



METRA

Metropolitan Environmental
TRaining Alliance

What to Expect During a Hazardous Waste Inspection

Why do we do inspections?

Memorandum of Agreement

DEP has an agreement with EPA and is the designated agency to enforce RCRA at the state level

- Resource Conservation and Recovery Act (RCRA) program delegated to DEP - 1980
- EPA accompanies DEP on some inspections
- DEP has 360 days to close a case
- Number and type of inspections specified



What prompts us to inspect specific sites?

- Memorandum of Agreement with EPA
- Citizen complaints
- Referrals from local governments
- Initiatives
- Just your lucky day!



Inspection Process

Before Inspection:

- Office prep

During Inspection:

1. Introductory meeting
2. Walk through
3. Records review
4. Closure meeting

After inspection:

- Inspection report
- Case closure
 - In compliance
 - Out of compliance (*major, minor*)



Inspection Process

Before Inspection:

Office preparation

- Review of Hazardous Waste Notification Form - 8700-12FL
- 40 CFR 262.18(d) – Starting in 2021 a SQG must re-notify every 4 years



Inspection Authority



Inspection Authority

- **Section 3007 of RCRA**
 - EPA Inspectors
 - Designated representative (authorized state)
 - **Florida is authorized state**
- **Section 403.091, Florida Statutes (F.S.)**
 - Consent from owner, operator, or person in charge
 - Inspection warrant
- **Permitted facilities**
 - Permit condition



Inspection Process

Introductory meeting

- Introductions
- Purpose of inspection
- What do you do here
- Walk through
 - Facility map or evacuation plan
- Records review
- Photographs
- Safety and personal protective equipment (PPE)



Inspection Process

Walk through

- All processes and procedures performed on contiguous property
 - What are you using?
 - How are you using it?
 - Wastes generated from the use of it?
- Waste storage areas (central and satellite)
 - Container management
- Walk outside buildings
 - May walk entire property



