

# RCRA Compliance Assistance Program “COMPASS”

- Introduced March 3, 1997
- 3 elements
  - Toll free telephone help line
  - Guidance documents & conferences
  - Site specific RCRA audits and consultation

Today's presentation

“what to expect from a site specific audit”

# RCRA Compliance Assistance

Who is eligible?

- Primary audience
  - New businesses
  - Small business
- Also, open to others
  - Case-by-case

*So, if in doubt, call us*

# How to apply

- Call the Compass line (888-424-4193)
- Call our main line (860-424-3023)
  - Ask for engineer of the day
- Call Dave Stokes (860-424-3269), or
  - E-mail [david.stokes@ct.gov](mailto:david.stokes@ct.gov)

# Pre-site Consultation

*You will be contacted & ask a few questions*

*What type of assistance are you seeking?*

*(For this presentation I will discuss a full RCRA compliance audit)*

- Your generator status
  - LQG
  - SQG
  - CESQG
- List of your processes (what do you do & how do you do it)
  - Cleaning & degreasing
  - Painting & paint removal
  - Metal finishing
  - Product manufacturing
- Types of waste storage devices
  - Satellite containers
  - Storage containers
  - Tank systems

# Pre-site Consultation

- Types of waste treatment devices
  - Evaporators
  - Compactors
  - Distillation
  - Wastewater treatment
- Types of solid & hazardous waste generated
  - RCRA listed
  - RCRA characteristic
  - RCRA exempt
  - Universal waste
  - Used oil
  - CT regulated waste
  - Scrap metal
  - Other CT solid waste & recyclables

*Then....*

*We will schedule the site visit*

*Plan for a full day*

# Day of site visit

## In-briefing

- Have key employees available
  - Plant mgr
  - Production mgr
  - Maintenance supervisor
  - RCRA compliance specialist
- Detailed description of processes
  - primary
  - ancillary
- Detailed description of all waste types
- Detailed description of waste handling practices
  - collection
  - storage
  - treatment

# Day of site visit

## In-briefing, continued

- Discussion of written programs and records
  - Inspection schedule & log
  - Training program
  - Emergency response plan
  - Waste profiles (hazardous waste determinations)
  - Job descriptions
  - Shipping record
- Company background information:
  - Date opened & former occupants
  - Number of employees & shifts
  - Water supplies & discharges
  - Historical solid waste disposal areas
  - Ground water monitoring wells
    - » Non-RCRA
    - » RCRA

# Day of site visit

## Tour the facility

- Process areas (focusing on.....)
  - Purpose of the process (cleaning, metal finishing, product mfg)
  - Type of chemicals used
  - Wastes from each process
  - Method of collection (piping, container, tank system, etc)
  
- Waste treatment & handling areas
  - Satellite containers
  - Storage areas (containers, tank systems)
  - Waste treatment areas (evaporators, compactors, WWTS, etc)
  
- Tour outdoors
  - Dust collectors
  - Dumpsters
  - Storm drains
  - Storage areas



# Day of site visit

## During the site tour

- Inspector will point out violations
  - At the time observed
  - Suggest corrective measures
    - Some can be corrected immediately
    - Others may take more time
- Inspector will offer waste minimization suggestions
- Inspector will offer waste recycling suggestions

# Day of site visit

## After the site tour

### – Review written programs

- Inspection schedule
- Training program
- Emergency response plan
- Spill prevention control and countermeasures (SPCC)
- Air emissions (Subpart AA, BB, CC)

### – Review records

- Waste profiles (hazardous waste determinations)
- Job descriptions
- Training records
- Inspection logs
- Shipping records
- Spill reports

# Day of site visit

## At close of inspection

- Provide an out-briefing:
  - Discuss observations
  - Describe all violations observed (including those described during the tour)
  - Explain corrective measures for each violation (including those described during the tour)
  - Offer recycling and waste minimization suggestions
  - **If violations are egregious – explain enforcement process**
- Inspector will offer to work with you to correct any outstanding violations
  - Get started correcting now!!
    - Inspector assistance is limited to 90-days
    - After 90-days, other RCRA office staff will provide the assistance

# Post Site Visit

## Inspection report

- Report will be sent within 30-days
  - Draft report if outstanding violations
  - Final report if no violations or violations corrected in 30-days
- Final report within 90-days
  - Final report documents all corrections made
    - Also describes corrections still pending
  - If violations still outstanding – RCRA office staff will provide the continuing assistance

**RCRA (HAZARDOUS WASTE) INSPECTION REPORT**  
**LARGE QUANTITY GENERATOR**

Name(s) of inspector(s): \_\_\_\_\_

Date(s) of inspection: \_\_\_\_\_

Complaint Number: \_\_\_\_\_

Previous RCRA inspection: \_\_\_\_\_

Active RCRA enforcement: \_\_\_\_\_

**SITE INFORMATION**

EPA ID Number: \_\_\_\_\_

Site Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Contact Name(s) and Title: \_\_\_\_\_

Contact Phone #: \_\_\_\_\_ Date established at present location: \_\_\_\_\_

Property owned/leased: \_\_\_\_\_ Previous occupants of site: \_\_\_\_\_

**STATUS** (actual – operating)

CESQG (<100kg/mo)

Large Quantity Handler Universal Waste

Recycle/Reclaim

SQG (100 – 1000kg/mo)

Small Quantity Handler Universal Waste

Burner/Blender

Large Quantity Generator (>1000kg/mo)

Transporter

Episodic Generator

Receiving waste from off-site: \_\_\_\_\_

Other: \_\_\_\_\_

**NOTIFICATION**

Notification as:

Hazardous Waste: \_\_\_\_\_

Universal Waste (if applicable): \_\_\_\_\_

Any discrepancies between notification & actual operations:  Yes (comments below)  No

If yes, has a status change been requested:  Yes  No

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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# DEP's Expectations

- Company will work to correct violations within 90-days
  - However, we understand some may take longer such as closure of a former waste storage area or analytical testing of a complex waste stream
  - If corrective measures take greater than 90-days – you should prepare and offer a schedule for correcting the violation
- Company will maintain an open dialog with the inspector
  - We don't want to hound you
  - Don't be afraid to ask questions
    - There is no such thing as a dumb question

# Any Questions

