ASTSWMO, Providing Pathways to Our Nation's Environmental Stewardship Since 1974

Electronic Tools for Hazardous Waste Inspections

Webinar Hosted by the ASTSWMO Hazardous Waste Subcommittee

April 30, 2020

Electronic Tools for Inspections

A State Perspective

Penny Wilson, AR DEQ

Connectivity between RCRAInfo and Smart Tools

Melissa Ferree (DE), Chair

ASTSWMO Program Information Management Task Force

ASTSWMO, Providing Pathways to Our Nation's Environmental Stewardship Since 1974

Wisconsin's Review of EPA's Smart Tools

and the reasons why we are not adopting it

ASTSWMO's Webinar of Electronic Tools for Inspections

April 30, 2020

Smart Tool Training

- Smart Tool demo at ASTSWMO's Joint Hazardous Waste and Materials Management Training (August 13-15, 2019).
- Smart Tool training in Chicago (November 5 & 6, 2019).
  - Three staff attended from WDNR (2 hazardous waste and 1 solid waste).
  - Training presented by EPA and Plateau, Inc., the developer.
  - The code for Smart Tools is owned by Plateau, Inc.
  - Smart Tools will also be used for other regulatory programs (e.g., LUST, Drinking Water, Air).
  - EPA wants feedback from the states so that Smart Tools can improved.
  - Panasonic Toughbook cost is about $4,500 per unit.
  - Microsoft Surface Pros about $1,100 per unit.

Smart Tool Training

- Overview (the ‘likes’):
  - Smart Tool’s software is ‘free’ for states to use.
  - Smart Tool’s operates through a web browser. Chrome is preferred.
  - Smart Tool’s works offline; however, limited to two facilities.
  - Ability to use voice, keypad, and writing stylus to enter data.
  - Ability to add “buildings” and “areas” prior to and during the inspection.
  - Ability to highlight areas of concern and follow up needs in your notes.
  - Ability to mark confidential information.
  - Ability to add documents.
  - Ability to take photos with tablet and load into system.
  - Ability to link comments to photos and regulatory issues.
  - Generate reports in a PDF format.
  - Audit trail.
  - Dashboard.
  - Ability to do ad hoc queries.

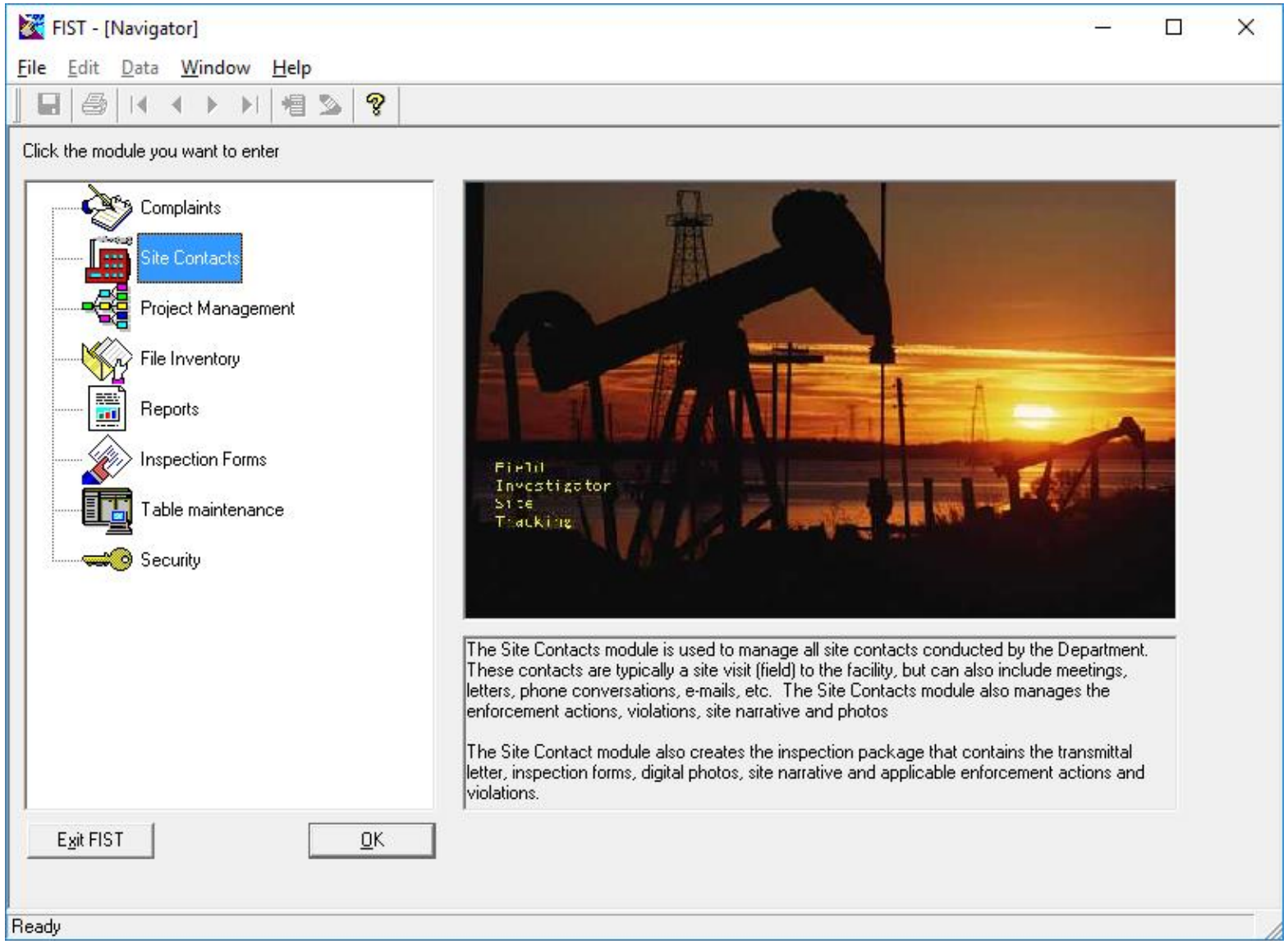
Smart Tool Training

- Overview (the ‘dislikes’):
  - Proprietary coding cannot be adjusted by states for their needs.
  - Reports cannot be created/adjusted by states for their needs.
  - Data resides at federal level.
  - Currently you are not able to link a facility’s operating permit to their facility info.
  - Does not have a true inspection form check list.
  - Does not manage violations and actions – done through RCRAinfo.
  - Currently can not automatically upload inspection data into RCRAinfo.

Smart Tools is great at the pre-inspection and inspection; however, Smart Tools is not a compliance tracking system.

