

MassDEP Multimedia Inspections

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Bureau of Air and Waste/MassDEP/Central Regional Office

**24th Annual New England Pretreatment Coordinators
Workshop**

UMASS Lowell Inn and Conference Center

Lowell, MA

October 27, 2022

Agenda

- MassDEP Overview
- Multimedia Inspections
 - AQ, HW, IWW, TURA, UST
- Common Violations
- Enforcement Scenarios
- Compliance Assistance

MassDEP Bureaus

Air and Waste



Waste Site Cleanup



Water Resources



DEP Central Region

77 Towns

Population
Served:

900,000



Multimedia Inspections

- Conduct approximately 60 inspections/year
 - *unannounced*
- EPA grants
- Complaints
- Initiatives



Multimedia Inspections

- Opening meeting
- Facility walk-through
- Records review
- Close out meeting
- Follow-up questions
- Repeat inspection



Air Pollution Control



Common Air Pollution Violations – Outside

- Visible emissions from stack or vents
- Dust from haul roads, rock crushers, etc.
- Odor complaints verified
- Noise
 - >10db above background or pure tone condition

Common Air Pollution Violations – Shop Floor

- Open containers of organic compounds -
 - Dip tanks, degreasers, paint/solvent containers
- Control equipment -
 - Not operating as approved (low Ox⁰ F)
 - Poor condition (rusting, unstable etc.)
 - Removed or replaced
 - Spray booths not meeting standards: 7.03(16)
stack height, spray guns, filters, compliant coatings!



Example of an Unacceptable Stack



Common Air Pollution Violations – Administrative

- Do not have an Air Plan Appr. or Certification
 - e.g., organic compound emissions > 1 ton/yr
- Exceeding approval/permitted limits
- Not keeping RECORDS **OR** inaccurate records
- Not conducting monitoring
- Have not submitted Source Registration/Emission Statement **OR** inaccurate SR/ES
- Have not submitted exceedance reports

Don't Cause A Nuisance Condition

- Dust
- Smoke
- Odor
- Noise



Hazardous Waste



Common Hazardous Waste Violations – Shop Floor

- Containers and tanks not labeled
- Containers left open
- Accumulation area not posted/marked
- No 2^o containment outdoors
- Accumulation area not secure
- Universal waste not labeled
 - *Hg lamps & devices, batteries, pesticides*

HAZARDOUS WASTE
FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR
PUBLIC SAFETY AUTHORITY OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERATOR INFORMATION:
NAME: _____
ADDRESS: _____
CITY _____ STATE _____ ZIP _____
EPA ID NO. _____ EPA WASTE NO. _____
ACCUMULATION START DATE _____ MANIFEST TRACKING NO. _____
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX
HANDLE WITH CARE!



Common Hazardous Waste Violations – Administrative

- Not registered/not properly registered –
 - *Acting out of Status!*
- Not keeping waste profiles
- Not using correct ID on manifest
- Not keeping manifest copies
- Weekly inspections not recorded
- No contingency plan or personnel training plan
 - *large quantity generators*


New Method of Registering/Obtaining ID# or Changing Information

[https://www.mass.gov/guides/
hazardous-waste-generation-generators#-
obtain-or-modify-an-id-number-](https://www.mass.gov/guides/hazardous-waste-generation-generators#-obtain-or-modify-an-id-number-)

Why Following the Rules is Important

Table of Contents

Obtain or Modify an ID Number

 You need a valid ID number before performing any hazardous waste activity.

PLEASE NOTE: The process for obtaining or modifying a Hazardous Waste Identification Number (EPA ID) in Massachusetts has changed.

Before June 15, 2018, you had to mail a paper form to the Department of Environmental Protection (MassDEP) to obtain an EPA ID. MassDEP performed electronic data entry from paper submissions, then transferred the records it created to the RCRAInfo national database. This was a time-consuming process.

