

UWSA Checklist for Surviving a RCRA Inspection

**Compliance Information for
University of Wisconsin System Campuses**

Revised: March 2019



Before the Inspection

- Obtain administrative buy-in to implement environmental compliance and best practices
- Self-identify non-compliance issues and opportunities for improvement
- Keep records organized, accessible and in order
- Designate qualified personnel, including backups, to accompany inspector
- Prepare a plan and procedures to manage inspections

During the Inspection

- Verify inspector credentials and make note of identity
- Inspector must be accompanied by university EHS staff
- Do not argue with the inspectors
- Take notes
- Answer all questions directly and truthfully
- If you are unable to answer a question, provide follow-up as soon as possible
- If a problem is found, correct it immediately
- Split samples – take a sample each time the inspector takes one
- Photograph what inspectors photograph
- Keep an exact duplicate of all records provided

After the Inspection

- Seek management attendance at exit briefing
- Clarify expectations and deadlines
- Consult legal counsel if necessary
- Keep communication open and constructive until issues are resolved
- Complete and organize your notes promptly

If no violations are found DNR will send a letter indicating as such. If violations have been detected, you will receive either a notice of noncompliance (NON) or notice of violation (NOV). If noncompliance issues or violations are not corrected in a timely manner, escalated enforcement options include an enforcement conference, an administrative order or a referral to Wisconsin Department of Justice.

Records Review

Inspectors will request records related to the cradle-to-grave management of hazardous wastes. These documents may include but are not limited to:

- Applicable permits
- Training records
- Emergency procedures and contacts
- Contingency plans, where applicable
- Inspection logs
- Waste analyses and profiles
- Hazardous waste manifests
- Other shipping documents
- Land disposal restriction notices
- Annual reports

Common Violations

1. Failure to properly label containers
2. Open containers
3. Improper disposal of hazardous waste
4. Improper management of Satellite Accumulation Areas
5. Exceeding storage time limits
6. Failure to regularly inspect and maintain documentation
7. Improper management of universal waste (labeling, dating, open containers)
8. Inadequate contingency plan
9. Inadequate personnel training
10. Management of used oil

Additional Resources

[Common Hazardous Waste Violations \(WA850\)](#), Wisconsin DNR, December 2018

[RCRA Audit Manual](#), US EPA, June 2001