Inspection Process

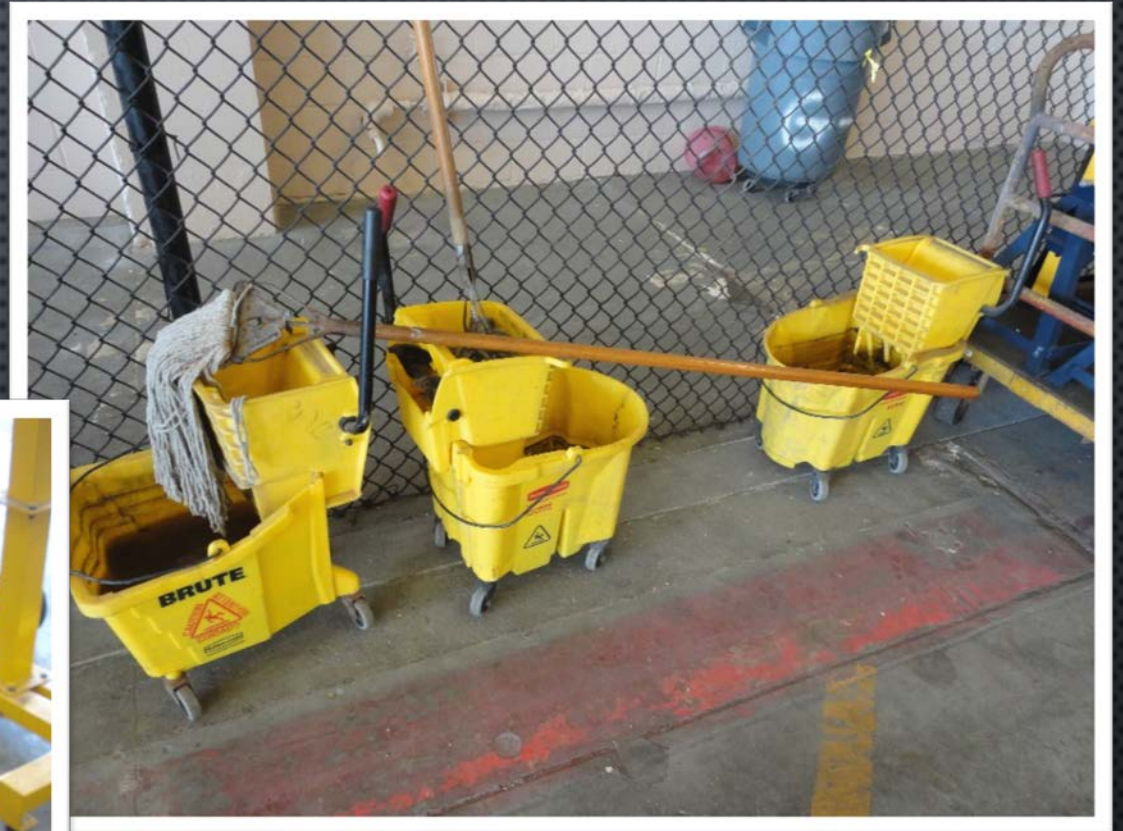
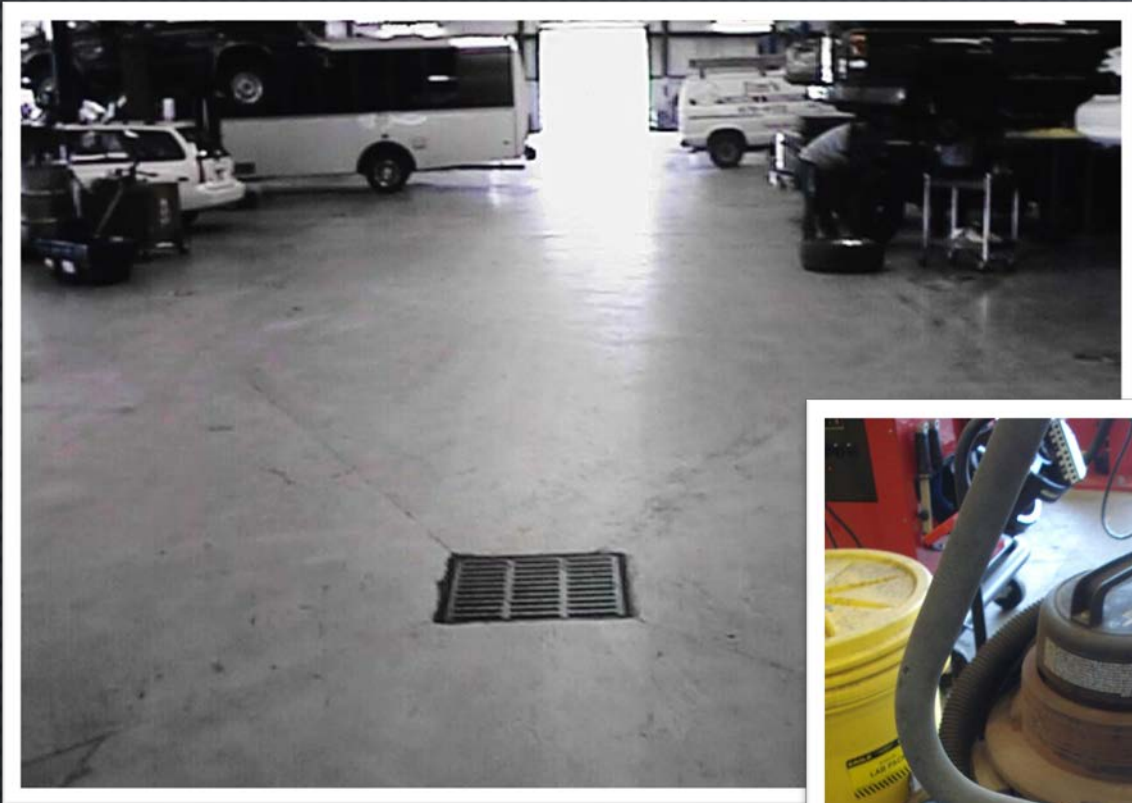
Process based inspection



