

US EPA ARCHIVE DOCUMENT

SESSION 15

RCRA ENFORCEMENT AND COMPLIANCE PROCESS

Basic RCRA Inspectors Overview



RCRA Enforcement Program Goals

- ▶ The RCRA program depends on whether the regulated community complies with the various RCRA requirements

- ▶ Goals of the RCRA enforcement program
 - Ensure that the regulatory and statutory provisions of RCRA are met
 - Inspections
 - Reporting
 - Compel necessary action to correct violations
 - Legal actions
 - Compliance incentives and assistance



RCRA Inspection Authorities

- ▶ The most common statutory authorities include:
 - §3007 Inspections
 - obtain information
 - obtain access to facility and copy records
 - obtain access to facility and inspect the premises
 - collect samples
 - §3013 Monitoring, Analysis, and Testing
 - order monitoring, testing, analysis, and reporting by facility owner or operator
 - conduct monitoring, testing, and analysis to be reimbursed by owner or operator



Types of Inspections

- ▶ Compliance Evaluation Inspection (CEI)
- ▶ Case Development Inspection (CDI)
- ▶ Compliance Sampling Inspection (CSI)
- ▶ Ground Water Inspection
 - Comprehensive Ground Water Monitoring Evaluation (CME)
 - Operation and Maintenance Inspection (O&M)
- ▶ Laboratory Audit Inspection (LAI)
- ▶ State Oversight Inspection



Type of Inspection	Description
Compliance Evaluation Inspection (CEI)	CEIs are routine inspections of hazardous waste generators, transporters, and TSDFs to evaluate compliance with the requirements of RCRA. CEIs encompass a file review prior to the site visit; an on-site examination of generation, treatment, storage, or disposal areas; and a review of records. Inspections of facilities with delisted waste may be conducted as part of a CEI. Also, corrective action inspections are specifically intended to evaluate facilities' compliance with consent orders and permit requirements.

Type of Inspection	Description
Case Development Inspection (CDI)	CDIs are conducted when RCRA violations are suspected or revealed during a CEI for the specific purpose of gathering data in support of an enforcement action.
Comprehensive Groundwater Monitoring Evaluation (CME)	CMEs are conducted to ensure that groundwater monitoring systems are designed and functioning properly at RCRA land disposal facilities. In addition to the CEI activities, CMEs include sampling and analysis of the facility's groundwater monitoring system and hydrogeological conditions.



Type of Inspection	Description
Compliance Sampling Inspection (CSI)	CSIs are inspections in which samples are collected for laboratory analysis. A sampling inspection may be conducted in conjunction with a CEI or any other type of inspection except a CDI.
Operation and Maintenance Inspection (O&M)	O&M inspections of land disposal facilities are conducted to determine the adequacy of the operation and maintenance of groundwater monitoring systems at RCRA facilities after land disposal facilities have closed. O&M inspections are usually conducted at facilities that have already received a thorough evaluation of the groundwater monitoring system under a CME inspection.

Type of Inspection	Description
Laboratory Audit	Laboratory audits are inspections of laboratories performing sample analyses. Audits ensure that these laboratories are using proper sample handling and analysis protocols.
State Oversight Inspection	State oversight inspections are conducted by U.S. EPA personnel to determine the effectiveness of State hazardous waste management programs and to determine facility compliance.
Joint Inspection	Joint inspections are CEIs conducted by both State and U.S. EPA personnel when RCRA authorities are shared by both agencies.

