

What to Expect from an ADEQ RCRA Inspection -How to Respond-

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Hazardous Waste Compliance Officer
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Our Team of Inspectors



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Types of Facility Inspections

- Complaints / Referrals
- Special Initiatives
- Routine Generator Inspections
 - Very Small Quantity Generators
 - Small Quantity Generators
 - Large Quantity Generators
- Hazardous Waste Transporters
- Treatment, Storage & Disposal Facilities (TSDFs)

The image shows a yellow complaint form titled "COMPLAINT". It includes fields for "TO:", "WHOSE FAULT:" (with radio buttons for Mine, Yours, Ours, Other), "DESIRED OUTCOME:" (with radio buttons for Apology, Explanation, Litigation, Promotion, Restitution, Change), "COMPLAINANT:", and an "ANONYMOUS" checkbox. There are also fields for Name, Date, and Year.

	LQG	SQG	VSQG
HW per month	>2,205 lbs	<2,205 lbs	<220 lbs
HW accumulated	No limit	<13,230 lbs	<2,205 lbs
Acute HW Accumulated	> 2.2 lbs	< 2.2 lbs	< 2.2 lbs



Notification:

- *Routine inspections are Unannounced, but facilities are sometimes given a two (2) week notification.*

Inspection Schedule:

- Introductions
- Notice of Inspection Rights
- Site structural inspection
- Records Review
- Closing Conference – Exit Debriefing



What we look at...

- Business Process
- Storage Locations
- Satellite Accumulation Areas
- Discharge Areas
- Loading Docks
- Tanks and Containers
- Drip Pads and Containment Systems
- Solid Waste Receptacles
- Wastewater Treatment Systems
- Safety Equipment (spill response, eyewash and showers)



Make sure they are available and maintained on site.

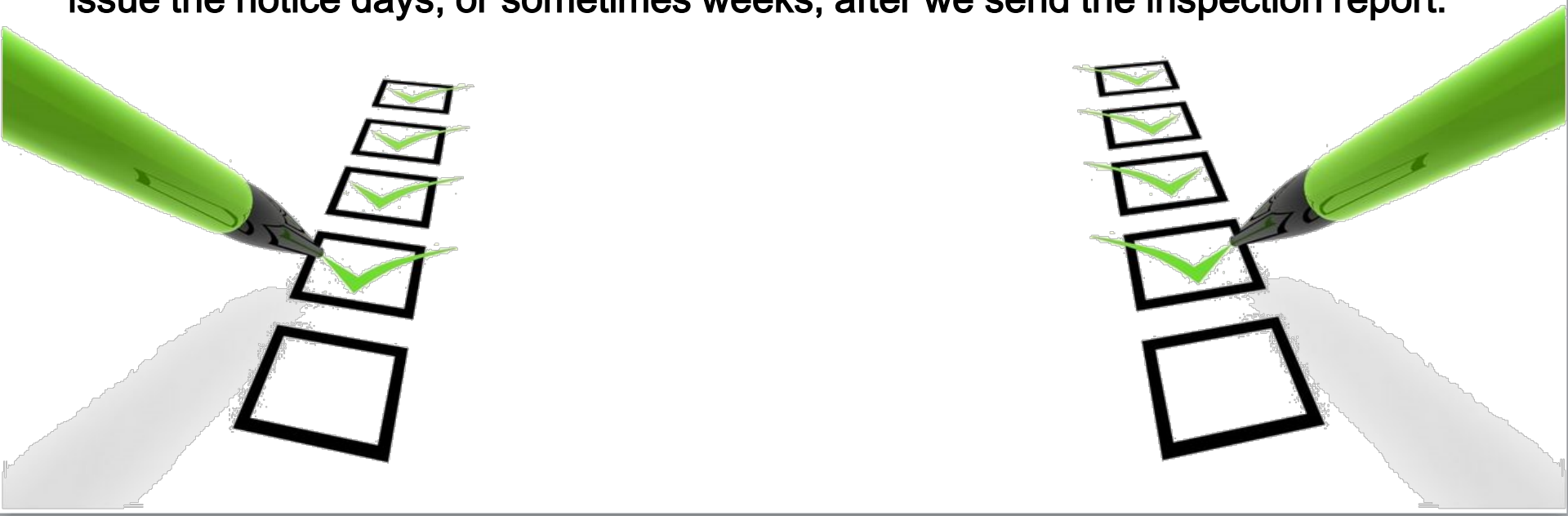
- Facility Annual Report (FAR) (Past 3 Years)
- Registration Forms (Past 3 Years)
- Generation Activity Forms (LQGs only - Quarterly For Past 3 Years)
- Waste Determination Records
- Contingency Plan (LQG) or Emergency Preparedness Plan (SQG)
- Training Materials
- Training Records (Past 3 Years)
- Inspection Checklists (LQGs only - Past 3 Years)
- Manifests and LDRs (Past 3 Years)
- Pollution Prevention (P2) Plan (If applicable)
- Waste Analysis/Treatment Plan (if applicable)
- Incident/Spill Reports (if any)