Now that Massachusetts has moved to the U.S. Environmental Protection Agency (EPA) online application **myRCRAid** - which allows you to apply for and obtain an ID electronically - the process works like this:

1. Register as a **RCRAInfo** user (follow the link in **Key Actions** below).
2. MassDEP approves your electronic signature. If you have questions about this process, see: [Important Electronic Signature Agreement \(ESA\) Details](#)
3. Login at **RCRAInfo**, access **myRCRAid**, and apply for an EPA ID by submitting a Site Identification Form electronically to MassDEP.
4. The agency reviews your application, either approving it or asking you to make corrections and submit it again.
5. Once approved, MassDEP issues your EPA ID through **RCRAInfo** and you are authorized to proceed with regulated hazardous waste activities.

It takes only minutes to create a **RCRAInfo** account and apply for an EPA ID via **myRCRAid**.

MassDEP will generally issue your EPA ID within seven (7) business days if the information you submit is complete and accurate.

See the detailed instructions and the FAQ in **Additional Resources** below to learn more.

KEY ORGANIZATIONS

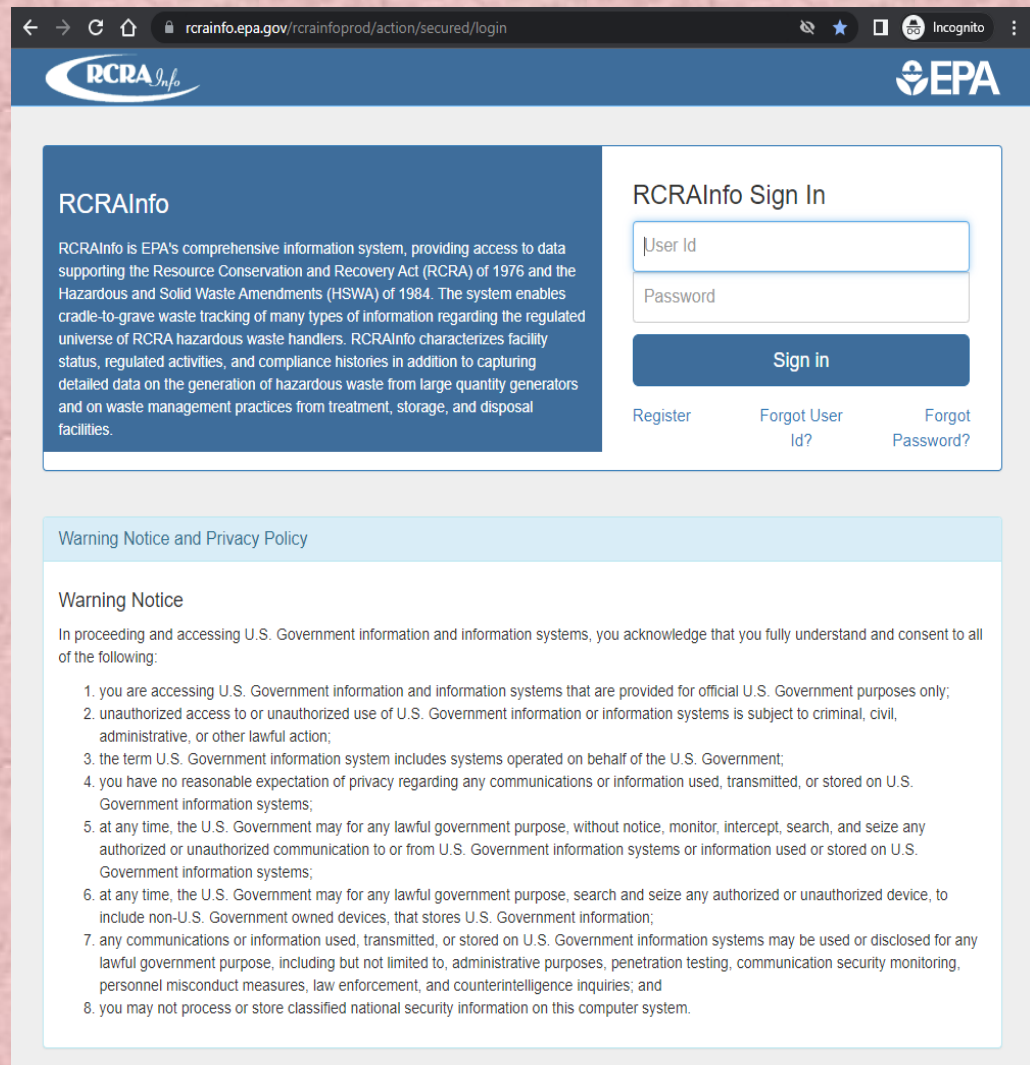
myRCRAid or e-Manifest Questions?

