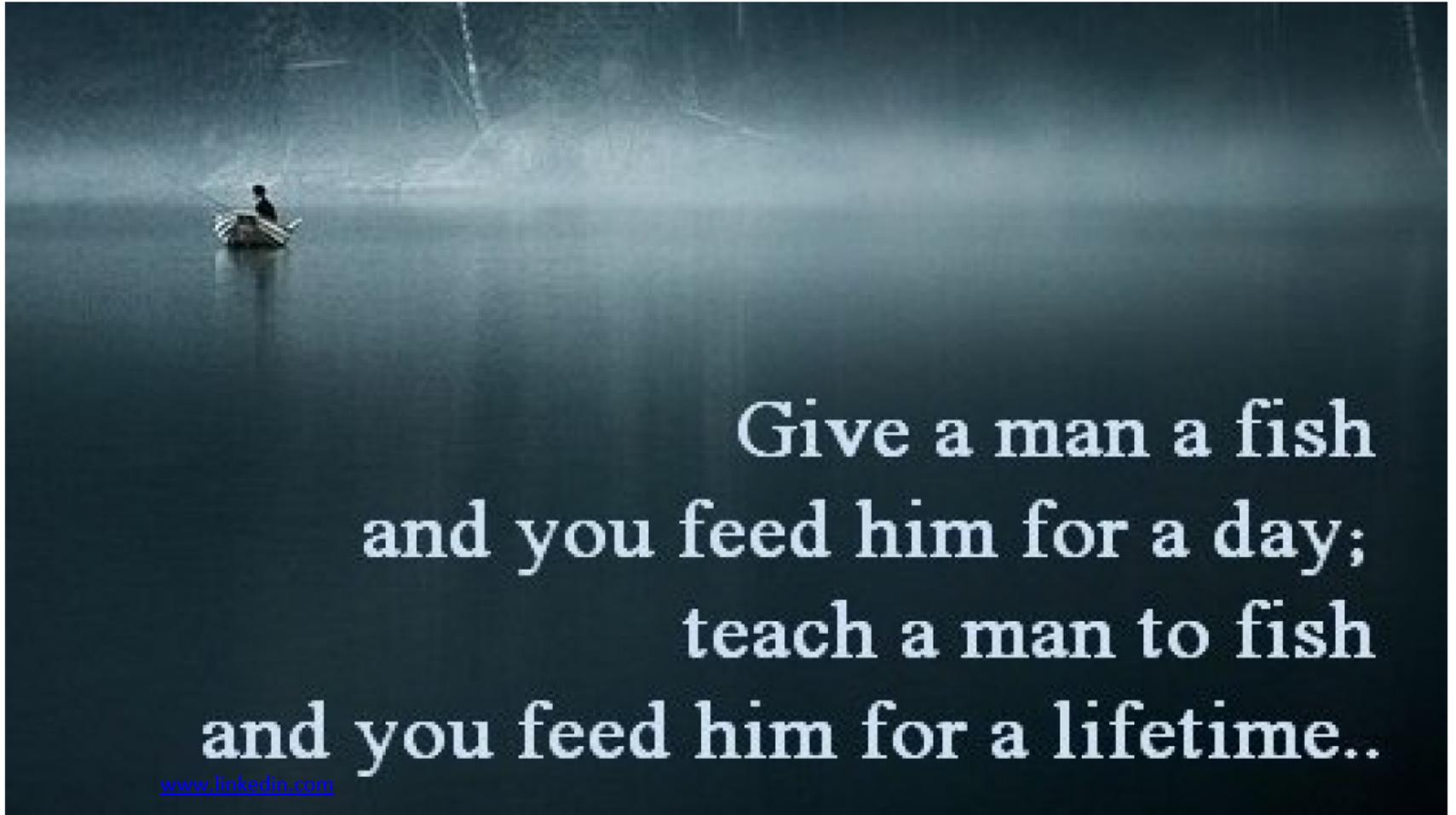
# Hazardous Waste Biennial Report

- Do we have one of those?????
- YES! If you are a LQG or TSD
- Even Year- Report Due
- Odd Year- Data Collected



Biennial report by March 1 of each even numbered year. For example Hz Waste activities that occurred during 2015 were reported on March 1, 2016. [State of Florida's biennial reporting software \(BRSW6\)](#).