Inspection Report

- Cover Page – Contact info
- Signed Notice of Inspection Rights
- Photographic log with comments
- Checklist – Custom for each generator status
 - Areas of concern, or lack thereof, observed by inspectors
 - Includes a summary of the facility information, inspection activities, observations, and a list of documents reviewed for compliance
- Exit Debriefing of Field NOC

The NOC or NOV is not always attached to the inspection report – We may issue the notice days, or sometimes weeks, after we send the inspection report.



- Identifies deficiencies noted during the inspection and areas of concern
- Suggestions for improvements
- Request additional documents

The Exit Debriefing may not include everything that will be addressed in the NOC or NOV.



NOC / Field-Issued NOC:

- Lists minor violations and compliance conditions.
- After *Compliance Condition* deadline, case goes to Community Liaisons for compliance assistance and closure.



NOV:

- Lists major and minor violations, and compliance conditions.

Consent /Administrative Orders

Consent/Administrative Judgments



Top 10 Violations (2014 – now)

1. Treatment, storage, or disposal of hazardous waste without a permit
2. Failure to perform a waste determination
3. Improper treatment, storage, or disposal of hazardous waste
4. Inaccurate contingency plan / emergency preparedness plan
5. Failure to comply with preparedness and prevention requirements
6. Satellite accumulation container management
7. Labeling
8. Weekly inspections (applies to LQGs only)
9. Over 90/180 day storage limit
10. Failure to mark accumulation date on containers in the central storage area

Effective in Arizona spring 2019 (expected)

Some notable changes:

- VSQGs can send hazardous waste to LQG under control of same person for consolidation
- VSQGs & SQGs may maintain their generator category in the case of an episodic event (planned or unplanned event)

Notable changes continued:

- Additional labeling that identifies hazards of the content
 - Written hazard characteristic, waste code, DOT placard or pictogram

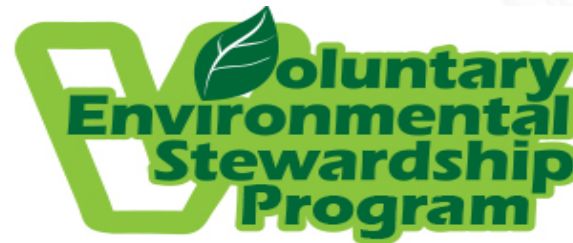


- LQGs must submit quick reference guides of contingency plans

- **Emergency Preparedness and Planning**
 - **Contingency Plan Quick Ref. Guide**
 - Eight components
 - Types/names of haz waste & hazards
 - Estimated max amounts of haz waste
 - Haz waste requiring special treatment
 - Map showing where wastes are generated, accumulated, and/or treated
 - Map of facility identifying routes of access and evacuation
 - Location of water supply
 - ID of on-site notification systems
 - Name of emergency coordinator(s) and 24/7 emergency telephone numbers

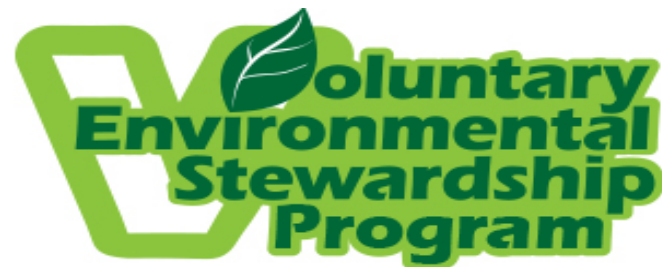


- Environmental compliance & commitment to public health and the environment
- Benefits
 - public recognition
 - coordination of multiple on-site inspections
 - advanced notification of inspections and enforcement rulings
- Five levels of VESP recognition: copper, bronze, silver, gold & platinum





- To sign up, visit www.azdeq.gov/VESP
- Contact info: Len Drago, 602-771-2288



Contact Info

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