

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.

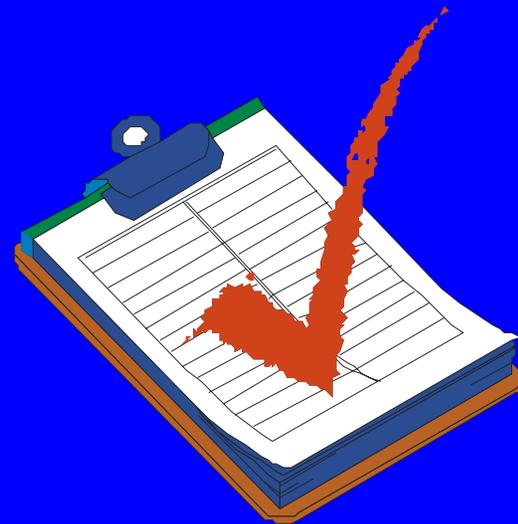
RECORDS REVIEW

- 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