

STEP INSIDE AN HHW INSPECTION



Kansas Department of Health and Environment
Bureau of Waste Management

**WHAT TO EXPECT
ON AN
INSPECTION**

INSPECTION PROCEDURES

- Generally Unannounced
 - May call that day for an unmanned facility
- Entry – Ask for contact person
- Present ID
 - Introductions
 - State the purpose of the inspection



PRELIMINARY DISCUSSION

- Basic information from checklist cover page (name of facility, address, phone, fax, number of employees, contact, etc.)
- Have there been changes since the last inspection?
 - New disposal contractor?
 - New SQG program?

PHYSICAL INSPECTION (WALK-THROUGH)

- Will tour entire facility (including perimeter)
- We will take photographs of the good and bad
- We will make comments and suggestions and identify problem areas during the walk-through.

RECORDS REVIEW

- Annual Report (3 years)
- Design plan
- Closure plan
- Operating plan
- Notification of changes to plans

RECORDS REVIEW

(Continued)

- Training records (3 years)
 - 24-hour and 8-hour refreshers
- Bills of lading (3 years)
- Hazardous waste manifests (3 years)
- Land disposal restriction notifications (LDRs)
- Weekly inspection records (3 years)

EXIT BRIEFING

- Inspector may ask additional questions to clarify or confirm information
- 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

(Continued)

- 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

COMMON HHW ISSUES

RECORDKEEPING

- Bills of lading at satellite locations
- Weekly inspections
 - Hazardous Waste Storage Areas
 - Non-hazardous Waste Storage Areas
 - Date of inspection
 - Signature of inspector
 - Assess volume and container integrity



CONTAINER CONDITION

- Labeling

- Sign in the area and/or labels on individual containers

- Hazardous Waste with DOT class (Examples)

- Flammable
 - Corrosive
 - Poison
 - Oxidizer



- Non-Hazardous Waste with contents (Examples)

- Glass Cleaner
 - Baking Soda

CONTAINER CONDITION (Continued)

- Hazardous waste containers must be closed
 - Bolts on rings must be tightened
 - Bungs must be tightened.
- Must be in good condition or “over packed”
 - No dents
 - No rust
 - No holes

SEGREGATION

- Placed in designated area within 1 week
- Incompatibles segregated
 - Small tubs
 - Over pack containers
 - Separated secondary containment

SATELLITE FACILITY

- Must have a host facility
 - Must be described in hosts' permit
- Maintain bills of lading (3 years)
- Minimum of two cabinets
 - Flammables
 - Corrosives
- Weekly inspections
- Waste segregated and stored by the end of each day
- Arrangements made within 1 week of reaching storage capacity to remove all waste

USED OIL

- All containers must be labeled “Used Oil”
- Must use a transporter registered with KDHE

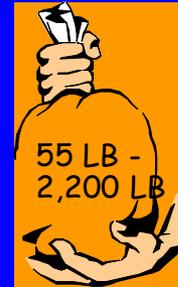
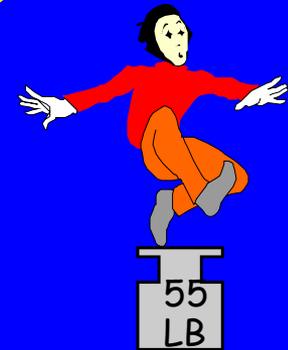


GENERATOR STATUS

CAN I ACCEPT THEIR
WASTE?

THREE TYPES OF GENERATORS (until end of 2008)

- Small Quantity Generator
(less than 55 lbs/month)
- Kansas Generator
(55 lbs to <2,200 lbs/month)
- EPA Generator
(2,200 lbs/month or more)



DETERMINING STATUS

- Call KDHE and ask
 - Linda Prockish – 785-296-0005
 - Rebecca Wenner – 785-296-1604
 - Jim Rudeen – 785-296-1603
- Ask the facility questions
 - Generator Verification Checklist

VERIFYING STATUS

- How much hazardous waste did they ship last year? (Verify their Manifests)
 - If they ever shipped more than 2,200 pounds, call KDHE.
 - If they frequently ship 55 pounds or more at a time you might want KDHE to take a look
- Remember not to average any waste streams (maximum generated each month)

VERIFYING STATUS

(Continued)

- What hazardous wastes do they generate?
 - Waste parts washer solvent
 - Waste paints and solvents
 - Rags contaminated with solvent
 - Paint filters
 - Waste corrosives
- Used oil is NOT a hazardous waste if it is being recycled.

CONFIRMING GENERATOR STATUS

- Any questions call KDHE
 - Rebecca Wenner – 785-296-1604
 - Jim Rudeen – 785-296-1603
 - Or your local district office

HOW WILL THE NEW
HAZARDOUS WASTE
REGULATIONS AFFECT
YOUR SMALL QUANTITY
GENERATOR PROGRAM?

CHANGES TO GENERATOR STATUS

- There will be four classifications of hazardous waste generators
 - Splitting the Kansas generator category
- Changing the terminology to better match EPA's terminology
- HHW's might be able to accept from larger generators

FOUR CATEGORIES

- Conditionally Exempt Small Quantity Generator (CESQG)
 - less than 55 lbs/month
- Limited Small Quantity Generator
 - 55 lbs/month to <220 lbs/month
- Small Quantity Generator
 - 220 lbs/month to <2,200 lbs/month
- Large Quantity Generator
 - 2,200 lbs/month or more

POSSIBILITY TO EXPAND PROGRAMS

- In addition to accepting waste from Conditionally exempt small quantity generators (CESQG) (formerly SQG), might be able to accept from Limited small quantity generators

UNIVERSAL WASTE

- First has to be a hazardous waste
- Most common type in Kansas is fluorescent bulbs
- If managed as universal waste, then it is exempt from the following:
 - Manifesting requirements
 - LDR requirements
 - Requirement to use a registered transporter

UNIVERSAL WASTE

- Two types of Universal Waste Handlers
 - Small Quantity
 - Accumulate < 11,000 lbs at any time
 - Large Quantity
 - Accumulate 11,000 lbs or more at any time
- Most HHWs would be small quantity handlers

Universal Waste

- Can currently accept the following universal waste from any business or home:
 - Fluorescent bulbs (mercury containing lamps)
 - Batteries (all sizes and shapes)
- May require a very small change to your operating plan
- Can charge for this service to recover costs

CONTACT INFORMATION

- BWM web site:
<http://www.kdheks.gov/waste>
- Jim Rudeen
785-296-1603
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- Rebecca Wenner
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QUESTIONS???