Inspection Process



Inspection Process





Things That Catch Our Attention

Waste Determination

- 40 CFR 262.11



Things That Catch Our Attention



Things That Catch Our Attention

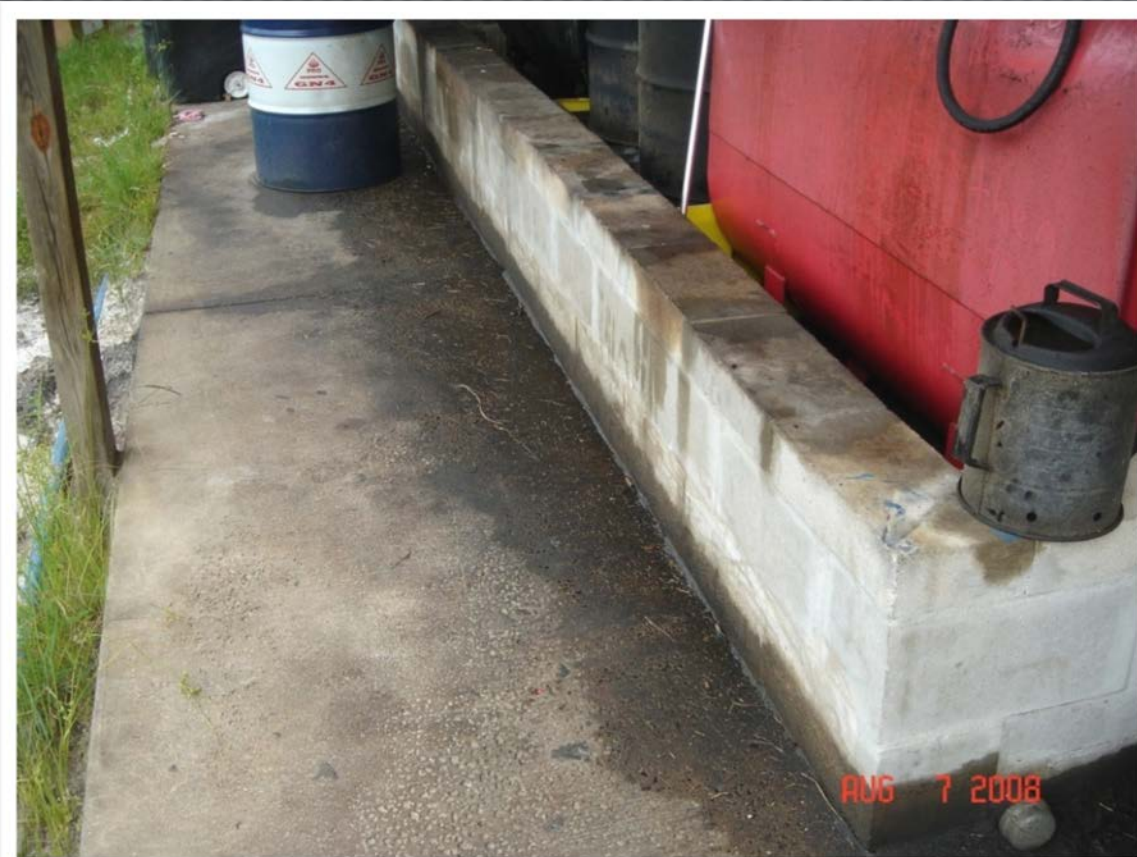


Things That Catch Our Attention

- Used Oil
- 62-710.401(6), FAC
 - Labeling
 - Secondary Containment



Things That Catch Our Attention



Concrete not sealed



Valve open



Things That Catch Our Attention

Universal waste lamps

- Labeling
 - 40 CFR 273.14(e) / 273.34(e)
- Closed Container
 - 40 CFR 273.13(d)(1) / 273.33(d)(1)



Things That Catch Our Attention





Things That Catch Our Attention



Good! Things That Catch Our Attention



Things That Catch Our Attention

Walk around
buildings/site





Things That Catch Our Attention



Things That Catch Our Attention



Things That Catch Our Attention



- 40 CFR 262.15(a)(4) – SAA
- 40 CFR 262.16(b)(2)(iii)(A) – SQG
- 40 CFR 262.17(a)(1)(iv)(A) - LQG

Containers must be kept closed



Things That Catch Our Attention



Inspection Process



Inspection Process

Records review (3 years on-site)

- Manifests
- Waste Determinations
- Weekly Inspections
- Contingency Plan
- Training
- Notification of Local Authorities
- ...