[more contact info](#) >

Feedback

New Method of Registering/Obtaining ID# or Changing Information

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



The screenshot shows the RCRAInfo Sign In page. The browser address bar displays `rcrainfo.epa.gov/rcrainfoprod/action/secured/login`. The page header includes the RCRAInfo logo and the EPA logo. The main content area is divided into two sections. The left section, titled "RCRAInfo", provides a description of the system: "RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The system enables cradle-to-grave waste tracking of many types of information regarding the regulated universe of RCRA hazardous waste handlers. RCRAInfo characterizes facility status, regulated activities, and compliance histories in addition to capturing detailed data on the generation of hazardous waste from large quantity generators and on waste management practices from treatment, storage, and disposal facilities." The right section, titled "RCRAInfo Sign In", contains a "User Id" input field, a "Password" input field, and a "Sign in" button. Below the "Sign in" button are three links: "Register", "Forgot User Id?", and "Forgot Password?". At the bottom of the page, there is a "Warning Notice and Privacy Policy" section. The "Warning Notice" section states: "In proceeding and accessing U.S. Government information and information systems, you acknowledge that you fully understand and consent to all of the following:" followed by a list of eight numbered items regarding U.S. Government information access, unauthorized use, privacy expectations, and data handling.

RCRAInfo

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The system enables cradle-to-grave waste tracking of many types of information regarding the regulated universe of RCRA hazardous waste handlers. RCRAInfo characterizes facility status, regulated activities, and compliance histories in addition to capturing detailed data on the generation of hazardous waste from large quantity generators and on waste management practices from treatment, storage, and disposal facilities.

RCRAInfo Sign In

User Id

Password

Sign in

Register Forgot User Id? Forgot Password?

Warning Notice and Privacy Policy

Warning Notice

In proceeding and accessing U.S. Government information and information systems, you acknowledge that you fully understand and consent to all of the following:

1. you are accessing U.S. Government information and information systems that are provided for official U.S. Government purposes only;
2. unauthorized access to or unauthorized use of U.S. Government information or information systems is subject to criminal, civil, administrative, or other lawful action;
3. the term U.S. Government information system includes systems operated on behalf of the U.S. Government;
4. you have no reasonable expectation of privacy regarding any communications or information used, transmitted, or stored on U.S. Government information systems;
5. at any time, the U.S. Government may for any lawful government purpose, without notice, monitor, intercept, search, and seize any authorized or unauthorized communication to or from U.S. Government information systems or information used or stored on U.S. Government information systems;
6. at any time, the U.S. Government may for any lawful government purpose, search and seize any authorized or unauthorized device, to include non-U.S. Government owned devices, that stores U.S. Government information;
7. any communications or information used, transmitted, or stored on U.S. Government information systems may be used or disclosed for any lawful government purpose, including but not limited to, administrative purposes, penetration testing, communication security monitoring, personnel misconduct measures, law enforcement, and counterintelligence inquiries; and
8. you may not process or store classified national security information on this computer system.

New Method of Registering/Obtaining ID# or Changing Information

Select Registration Type

Industry User

Select this option if you want to submit RCRA Notification, Biennial Report and/or manifest data on behalf of a regulated hazardous waste site including federal facilities. Watch our quick How-To video below to see step-by-step instructions or view our [User Guide](#).

Industry User Registration

Watch How-To

(If you already have an existing CDX Account, skip the registration and just [Login](#).)

OR

Regulatory Agency User

Select this option if you represent a State environmental agency or the United States Environmental Protection Agency.

