



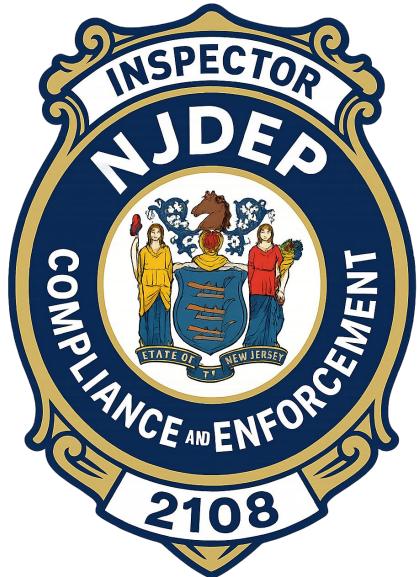
How to Survive a Hazardous Waste (RCRA) Inspection

PRACTICAL GUIDANCE FOR
RCRA GENERATORS

Martin E. Sánchez



December 2, 2025



Martin E. Sánchez

Supervisor | Bureau of Hazardous Waste Compliance & Enforcement
Central Regional Office

martin.sanchez@dep.nj.gov

609-439-9649

9 Ewing St., PO Box 420

Mail Code 09-03

Trenton, NJ 08625

About the Presenter

- **Central Regional Office Supervisor**, Bureau of Hazardous Waste Compliance & Enforcement (BHWCE), NJDEP
- **Oversees hazardous waste enforcement** for New Jersey's central region (used oil, universal waste, e-waste, regulated medical waste)
- **Statewide RCRAInfo data lead** – NJEMS data integrity, RCRA notifications, Biennial Reports & e-Manifest support
- **30+ years NJDEP experience** in permitting, enforcement & field inspection programs
- Previous roles with **Pretreatment & Residuals, Metro, and Northern Hazardous Waste C&E** programs
- **B.S. Environmental Sciences**, Rutgers University – Cook College
- Born in **Puerto Rico**, resident of **Northern New Jersey** for 40+ years

Compliance • Accountability • Environmental Protection



Purpose of This Training

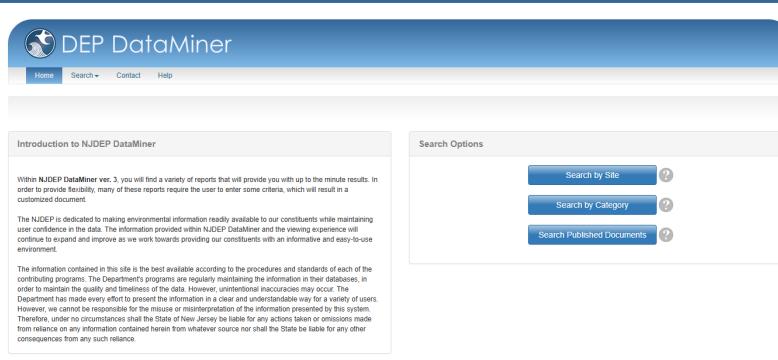
- Understand what RCRA inspections involve
- Learn what inspectors look for
- Prepare documentation and personnel
- Avoid common violations
- Maintain compliance and minimize liability



Types of RCRA Inspections

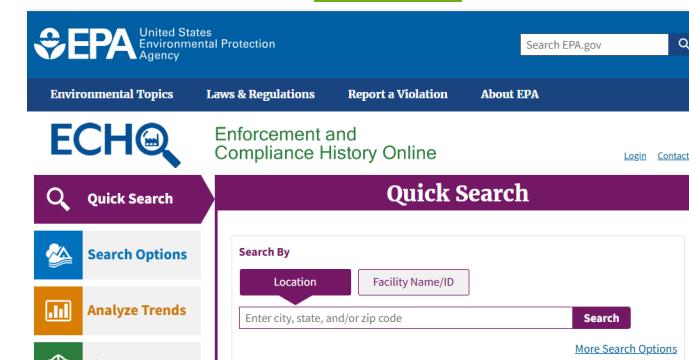
- Standard Compliance Inspection (SCI)
- SCI with Sampling
- Compliance Reviews / Follow-ups
- Investigation in Response to Complaints
- SCIs & Investigation reports, enforcement actions and data can be found:

[NJDEP DataMiner](#)



The screenshot shows the NJDEP DataMiner homepage. The top navigation bar includes links for Home, Search, Contact, and Help. Below the navigation is a search bar with the placeholder "Search NJDEP DataMiner". A sub-menu titled "Introduction to NJDEP DataMiner" is displayed, containing a brief description of the system and its purpose. To the right, a "Search Options" section provides three buttons: "Search by Site", "Search by Category", and "Search Published Documents".

[EPA ECHO](#)



The screenshot shows the EPA ECHO homepage. The top navigation bar includes links for Environmental Topics, Laws & Regulations, Report a Violation, and About EPA. The main header features the "ECHO" logo and the text "Enforcement and Compliance History Online". Below the header is a "Quick Search" section with a search bar and dropdown menus for "Search By" (Location and Facility Name/ID). To the left, there are links for "Search Options" and "Analyze Trends".