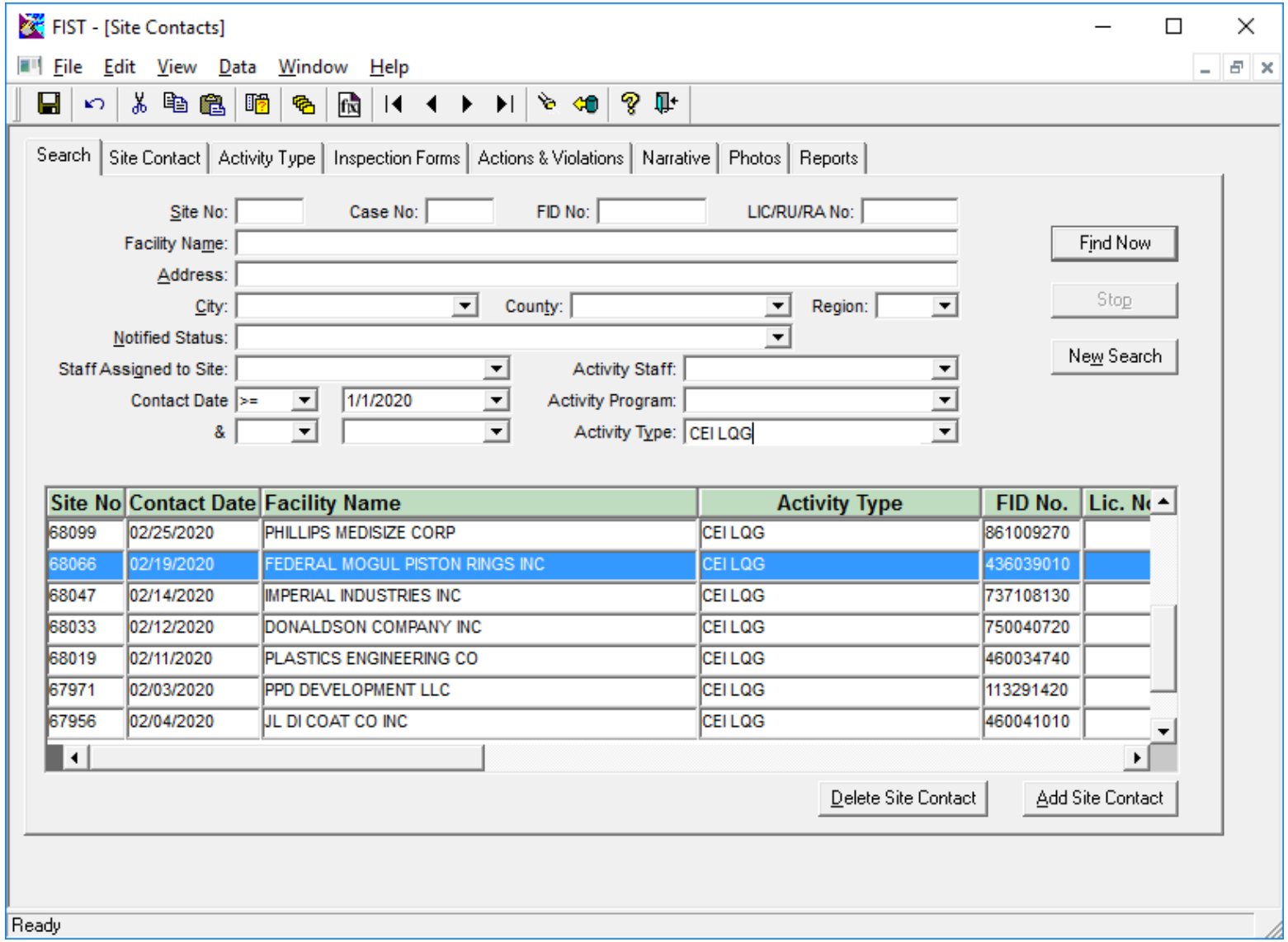
FIST – Field Investigator Site Tracking

- About 20 years old.
- Tracks:
  - Complaint
  - Site Contacts
  - Facility files
  - Submittal and Decisions for license facilities
  - Reports
  - Inspection forms
- FIST contains about 15 million pieces of information.



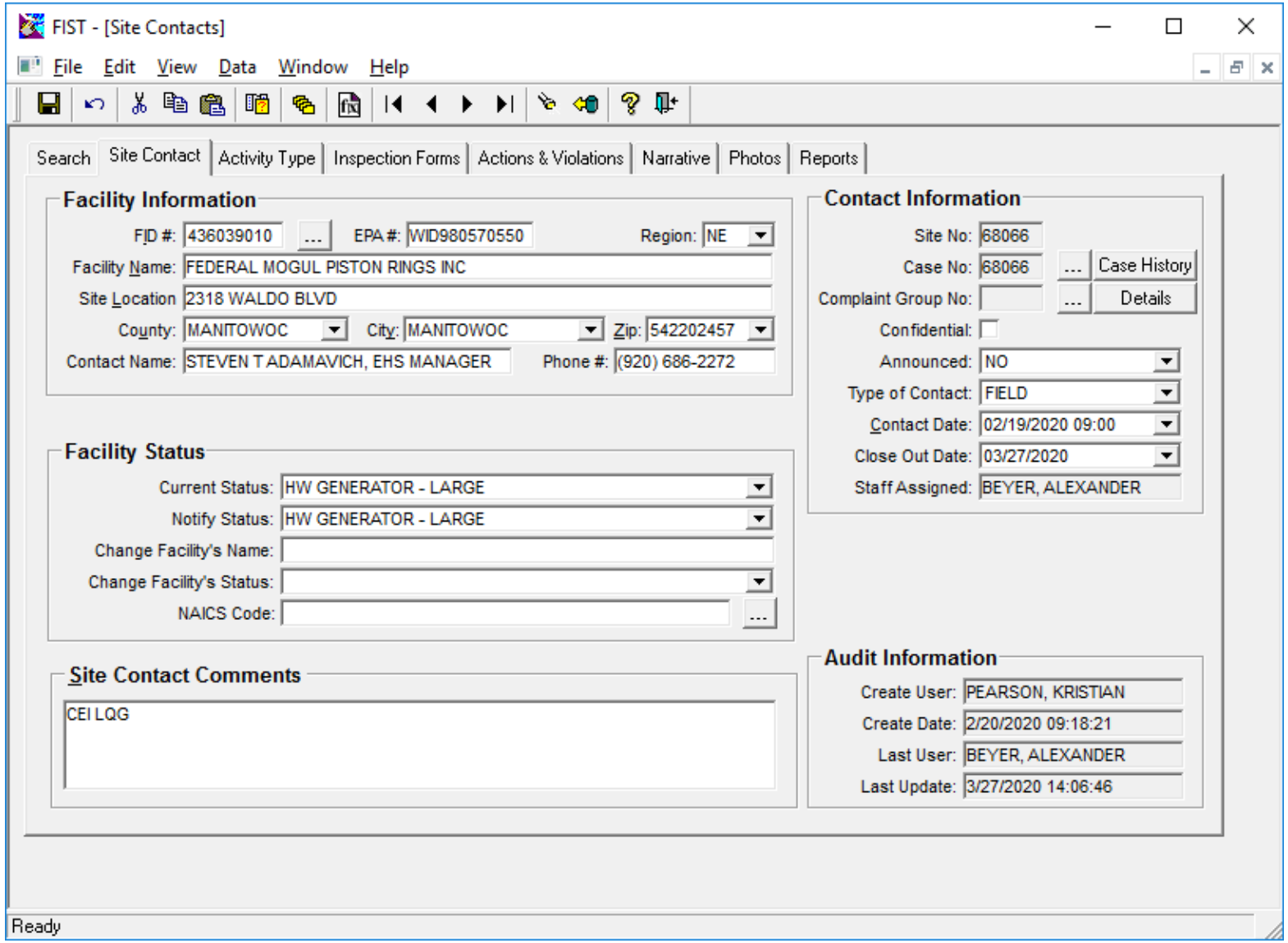
Site Contact

- The ‘Search’ tab page is where site contacts are added or updated.



