



# How to Survive a Hazardous Waste (RCRA) Inspection

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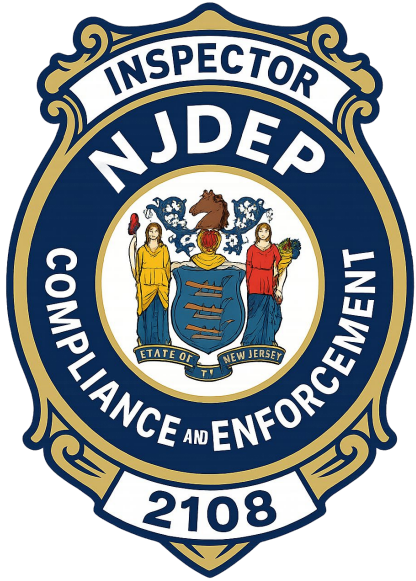
## PRACTICAL GUIDANCE FOR RCRA GENERATORS

Martin E. Sánchez



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## Martin E. Sánchez

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

[martin.sanchez@dep.nj.gov](mailto: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

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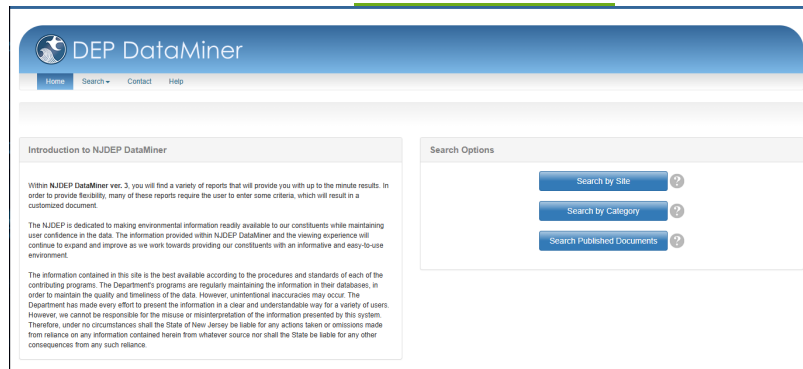
- Understand what RCRA inspections involve
- Learn what inspectors look for
- Prepare documentation and personnel
- Avoid common violations
- Maintain compliance and minimize liability



# 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



## EPA ECHO



# Inspector Authority & Process

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- 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

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- 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

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- 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

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- 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

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- 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

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- 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

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- 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

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- 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

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Compliance Assistance Packet for Generators

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

Hazardous Waste Generator (EPA)

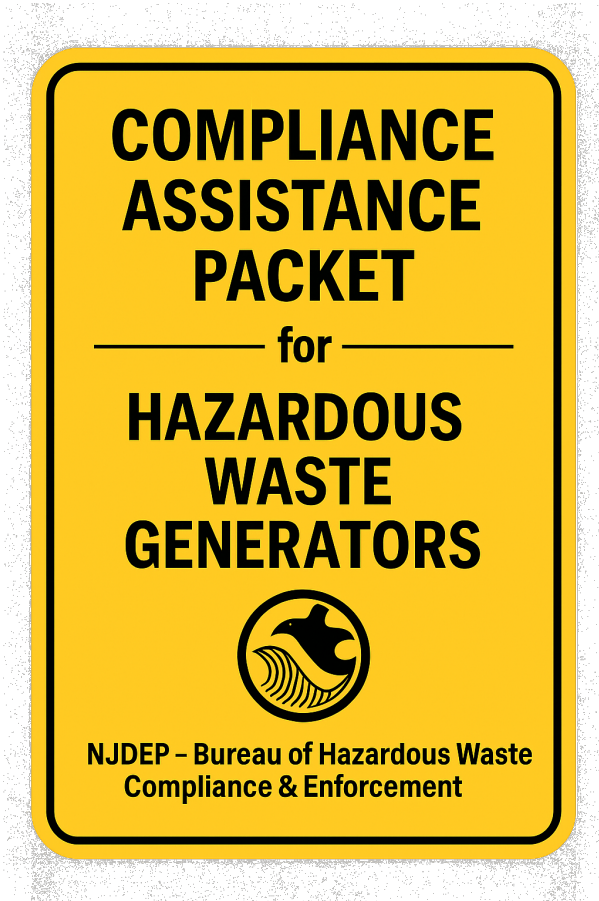
<https://www.epa.gov/hwgenerators>

RCRAInfo's Hazardous Waste Information Platform (HWIP)

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

RCRAInfo Industry Sign in

<https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>



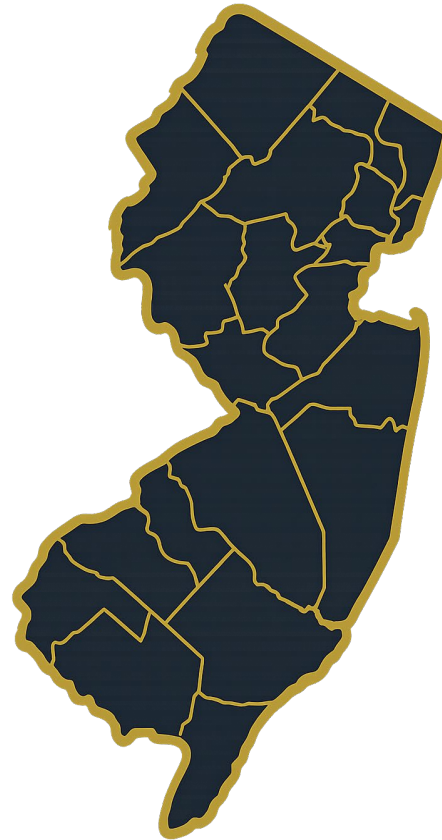
# NORTHERN

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, Somers-  
est, 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?

