Connecticut Department of
ENERGY & ENVIRONMENTAL PROTECTION

Field Component of the Enforcement Process

What to Expect During a RCRA Inspection

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Statutory Authority for Inspections

Title 22a Chapter 439 Section 22a-6(a)(5) states that an inspector may

" ... enter at all reasonable times, without liability, upon any public or private property, except a private residence, for the purpose of inspection and investigation to ascertain possible violations of any statute, regulation, order or permit..."

Reasons for Being Inspected

- Routine EPA commitment inspection
- Re-inspection due to the closure of a formal enforcement action
- Sector-based initiatives including junkyards, marinas, drycleaners, furniture re-finishers, and hospitals.
- Complaints
- Requests and referrals from other agencies including Department of Motor Vehicles, Department of Public Health, etc.
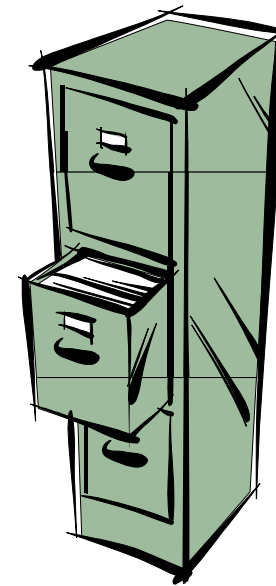
Re-Inspection Policy

CT DEEP's Enforcement Response Policy requires that companies that have previously had a formal enforcement action will be inspected within three years of the date of the closure of that formal enforcement action.

Inspector Conducts
Pre-Inspection File Review

This review can include:

- Review of DEEP files

- Review of the DEEP manifest database

- Biennial reports

- Internet search

DEP Inspector Arrives at Your Site

- All inspections conducted by the Waste Engineering and Enforcement Division are unannounced.

- The inspector will present their credentials and ask to meet with those in charge of environmental affairs.
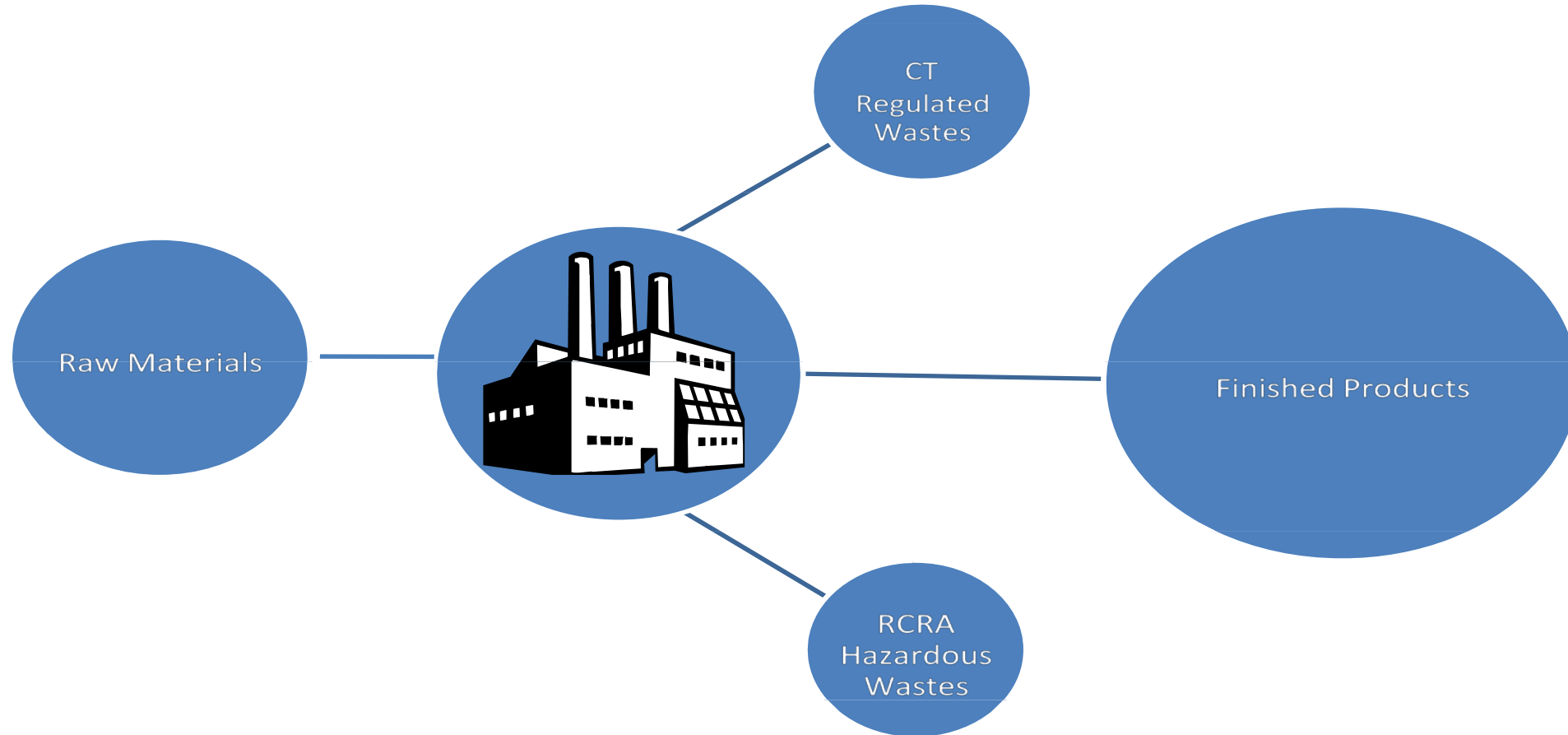
Initial Briefing

