



Guidelines For Asbestos NESHAP Landfill Recordkeeping Inspections

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Guidelines for Asbestos NESHAP Landfill Recordkeeping Inspections

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Stationary Source Compliance Division
Washington, DC 20460

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DISCLAIMER

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INTRODUCTION

The purpose of this guidance document is to assist asbestos NESHAP compliance inspectors in conducting active landfill recordkeeping inspections.

This manual details landfill recordkeeping requirements and includes step-by-step instructions for every phase of a landfill recordkeeping inspection. Pre-inspection activities (disposal site targeting, reviewing Agency records, developing an inspection plan), onsite inspection activities (interviewing, reviewing and records' sampling), and post-inspection activities (writing the inspection report, determining the need for enforcement action) are discussed. A landfill recordkeeping flowchart and inspection checklist are also included.

SECTION 1

LANDFILL RECORDKEEPING AND REPORTING REQUIREMENTS

The new requirements for waste disposal affect both generators of asbestos-containing waste material (ACWM) and waste disposal site operators. Generators must provide the waste disposal site a properly completed waste shipment form with every load of ACWM delivered, inform EPA when they cannot determine the disposition of their waste, and maintain copies of waste shipment records (WSRs) and associated correspondence in their files. Waste disposal site operators are required to verify information contained in the WSRs, inform generators that the ACWM has been received, inform EPA if efforts to resolve discrepancies have failed, and also maintain waste shipment information.

The following discussion provides detailed information concerning both recordkeeping and reporting requirements for owners/operators of asbestos landfills.

RECORDKEEPING REQUIREMENTS

The revised asbestos NESHAP requires waste disposal site operators to maintain both waste shipment and ACWM deposition information.

Waste Shipment Records

Landfill operators must check the WSR that accompanies each asbestos waste shipment that arrives at the facility to make sure that the information on the WSR accurately describes the waste shipment. The landfill operator must verify that the information in WSR Item 6 (Number and Type of Containers) coincides with the quantities reported in WSR Item 7 (Cubic meters or yards) and determine if the load contains a significant amount of improperly enclosed or uncovered waste. Any discrepancy seen must be noted in Item 12 of the WSR.

Waste disposal site operators need not open bags or other containers to verify that they contain ACWM; the WSR accompanying the load is sufficient verification. Once the load has been examined, and discrepancies noted, the waste disposal site operator must complete Item 13 (Certification of Receipt) of the WSR, return a copy to the generator (within 30 days), and maintain a file copy.

Copies of all WSR's must be kept for at least 2 years. To facilitate future reference, WSRs should be kept in chronological order in a secure, water-tight file. Copies of WSRs must be provided, upon request, to the agency(ies) responsible for implementation of the asbestos NESHAP and the file must be made available for inspection during normal business hours.

ACWM Deposition Information

Waste disposal site operators are also required to maintain up-to-date, accurate records that indicate the location, depth, area, and quantity of ACWM within the disposal site on a map or diagram of the disposal area.

REPORTING REQUIREMENTS

The revised asbestos NESHAP also subjects waste disposal site owners/operators to several new reporting requirements. Required reports concern stationary source information, WSR discrepancies, improperly-contained waste, disturbance of disposed ACWM, and disposal site closures.

Waste Site/Stationary Source Report (§§ 61.153, 61.10)

Within 90 days of the effective date of the revisions to the asbestos NESHAP (by February 18, 1991) for existing sources, or within 90 days of the initial startup date for sources having a startup date after the effective date, disposal site operators are required to submit the following information about their waste site operations to the agency responsible for administration of the asbestos NESHAP program:

- A brief description of the waste disposal site (location, size, etc.).
- A description of the method or methods that will be used to comply with the asbestos NESHAP, or a description of alternative methods that will be used. Methods to be used may include covering asbestos waste daily with six (6) inches of nonasbestos cover, or the use of a dust suppressant. Other information that might be reported includes procedures to prevent public access to the asbestos waste disposal area, such as the use of warning signs and fencing. This information must be reported using the format in Appendix A of Part 61 of Title 40 of the Code of Federal Regulations (40 CFR).

