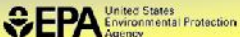
 EPA United States Environmental Protection Agency

EPA RCRA Inspector Training Update for NEWMOA

Emily Chow
September 18, 2012

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 EPA United States Environmental Protection Agency

Purpose of Webinar

1. Provide an update on EPA Office Compliance's (OC) training project
2. Go over topics covered in the first 5 training modules
3. Go over upcoming new training

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Inspector Training Update

- OC wants to provide up-to-date and inspector-focused training to support EPA and state RCRA inspectors
- EPA worked closely with a workgroup represented by:
 - 6 state associations
 - 12 states
 - 6 EPA regions, and
 - 7 EPA HQ offices

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Inspector Training Update (cont.)


- Completed content development for:
 - Fundamentals for RCRA Inspectors Training (FRIT)
 - Definition of Hazardous Waste (DHW)
 - Process-Based Inspection (PBI)
 - RCRA Wastewater Treatment Exemptions/Exclusions (RWTE)
 - Subparts AA, BB, CC (AA-CC)

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Inspector Training Update(cont.)


- Currently converting these 5 PowerPoint presentations into Adobe E-Learning courses
 - A self-paced online study
 - Most OC courses on NETI will be in this format
 - Expect to have FRIT, DHW & PBI online by January 2013
 - Expect to begin converting RWTE & AA-CC to e-learning in FY2013

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Example of E-Learning

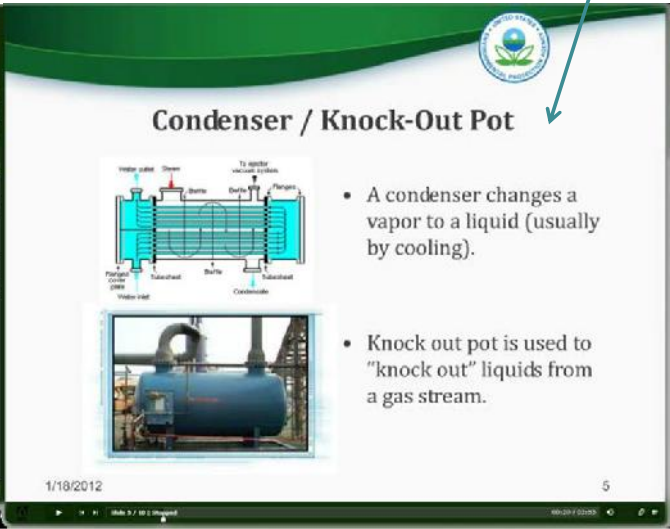
Streaming video



Script



Presentation slide



Condenser / Knock-Out Pot

- A condenser changes a vapor to a liquid (usually by cooling).
- Knock out pot is used to "knock out" liquids from a gas stream.

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Example of E-Learning

safetyFIRST

Review & Evaluate the Issue

- Collect & Review Data
- Schedule Additional Meetings, if needed
- Keep Management Apprised
- Promptly Communicate Concerns

Tip #1 Tip #2 Tip #3

Roll your mouse over each SIT Success Tip to read it.

HELP | EMAIL | RESOURCES | MAPP

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Topics Covered by all Modules

Field Applications

Other Content

Common Problems Found

Intro & Summary

Individual Lessons

Inspector Tips

Pictures & Case Studies

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Topics covered by FRIT

Part 1 of this module consists of:

- Overview of RCRA Statute and Regulations
- Hazardous Waste Identification
- Satellite Accumulation
- Containers and Tanks
- Subparts AA through CC
- Land Disposal Restrictions
- Imports and Exports
- Universal Waste
- Used Oil

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Topics covered by FRIT (cont.)

