HOW DO YOU BECOME AN INSPECTION CANDIDATE?

Kansas Department of Health and Environment
Bureau of Waste Management
HOW ARE YOU CHOSEN?

- Candidate List
- Complaint
- Facility-Type Initiative
INSPECTION PROCEDURES

• Entry – Ask for environmental contact (Person listed on Notification form)
• Present ID – State the purpose of the inspection
• Outline the process – Preliminary discussion, walk-through inspection, records review, and exit briefing
• Estimate the amount of time of inspection
PRELIMINARY DISCUSSION

• Basic information from checklist cover page (name of facility, address, phone, fax, number of employees, contact, etc.)
• Are there any trade secrets or confidentiality issues?
• What kind of manufacturing? What is produced?
PRELIMINARY DISCUSSION

• What are the processes?
• What solid and hazardous wastes are generated?
• How much of each waste is generated per month?
• How is each waste disposed?
• Are there any safety issues before beginning facility tour?
PHYSICAL INSPECTION (WALK-THROUGH)

- Will tour entire facility (including perimeter)
- Focus on points of waste generation and storage
- Bring your keys (we need to see every closet and attic)
- We will take photographs
- We will make comments and suggestions and identify problem areas during the walk-through.
RECORDS REVIEW

- Inspection Logs
- Hazardous Waste Manifests (3 years)
- Land Disposal Restrictions (3 years)
- Waste Determination Documentation – analytical reports, MSDSs, etc.
- Special Waste Disposal Authorizations
- Annual/biennial Reports
- Training Records
- Contingency Plan
RECORDS REVIEW
EPA Generators

• Additional documents for EPA generators
  – Training Documentation
  – Job Titles
  – Job Descriptions
  – Contingency Plan
BREAK!!

• Most inspectors will take a break and either leave or ask for some time alone to organize their notes and thoughts before the exit briefing.
EXIT BRIEFING

- Inspector may ask additional questions to clarify or confirm information
- Inspector will explain your generator status
- Inspector will explain all violations and comments/concerns identified during the inspection
- Inspector will explain corrective actions that are needed
- Inspector may cite a violation even though corrective actions were implemented during the inspection
EXIT BRIEFING

• Inspector will establish deadlines for compliance (correcting violations and addressing concerns)
• Inspector will leave a written Notice of Compliance/Non-compliance form or send a letter explaining each of the violations and comments
• Inspector will answer all of your questions or will write them down to get you answers later
• Inspector may leave a customer satisfaction survey for you to complete
INSPECTIONS - AUTHORITY
K.A.R. 28-31-12

• To gain entry at any reasonable time of day
• To collect samples
• To analyze samples collected to determine if waste is hazardous
• To stop and inspect any vehicle transporting hazardous waste
• To photograph any hazardous waste facility, structure, or equipment
INSPECTIONS - AUTHORITY
K.A.R. 28-31-12

• To inspect and copy records or other information
• To drill test wells or groundwater monitoring wells
• To direct the operator to make changes if unsafe conditions or procedures are noted during the inspection
• To be treated fairly and with respect
INSPECTIONS - YOUR RIGHTS

• To have the inspector observe all reasonable security, safety, and sanitation measures
• To collect duplicate samples of any sample collected by the inspector
• To receive a written list of violations and comments noted during the inspection
• To designate information given to the inspector as a trade secret or confidential
  (Will have to be documented)
• To be treated fairly and with respect