Regulatory User Registration

Industrial Wastewater



Common Industrial Wastewater Violations

- Discharging to the ground, septic system, surface water without permit
 - *e.g. wash water; noncontact cooling water*
- Unlicensed operator for wastewater pre-treatment system
- No operations and maintenance manual
- Failing to report – discharge monitoring reports
- No certification for holding tank
 - *in-ground or above-ground IWHT*
 - *or using holding tank but connected to sewer*

Common Industrial Wastewater Violations



Common Industrial Wastewater Violations

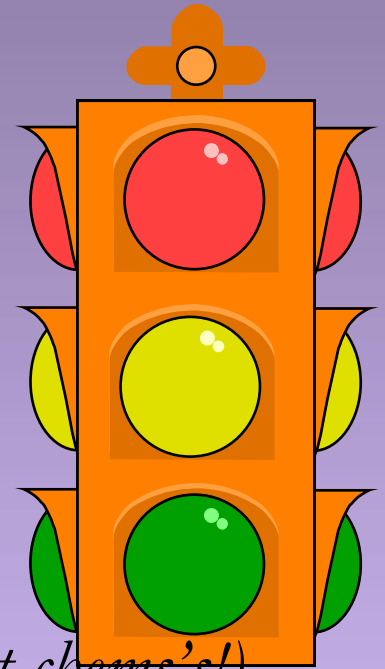


Toxics Use Reduction



Common TURA Violations

- Failure to file for all toxics (chemicals)
 - 25,000 lbs/yr manufacture
 - 25,000 lbs/yr process
 - 10,000 lbs/yr otherwise-used (*treatment chems's!*)
- TURA Plan deficiencies
 - Missing process mapping, material accounting
 - Plan Summary and certification submitted but no plan (!)



TURA

Lower Reporting Thresholds

- Higher Hazard Substances - 1,000 lbs/yr
cadmium, cadmium compounds, hexavalent
chrome, formaldehyde, trichloro- and
tetrachloroethylene, methylene chloride, nPB,
HF, Cn compounds, DMF, TDI

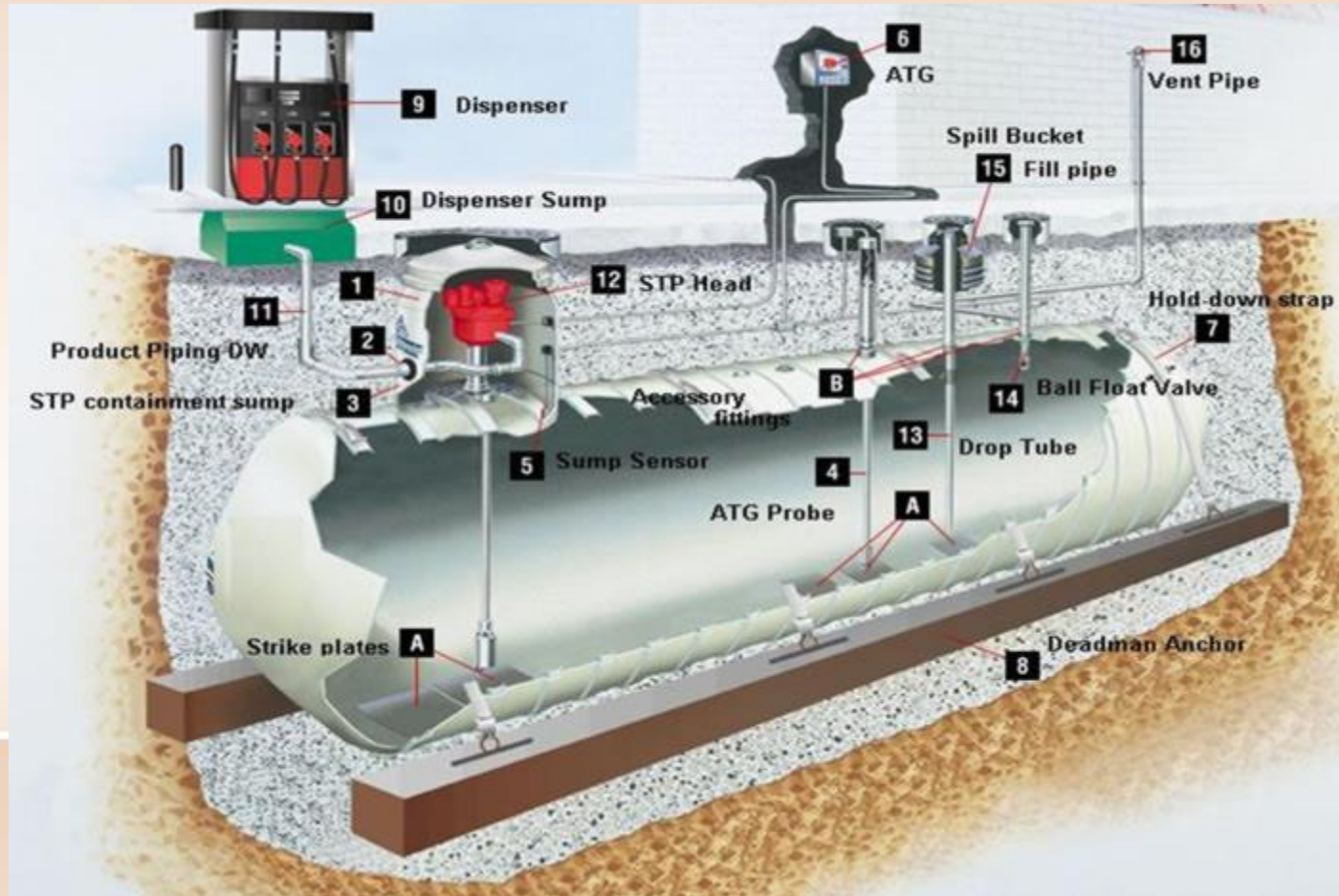
[https://www.turi.org/Our Work/Policy/TURA List/Higher Hazard Substances](https://www.turi.org/Our_Work/Policy/TURA_List/Higher_Hazard_Substances)