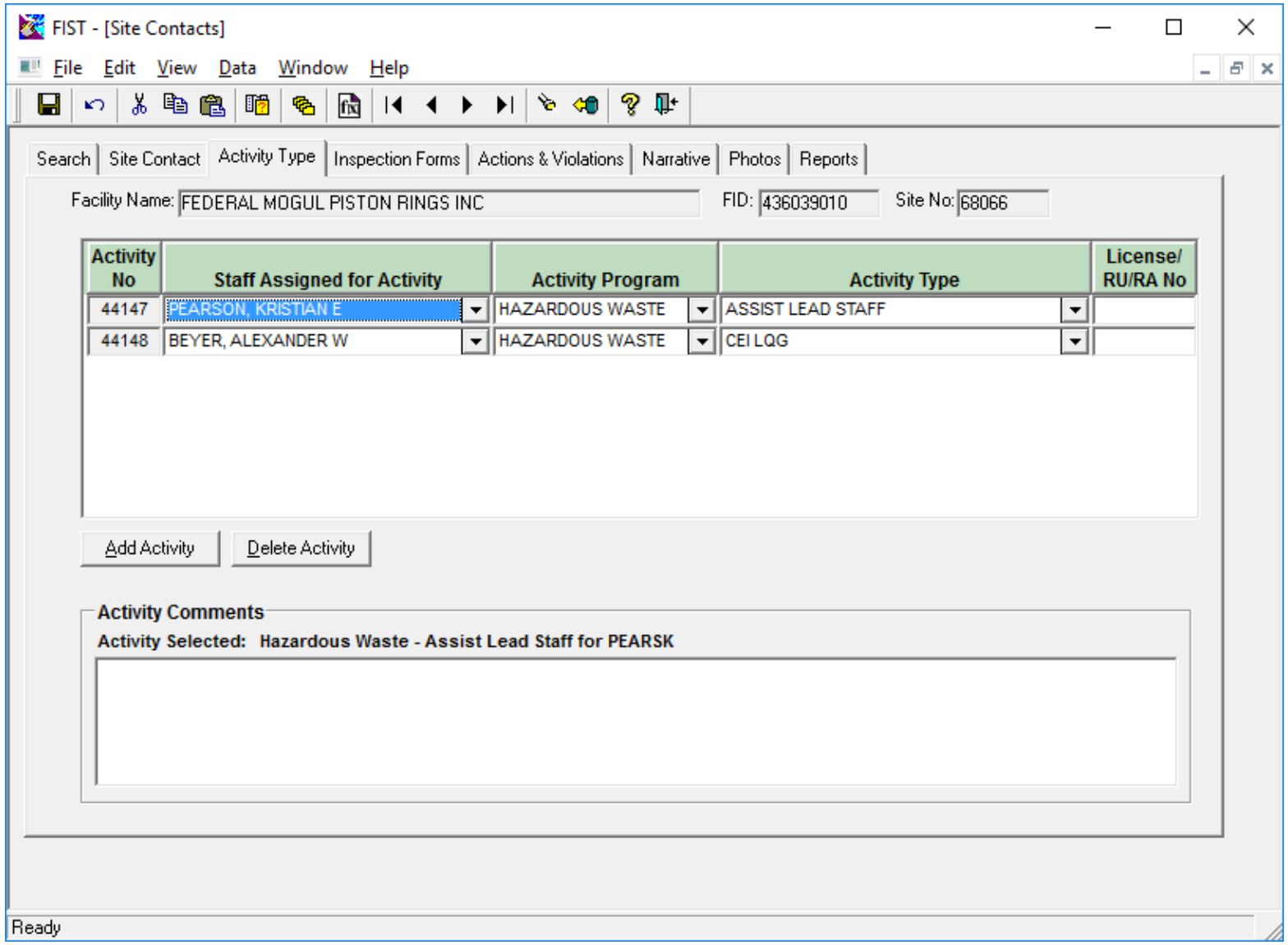
Site Contact

- The ‘Site Contact’ tab page is where the basic facility information is located and who is the lead staff person.



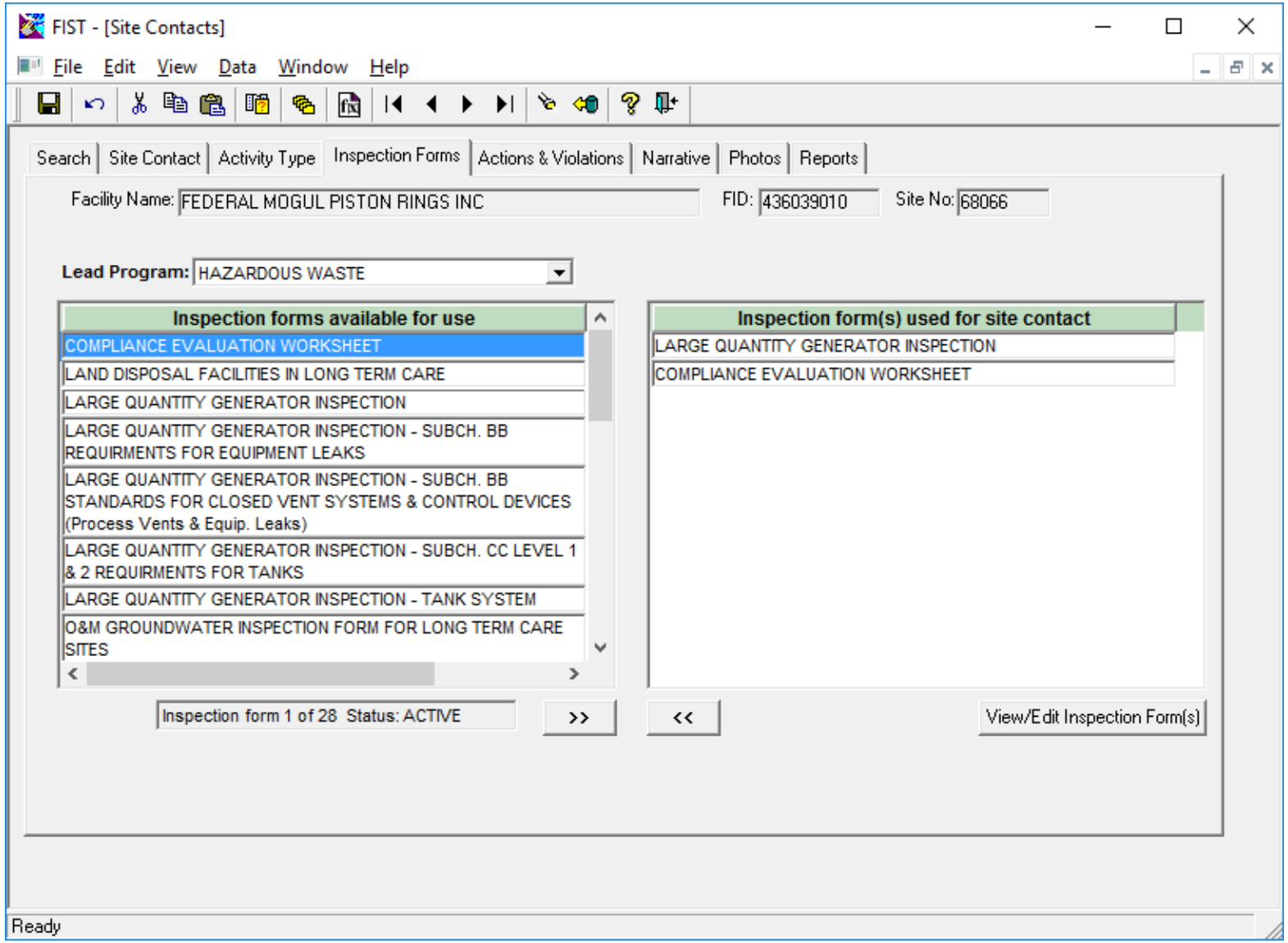
Site Contact

- The ‘Activity Type’ tab page is where site activities and additional staff is added.