In addition to the information listed above, the waste disposal site operator also has to report (within the same time period) the following information to comply with the source reporting requirements of 40 CFR Part 61 Subpart A §61.10:

- Name and address of the owner or operator.
- Location of the source.
- Type of hazardous pollutants emitted by the stationary source.
- Brief description of the nature, size, design, and method of operation of the stationary source, including the operating design capacity of the source. Identify each point of emission for asbestos.

- The average weight per month of asbestos being processed by the source over the last 12 months preceding the date of the report.
- Whether the source can/cannot comply with the standard within 90 days of the effective date.

If there is a change in any of the information listed above, the waste disposal site owner/operator must report the changes to the appropriate agency within 30 days after they occur as required by 40 CFR § 61.10(c).

Discrepancy Reports (§ 61.54 (e)(3))

If there is a discrepancy between the number of containers shown on the WSR and the number counted in the load, waste disposal site operators must make note of this in Item 12 of the WSR and contact the generator to determine if there is a reasonable explanation for the discrepancy. If the discrepancy is resolved, the waste disposal site operator must note this on the WSR, send a signed copy of the WSR to the generator (within 30 days), and retain a file copy.

If the discrepancy cannot be resolved within 15 days of receipt of the ACWM, the waste disposal operator must send a written discrepancy report immediately to the agency which is responsible for the generator of the waste and, if different, the agency in whose jurisdiction the disposal site is located. The report must describe the discrepancy and steps taken to resolve it. Information provided should include how and when the waste disposal site operator attempted to reach the generator and the results of these efforts. A copy of the WSR in question must be submitted as well.

Improperly-Contained Waste Report (§ 61.154 (e)(1)(iv))

As disposal site operators check asbestos waste shipments that arrive at their facilities, they are required to note whether a significant amount of improperly enclosed or uncovered waste exists in the load. If such material is discovered, the waste disposal site operator must make note of this in Item 12 of the WSR and send, by the following working day, a written report of the problem to the agency responsible for administering the asbestos NESHAP program for the jurisdiction where the job site is located (identified on the WSR). If the disposal site is in a different jurisdiction than the job site, the written report must also be sent to the agency responsible for the disposal site.

The written report must include a copy of the WSR and a detailed description of the improperly enclosed or uncovered waste so that the Agency can determine the urgency of the situation and the course of action to pursue.

Excavation/Disturbance Report (61.151(d))

If an owner or operator of an asbestos landfill plans to excavate or otherwise disturb (e.g., drill methane vents) any ACWM that has been deposited and covered at a waste disposal site, the Administrator must be informed, in writing, at least 45 days prior to the disruptive activity. The following information must be contained in the notice:

- Scheduled starting and completion dates.
- Reason for disturbing the waste.
- Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated ACWM. (If deemed necessary, the Administrator may require changes in the emission control procedures to be used.)
- Location of any temporary storage site and the final disposition site.

If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided to the Administrator at least 10 working days before excavation begins. In no event shall excavation begin earlier than the date specified in the original notification.

Closure Report (§ 61.151(e))

Agency Notification

Upon closure of a facility, the owner or operator of the site must submit to the Administrator a copy of the records of the location, depth and area and quantity (yd³ or m³) of ACWM within the disposal site which have been maintained on a map or diagram of the disposal area.

Deed Notation

In addition, within 60 days of closing a waste disposal site, the owner/operator must record, in accordance with State law, a notation on the deed to the facility property, and on any other instrument that would normally be examined during a title search, that:

- The land was used for the disposal of ACWM,
- The survey plot and record of the location and quantity of ACWM disposed of within the disposal site have been filed with the Administrator, and
- The site is subject to the National Emission Standards for Hazardous Air Pollutants: Asbestos (40 CFR part 61 subpart M).