# Training!



Give a man a fish  
and you feed him for a day;  
teach a man to fish  
and you feed him for a lifetime..

[www.linkedin.com](http://www.linkedin.com)

# Training/ Communication

“Put the thing on the stuff over there in the place, when it’s time.”

<https://www.youtube.com/watch?v=IKtDnTNMCIE>



Message Sent-“She’s got a gun, lets Get out while we can.”

Message Received- “Let’s have some fun and take out the dam.”

Message Sent- “NO, Pull up, they’ll kill us, there’s got to be another way!”

Message Received- “Don’t pull up, kill us, there’s no other way.”

# Training & Emergency Preparedness are Important!

## Personnel Training Record Checklist

<input checked="" type="checkbox"/> <b>Job Title</b>
<input checked="" type="checkbox"/> <b>Job Description</b> (related to hazardous waste management)
<input checked="" type="checkbox"/> <b>Name of Employee</b>
<input checked="" type="checkbox"/> <b>Description of Type and Amount of Both Introductory and Continued Training</b> (related to hazardous waste skill, education, qualifications, duties)
<input checked="" type="checkbox"/> Training Designed so facility personnel can respond to emergencies
<input checked="" type="checkbox"/> Records of Training
<input checked="" type="checkbox"/> New Personnel Receive Required Training within 6 months
<input checked="" type="checkbox"/> Training Records that Personnel have Completed Annual Training
<input checked="" type="checkbox"/> Records of Training (content of training)
<input checked="" type="checkbox"/> New Personnel Receive Required Training within 6 months

# Training & Emergency Preparedness

- Also Remember
- - Training Records for **current employees** must be **kept until facility closure** (e.g. A 40 year employee will have 40 years worth of training).
- - Training Records for **past employees** must be kept for **3 years from last date worked at facility**.

# Training & Emergency Preparedness

## LQG

### LQGs- Must have a Contingency Plan

[https://www.michigan.gov/documents/deq/deq-ead-tas-wmd-contgncy\\_306001\\_7.pdf](https://www.michigan.gov/documents/deq/deq-ead-tas-wmd-contgncy_306001_7.pdf)

Remember to Document Arrangements with Local Emergency Services!

# Training & Emergency Preparedness

## SQG

### HAZARDOUS WASTE EMERGENCY INFORMATION

EMERGENCY NAME \_\_\_\_\_  
COORDINATOR PHONE \_\_\_\_\_  
ALTERNATE NAME \_\_\_\_\_  
PHONE \_\_\_\_\_  
FIRE DEPT. PHONE \_\_\_\_\_  
HOSPITAL PHONE \_\_\_\_\_  
POLICE PHONE \_\_\_\_\_

Fire alarm is located: \_\_\_\_\_  
\_\_\_\_\_

Spill control equipment is located: \_\_\_\_\_  
\_\_\_\_\_

Fire extinguishers are located: \_\_\_\_\_  
\_\_\_\_\_

Map of facility with emergency equipment, spill equipment, exit routes, and alarm locations.



National Response Center: 1-800-424-8802  
Michigan Pollution Emergency: 1-800-292-4706

Provided by: The Environmental Assistance Division and the Waste Management Division of the Michigan Department of Environmental Quality  
Environmental Assistance Center 1-800-662-9278

Other hazardous waste requirements may apply.



EQP 3472

[Hazardous Waste Emergency Posting Form for Small Quantity Generators](http://www.michigan.gov/documents/deq/deq-ead-tas-sqgposter_306002_7.pdf)  
[http://www.michigan.gov/documents/deq/deq-ead-tas-sqgposter\\_306002\\_7.pdf](http://www.michigan.gov/documents/deq/deq-ead-tas-sqgposter_306002_7.pdf)

# Emergencies Can Happen! Be Prepared!



Liberty Mutual Insurance "Humans" Commercial (London Olympics 2012 Ad)