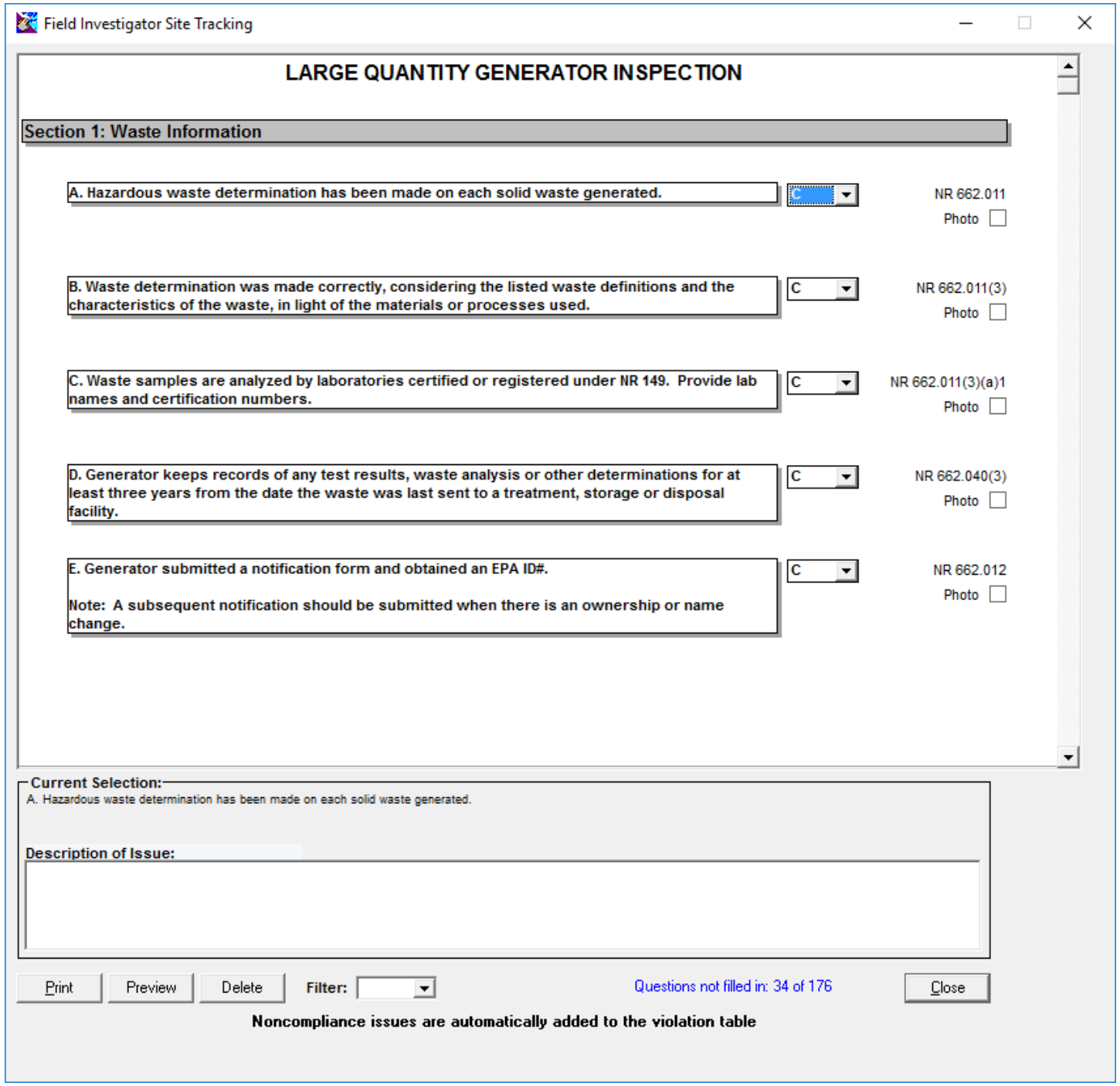
Site Contact

- The ‘Inspection Forms’ tab page is where the inspections form are added and updated.
- There are 69 different inspection forms. 30 for just hazardous waste.
- The inspection form data now contains about 7 million pieces of information.



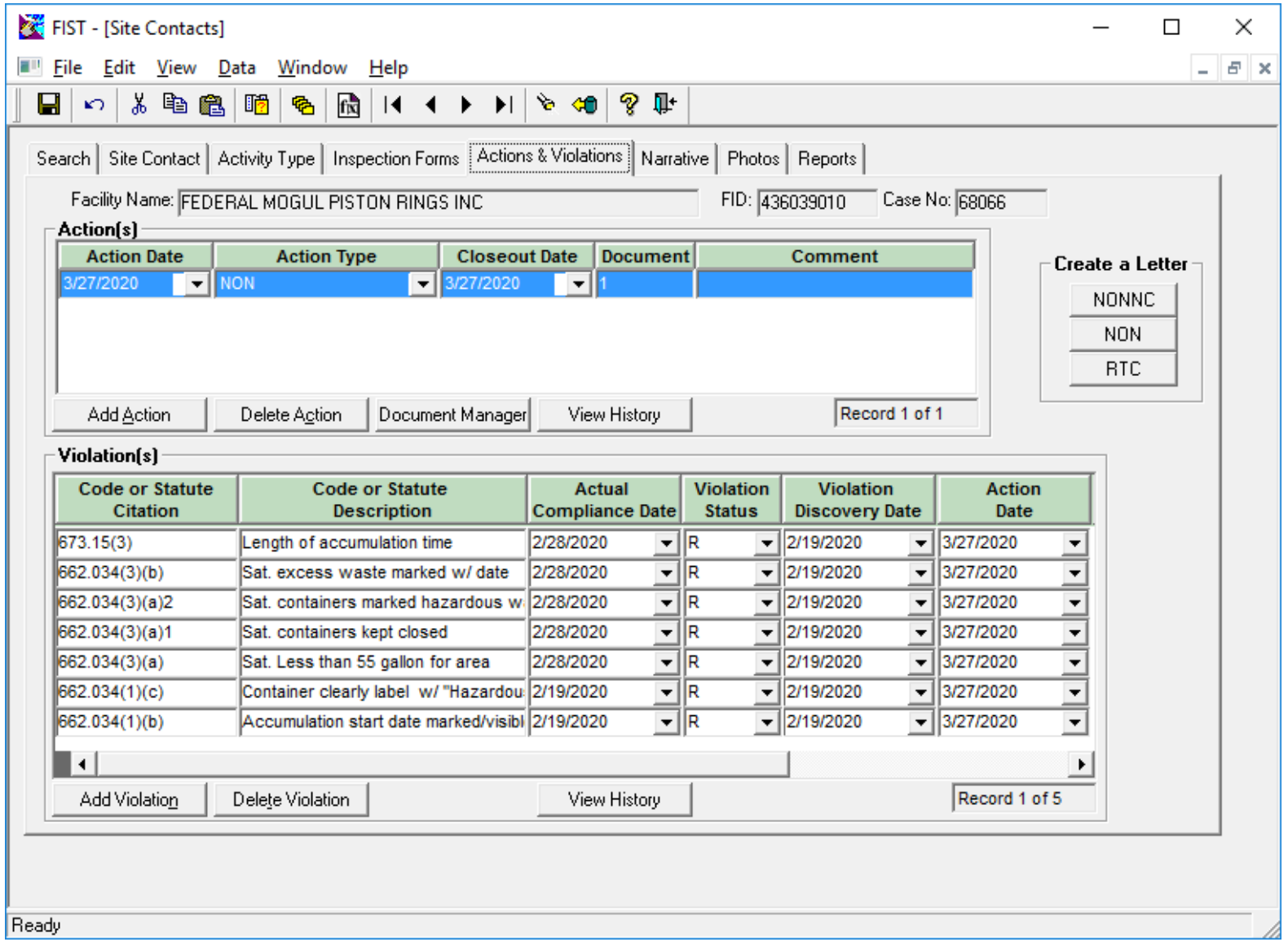
Site Contact

- Window used for the inspection form to enter the compliance evaluation.
- Has a comment section.
- Areas of non compliance in the inspection form are automatically added to FIST's violation table.
- Information in inspection form is used to generated action letter.



Site Contact

- The ‘Actions and Violations’ tab page is where the:
  - site actions and violations are recorded.
  - action letter is generated.
  - documents are uploaded.
- Can view past actions and violations for the site.



Site Contact

- Example of raw output from FIST to a Word document.

Identified below are the eighteen alleged areas of noncompliance with Chapters NR 660 to 679, Wisconsin Administrative Code. and the actions you should take to resolve these alleged areas of noncompliance. The fifteen alleged areas of noncompliance were resolved during the site visit and therefore no additional action is needed. As part of its hazardous waste regulatory program, the Department may perform additional inspections at this facility to ensure compliance with chapters NR 660 to 679, Wisconsin Administrative Code. The inspection forms identified 13 items that were not inspected (NI). Since the items were not inspected a compliance determination was not made. The inspection forms also identified one item for which a compliance determination (ND) was not established as part of this inspection. Identified below is the action needed to address this item.