SECTION 2

PRE-INSPECTION ACTIVITIES

In the 2 years following promulgation of the revised asbestos NESHAP, all waste disposal sites which accept ACWM should be visited for a baseline inspection. This inspection will provide the opportunity for disposal site operators to learn about reporting and recordkeeping requirements, help publicize EPA's intention to enforce the waste disposal requirements, and assist in the collection of information necessary for inspection targeting.

The following in-house activities should be conducted to ensure smooth performance of landfill recordkeeping inspections.

TARGETING WASTE DISPOSAL SITES

Targeting of waste disposal sites should be based on their size, the amount of asbestos waste accepted for disposal, other enforcement actions (i.e., RCRA), and exception reports, etc. Such information may be obtained from a variety of sources:

- **Landfill lists.** Lists of landfills may be obtained from EPA Regional Offices, States and local agencies. Only some of these lists indicate whether ACWM is accepted by a particular landfill; however, individuals noted on the lists may be contacted to provide additional information.
- **Notifications.** Information pertaining to landfills not previously known to accept ACWM may be found in generator notifications. Additionally, any landfill noted which is scheduled to receive large quantities of ACWM should be targeted for inspection.
- **Previous inspection reports.** Waste disposal sites identified in inspection reports concerning demolitions or renovations performed out of compliance should be targeted for inspection.

PLANNING THE WASTE DISPOSAL SITE RECORDKEEPING INSPECTION

A NESHAP inspector who takes the time to properly plan a field inspection will find that the actual inspection will be accomplished more efficiently and will be more productive. In preparation for an asbestos landfill recordkeeping inspection an inspector should:

- Become familiar with the types of records a facility is required to maintain.

- Review agency files.
 - Determine whether the landfill whose records are to be inspected has been identified as the waste disposal site on demolition/renovation notifications received. Make copies of such notifications.
 - Determine if any reporting or recordkeeping problems have been reported for the site (e.g., an unexpectedly large number of exception reports). If the removal jobs and the disposal site are in the same regulatory jurisdiction this will be easy to do, since generators are required to inform the regulatory agency in charge if there are problems with the disposition of their ACWM. If the disposal site is located outside the regulatory jurisdiction, however, such information may not be available, for generators are not required to inform the agency responsible for the waste disposal site. Make copies of such information.
 - Examine landfill-generated reports (discrepancy, stationary source, improperly-contained ACWM, closure and excavation/disturbance reports).
 - Review any complaints submitted.
- Communicate with other agencies or departments. City building departments may issue demolition/renovation and construction permits. Health departments may issue landfill operating permits or have records of complaints. Review any pertinent inspection reports filed by these agencies.
- Acquire the following information:
 - Where records are maintained.
 - Directions to this location.
 - The business hours where the records are kept.
 - Who is in charge of maintaining these records.
 - The hours this person works.
 - Directions to the landfill.
 - Landfill operating hours.
 - How much ACWM is accepted by the landfill.
 - How often the landfill accepts ACWM.
 - How often records are sent to the central storage area from the landfill.
- Plan for the efficient use of time. Inspectors will probably have to inspect records kept both at the landfill and at an office or storage area elsewhere. Determine the traveling distance/time between the locations and plan accordingly. A full day may be necessary to properly inspect all records.