Inspector Authority & Process

- Inspectors operate under the state authority to inspect. See [N.J.S.A. 13:1D-9](#).
- DEP inspectors have the authority to immediately & lawfully enter & inspect a site for the purpose of ascertaining compliance or noncompliance.
- Inspection Process includes:
 - Opening conference
 - Site/Facility walk-through
 - Sampling
 - Records review
 - Closing conference



Records to Have Ready

- Hazardous Waste Manifests (3 years)
- Land Disposal Restriction (LDR) notifications
- Weekly container inspection logs
- Training records (3 years)
- Contingency plan & emergency contacts
- Waste determinations (lab reports, SDS)



What Inspectors Look For

- Container labeling (hazardous waste, accumulation start date)
- Container condition (closed, no leaks)
- Accumulation time limits (<90 days or <180 days)
- Satellite accumulation area management
- Emergency preparedness & contingency plan
- Employee training & knowledge
- Manifest discrepancies / missing
- Waste determination



Common RCRA Violations

- Open or leaking containers
- Improper or missing markings/labels
- Failure to conduct/document inspections
- Exceeding accumulation time limits
- No waste determination or improper classification
- Lack of training documentation



Best Practices to Prepare

- Conduct internal audits regularly
- Keep records organized and accessible
- Train employees on RCRA requirements
- Maintain clean and orderly RCRA container and/or tank accumulation areas
- Have a plan for the inspection day (escort, copies of records)



During the Inspection

- Be professional and cooperative
- Provide requested documents promptly
- Take notes on inspector questions and findings
- Correct minor issues immediately, if possible
- Ask for clarification if something is unclear



After the Inspection

- Review inspector's closing comments
- Document any corrective actions taken
- Respond promptly to any formal notice or report
- Use findings as training opportunities



Key Takeaways

- Preparation is the best defense
- Stay organized year-round, not just before inspections
- Maintain strong training and recordkeeping
- View inspections as a compliance partnership, not a threat



Compliance Assistance Information

Compliance Assistance Packet for Generators

<https://www.nj.gov/dep/enforcement/docs/ca-packet.pdf>

Hazardous Waste Generator (EPA)

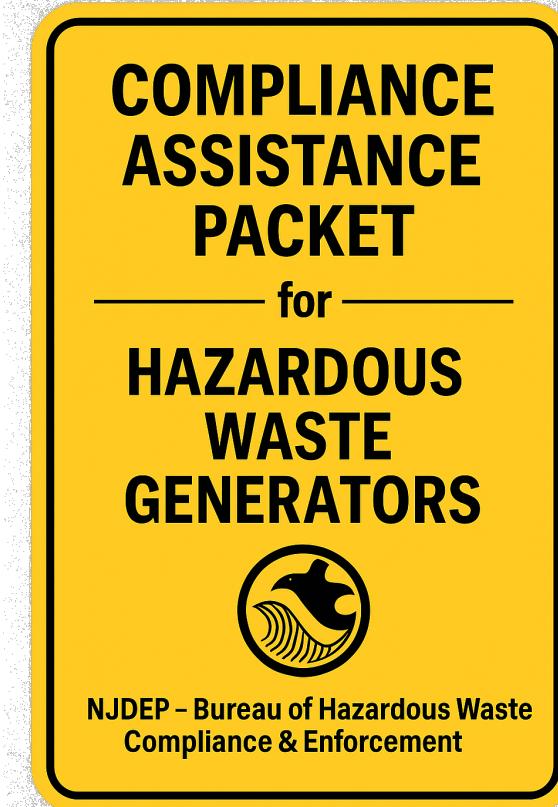
<https://www.epa.gov/hwgenerators>

RCRAInfo's Hazardous Waste Information Platform (HWIP)

<https://rcrapublic.epa.gov/rcriinfoweb/action/modules/hd/handlerindex>

RCRAInfo Industry Sign in

<https://rcriinfo.epa.gov/rcriinfoprod/action/secured/login>



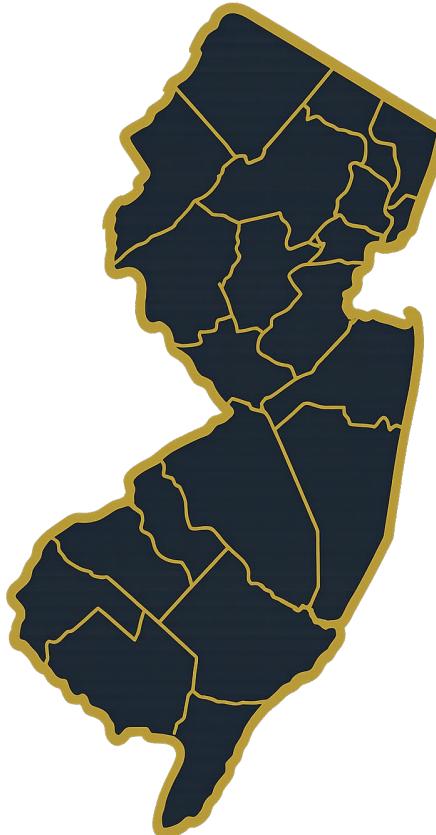
NORTHERN

Supervisor: Paula Hanley-Tagliaferri
7 Ridgedale Avenue
Cedar Knolls, NJ 07927
Mobile: (609) 439-9638
Office: (973) 656-4470
Counties: Bergen, Essex, Hudson,
Hunterdon, Morris, Passaic, Some-
mest, Sussex, and Warren

CENTRAL

Supervisor: Martin Sánchez
9 Ewing Street
PO Box 420 Mail Code 09-03
Trenton, NJ 08625-0420
Mobile: (609) 439-9649
Office: (609) 943-3019
Counties: Mercer, Middlesex,
Monmouth, Ocean, and Union

HAZARDOUS WASTE C&E



REGIONAL OFFICES

SOUTHERN

Supervisor: Jeffrey Salabritas
2 Riverside Drive
Suite 201
Camden, NJ 08103
Mobile: (609) 439-9739
Office: (856) 614-3648
Counties: Atlantic, Burlington,
Camden, Cape May, Cumberland,
Gloucester, and Salem

BUREAU HQ

Bob Gomez, Bureau Chief
9 Ewing Street
PO Box 420 Mail Code 09-03
Trenton, NJ 08625-0420
Mobile: (609) 292-3837
Office: (609) 943-3019





Questions?

