



Hazardous Waste Inspection Insights

Department of Environmental Quality





Don Burke

Environmental Specialist II

**Environmental Stewardship Initiative
Division of Environmental Assistance and Customer Service**

Don.Burke@ncdenr.gov

919-707-8131



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



Inspection Expectations

The Inspection Report



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



Electronic Notification

RCRAInfo

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>

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.



Electronic Notification

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 Notification

RCRAInfo



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:
<https://files.nc.gov/ncdeq/Waste%20Management/DWM/HW/8700-guidelines/Electronic-Filing-of-EPA-Notifications.pdf>



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)
- Hazard statement or pictogram consistent with OSHA Hazard Communication Standard 29 CFR 1910.1200
- 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**):

HAZARDOUS WASTE

STATE AND FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY, THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR
THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL

GENERATOR INFORMATION:
NAME _____
ADDRESS _____ PHONE _____
CITY _____ STATE _____ ZIP _____
EPA / MANIFEST ID NO. / DOCUMENT NO. _____
EPA _____ ACCUMULATION _____
CONTENTS, COMPOSITION: _____

PHYSICAL STATE: SOLID LIQUID
HAZARDOUS PROPERTIES: FLAMMABLE TOXIC
 CORROSIVE REACTIVITY OTHER _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX
HANDLE WITH CARE



Inspection Requirements

Container Labelling

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)



Inspection Requirements

Container Labelling

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



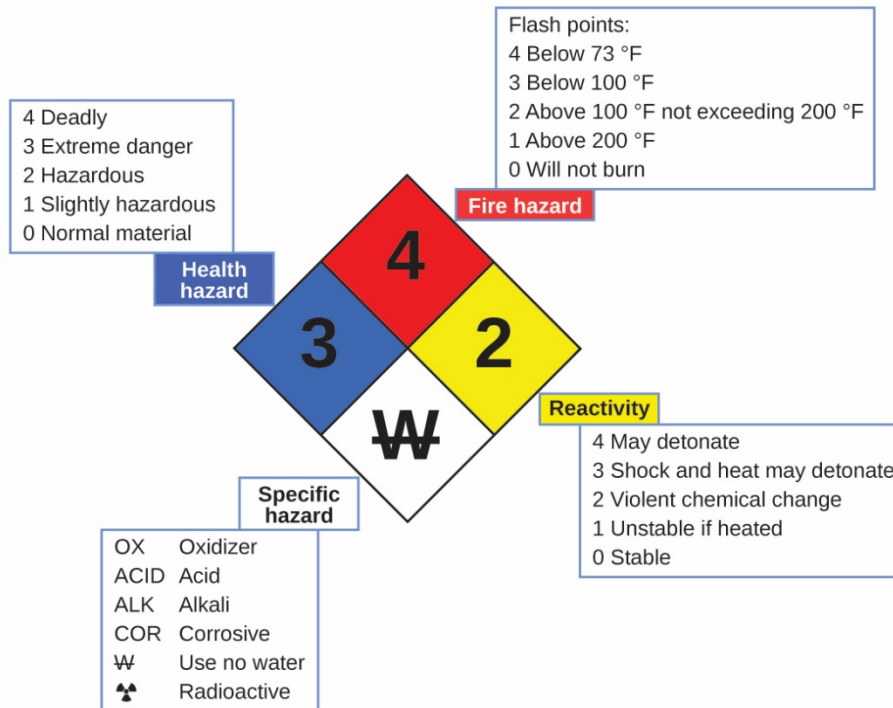
Inspection Requirements

Container Labelling



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/marketing 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



**North Carolina Department of Environmental Quality
Division of Waste Management
Hazardous Waste Section - Compliance Branch**

REGIONAL INSPECTOR MAP

Brent Burch - Branch Head / 828.321.9585 / Brent.Burch@ncdenr.gov

Lisa Valdmets - Branch Secretary / 919.707.8231 / Lisa.Valdmets@ncdenr.gov



Western Unit

Sean Morris - Western Unit Supervisor / 704.464.1357 / Sean.Morris@ncdenr.gov

Richard Concepcion - Environmental Chemist / 828.578.6927 / Richard.Concepcion@ncdenr.gov

<p>Jeff Menzel 828.419.5034 Jeff.Menzel@ncdenr.gov</p>	<p>Nick Guglielmi 919.935.2010 Nick.Guglielmi@ncdenr.gov</p>
<p>Ernie Lawrence 336.352.5742 Ernest.Lawrence@ncdenr.gov</p>	<p>Rose Pruitt 919.270.3476 Rose.Pruitt@ncdenr.gov</p>
<p>Andrew Martin 919.270.3507 Andrew.Martin@ncdenr.gov</p>	

Eastern Unit

Heather Goldman - Eastern Unit Supervisor / 980.224.9858 / Heather.Goldman@ncdenr.gov

Autumn Romanski - Environmental Chemist / 919.280.1510 / Autumn.Romanski@ncdenr.gov

<p>Jack Kitchen 919.219.0402 Jack.Kitchen@ncdenr.gov</p>	<p>Phil Orozco 919.212.2501 Phil.Orozco@ncdenr.gov</p>	<p>Vacant</p>
<p>Jenne Walker 919.707.8224 Jenne.Walker@ncdenr.gov</p>	<p>Wes Hare 910.821.0457 Wes.Hare@ncdenr.gov</p>	<p>Updated 4/15/2019</p>

Thank You for Your Efforts!



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





Don Burke

Environmental Specialist II

Environmental Stewardship Initiative

Division of Environmental Assistance and Customer Service

Don.Burke@ncdenr.gov

919-707-8131

