

# ***Inspection Process and Common Problems***



*EPA Lab Integrated Strategy: Assistance, Inspections, and  
Enforcement*

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# ***Inspection Process***

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- Facilities selection
- Distribution and Schedule
- Conducting the Inspection
  - Review of environmental program
  - Activities during the inspection

# ***Problems Observed***

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- Hazardous Waste
- Underground Storage Tanks
- SPCC
- CAA

# ***Resource Conservation and Recovery Act (RCRA) Hazardous Waste***

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- ▶ **Universal Waste**
- ▶ **Storage over 90 days or 180 days**
- ▶ **Satellite accumulation areas**
  - Open hazardous waste containers not currently in use
  - There are no hazardous waste labels or containers are mislabeled
  - Satellite accumulation areas are not located at or near the point of generation
  - Moving waste from a SAA to another SAA
- ▶ **Waste determination**
- ▶ **Contractors ordinarily handle waste determinations and manifests**



# *Underground Storage Tanks (USTs)*

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- ▶ Leak detection testing has not been conducted on an UST or underground piping
  - “Magic Box” is not used
- ▶ Failure to perform required maintenance on and calibration of electronic tank leak detection devices

# ***Spill Prevention, Control, and Countermeasure Plan (SPCC)***

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- ▶ The Facility lacks a plan
- ▶ The plan is missing key elements required in the Code of Federal Regulations Part 112.7
- ▶ The plan has not been reviewed every 3 years
- ▶ The plan has not been signed and dated by a Certified P.E. or Top Manager



# ***Clean Air Act (CAA):***

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- ▶ Failure to submit proper startup notifications



# *Enforcement*

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## ▶ Tool Box

