

# **EPA RCRA Inspector Training Update for NEWMOA**

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# Purpose of Webinar

1. Provide an update on EPA Office Compliance's training project

2. Demo existing eLearning Courses

3. Status of new training

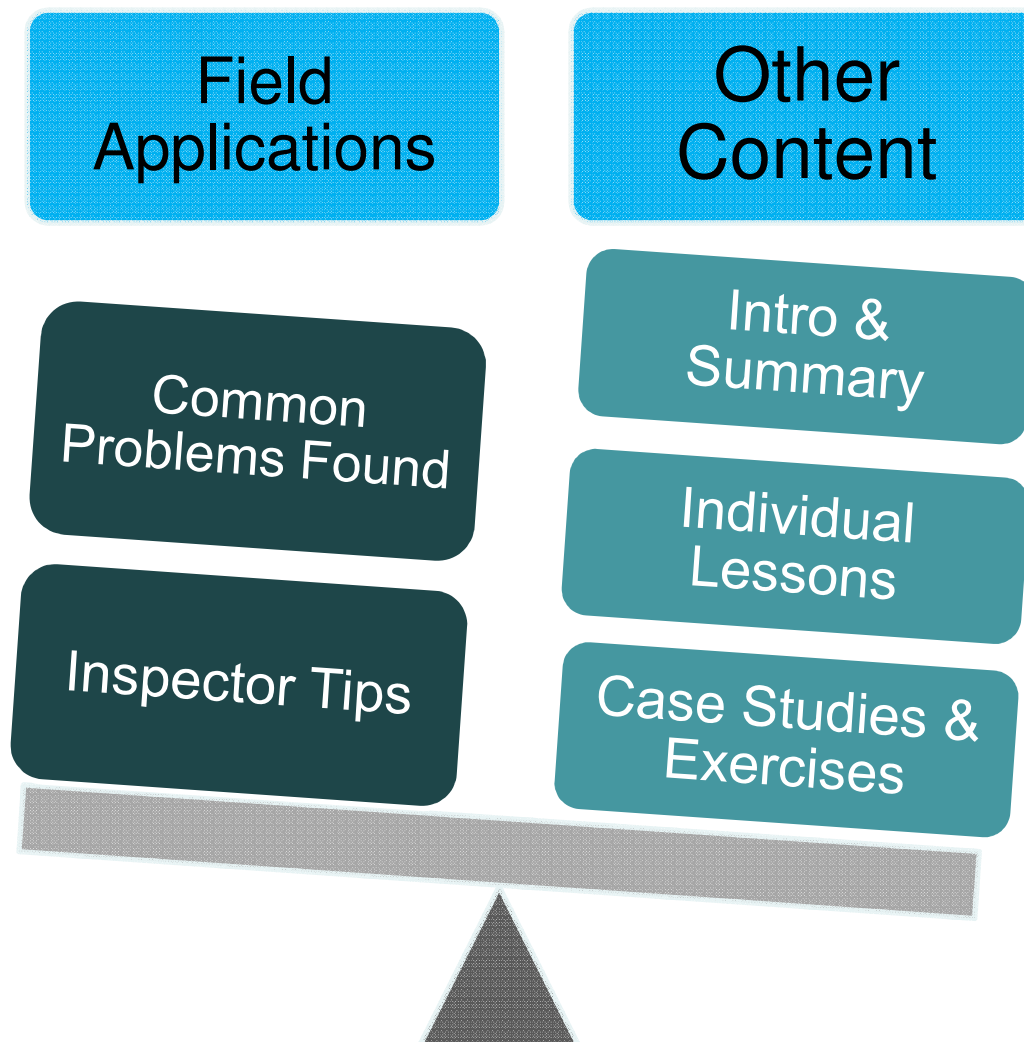
# Inspector Training Update

- OC has posted 3 eLearning courses on the NETI training site at <http://www.epa.gov/compliance/training/neti/courses.html>
  - Fundamentals for RCRA Inspectors Training (FRIT)
  - Hazardous Waste Determinations (HWD)
  - Process-Based Inspection (PBI)
- Currently converting RCRA Wastewater Treatment Exclusions/Exemptions and Subparts AA-CC into eLearning format

# Features of RCRA eLearning

- Navigation system that allows students quick access to specific topics and inspector tips
- Voice over slides for both visual & audio learners
- Integrated animations where possible
- Knowledge quizzes at the end of each lesson and a final test to reinforce learning