Part 2 of this module consists of:

- Authorization, Limitation & Roles of RCRA Inspectors
- Health & Safety Considerations
- Preparing for an Inspection with RCRA Focus
- Conducting an Inspection at RCRA Facilities
- RCRA Inspection Follow-Up

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Topics Covered by DHW

- Overview of the Hazardous Waste Determination Process
- Brief Overview on Definition of Solid Waste
- Definition of Hazardous Waste
- Exemptions to Hazardous Waste

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Topics Covered by PBI

- What's a PB Investigation?
- Common Problems Found during PBI
- How to Conduct PBI?
- Inspector Tips
- Including Case Studies

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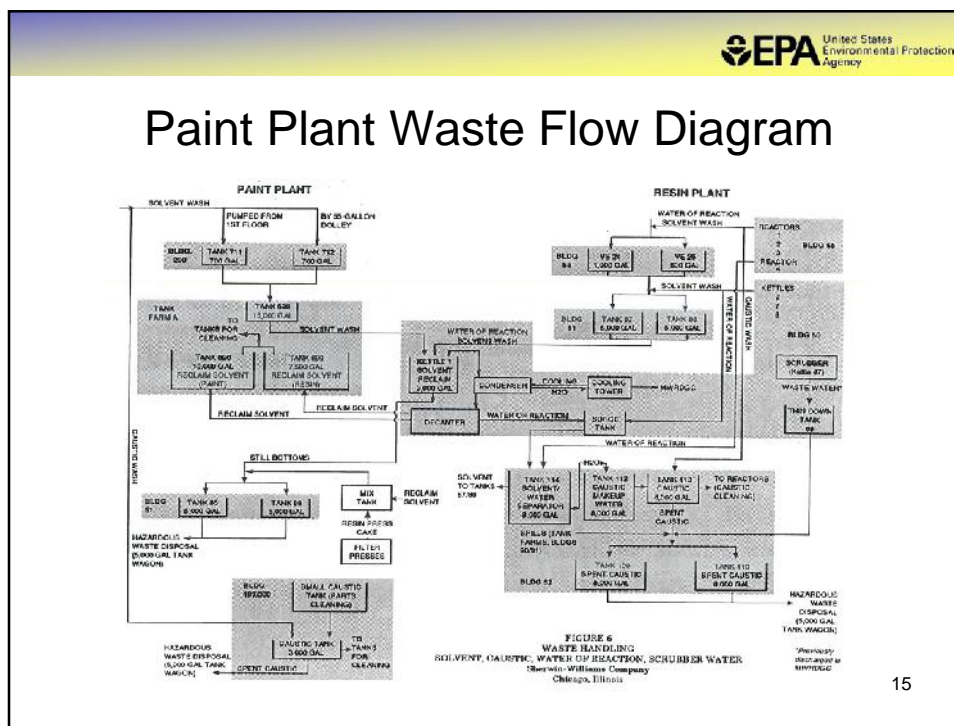
Paint Manufacturer Example


Facility notified as

- 4 less-than 90 day hazardous waste tanks, which collected still bottoms from a “closed loop” recycling system
- 3 satellite accumulation containers
- One less-than 90 day container accumulation area
- Prior storage “TSD” subject to corrective action




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Paint Manufacturer Example (Cont.)

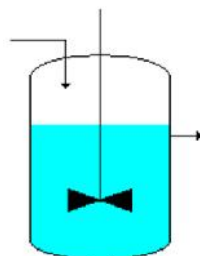
- NEIC process-based inspection found it was not a “closed loop” recycling system, resulting in 14 tanks managing HW with numerous violations
 - Discovered 5 unidentified wastestreams, which were HW, one resulting in an unpermitted waste pile.
 - Found an additional 50 potential areas that needed corrective action
- Settlement was for \$4.7 million in penalty and launched a multi-million dollar facility clean-up



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Reactor

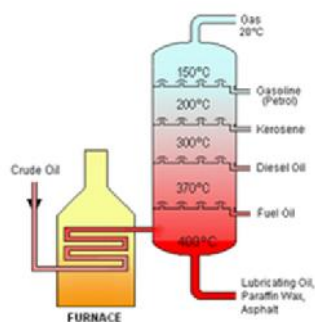


Reaction takes place (usually under heat and pressure, and sometimes with a catalyst) to make a product or intermediate. Usually needs periodic cleaning!