- Accumulate necessary inspection materials:
 - copies of applicable notifications, exception reports, etc.
 - employee identification
 - copy of regulation
 - bound notebook and writing implements
 - manila folders
 - large envelopes
 - landfill recordkeeping checklist
 - shipping supplies (if necessary)
 - business cards
- Try to plan the inspection for a day when asbestos is being accepted by the landfill so that landfill deposition and recordkeeping operations may be observed first-hand. Bring personal protective equipment, a camera, landfill inspection checklist and asbestos sampling materials as needed.
- If the landfill records are expected to be too numerous to review individually, devise a sampling strategy which will fulfill the objectives of the inspection. The six basic steps below are designed to help ensure that each sample selected is both appropriate and defensible:
 - 1) Determine the objective of the particular inspection step. What is the inspector trying to determine and what needs to be reviewed to make the determination? (e.g., compliance with the requirement to submit discrepancy reports - all WSRs)
 - 2) Identify the population under review. The population will vary depending on the intent of the inspection. (e.g., all WSRs; all WSRs that contain discrepancy information; WSRs for which exception reports have been filed, etc.)
 - 3) Determine whether a **judgmental** or **probabilistic** sampling method should be employed. A judgmental method is used when there is reason to suspect that a violation or violations have occurred. Probabilistic (statistical) methods, however, are more often used. (Keep in mind that the initial sampling strategy selected may have to be altered during the actual inspection.)

Judgmental sampling is directed to the segments of the population where problems or deficiencies are likely to exist. For example, if the inspector is responding to exception reports from a generator, only that generators' WSRs may be examined.

Probabilistic sampling (statistical sampling) is an organized, methodical process designed to select data which accurately represent the population of interest. Several varieties of such sampling are described below:

-Random sampling: the objective is to select items purely by chance; pull items at random, without prejudice, or number the documents and use a random number table.

-Block sampling: the objective is to draw conclusions about the population by examining certain segments or clusters of data that have been selected at random; often used when the population is so large that random sampling would produce too many subjects for review; can only be used when population is expected to be consistent throughout.

For example, if the inspector is trying to determine whether discrepancy reports are being filed appropriately, and information is available that no one was assigned to that task for the first six months following promulgation of the revisions to the Asbestos NESHAP, selecting a block of documents from that time period would not be appropriate. The information gathered would not be representative of the facility's compliance with these provisions.

-Stratification Sampling: the objective is to arrange items by important categories or subsets; allows the inspector to categorize populations by groups.

For example, if the inspector is responding to numerous citizen complaints concerning dust generated by dumping activities on Saturdays, only these records may be selected for review.

-Interval Sampling: also known as systematic sampling; objective is to select samples at various intervals (e.g., every tenth item); the first item must be picked at random.

- 4) Determine the sample size. Sample sizes can be determined either statistically or based on the inspector's judgment. In all cases, the sample must be representative of the total population selected. See Table 2-1.

TABLE 2-1. DETERMINATION OF MINIMUM SAMPLE SIZE

Population Size	Sample Size
2-8	3
9-15	5
16-25	8
26-50	13
51-90	20
91-150	32
151-280	50
281-500	80
501-1200	200
1201-3200	315
3201-10000	500

- 5) Conduct sampling.
 - 6) Document the sampling strategy. In the field logbook describe the rationale for selecting the sample and how the sample was selected.
- Record known information. More efficient use of onsite inspection time is ensured if preliminary information is recorded on the landfill recordkeeping inspection checklist before arriving at the site.

SECTION 3

FIELD INSPECTION ACTIVITIES

Onsite activities include a pre-inspection interview, records inspection and wrap-up interview.

PRELIMINARY INTERVIEW

During the preliminary interview, it is critical that discussions be properly documented for they may later prove useful if violations are detected. The following steps should be followed once an inspector arrives on site:

- Show your identification and request to see the person in charge of maintaining the records pertaining to ACWM disposal.
- When this person arrives, introduce yourself and give him/her your business card.
- Document the name and title of the person interviewed. Get his/her business card if possible.
- Explain the authority (Section 114 (a)(2) of the Clean Air Act), purpose (asbestos NESHAP compliance), and components (records review) of the inspection.
- Inform the representative that the facility may be required to provide the inspector copies of records of interest.
- If records are being inspected at the landfill itself and offloading will be observed, discuss safety requirements and emergency procedures and indicate that photographs and/or samples may be taken.
- Determine whether the landfill has a State-required permit to operate. If it does, check the expiration date of the permit and record pertinent information on the inspection form.
- Ask the person to describe the recordkeeping procedures followed for WSRs and ACWM deposited at the site.
- Complete applicable sections of the Landfill Recordkeeping Inspection Checklist.
- If this is the facility's first Asbestos NESHAP compliance inspection, explain the waste disposal requirements to the interviewee and answer any questions to the best of your ability.