# Topics Covered by all Modules



# 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

# 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

# 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





# Topics Covered by PBI

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

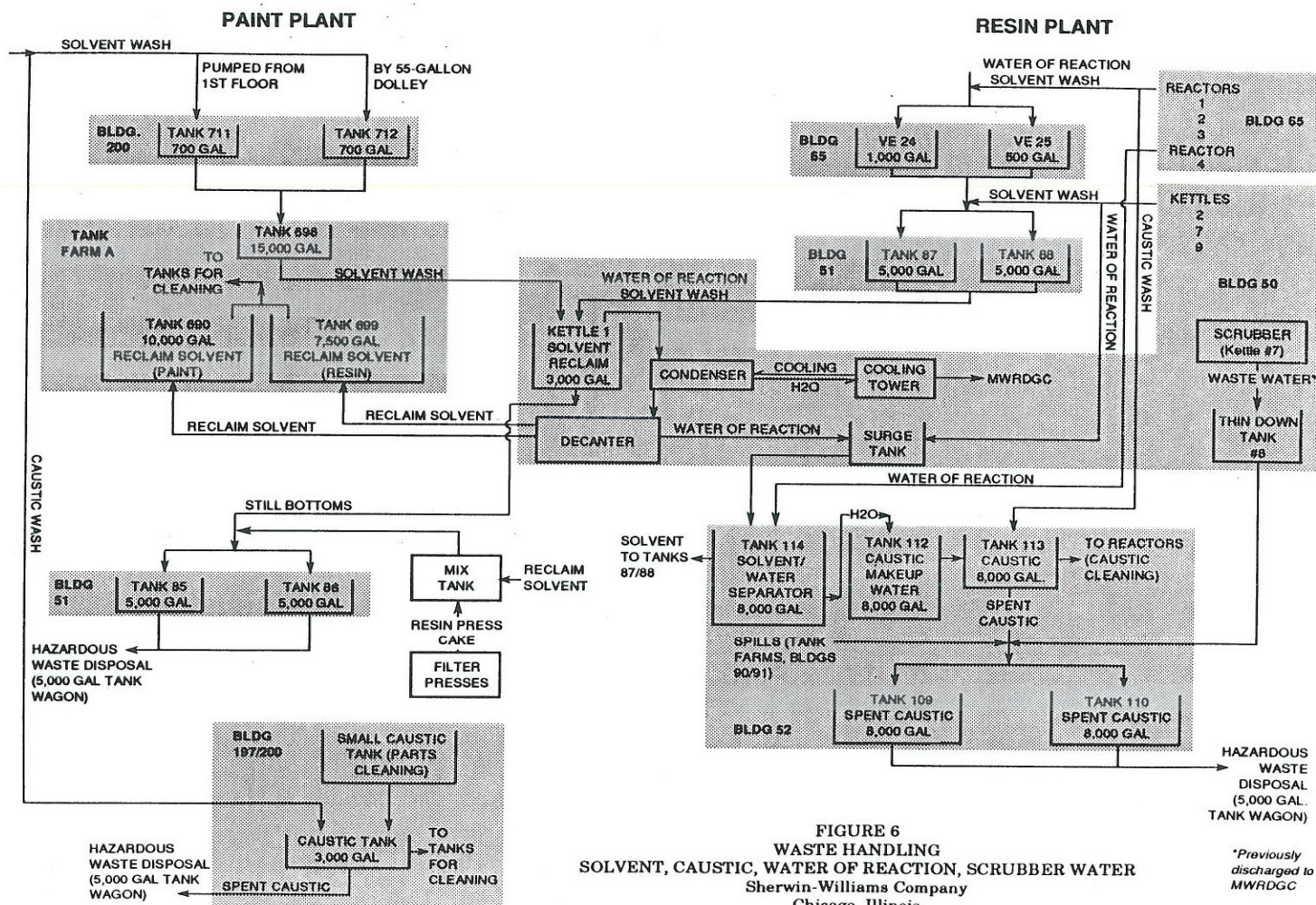