<https://www.youtube.com/watch?v=zfyWct2FJBU>

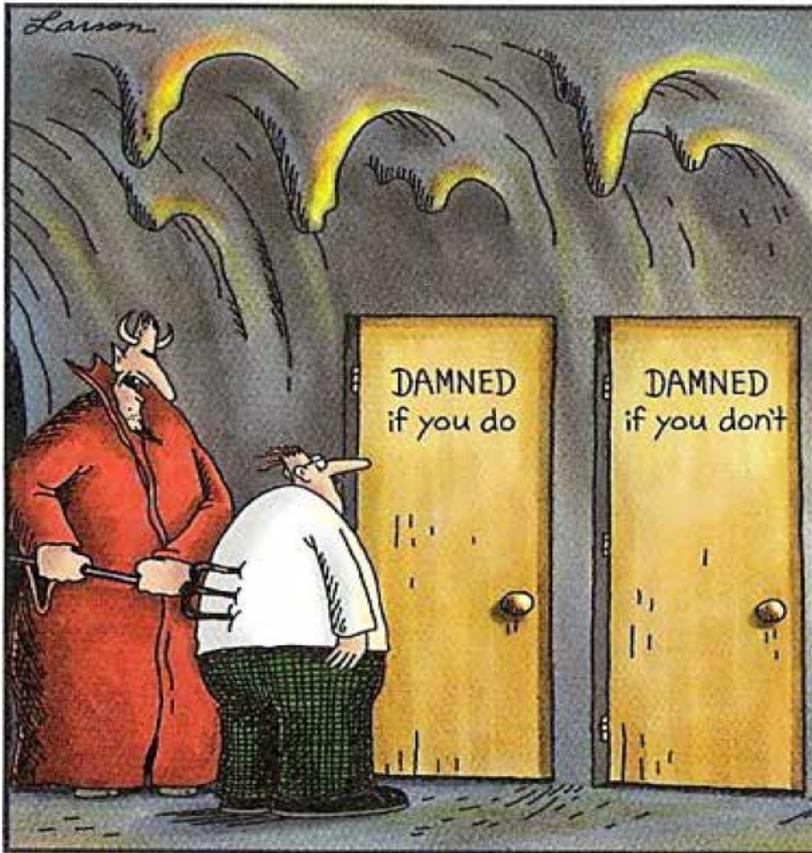
# The RCRA inspector approaches...

What is your inspector looking at?