- Request the files you wish to review. If permission is denied, do not be forceful. Simply explain again the authority of your visit and ask the person to contact his/her supervisor regarding the situation. Either you or your agency's attorney may need to contact the facility's attorney directly to resolve the difficulties.

REVIEWING RECORDS

The records of most interest at a waste disposal site are 1) WSRs for each shipment of ACWM disposed of at the site, and 2) up-to-date records (on a map or diagram) that indicate the location, depth and area, and quantity of ACWM within the site.

Waste Shipment Records

For all ACWM received, the owner or operator of the active waste disposal site must comply with the following waste shipment recordkeeping provisions:

- Record and maintain the following information on forms similar to that noted in the regulation:
 - waste generator's name, address and telephone number;
 - transporter's name, address and telephone number;
 - quantity of ACWM received (cubic yards or meters);
 - presence of improperly-enclosed or uncovered waste, or any ACWM not sealed in leak-tight containers; and
 - date of receipt.
- Send a copy of the waste shipment record to the waste generator as soon as possible but no longer than 30 days after receipt of the waste.
- Attempt to reconcile differences in the amounts of ACWM received and that recorded on the waste manifest form brought by the transporter. If the discrepancy is not resolved within 15 days after receiving the waste, immediately submit a discrepancy report which details the discrepancy and attempts made to reconcile it to the governmental agency responsible for administering the asbestos NESHAP program for the *waste generator* (identified in the waste shipment record), *and, if different*, the governmental agency responsible for administering the asbestos NESHAP program for the disposal site.
- Retain a copy of all records and reports required by this paragraph for at least 2 years.

In inspecting the WSR file, note how the file is maintained and if the WSRs have been filled out completely, including all of the required signatures. All signatures should be **hand-written**.

Note any WSRs that have an entry pertaining to discrepancies or improperly-contained waste (Item 12 on the example WSR in the revised NESHAP) and ask how those discrepancies were resolved. Ask to see copies of any discrepancy reports or reports of improperly-contained waste submitted to the responsible agency for the WSRs in question.

Attempt to match information obtained during the pre-inspection agency file review (notifications, exception reports, etc.) with records maintained by the waste disposal site.

Pay attention to the dates of shipment of ACWM and acceptance by the landfill. ACWM is often stored by the transporter until a full load is accumulated.

Photocopy WSRs which lack the required information. If a photocopier is not available, either 1) record the necessary information in sufficient detail or 2) remove the records from the facility, photocopy them and return them later. (If records are to be removed from the facility, sign a receipt indicating that they will be returned as soon as possible).

ACWM Deposition Records

Ask the site operator for the most recent tally of the total quantity of ACWM deposited at the site. The operator should be able to provide you with a total that includes all but the most recent shipments. Examine the records showing the location, depth and area, and quantity of ACWM within the site to determine that they are up-to-date. Check to see that the proper information is being collected and the backlog of information to be added to the records is only for current waste shipments.

ADDITIONAL ACTIVITIES

If records are being reviewed at the landfill itself, you may be able to gain additional information regarding compliance with the provisions of the Asbestos NESHAP by doing the following:

- Observe ACWM being off-loaded into the landfill. Note how the load is verified, whether improperly-contained waste is present, and whether the vehicle is properly marked during offloading. Take samples as necessary to help assess compliance with the provisions of the waste disposal provisions of the asbestos NESHAP.
- If offloading cannot be observed, interview the person directly in charge of waste disposal site operations. Ask him/her to describe waste handling, load verification, and recordkeeping activities.
- Inspect the asbestos disposal site; compare your observations with information recorded on the required site map.
- Note the accessibility of the asbestos landfill area to the general public. If the landfill operator claims that a natural barrier or fence is being used to deter access, determine

if the Administrator has been informed and has agreed that access is sufficiently restricted.