# Paint Manufacturer Example

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



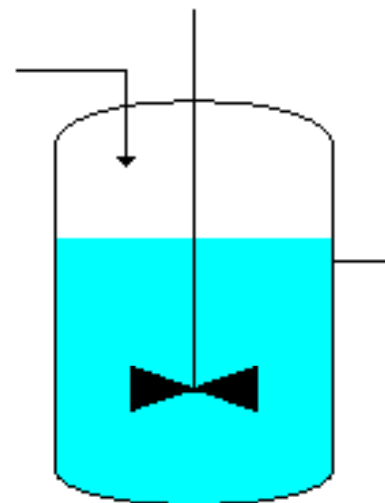
# Paint Plant Waste Flow Diagram







# Reactor



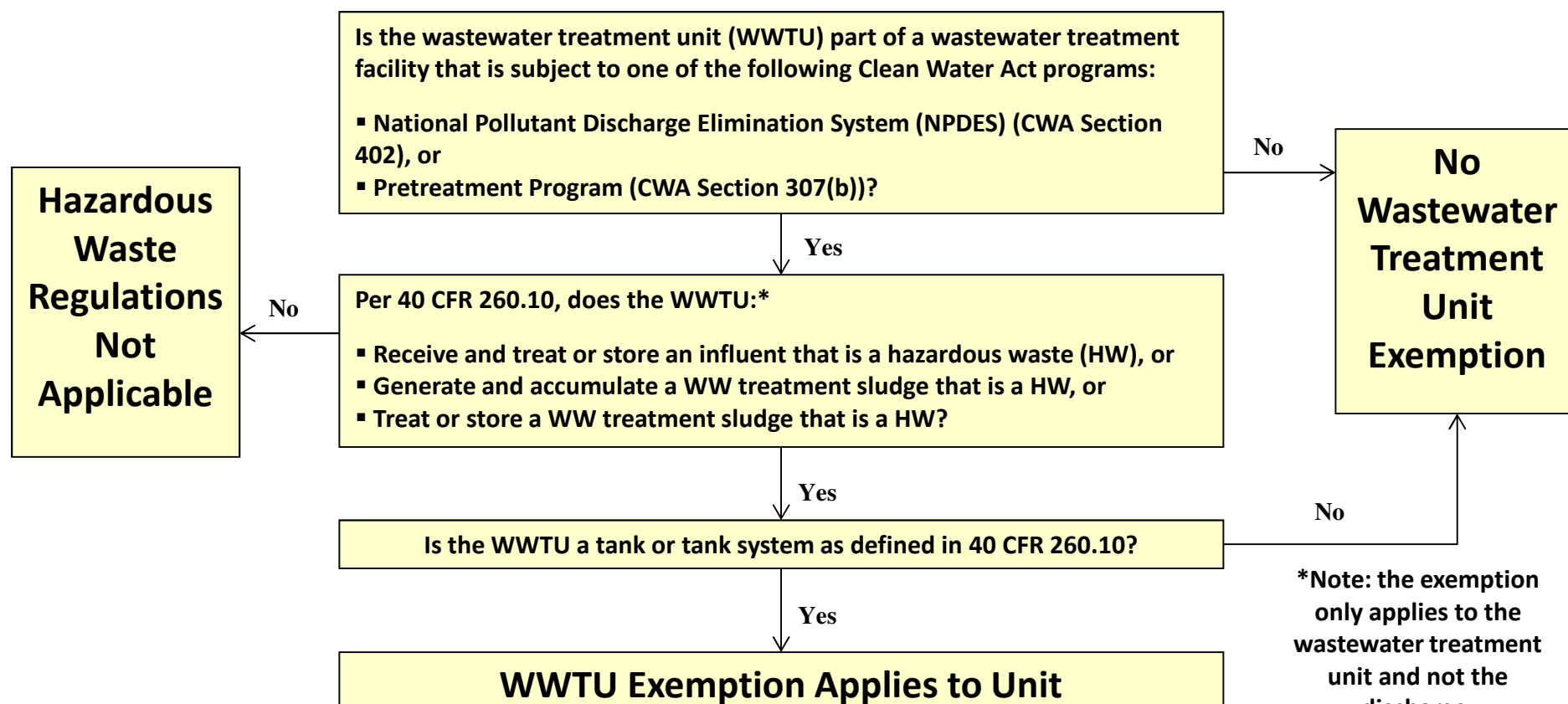
Reaction takes place (usually under heat and pressure, and sometimes with a catalyst) to make a product or intermediate. Usually needs periodic cleaning!