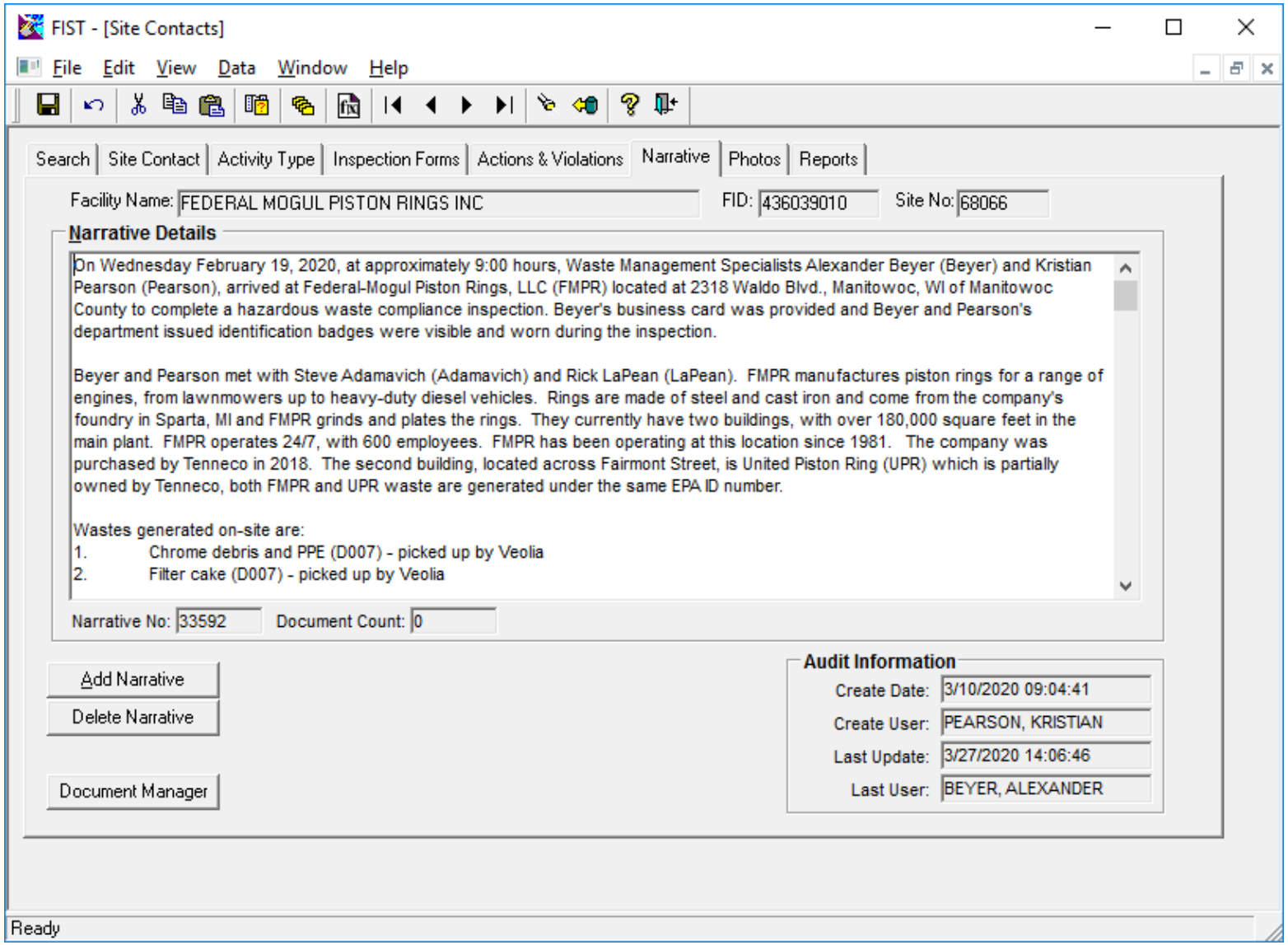
Alleged Areas of Noncompliance

1 Failure to have a container marked with the accumulation start date as required by s. NR 668.50(1)(b), Wis. Adm. Code. The site inspection showed ... The site inspection showed numerous hazardous waste containers on shrink wrap pallets that lacked marking identifying each container's content (see photos 4, 5, and 6). To comply with this requirement date the container when the waste is first placed into the container or when the contents of the container become a waste, i.e. a product that will no longer be used.

2 Failure to have a container marked with the accumulation start date as required by s. NR 668.50(1)(b), Wis. Adm. Code. The site inspection showed ... The site inspection showed numerous hazardous waste containers throughout the facility missing the accumulation start date tag (see photos 2, 4, 5, and 6). To comply with this requirement date the container when the waste is first placed into the container or when the contents of the container become a waste, i.e. a product that will no longer be used.

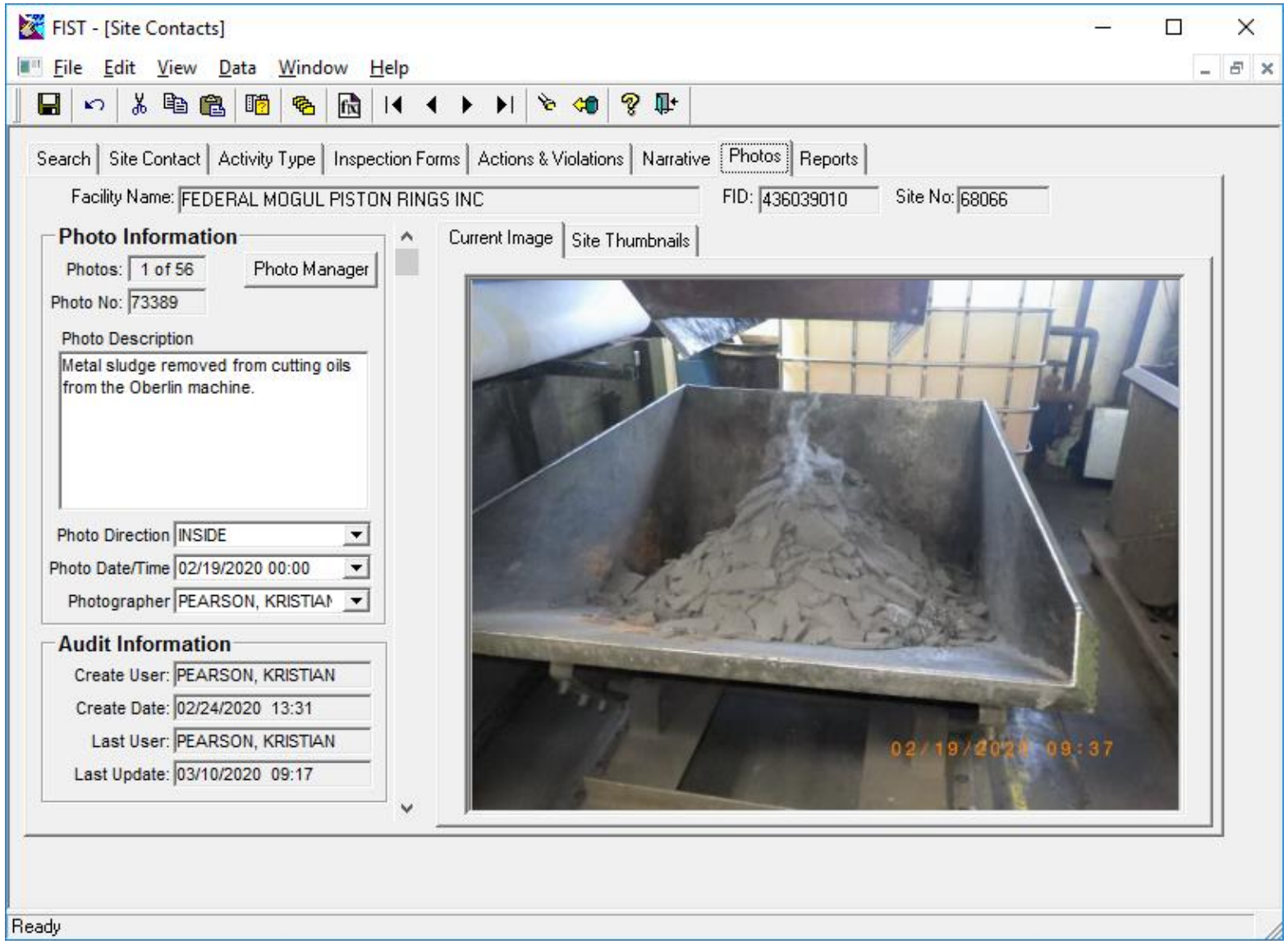
Site Contact

- The ‘Narrative’ tab page is where the site narrative is stored either as a document (Word or pdf) or as a text.