QUALITY ASSURANCE CHECK

Once you have finished reviewing pertinent records, check to see that the objectives of the inspection have been met. Have appropriate types and quantities of records been reviewed? Have potential violations been thoroughly documented? Has the field inspection checklist been completed?

POST-INSPECTION INTERVIEW

Once you have reviewed your inspection activities, conduct a quick, concise wrap-up interview to obtain any additional information necessary and to convey to the owner/operator, in general terms, the findings of the inspection. It is extremely important that you do not make and convey a field decision concerning the facility's compliance for a number of reasons which include the following:

- You may later recall items you failed to mention and include them in your inspection report; if an enforcement action is contested, your credibility and integrity could be called into question.
- Individuals other than yourself may make the final determination pertaining to the facility's compliance status.
- You may not be aware of other enforcement actions being taken.

In situations where potential violations have been identified, be sure to note (on your checklist or in your field logbook) any observed or verbally-communicated responses of the owner/operator. This documentation may prove to be of great importance where enforcement actions are considered.

SECTION 4

POST-INSPECTION ACTIVITIES

No matter how blatant a violation appears, or how thoroughly an inspection was done, an enforcement case cannot be supported without proper records and documentation. It is imperative that each agency in charge of administering the asbestos NESHAP program set up and implement a system whereby supporting documentation is properly taken, controlled, and maintained. Generated reports and checklists must be clear and concise and accurately support the observations of the inspector. All records must be organized and properly maintained to be accessible for future use.

The purpose of this section is to outline inspection followup procedures and provide general guidance to aid in the process of report preparation, data management, document control, and record maintenance and storage.

INSPECTION FOLLOWUP

When potential violations have been documented, the inspector should complete his/her inspection report and brief his/her supervisor and/or attorney concerning the 1) need for reinspection; 2) need for information request under Section 114 of the CAA; 3) enforcement options available, etc.

REPORT PREPARATION

A comprehensive and properly completed checklist can serve as the inspection report. The following information should also be included:

- Inspector observations;
- Owner/operator admissions;
- Description of evidence collected; and
- Owner/operator response actions.

Since it may take several years before a lawsuit is filed, a detailed narrative of the inspection will prove beneficial in refreshing the inspector's memory and will provide strong evidence for the case.

DATA MANAGEMENT

Each violation of an asbestos landfill owner/operator should be entered into a computer tracking system to provide a record of violations for the landfill.

DOCUMENTATION

It is essential that all information gathered be properly documented, controlled and maintained. Since checklists and reports generated by an inspector may be the basis of affidavits for civil or criminal enforcement actions, they must be precise and legible. All documents generated during the course of an inspection are considered part of the permanent evidentiary file and should not be destroyed or thrown away, even if they become illegible or if inaccuracies are discovered. Errors in documents should be noted and corrected.

RECORDS MAINTENANCE

Records need to be properly filed and maintained to allow for easy access of all case documents. Records also need to be retained under storage conditions which minimize deterioration or loss of data files.

Regardless of whether computer-based data management systems or manual procedures are used, responsible individuals within a program office must be able to access and trace the destination of project files. The inspector must be familiar with and use all filing procedures appropriately.

SECTION 5

ASBESTOS NESHAP ENFORCEMENT

EPA may take administrative and/or judicial actions against violators of the asbestos NESHAP. Violations of asbestos landfill recordkeeping and reporting requirements include, but are not limited to the following.

LANDFILL RECORDKEEPING VIOLATIONS

Recordkeeping violations include failure to:

- Maintain records of waste shipments.
- Record information on location and amount of asbestos in disposal site.
- Return a signed copy of the WSR to the generator.
- Maintain records for sufficient time.