# 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

# Wastewater Treatment Unit Exemption Applicability Determination



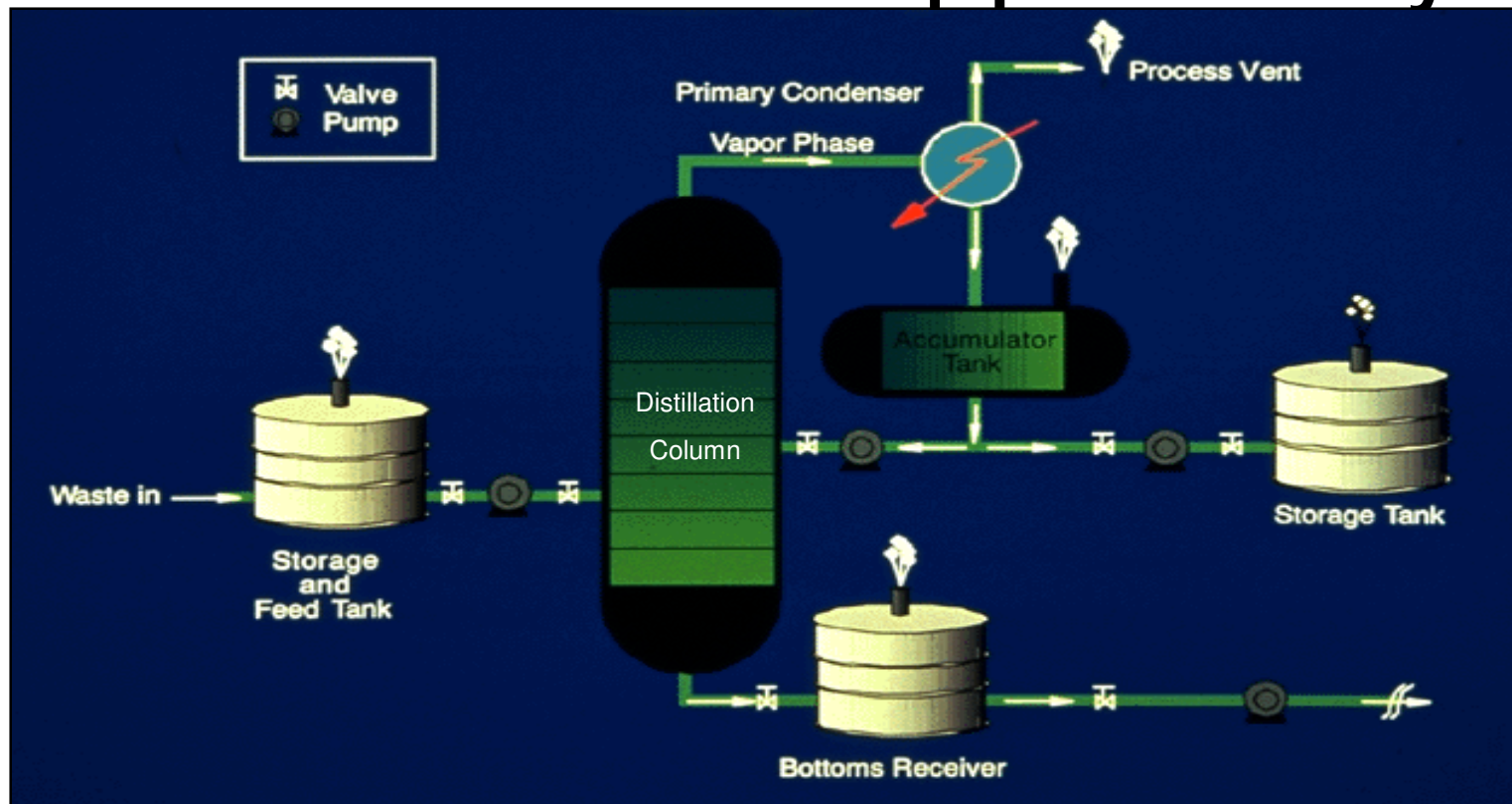
# Topics Covered by AA-CC

This is a fairly technical module and it covers:

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



# 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.

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

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





# Demo of eLearning

# Four New Courses

- Formed 4 workgroups to help ICF develop the content
- Solicited representation from ASTSWMO, NEWMOA, RCRA training workgroup, EPA HQ & Regions to support each of these courses
- The 4 new courses are:
  - Land Disposal Restrictions (LDR)
  - Tanks & Containers (T&C)
  - Sampling & Analysis Evaluations (SAE)
  - Solid Waste Determinations (SWD)

The new courses use a hybrid of the Action Mapping and traditional training formats. They contain many exercises and activities, so students can learn by doing.

## The Action Mapping process

1.  Identify the **business goal**.
2.  Identify what people need to **do** to reach that goal.
3.  Design **activities** that help people practice each behavior.
4.  Identify the **minimum information** people need to complete each activity.



## Everything supports the business goal.



# Features of New Courses

- Focus on activities inspectors need to learn during pre-inspection, onsite inspection, and post-inspection
- Provide general content upfront, but use exercises & activities to let students learn by doing
- Reinforced with knowledge quizzes and a final test

# Status of New Courses

- Currently, workgroups are finalizing the scope & outline for each course
  - Developed concept paper
  - Developed annotated outline
  - Begin to build up the exercises
- Plan to complete content development by end of 2014

# Contact for RCRA Courses

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# Additional OC Resources for Inspectors

- EPA Inspector Wiki

<https://ssoprod.epa.gov/sso/jsp/inspectorlogin.jsp>

- Compliance Assistance Centers

<http://www.assistancecenters.net/>