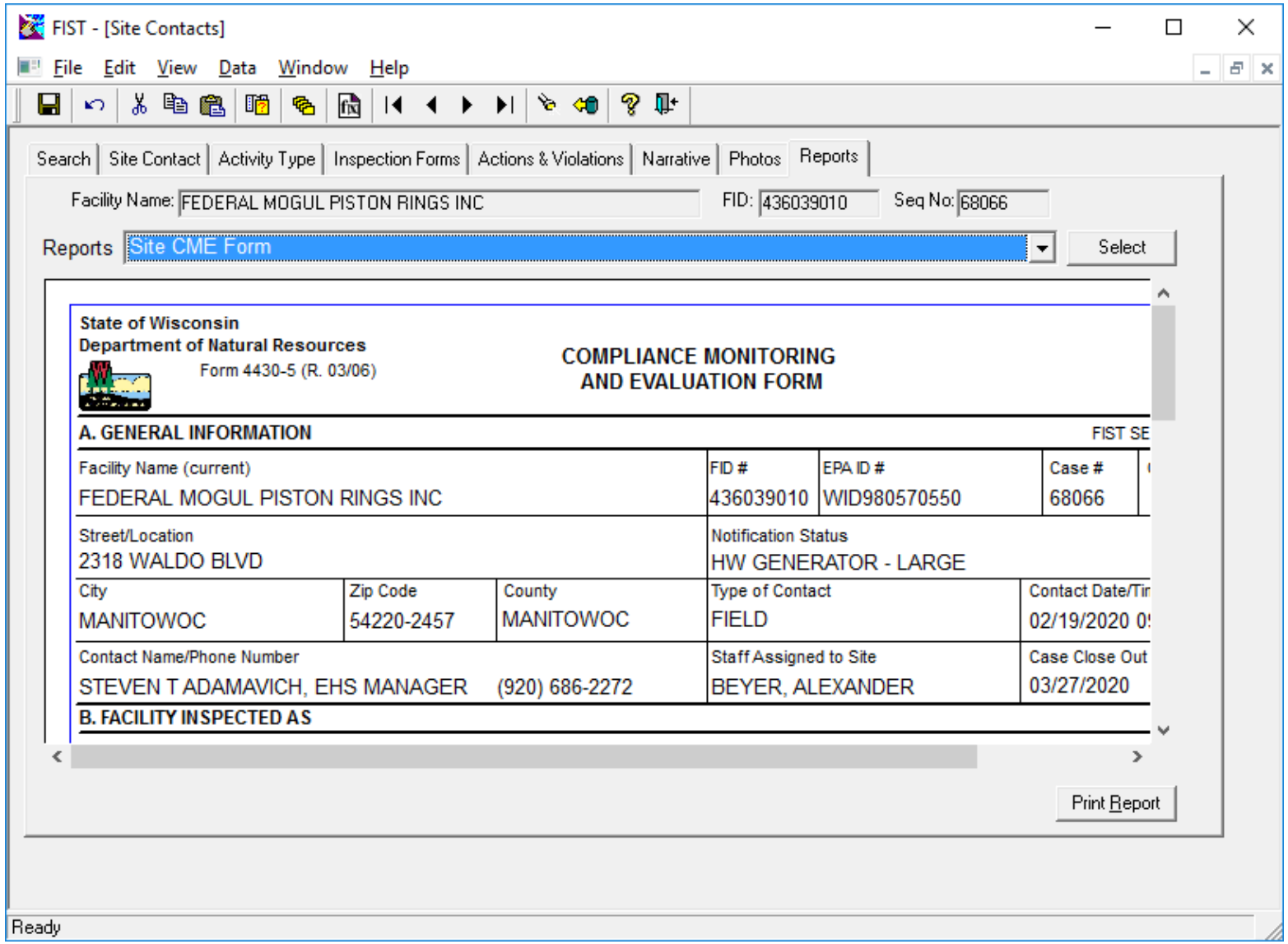
Site Contact

- The ‘Photo’ tab page is where the photos are entered and viewed.
- FIST has about 60,000 photos.
- Can search for photos based on key words.
- Can view past photos from site.



Site Contact

- The ‘Reports’ tab page is where the reports for the site contact are generated.
- FIST has 12 different reports for site contacts.
- Can be exported as a PDF document.



Colorado Enforcement and Compliance Online CoEcho

Amy Williams
303-692-3461

Facility History Report

ard | **Facility History** | Enforcement Actions

Name	EPA ID	Address	City
XPO LOGISTICS FREIGHT INC - UDV	COR000200469	9801 DALLAS ST HENDERSON CO, 80640	HENDERSON

General Info

EPA ID COR000200469
Name XPO LOGISTICS FREIGHT INC - UDV
Address 9801 DALLAS ST HENDERSON CO, 80640

Contact Info

Name JEFF SEXTEN
Phone 734-757-1657

Notification Activity - RCRA Info

Generator Status: ☐ LQHUW ☐ Transporter
Large Quantity Generator: ☐ TSD ☐ Transfer Facility

Inspection Date	Inspection Date	Eval Types	Inspector Name	Violation	Finalized Date	Report Type	Enforcement Type	Issued Date	Open Enforcement	Citations
6/13/2019	6/13/2019	EFR, EFR, SNN	AMY WILLIAMS		6/13/2019	Comments on NOI				
12/5/2018	12/5/2018	SNY	AMY WILLIAMS	True	2/20/2019	Offline	Compliance Advisory	7/25/2018		GRA, MRA, OIL, PTE, PTG, PTJ, PTK, P...
							Consent Order	5/30/2019		
7/25/2018	7/25/2018	CEI	AMY WILLIAMS	True	9/11/2018	Online	Compliance Advisory	7/25/2018		GRA, MRA, OIL, PTE, PTG, PTJ, PTK, P...
							Consent Order	5/30/2019		
10/13/2015	10/13/2015	EFR, SNN	AMY WILLIAMS		10/13/2015	Memo to File				
6/2/2015	6/2/2015	FSD	AMY WILLIAMS		6/2/2015	Memo to File				
3/24/2015	3/24/2015	SNY	AMY WILLIAMS	True	3/24/2015	Memo to File				GLB, MRC, OIL, PTF, PTG, PTH, PTJ, P...
3/24/2015	3/24/2015	CEI, ERP	AMY WILLIAMS	True	5/21/2015	Online Report	Early Settlement Agreement	9/24/2015		GLB, MRC, OIL, PTF, PTG, PTH, PTJ, P...
							Compliance Advisory	3/24/2015		
6/4/2014	6/4/2014	FSD	AMY WILLIAMS		6/4/2014	Memo to File				
5/29/2013	5/29/2013	FSD	AMY WILLIAMS		5/29/2013	Offline Report				
8/14/2012	8/14/2012	FSD	AMY WILLIAMS		8/14/2012	Memo to File				
7/20/2011	7/20/2011	FSD	AMY WILLIAMS		7/20/2011	Memo to File				
8/31/2004	8/31/2004	CEI	EDWARD SMITH		9/7/2004	Online Report				

Inspection Search Report

View past reports (i.e formal report, attachments & pictures)
Find previous inspections

Codes	EPA ID	Facility Name	Address	City	Inspection Date	Violations	Eval Types	Sector	Complaint	Report Linked	Inspector	
+	COD059256966	BERTHOD MOTORS INC	2914 GRAND AVE	GLENWOOD SPRINGS	2/21/2020	Yes	CEI		☐	Yes	AMY WILLIAMS	Definalize
+	COR000001990	LOWES OF GREENWOOD VILLAGE #311	9100 E PEAKVIEW AVE	GREENWOOD VILLAGE	2/10/2020		EFR		☐		AMY WILLIAMS	Definalize
+	COR000015073	MWZ INC DBA ARVADA SQUARE FIRE	9545 RALSTON RD	ARVADA	2/13/2020		EFR		☐		SUSAN GUIET	Definalize
+	COR000215632	SAMTEC INC	5050 LIST DR	COLORADO SPRINGS	3/28/2020		EFR		☐		KENDALL GRIFFIN	Definalize
+	COR000230532	BROOKDALE DENVER	2500 S ROSLYN ST	DENVER	1/30/2020		EFR		☐		SUSAN GUIET	Definalize
+	COR000226118	THE MEMORIAL HOSPITAL	750 HOSPITAL LOOP	CRAIG	1/30/2020		EFR		☐		SUSAN GUIET	Definalize
+	COR000247460	LOWES OF PARKER CO #1755	10000 S TWENTY MILE RD	PARKER	2/10/2020		EFR		☐		AMY WILLIAMS	Definalize
+	COR000007286	ROCKY MOUNTAIN BODY AND PAINTING INC	324 AUBURN DR	COLORADO SPRINGS	2/11/2020		EFR		☐		AMY WILLIAMS	Definalize
+	COR000223487	FENDER MENDER OF DURANGO INC	21 VALLE ESCONDIDO DR	DURANGO	3/20/2020		EFR		☐		DANIEL GOETZ	Definalize
+	CO1680090031	US EPA NEIC/Region 8 Laboratory	NORTH AVE & 3RD ST - 1 DFC BLDG 2	LAKEWOOD	1/7/2020	Yes	CEI		☑	Yes	DAVE FOSTER	Definalize
+	COR000205443	MIDAS MUFFLER #77107	3901 S COLLEGE	FORT COLLINS	1/9/2020		CEI		☑	Yes	DANIEL GOETZ	Definalize
+	COD991300484	CLEAN HARBORS DEER TRAIL LLC	108555 E HWY 36	DEER TRAIL	1/9/2020		CEP		☐		ROBERT NABORS	Definalize
+	COR000250191	Stake Center Locating	418 8TH AVE UNIT B9	Loveland	1/9/2020	Yes	CEI		☑	Yes	DANIEL GOETZ	Definalize
+	COR000219154	CARMAX #7201	4010 TUTT BLVD	COLORADO SPRINGS	1/9/2020	Yes	CEI,ERP	SQG	☐	Yes	AMY WILLIAMS	Definalize
−	COR000007286	ROCKY MOUNTAIN BODY AND PAINTING INC	324 AUBURN DR	COLORADO SPRINGS	1/9/2020	Yes	CEI,ERP	SQG	☐	Yes	AMY WILLIAMS	Definalize
		Inspected As Name	Report Type	Report Due Date	Finalize Date	Violated Coverage Area						
		ROCKY MOUNTAIN BODY AND PAINTING INC	Online	2/23/2020	2/11/2020	GRA						
+	COR000247478	LOWES OF GREELEY CO #1812	2400 47TH AVE	GREELEY	1/10/2020		ERP,CEI	SQG	☐	Yes	DANIEL GOETZ	Definalize
+	COR000250241	ETI INC.	1739 S CO RD 13C	Loveland	1/10/2020		CEI		☑	Yes	DANIEL GOETZ	Definalize