➤ Persistent Bioaccumulative Toxins – 19

10 lbs, 100 lbs, 0.1 gm/yr

- PFAS - 100 lbs/yr individual, 172+;
25k/25k/10k/yr N.O.L.

Underground Storage Tanks



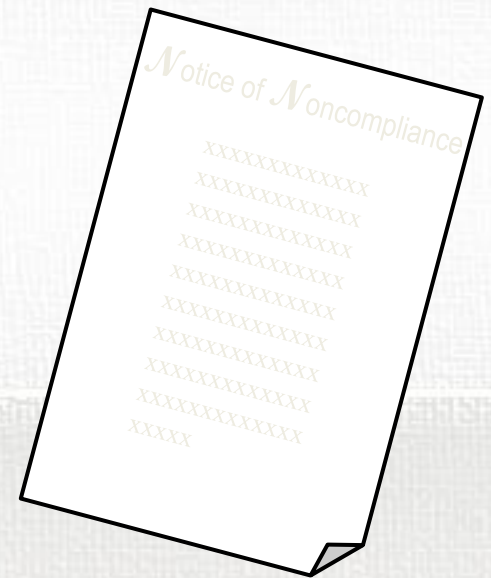
Underground Storage Tanks

- 310 CMR 80.00
 - Single-walled steel tanks removed by 8/7/2017 or have approved extension to 7/1/2018 or financial hardship
 - Turbines with no sumps upgraded by 1/1/19
 - Tanks for emergency engines applicable
 - Tanks used for process heat/hot water are not consumptive use!
 - *sumps and spill buckets containing liquid;*
 - *failure to conduct monthly inspection*

Notice of Noncompliance (NON)

Cover letter & Notice of Non-Compliance;
inspection report

- Regulations violated
- Date(s) of violations
- Compliance schedule



Higher Level Enforcement (HLE)

- Administrative Consent Order with Penalty
can include penalty mitigating Supplemental Environmental Project!
- Penalty Assessment Notice
- Unilateral Administrative Order
- Attorney General or EPA Referral



Incentives For Self-Policing: Environmental Self Audit Policy

If found during routine self-auditing (i.e. EMS)

- No Notice of Non-Compliance (NON)
- Eliminates potential for daily penalties
- No punitive penalty