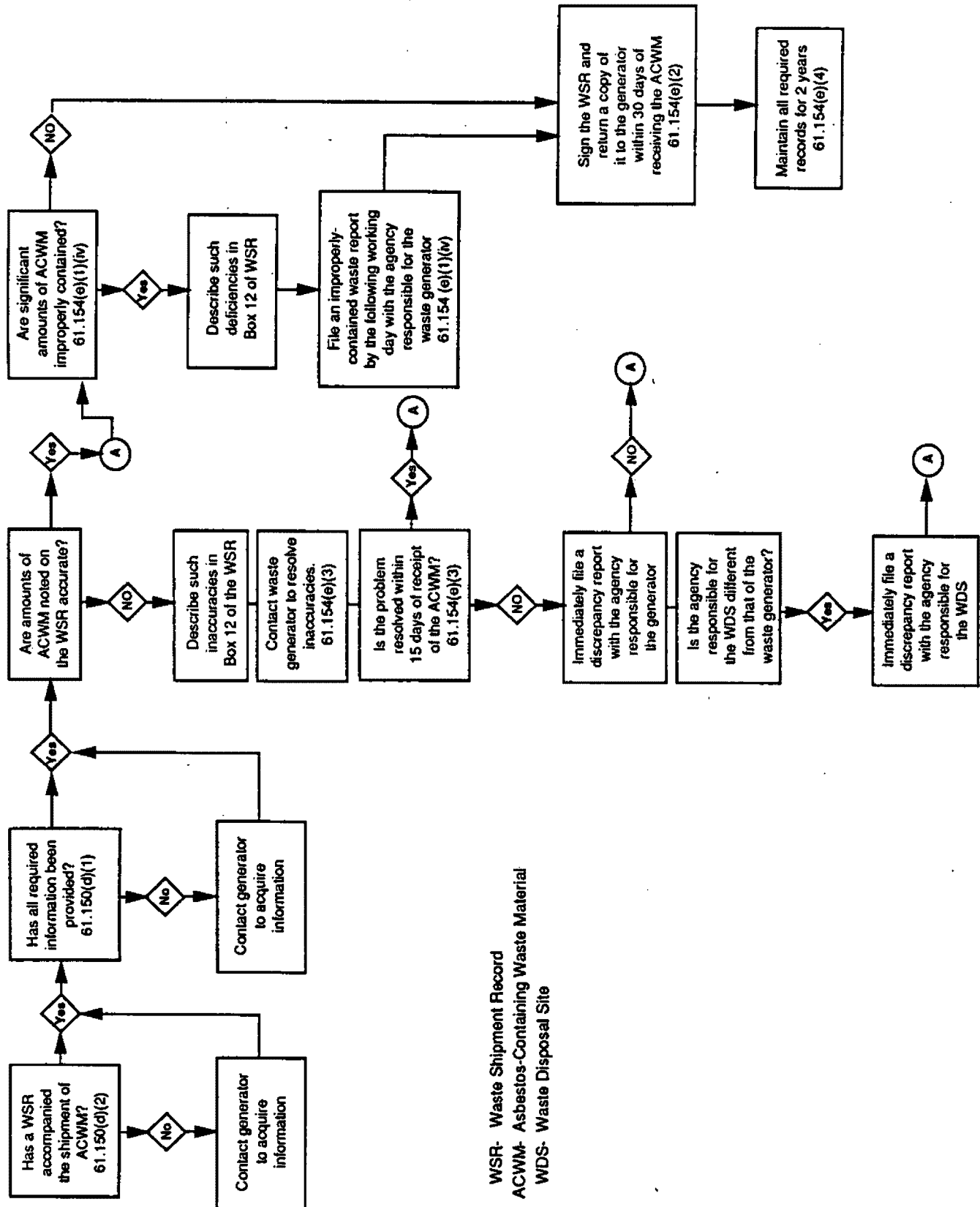
LANDFILL REPORTING VIOLATIONS

Reporting violations include failure to:

- File discrepancy reports.
- Report uncontained waste.
- File reports within required time.
- Report, upon closure, information to EPA (or its delegated authority) on location and amount of waste.
- Place, upon closure, a notification on deed to property concerning presence of asbestos waste.
- Notify EPA prior to excavating or disturbing buried asbestos-containing waste material.