Inspection Sign-up

List Name	EPAID	Facility Name	Address	City	Zip	Last CEI Inspection Date	Last Inspection Date	Last Insp. Type	Due Date	Comment
EManifestMining2020	COD983792193	APPLEWOOD AAUTO BODY INC	2595 YOUNGFIELD ST	GOLDEN	80401				5/31/2020	Never inspected; No reported shipments in 2019; Shipped 10-55 gallon drums last half of 2018; CDPHE to inspect
EManifestMining2020	COD983793589	BARONE INC	5879 W 58TH AVE	ARVADA	80002				5/31/2020	Never inspected; Shipped est. 3000 lbs. in 2019; CDPHE to inspect
EManifestMining2020	COR000245076	BENEVOLENT HEALTHCARE FOUNDATION D/A PROJECT CURE	10377 E GEDDES AVE	CENTENNIAL	80112				5/31/2020	Never inspected; Shipping at VSQG levels in 2019; 4 large shipments last half of 2018; 1-time LQG; CDPHE to inspect
EManifestMining2020	COR000242701	BONA FIDES LABORATORY INC	4910 FOX ST UNIT E	DENVER	80216				5/31/2020	Never inspected; Shipping 1-55 gallon drum per month; CDPHE to inspect
EManifestMining2020	COD069718682	BRIGHTON AUTO BODY	190 GREAT WESTERN RD	BRIGHTON	80601				5/31/2020	Never inspected; No reported shipments in 2019; 1 shipment of 3000 lbs. in 2018; CDPHE to inspect
LQGs2020	COR000216390	CARESTREAM HEALTH	2000 HOWARD SMITH AVE W	WINDSOR	80550-3387	11/3/2016	5/1/2017	EFR	6/30/2020	
EManifestMining2020	COD007056542	COLORADO SERUM CO.	4950 YORK ST	DENVER	80216-2266	8/9/2012	8/9/2012	CEI	5/31/2020	Last inspected 2012; Shipping 2000 lbs. every 2 months for last 18 months; CDPHE to inspect
LQGs2020	COD000818179	COORSTEK INC CLEAR CREEK VALLEY PLANT	17750 W 32ND AVE	GOLDEN	80401	2/19/2016	12/8/2016	SNN,EFR	6/30/2020	
LQGs2020	COD982591372	COORSTEK MCINTYRE	4545 MCINTYRE ST	GOLDEN	80403	2/19/2016	2/19/2016	CEI	6/30/2020	
LQGs2020	COD980962096	DENVER HEALTH	777 BANNOCK ST	DENVER	80204	5/16/2016	5/16/2016	CEI	6/30/2020	
EManifestMining2020	COR000007625	DENVER ZOO	2300 STEELE ST	DENVER	80205				5/31/2020	Never inspected; Shipped est. 800 lbs. last 6 months; CDPHE to inspect
LQGs2020	COD048742175	HAZEN RESEARCH INC	4601 INDIANA ST	GOLDEN	80403-1848	5/9/2016	6/23/2016	EFR	6/30/2020	
LQGs2020	COD981543804	KBP COIL COATERS INC	3600 E 44TH AVE	DENVER	80216	2/18/2016	2/18/2016	CEI	6/30/2020	
LQGs2020	COD078341658	KODAK ALARIS COLORADO	9952 EASTMAN PARK DR	WINDSOR	80551	11/3/2016	5/1/2017	EFR	6/30/2020	
EManifestMining2020	COD980959886	MAACO AUTO PAINTING	2424 E COLFAX	DENVER	80206		10/12/2005	CAV	5/31/2020	Last inspected 2005; Shipping 2000 lbs. every 4 month; CDPHE to inspect
EManifestMining2020	COR000224493	NATIONAL COATINGS & SUPPLIES	1591 W ALAMEDA AVE	DENVER	80223	8/24/2015	8/24/2015	CEI	5/31/2020	Last inspected 2015; No reported shipments in 2019; 4 large shipments last half of 2018; CDPHE to inspect
EManifestMining2020	COR000241620	NORDIC ANALYTICAL LABORATORIES LLC	3960 GRAPE ST	DENVER	80207				5/31/2020	Never inspected; Shipping 1200 lbs. every month; CDPHE to inspect

