Executive Summary
The US Environmental Protection Agency (EPA) and State inspectors can visit your facility at any time to conduct a hazardous waste inspection. To avoid the potential for substantial fines and penalties, it is critical to ensure that you and your employees are prepared for inspectors’ scrutiny. Use the four tips in this paper to keep your facility inspection ready and make sure your team knows what to do when a regulator comes knocking.
Plan Now for Compliance Success

By ensuring you are well-prepared for a hazardous waste inspection, you will reap rewards that benefit your company in several ways.

First, by using self-assessment tools throughout the year and properly training your personnel, you will help ensure compliance with regulations designed to protect human health and the environment.

Secondly, you will fulfill your fiduciary obligation to your company by avoiding hefty legal fees, fines, and future liability.

Pre-inspection Preparation

Planning ahead will give you the confidence to handle inspections in an organized and controlled manner. Most inspections consist of two distinct parts: the administrative audit during which your recordkeeping and plans will be scrutinized, and the “walk around” during which the inspector will examine your on-site waste management operations.

Read on for four basic tips that can help you ace your next hazardous waste inspection.
1. Develop a Standard Operating Procedure

It's essential to develop, practice, and follow a written Standard Operating Procedure (SOP) to handle inspection protocol. An SOP helps ensure employees involved in a RCRA inspection are familiar with established company policies and expectations in advance. It can also provide consistency as personnel have a written standard to which they can refer. Some State agencies have formal inspection checklists. If you can obtain a copy of your state’s RCRA inspection checklist, you will have a better sense of what must be included in your inspection procedure.

At a minimum, your SOP should include:

**A DESCRIPTION OF THE ADMINISTRATIVE AND WALK-THROUGH PROCESS:**

It explains a typical inspection process and provides clear direction for facility personnel. It should include, at a minimum:

- The name of the lead company representative responsible for conducting a RCRA inspection, and his or her backup. This person should be the most qualified and knowledgeable employee regarding the facility’s operations and the RCRA compliance program.
- Location for inspector to review records/documents (this location should be easy to monitor and restrict inspector access to only those items necessary for the inspection)
- Employee’s legal obligations and allowances during and after inspections
- Actions that trigger contacting your legal counsel
- Actions and timelines to follow after the inspection

**PROCEDURES FOR WELCOMING THE INSPECTOR:**

- Verifying credentials, requesting opening conference, briefing on security and safety, and issuing personal protective equipment (PPE) as appropriate

**SUGGESTED DIRECT ROUTE:**

A direct, predetermined inspection route will limit the regulator’s visit to areas necessary for the RCRA inspection.

- Central (90-/180-day) storage, satellite accumulation points, universal waste accumulation areas, and used oil storage areas
- Recycling units and waste treatment activities (e.g., elementary neutralization units and wastewater treatment units), if applicable

**A LIST OF ESSENTIAL “DO’S AND DON’TS” DURING THE INSPECTION**

- Do take copious notes, duplicate photos, and split samples
- Keep answers succinct and on point and politely ask for explanations and regulatory references
- Don’t take inspectors where they haven’t asked to go, become argumentative, or improvise if you’re unsure of an answer
2. Have Site Information at the Ready

Assemble a binder that contains an explanation of your operating processes, as well as an inventory of the waste streams generated and a description of waste management practices employed at the facility.

Providing a site map indicating hazardous waste central storage areas and satellite areas will allow for a more direct and focused walk-through.

3. Prepare Personnel to Handle Inspections

Train your personnel to answer questions posed by an inspector honestly and as succinctly as possible. If they are uncertain about how to answer, they may refer the question to a supervisor. This skill may need to be practiced so that personnel are comfortable under the pressure of the moment. Make it a practice throughout the year to ask your personnel questions that might reasonably be asked of them by a RCRA inspector.
4. Request a Pre-inspection Consultation

If possible, reserve office space for a pre-inspection consultation. Notify required attendees, such as State RCRA program representatives, management, legal counsel, and area supervisors.

At the opening conference, the inspector should define the scope of the inspection. Is it administrative only or a full audit? The purpose may be to discuss compliance with deadlines established in a RCRA permit or to address specific areas of concern that were previously identified. The inspector may be there in response to complaints or alleged violations or to follow up and verify corrections and compliance with an enforcement action.

Always take notes. Capture full contact data of those present and summarize the conversation. You may make note of:

- Why the inspection was initiated (e.g., routine, random, follow-up to previous violation, complaint)
- An outline of inspection objectives
- What facility information was requested by and provided to the inspector
- Planned sampling activities
- Regulatory references discussed

Keep inspection-related records per your legal policies for record retention.

Inspection Success

When your facility is prepared for inspection, you can welcome regulators on site with confidence.

Every successful inspection starts long before the inspector arrives. When personnel are trained to thoroughly understand the RCRA requirements and what inspectors look for, they can develop good habits and safe work practices that keep your facility in compliance on a day-to-day basis.

Want better RCRA training? At Lion.com/RCRA, find a variety of courses for managers and personnel at large, small, or very small quantity generator facilities.

A successful inspection not only protects your organization from civil penalties, follow-up visits, and costly corrective measures, it can underscore the tremendous value you bring to your organization as an environmental professional. When the inspection is done, others in your organization will better understand the importance of the work you do every day to manage hazardous waste safely and in compliance.
Common Inspection Safety Items

- Safety glasses, goggles, or face shield
- Hard hat
- Rubber-soled, metal-toed, non-skid shoes
- Gloves (disposable if possible)
- Ear plugs (for noise protection)
- Protective clothing, such as rubber aprons or coveralls
- Respirators and cartridges (if inhalation hazards are present)
- Self-contained breathing apparatus (for certain confined spaces)
- Disposable plastic shoe covers (for sterile/clean areas)
- Disposable towels or rags
- Digital camera with memory cards
- Flashlight and batteries
- Pocket calculator
- Pocket knife
- Tape measure

While the timing of routine inspections may be somewhat predictable based on historical precedence, an inspector may knock on your facility door at any time. To be ready for an unannounced inspection, assess your workplace for chemical, physical, and energy hazards to determine what protective equipment should be on hand to facilitate the inspection process. Your individual needs will be determined by physical site conditions, the dangers present, applicable OSHA standards, and other considerations (e.g., whether or not sampling will take place).
Building Confident Compliance Teams

Effective training is the key to a confident and productive workforce. To help you and your team build a strong compliance program and understand the regulations that affect your business, Lion Technology designs training to empower as well as educate. Since 1977, two out of three Fortune 500 companies in manufacturing, chemical, and transportation—as well as Federal and State government agencies—have trusted Lion for expert training delivered by full-time instructors. At Lion’s nationwide, interactive workshops, industry professionals get the knowledge and tools to succeed and keep their sites in compliance.

Sometimes, you simply can’t leave your site for training. With online training at Lion.com, convenient courses for compliance managers, EHS professionals, engineers, and shift workers are just a click away. Learn on your own schedule with interactive, 24/7 online courses or join a live webinar for guidance on critical regulatory topics and new rules. Bring an expert Lion instructor to your site to present training tailored to your employees’ needs. Lion can present any of our public workshops privately to your group or help you build a hazmat shipping, RCRA hazardous waste, workplace safety, or environmental training program that’s right for your team.

If you’re responsible for compliance with RCRA hazardous waste rules; 49 CFR, IATA, or IMO hazmat shipping standards; US EPA air, water, and chemical regulations; or OSHA workplace safety mandates, visit Lion.com now to see how effective, engaging training can simplify your responsibilities and make it easier to comply with the complex rules that affect your job.