Hazardous Waste Inspection Insights

Department of Environmental Quality
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**GOAL**

- Get the inspector in the facility as fast as possible!
- Get the inspector out of the facility as fast as possible!

**HOW?**

- Organize facility records
- Ensure that multiple staff are knowledgeable about the facility records
Once you receive the inspection report… READ the report!

- Pay special attention to the inspector’s comments & recommendations

- The inspection report can prepare you for the next inspection: EPA or State
Inspection Process

Administrative Review

The Administrative Review can include the following documents for the past three years:

Small Quantity Generator

- Manifests/LDRs
- Waste Profiles
- Weekly Inspections of Central Accumulation Area(s)
- Emergency Preparedness (documented arrangements made with local emergency authorities)
- Emergency Info posted by phones/areas
- Training - Employees must be thoroughly familiar with HW management

Large Quantity Generator

- Manifests/LDRs
- Waste Profiles
- Waste Minimization Plan
- Weekly Inspections of Central Accumulation Area(s)
- Emergency Preparedness
- Contingency Plan
- Training
- Biennial Report
Update the Facility Contacts!

**Reminder: Electronic Notification**
Now facilities request EPA ID numbers and update facility information electronically in EPA's RCRAInfo database instead of submitting a hard copy (EPA 8700-12 Form) to the DWM-Hazardous Waste Section for entry in RCRAInfo.

[https://rcrainfo.epa.gov](https://rcrainfo.epa.gov)

The only exception is a facility that submitting a RCRA Part A Application/Revision:

The generator must still submit a hard copy (EPA 8700-23 Form) to the HWS Permit Writer in lieu of entering this information directly into RCRAInfo.
For future EPA Notifications
(Biennial Reports, 8700 updates, and Electronic Manifest) the DWM-Hazardous Waste Section contact is:

Lisa Valdmets (Lisa.Valdmets@ncdenr.gov; 919-707-8231)

The NC DEQ Hazardous Waste Section is going paperless! All facility notifications need to be submitted directly through EPA’s RCRAInfo database.

Once registered, you will enjoy the convenience of immediate access to the RCRAInfo database to update your facility’s records including Site Name, Site Contact, Generator Status and more!
Electronic Filing of EPA Notifications (8700 forms): Register for myRCRAid
https://rcrainfo.epa.gov/rcrainfoprod

The HWS tutorial for registering in RCRAInfo can be found at this link:
Marking and Labeling

Requires SQGs and LQGs to label HW containers (satellite and central accumulation) and tanks with the following:

- The language “Hazardous Waste”
- Indication of the hazards of the contents (characteristic identifier)
- Applicable hazardous waste code(s) (required prior to shipping only)
Marking and Labeling

Indication of the hazards of the contents -

Examples include, *but are not limited to*:

- Applicable HW Characteristics: Ignitable, Corrosive, Reactive, Toxic
- Hazard Communication consistent with DOT requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding)
- Chemical hazard label consistent with the National Fire Protection Association code 704
Examples of Labels that indicate the “Hazards”

The applicable hazardous waste characteristic (i.e., ignitable, corrosive, reactive, toxic):
Examples of Labels that Indicate the “Hazards”

There are 9 DOT hazard classes. Hazard communication consistent with DOT (49 CFR part 172 Subpart E – Labeling or Subpart F – Placarding)
Examples of Labels that Indicate the “Hazards”

Hazard statement or pictogram consistent with OSHA (29 CFR 1910.1200). Example: Globally harmonized system (GHS)

Acute Toxicity – *harmful*  Toxic – *fatal*  Corrosive  Flammable  Self-Reactive
Examples of Labels that Indicate the “Hazards”

Chemical hazard label consistent with the National Fire Protection Association code 704
Inspection Requirements
Marking and Labeling Clarifications

- Labeling/marking must occur at the initial point of generation.

- For containers that have small containers inside (e.g., tubes, vials, etc.), generators can mark the outer/secondary container or attach a tag with the required information.

- For containers that already have appropriate marking and labeling (e.g., a Commercial Chemical Product in its original container with an intact label), the existing marking and labeling is sufficient, provided it indicates the hazards of the chemical and the words “Hazardous Waste” are added.
Inspection Requirements
Marking and Labeling Examples

Before
Inspection Requirements
Marking and Labeling Examples

After
inspection requirements
central accumulation area (caa) aisle space

remember, any size container must be 24” apart;

and, all labels must be visible
Inspection Requirements
CAA Aisle Space

Designate CAA Staging Areas to Ensure Compliance
Thank You for Your Efforts!

“The difference between try and triumph is a little umph.” – Anonymous
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