- Drums outside
- Dead Vegetation
- Soil Staining
- Access to the Building



# The inspector is at the door Now what??

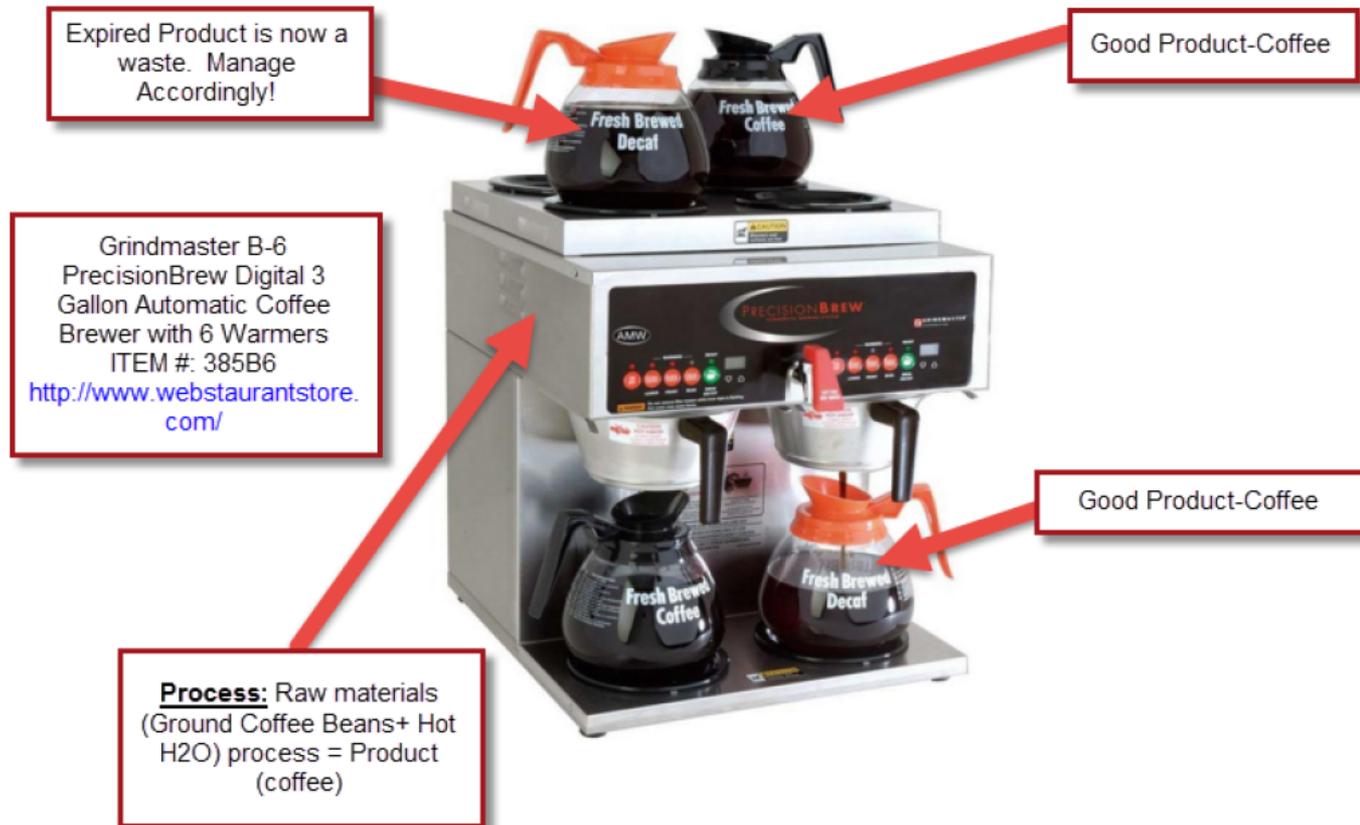


"C'mon, c'mon—it's either one or the other."

**"Invite them in"**

[www.pinterest.com](http://www.pinterest.com)

# How is Waste Generated? Show me the Process.



Note: Decanters sold separately

# Facility Inspection



“Show the inspector the way it is”



# RCRA Inspection- Examine vegetation



# RCRA Inspection- Inspect Waste Accumulation Areas



# RCRA Inspection-

## Inspect Containers-labeled AND closed!



# Signs, Labels, Placards



**Hazardous Waste**  
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL  
If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology or the Environmental Protection Agency

Accumulation Start Date: <b>VERY IMPORTANT</b>	Generator Name:
Reportable Quantities (RQ): lbs <small>40 CFR Subchapter J, Part 302, Table 302.4</small>	Address:
Manifest Document #:	City:
Emergency Response Guide #:	State:
EPA Waste Code(s) and/or Characteristic(s) <b>e.g., D001, F003</b>	Zip:
EPA/DOT Shipping name:	EPA ID #:
Hazard Class: <input type="checkbox"/> <input type="checkbox"/>	
UN/NA #:	
Packing Group (PG): <input type="checkbox"/>	

In the event of a spill or release of this hazardous waste, contact the US Coast Guard National Response Center at 1-800-424-8802 for information and assistance.



<http://www.trafficssign.us/regsign.html>  
[http://www.ecy.wa.gov/programs/hwtr/hw\\_labels/](http://www.ecy.wa.gov/programs/hwtr/hw_labels/)  
[www.livescience.com](http://www.livescience.com)  
[www.pinterest.com](http://www.pinterest.com)

# Labels come in all shapes and sizes

“Hazardous Waste” and Date and Waste Code (e.g. D001)

Label Type	Purpose	Typical Label Location	Label Example
<b>NFPA 704 Diamond</b> <a href="http://www.nfpa.org/704">www.nfpa.org/704</a>	Provides information about hazards that occur during emergency response	Outside buildings, on doors, on tanks, visible to emergency responders during spill or fire	
<b>DOT Placard</b> <a href="http://www.dot.gov/">www.dot.gov/</a>	Provides information about hazards to transportation workers and emergency responders	Tank cars, cargo tanks, portable tanks, bulk packages, vehicles or containers containing non-bulk packages	
<b>OSHA HazCom 2012</b> <a href="http://www.osha.gov/">www.osha.gov/</a>	Provides information about hazards to workers using chemicals under normal conditions of use	Pipes, drums, and containers of materials that are used in the workplace	