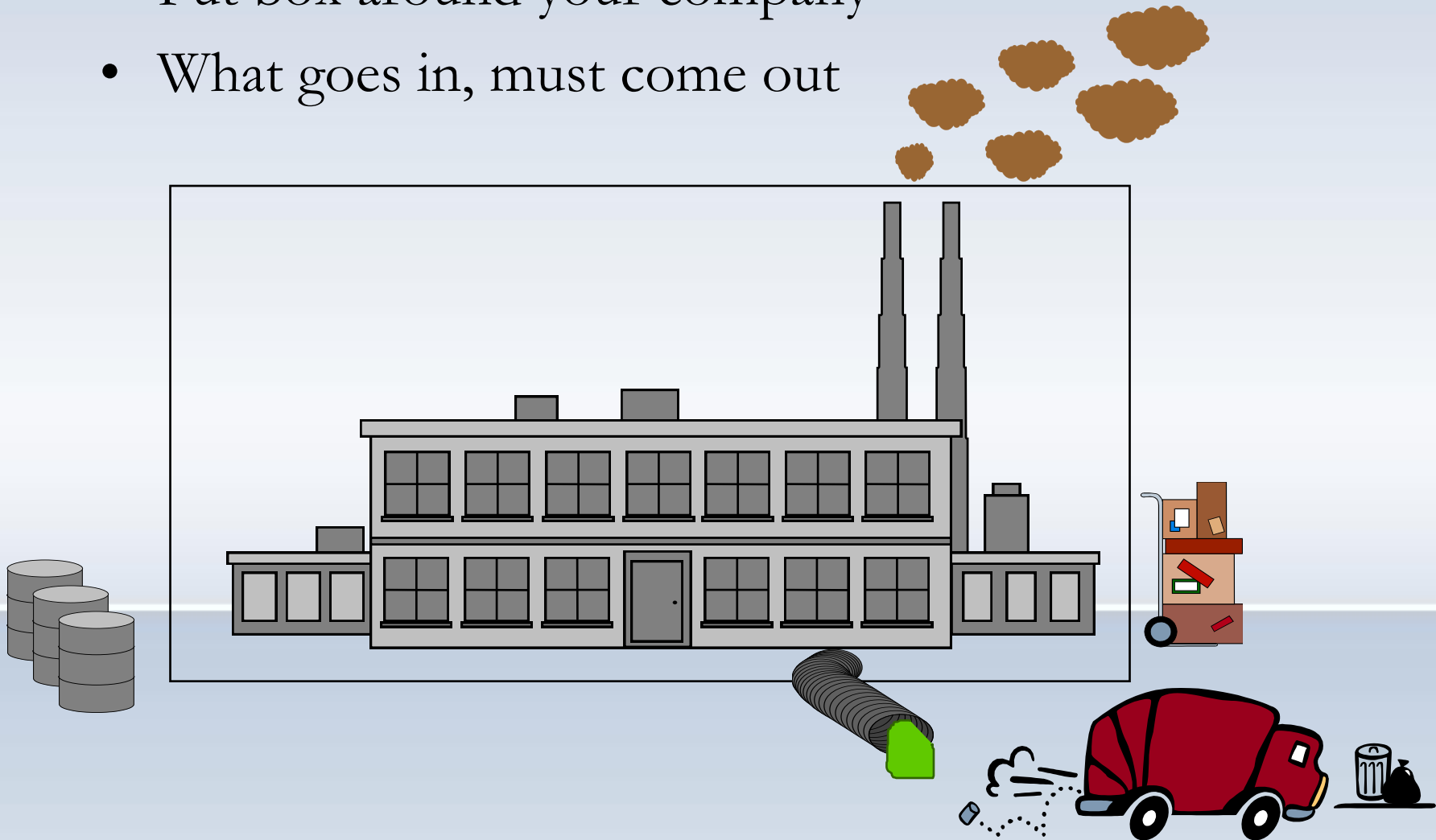
If found in non-systematic audit

- 75% off punitive penalty

Economic benefit recovered

Overview of Facility

- Put box around your company
- What goes in, must come out



Does this look familiar?





Other Resources

The Office of Technical Assistance and Technology (OTA)

100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

- phone: (617) 626-1060
- Director: Tiffany Skogstrom
- Senior Engineer: James.Cain@mass.gov
- phone: (617) 634-9450

Other Resources *continued*

Toxics Use Reduction Institute

The Offices at Boott Mills West

126 John Street, Suite 14

Lowell, MA 01852

- phone: 978-934-3275
- Director: Baskut Tuncak

Cleaning Laboratory

- Director: [Jason Marshall@uml.edu](mailto:Jason.Marshall@uml.edu)
- phone: (978) 934-3133

Thank you!

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MassDEP
Commonwealth of Massachusetts
Department of Environmental Protection