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Distillation Column



A column is used to separate the material into different components (by densities, boiling points)

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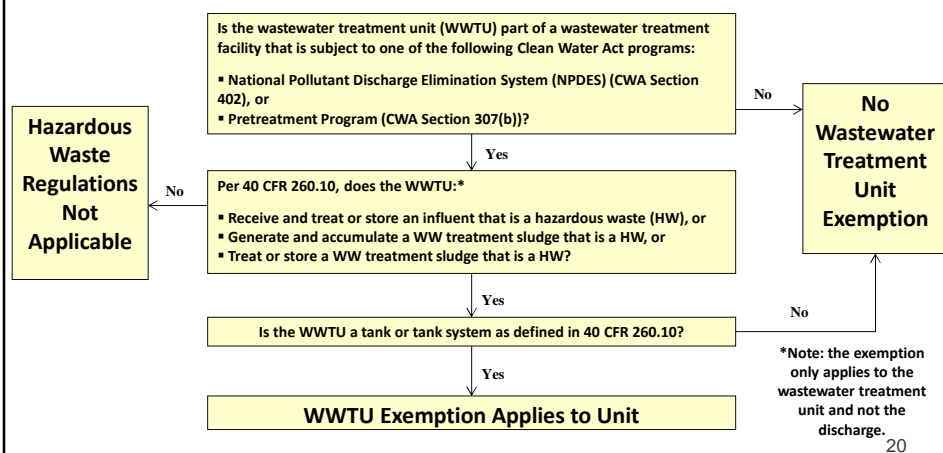
Topics Covered by RWTE

This module contains 6 related lessons:

- Wastewater Treatment Unit Exemption
- Elementary Neutralization Unit Exemption
- Headworks Wastewater Exemption
- Industrial Wastewater Discharge Exclusion
- Domestic Sewage Exclusion
- Centralized Waste Treatment

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Wastewater Treatment Unit Exemption Applicability Determination



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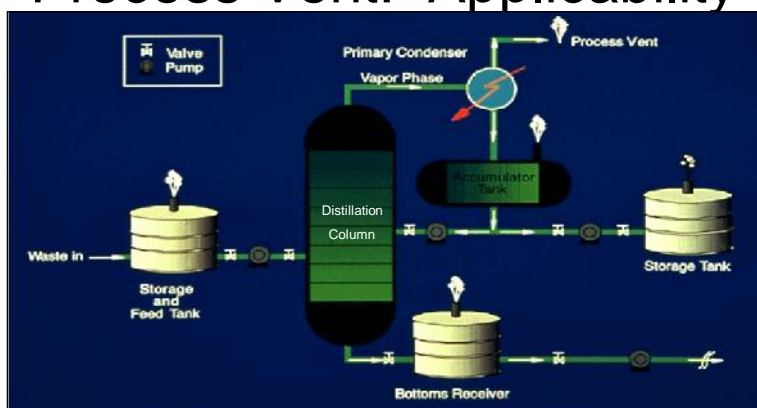
Topics Covered by AA-CC

This is a fairly technical module and it covers:

- Lesson 1: Overview
- Lesson 2: Subpart AA
- Lesson 3: Subpart BB
- Lesson 4: Subpart CC

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Process Vent: Applicability



The feed tank vent, bottoms and accumulator tanks' vents and condenser process vent, above, would be subject to Subpart AA control of their

process vent emissions.

3/7/12

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RCRA Organic Air Emissions Standards: What Is Subject to the Standards?

SUBPART	EQUIPMENT/UNITS COVERED	WASTE STREAM THRESHOLD CONCENTRATION
AA	Certain process vents	≥ 10 ppmw total organic concentration
BB	Equipment leaks for equipment in contact with HW stream	≥ 10 % by weight total organic concentration
CC	Tanks, surface impoundments and containers	≥ 500 ppmw average VOC at the point of origination

3/7/12

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Upcoming Training Development in 2013/2014

- Sampling & Waste Analysis
 - Sampling Strategy
 - How to review lab results & identify gaps
 - Determine if a facility is in compliance with its Waste Analysis Plan
- Definition of Solid Waste
- Land Disposal Restrictions
- Tanks & Containers

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State's Participation Needed

- EPA contractor will draft content for all 4 new courses
- EPA wants input from states on the drafts and final products