[www.nfpa.org/Assets/files/.../704/704\\_FAQs.pdf](http://www.nfpa.org/Assets/files/.../704/704_FAQs.pdf)

# Labels come in all shapes and sizes

“Hazardous Waste” and Date and Waste Code (e.g. D001)



[rampages.us](http://rampages.us)

# Placards

Generators must make available the appropriate **U.S. DOT Placard** to the transporter if **>1000 pounds** (approximately 2 drums) of hazardous waste is shipped offsite.



[http://www.phmsa.dot.gov/staticfiles/PHMSA/Hazmat/digipak/pdfs/presentation/Placarding\\_Requirements\(04-07\).pdf](http://www.phmsa.dot.gov/staticfiles/PHMSA/Hazmat/digipak/pdfs/presentation/Placarding_Requirements(04-07).pdf)

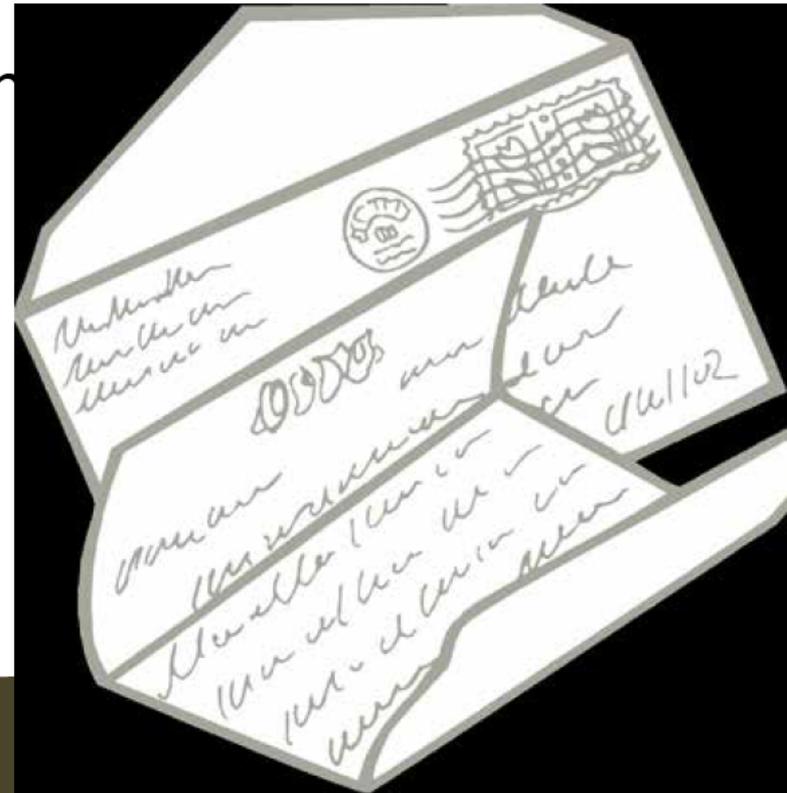
[http://www.safety-sign.com/info/materials/dot\\_placards.php](http://www.safety-sign.com/info/materials/dot_placards.php)

<http://www.placardsign.com/what-are-placard-signs.html>

# What happens next?

Your inspector may:

- Request additional information
- Write up an inspection report
- If violations were observed a Violation Notice (VN) is sent



# Specific Resources

- [Waste Characterization](#)
- [Common Waste Generator Violations](#)
- [Hazardous Waste Program Inspection Forms](#)
- [Statutes and Rules](#)
- EQP5150 - [Michigan Site Identification Form \(directions not included\)](#) Revised 5/2010
- EQP5150 - [Michigan Site Identification Form Directions \(form not included\)](#) Revised 7/2005

# Inspector's Goals

Of course...

- Complete a full compliance inspection
- Determine your compliance with applicable rules and regulations as well as with any permit condition

Also...

- Ensure your understanding of the rules and regulations you are subject to.
- Make sure you understand your compliance status
- Help you answer any questions or concerns you may have
- Have an open communication
- Provide you with excellent customer service

# Questions?

