

REGULATORY ASSISTANCE

Third-Party Waste Handler and Receptor Audits

Founded in 1974, Trinity Consultants helps organizations overcome complex, mission-critical challenges in EHS, engineering, and science through expertise in consulting, technology, training, and staffing. We support clients in geographies worldwide and across a broad range of sectors including industrial, energy, manufacturing, mining, life sciences, and commercial/institutional.

Ensuring Compliance of Your Third Party Waste Receptors

The Resource Conservation and Recovery Act (RCRA) created a system for controlling hazardous waste from the time of generation to its final disposal. Broadly, if you generate hazardous waste you can be held responsible for its improper transportation and disposal. This waste handling concept is defined as “Cradle-to-Grave” with joint and several liabilities. An important way to control the potential liability is to audit the operations of these waste handlers and receptors. Trinity can conduct this audit for your facility.



The types of waste are either non-hazardous or hazardous waste. There are many different types of treatment/disposal sites, including landfills: hazardous/non-hazardous, surface impounds, injection well, incinerators, beneficial use processes, wastewater treatment, land treatment facilities, salt dome or salt bed formations, underground mines or caves, concrete vaults, disposal bunkers, container re-conditioners/washes, universal waste processing, and others.

Auditing the Third-Party Waste Handler/Receptor

Trinity can provide audits of these third party facilities and service providers on behalf of waste generators. The audits are addressed in three segments: pre-visit data collection, on-site review, and post visit follow-up with audit report.

Areas addressed during these phases include:

- ▶ **General Information** - Address, contact, company profile, site profile, facility staffing, site history, facility setting and surrounding use, security and emergency response
- ▶ **Operations Review** - Hazardous waste TSD, recycling and non-hazardous waste TSD, container management, bulk storage, transportation, laboratory operations, and receipt control/waste tracking
- ▶ **Residuals Management** - Residuals generated and offsite receiver and stormwater management
- ▶ **Summary of Permits** - Permits/registrations, generator status, authorized waste, prohibited waste, and performance relative to permit requirements
- ▶ **Regulatory Compliances** - SPCC/RCRA contingency plans, agency reporting, health and safety compliance, agency contact, regulatory inspection history, regulatory violations/corrective actions/facility investigations, litigation, reportable quantity (RQ) releases, review of federal databases, and environmental site assessment studies (ESA 1 and ESA 2)
- ▶ **External Sources** - State and federal databases, as well as interviews with applicable agency staff
- ▶ **Site Walkthrough** - The physical site is reviewed including all buildings, storage areas, stormwater outfalls, property boundary, adjoining properties, wastewater discharges, housekeeping, accumulation pads, odors, etc.
- ▶ **Company Financial Review** - Income statements, balance sheets, financial statements are reviewed, site closure requirements, and insurance summaries





- ▶ **Supporting Data/Documentation** - Includes site maps, site layout, insurance certificates, permits, financial statements photographs, regulatory correspondence letters, regulatory inspections, trainings, certifications including ISO, etc
- ▶ **The Report** - All the site data and research is assembled into a report with observations/findings identified, and any required corrective actions are noted

Why Choose Trinity

For more than 45 years, Trinity has assisted facilities with their auditing needs. This domain expertise, combined with our knowledge of industry processes and our auditing experience provide a powerful resource for industrial companies. Trinity's staff includes Certified Professional Environmental Auditors (CPEAs), certified ISO 14001 auditors, American Chemistry Council Responsible Care® trained auditors, Certified Practitioners for Energy Management Systems - Industrial Sector (CP EnMS) ISO 50001 and Superior Energy Performance, ISO 9001 and OHSAS 18001 trained auditors

For more information about how we can help your organization, please contact Trinity Consultants by calling 800.229.6655.

ISO 9001:2015 certified at our corporate office in Dallas, Texas