

How to Survive an Inspection

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Hazardous Waste Enforcement



Goals

- ∞ Coming out ahead
- ∞ Minimizing time/energy/headaches
- ∞ Minimizing violations/penalties



Preparation

- ∞ **Anticipate inspection**
 - Know the regulations
- ∞ **Get help**
- ∞ **Be organized**
- ∞ **Good housekeeping**



Not good



Inspection

Ω Turn a negative into a positive

Ω Do's and Don'ts

- Don't leave inspector waiting
- Don't deny entry to the inspector
- Request identification
- Attitude
- Be attentive



Inspection continued

Ω Do's and Don't's

- Problem inspector
- Reliance on experts?
- See report

Violations

- Ω Understand the Notice of Violation (NOV)
- Ω Is the violation correct?
- Ω Keep in contact with the inspector
- Ω Don't ignore the NOV
- Ω Come into compliance
- Ω Expect follow-up



Penalty

- ⌚ Send in hearing request
- ⌚ Ask for settlement meeting
- ⌚ Bring lawyer?
- ⌚ Propose settlement
- ⌚ Steps if no settlement reached