Enforcement Action Activities

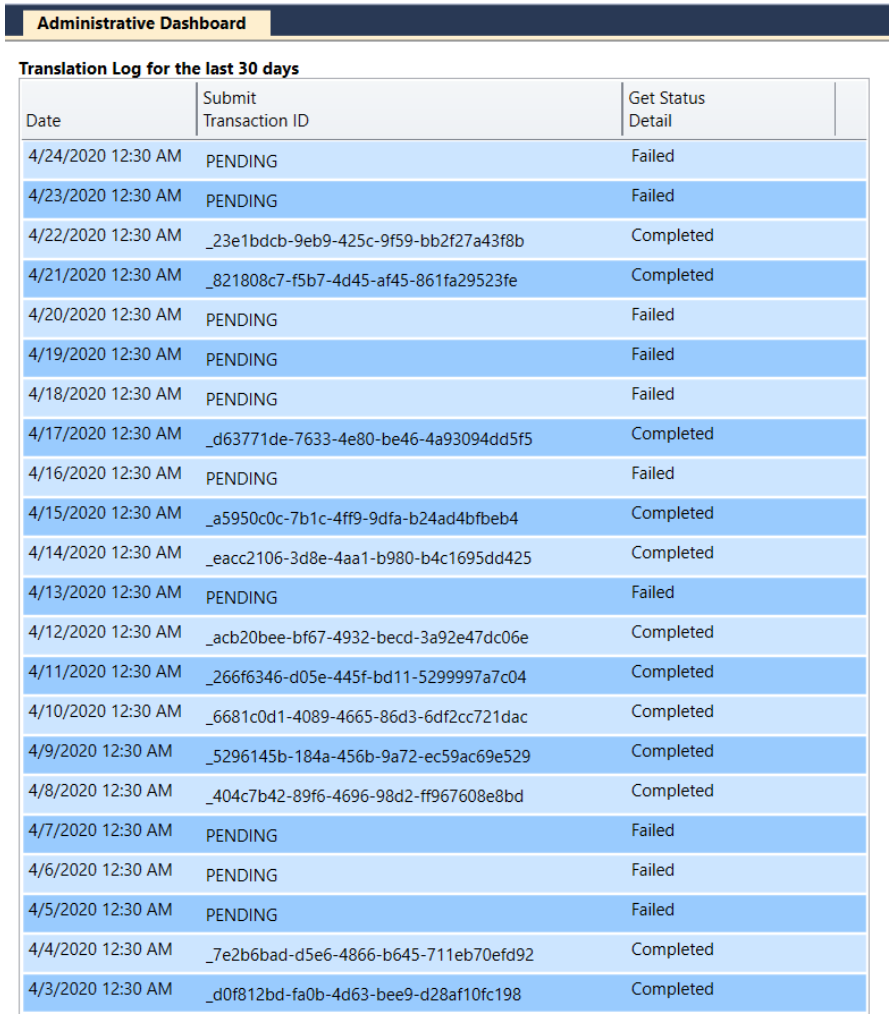
Case Person	Issue To Na...	EPA ID	Initial Insp Date	Eval Type	Sector	Enf Type	Issued Date	Re-Inspect...	Last CEI	TSD	LQG	SQG	VS...	Trans	NN	Comp-laint
AMY WILLIAMS	BERTHOD MOTORS INC	COD059256966	2/21/2020	CEI		Adv	2/21/2020	4/1/2020	2/21/2020			X				
RACHEL LEMMONS	QUALITY LININGS COMPANY INC	COD031951130	2/26/2020	ERP CEI	SQG	Adv	2/26/2020		2/26/2020			X				
AMY WILLIAMS	HIGHVAC CORPORATION	COD078339413	2/4/2020	ERP CEI	SQG	Adv	2/4/2020	3/9/2020	2/4/2020			X				
KENDALL GRIFFIN	SAMTEC INC	COR000215632	2/14/2020	ERP CEI	SQG	Adv	2/14/2020	3/28/2020	2/14/2020			X				
SUSAN GUIET	BROOKDALE DENVER	COR000230532	11/15/2019	NRR		Unil	1/22/2020						X		X	
SUSAN GUIET	NEW METHOD LAUNDRY & CLEANERS INC	COR000218040	3/25/2020	NRR		Adv	3/25/2020						X			
SUSAN GUIET	SPRINGS CLEANERS	COD131587842	3/25/2020	NRR		Adv	3/25/2020						X			
ROBERT NABORS	PUEBLO CHEMICAL DEPOT	CO8213820725	10/18/2019	CEP		ESA	1/9/2020			X	X					
DAVE FOSTER	COORSTEK INC WTM OPERATIONS	COR000230474	2/26/2020	CEI ERP	SQG	Adv	2/26/2020		2/26/2020			X				
AMY WILLIAMS	ABC AUTO BODY OF BOULDER LLC	COD981542244	4/22/2020	CEI		Adv	4/22/2020		4/22/2020				X			
SUSAN GUIET	PARKER CLEANERS	COD981542335	3/25/2020	NRR		Adv	3/25/2020	4/2/2020					X			
DANIEL GOETZ	STAKE CENTER UTILITY LOCATE	COR000250191	1/9/2020	CEI		Adv	1/9/2020		1/9/2020						X	X
AMY WILLIAMS	VESTAS BLADES AMERICA INC	COR000220400	1/23/2020	CEI		Adv	1/23/2020	1/28/2020	1/23/2020		X					
SUSAN GUIET	CORONA DRY CLEANERS	COD983769498	3/25/2020	NRR		Adv	3/25/2020						X			
ROB BEIERLE	FHWA CFLHD MATERIALS LABORATORY FED HIWY ADM	CO4690090010	2/25/2020	CAC		Adv	2/25/2020									
AMY WILLIAMS	ROCKY MOUNTAIN BODY AND PAINTING INC	COR000007286	1/9/2020	CEI ERP	SQG	Adv	1/9/2020	2/11/2020	1/9/2020			X				
SUSAN GUIET	LOWES OF ARVADA #340	COR000001982	1/16/2020	CEI ERP	SQG	Adv	1/16/2020	1/16/2020	1/16/2020			X				
SUSAN GUIET	THE MEMORIAL HOSPITAL	COR000226118	11/15/2019	NRR		Unil	1/22/2020						X			
SUSAN GUIET	MWZ INC DBA ARVADA SQUARE FIRE	COR000015073	1/16/2020	ERP CEI	SQG	Adv	1/16/2020	2/13/2020	1/16/2020			X				
DANIEL GOETZ	FENDER MENDER OF DURANGO INC	COR000223487	2/6/2020	CEI		Adv	2/6/2020	3/20/2020	2/6/2020				X			
DAVE FOSTER	FLORIDA CIRTECH INC	COR000007971	1/30/2020	CEI ERP	SQG	Adv	2/3/2020		1/30/2020			X				
AMY WILLIAMS	CARMAX #7201	COR000219154	1/9/2020	CEI ERP	SQG	Adv	1/9/2020	2/6/2020	1/9/2020			X				

Enforcement Penalties

Issued To Name	EPA ID	Issued Date	Enf Type	Enforcement Number	Final Date	Final Penalty Amount	Final Cash Amount	SEP Credit Amount	SEP Value Amount	Suspended Amount
PUEBLO CHEMICAL DEPOT	CO8213820725	1/9/2020	ESA	20-01-09-01	1/9/2020	$32,760.00	$32,760.00			
AIR METHODS CORPORATION	COD983789231	1/7/2020	Con	20-01-06-01	1/7/2020	$31,238.00	$31,238.00			
THE MEMORIAL HOSPITAL	COR000226118	1/22/2020	Unil	20-01-22-01	1/31/2020	$2,000.00	$2,000.00			
BROOKDALE DENVER	COR000230532	1/22/2020	Unil	20-01-22-02	1/31/2020	$2,000.00	$2,000.00			

4 Total Number of Facilities
$67,998.00 Total Final Penalty Amount
$67,998.00 Total Final Cash Amount

Translation to RCRAInfo



Administrative Dashboard

Translation Log for the last 30 days

Date	Submit Transaction ID	Get Status Detail
4/24/2020 12:30 AM	PENDING	Failed
4/23/2020 12:30 AM	PENDING	Failed
4/22/2020 12:30 AM	_23e1bdcb-9eb9-425c-9f59-bb2f27a43f8b	Completed
4/21/2020 12:30 AM	_821808c7-f5b7-4d45-af45-861fa29523fe	Completed
4/20/2020 12:30 AM	PENDING	Failed
4/19/2020 12:30 AM	PENDING	Failed
4/18/2020 12:30 AM	PENDING	Failed
4/17/2020 12:30 AM	_d63771de-7633-4e80-be46-4a93094dd5f5	Completed
4/16/2020 12:30 AM	PENDING	Failed
4/15/2020 12:30 AM	_a5950c0c-7b1c-4ff9-9dfa-b24ad4bfbeb4	Completed
4/14/2020 12:30 AM	_eacc2106-3d8e-4aa1-b980-b4c1695dd425	Completed
4/13/2020 12:30 AM	PENDING	Failed
4/12/2020 12:30 AM	_acb20bee-bf67-4932-becd-3a92e47dc06e	Completed
4/11/2020 12:30 AM	_266f6346-d05e-445f-bd11-5299997a7c04	Completed
4/10/2020 12:30 AM	_6681c0d1-4089-4665-86d3-6df2cc721dac	Completed
4/9/2020 12:30 AM	_5296145b-184a-456b-9a72-ec59ac69e529	Completed
4/8/2020 12:30 AM	_404c7b42-89f6-4696-98d2-ff967608e8bd	Completed
4/7/2020 12:30 AM	PENDING	Failed
4/6/2020 12:30 AM	PENDING	Failed
4/5/2020 12:30 AM	PENDING	Failed
4/4/2020 12:30 AM	_7e2b6bad-d5e6-4866-b645-711eb70efd92	Completed
4/3/2020 12:30 AM	_d0f812bd-fa0b-4d63-bee9-d28af10fc198	Completed

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Thank you

More questions?

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Future Webinars

- May 14, 2020: State-EPA Hazardous Waste Roundtable (open only to States and Territories and EPA)

- May 21, 2020: Inspecting Permitted Facilities & Following Permit Conditions – TN Department of Environmental Conservation staff

For Mid-Year Webinars being held by other ASTSWMO Subcommittees, visit the 2020 Mid-Year Webinars page at:

http://astswmo.org/event/astswmo-mid-year-webinars-2020/