APPENDIX A

Asbestos Waste Disposal Site WSR Recordkeeping Requirements



APPENDIX B

ASBESTOS WASTE DISPOSAL SITE RECORDS INSPECTION CHECKLIST

Site Name: _____

Site Address: _____

Agency Assigned Landfill Identification Number: _____

Inspector(s): _____

Date of Inspection: _____ Time of Inspection: _____

I. PRELIMINARY INTERVIEW

1. Owner Name: _____

2. Site Contact: _____

a. Title: _____

b. Affiliation: _____

c. Mailing Address: _____

d. Telephone Number: _____

	YES	NO	NA
3. Is the landfill approved by the State?	—	—	—

If yes, Operating Permit No.: _____

Effective date: _____ through _____

4. Are waste shipment records maintained? (61.154(e)(1))	—	—
--	---	---

Where are WSRs filed? _____

Do these records contain the following information?

a. Waste generator's information (61.154(e)(1)(i)):

1) name	—	—
---------	---	---

2) address	—	—
------------	---	---

3) telephone number	—	—
---------------------	---	---

YES NO NA

b. Transporter's information (61.154(e)(1)(ii)):

1) name	—	—	
2) address	—	—	
3) telephone number	—	—	
4) signature	—	—	

c. Quantity of ACWM (cubic yards or meters)
(61.154(e)(1)(iii))

— —

d. Presence of improperly enclosed or uncovered waste, or any ACWM not sealed in leak-tight containers (61.154(e)(1)(iv)):

— — —

Has the landfill operator reported to the EPA, in writing, by the following day, the presence of a significant amount of improperly enclosed or uncovered waste? (Record or photocopy WSRs indicating improperly enclosed or uncovered waste.)

e. Date of receipt (61.154(e)(1)(v))

— —

f. Comments: _____

5. Have signed copies of waste shipment records been sent to the waste generator as soon as possible, but no longer than 30 days after receipt of the waste? (61.154(e)(2))

— —

Comments: _____

6. Has the landfill operator attempted to reconcile differences between the quantity of waste designated on the waste shipment record and the quantity actually received? (61.154(e)(3))

— — —

Explain: _____

YES NO NA

If the discrepancy is not resolved within 15 days after receiving the waste, has a report been filed immediately with the government agency responsible for administering the asbestos NESHAP program for the *waste generator*

— —

and

if different, the government agency responsible for administering the asbestos NESHAP program for the *disposal site*?

— —

7. Are copies of all required records and reports retained for 2 years? (61.154(e)(4))

— —

8. Is a map or diagram of the disposal area being maintained? (61.154(f))

— —

Does the map or diagram contain the following ACWM information?

location

— —

depth

— —

area

— —

quantity (cubic yards or meters)

— —

9. Are records available for inspection? (61.154(i))

— —

10. Upon closure, has the disposal site operator informed EPA as to the location and amount of waste? (61.154(g))

— — —

- | | | | | |
|-----|--|---|---|---|
| 11. | Upon closure, has a notification concerning the presence of asbestos waste been placed on the deed to the property? | — | — | — |
| 12. | Has written approval from the Administrator been obtained prior to excavating or otherwise disturbing any ACWM already deposited and covered? (61.154(j)) | — | — | — |
| 13. | Has a stationary source report been filed with the Administrator or government agency responsible for administering the asbestos NESHAP program? (61.153.(a), 61.10) | — | — | — |
| 14. | When did construction of the disposal site commence? (61.07) _____ | | | |