The inspector will discuss the reason for the inspection, the areas to be inspected, and what documents will be needed for review.

Discussion of the Company's Manufacturing or Industrial Processes

Tour of the Company

The tour will visit all parts of the plant including:

- Manufacturing Areas

- Maintenance Shops

- Laboratories

- Research and Development Areas

- Satellite RCRA and CT-Regulated Waste Accumulation Areas

- All RCRA Hazardous Waste Storage Areas

Satellite Storage Areas

- Closed when not in use
- Words "Hazardous Waste"
- Description of the contents
- At or near the point of generation
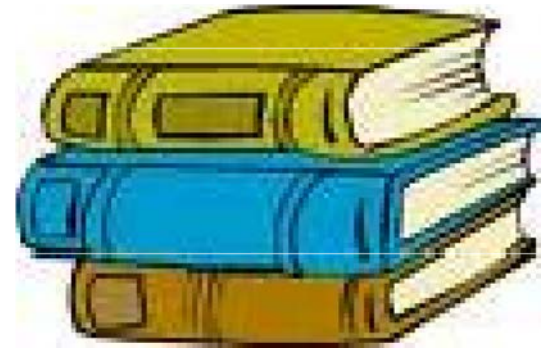- Under control of the operator of the process generating the waste

Less than 90-Day Storage Areas

- Containers closed when not in use
- Containers with the words "Hazardous Waste"
- Containers with a description of the contents
- Date of accumulation present
- Segregation of possible incompatibles and co-stored materials
- Secondary containment (10% of total volume or 100% of largest container)
- Impervious Base and Berms
- 50 feet from the property line for ignitable or reactive wastes

Review of Paperwork

- Contingency plan
- Personnel training records
- Manifests
- Recycling information (per CGS Sec. 22a-241b (d))
- Inspection schedule and logs
- Hazardous waste determinations
- Subpart AA, BB, CC documentation
- Closure/post-closure issues
- Financial assurance for closure

Outbriefing

- An outbriefing at the end of the inspection is given with the appropriate company personnel.

- This outbriefing will identify any violations known at the time of the inspection.

- Issues that may require submission of more information will be identified and discussed.

- Ways to come in to compliance will be discussed.

"Top Ten" List

1. Inspections (46/323 citations).
2. Personnel Training (36/323 citations).
3. Emergency Preparedness (35/323 citations).
4. Container Management (30/323 citations).
5. Marking/Dating (30/323 citations).
6. Hazardous Waste Determinations (28/323 citations).
7. Used Oil (23/323 citations).
8. Universal Waste (22/323 citations)
9. Closure/Financial (13/323 citations)
10. Transporter Requirements (9/323 citations)

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CT DEEP RCRA inspection report formats are available at:

http://www.ct.gov/deep/cwp/view.asp?a=2718&q=416912&deepNav_GID=1967

or

http://www.ct.gov/dep/cwp/view.asp?A=2718&Q=416912

Any Questions?