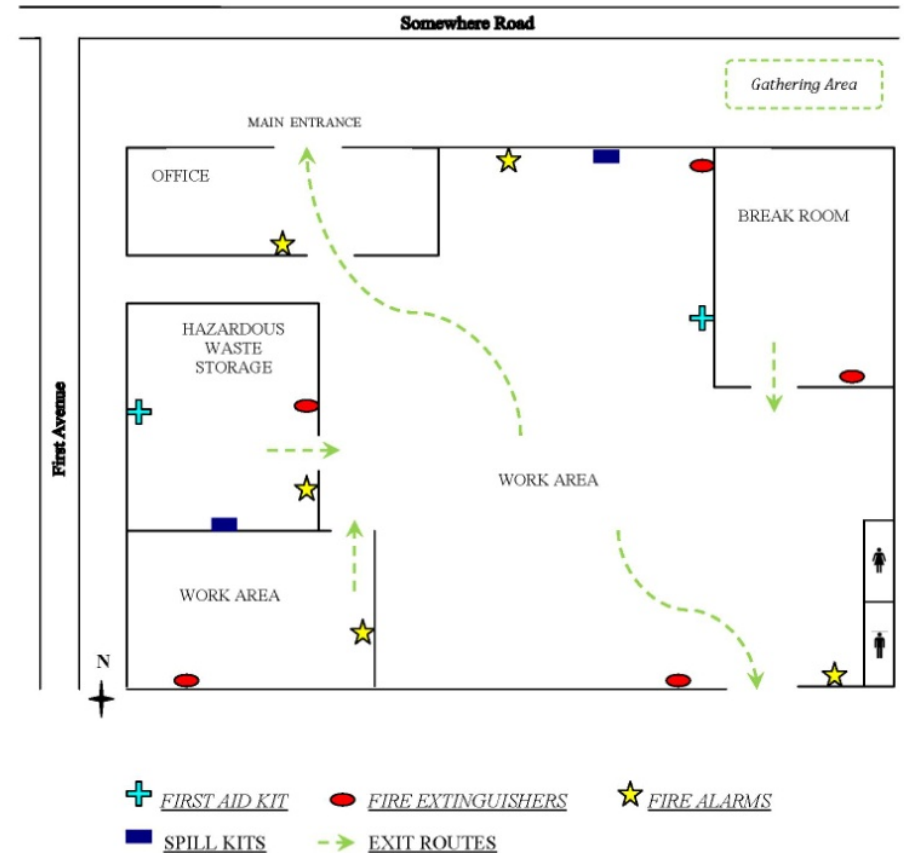


Records Review

- **SQG must post emergency information in areas where waste is generated and accumulated**
 - 40 CFR 262.16(b)(9)(ii)
 - Include satellite accumulation areas
- **Posting must include:**
 - Name & phone number of Emer. Coord.
 - Locations of fire extinguishers & spill control, fire alarms
 - Phone number of fire department
- **LQG must develop and maintain a contingency plan according to 40 CFR 262 Subpart M**

My Company Inc.
191 Somewhere Road
Otherville, Florida 32111

Emergency Coordinator: _____ (904) 999-9999
Fire Department: (904) 999-9999
CHEMTREC: (800) 424-9300
Police Department: (904) 999-9999
Emergency Response: (904) 999-9999
Hospital: _____ (904) 999-9999



Records Review

- **Conduct weekly hazardous waste accumulation area inspections**
 - 40 CFR 262.16(b)(2)(iv)
 - 40 CFR 262.17(a)(1)(v)
- **Document weekly hazardous waste container inspections**
 - 62-730.160(3), FAC
 - Electronic records are acceptable

WEEKLY INSPECTION LOG		
Inspector: _____	Date: _____	Time: _____
Clearly Print Name		
Accumulation Area Inspected: _____	Number of Containers: _____	
Are all containers in good condition?	Yes _____	No _____
Is there any evidence of leaks or spills?	Yes _____	No _____
Are all containers labeled "Hazardous Waste"?	Yes _____	No _____
Are all containers marked with an accumulation start date?	Yes _____	No _____
Are all containers closed?	Yes _____	No _____
Is there adequate aisle space between rows of drums?	Yes _____	No _____
Is spill control equipment available?	Yes _____	No _____
Observations: _____		

(If containers in poor condition or leaks/spills were found, please note action taken in area below)		
<u>Repairs or Remedial Action</u>	<u>Date</u>	
_____	_____	
_____	_____	
_____	_____	



Inspection Process

Closure meeting

- Thank you!
- Review inspection findings
 - The good, the bad, and the ugly
- Do you have questions/comments
- Follow up
 - Facility (response)
 - DEP (email)



Questions



Contacts

John White, Environmental Consultant
Department of Environmental Protection, Central District
John.White@FloridaDEP.gov
407-897-4305

Miranda Rothenberger, Environmental Specialist
Department of Environmental Protection, Central District
Miranda.Rothenberger@FloridaDEP.gov
407-897-4301

