“LET’S SUMMARIZE THE HAZARDOUS WASTE REGULATIONS”

Hazardous Waste Handler Seminar
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RCRA MADE EASY?
WHAT IS RCRA?

• Resource
• Conservation &
• Recovery
• Act
WHAT IS RCRA?

• Our nations primary law governing the disposal of solid and hazardous waste

• Congress passed on October 21, 1976

• Addressed increasing problem of municipal and industrial waste
RCRA GOALS

• Protecting human health and the environment from the hazards of waste disposal
• Conserving energy and natural resources
• Reducing the amount of waste generated
• Ensuring wastes are managed in an environmentally-sound manner
CRADLE TO GRAVE
## RCRA REGULATIONS SUMMARY SHEET

<table>
<thead>
<tr>
<th>REQUIREMENTS</th>
<th>CESQG (Conditionally Exempt Small Quantity Generator [261.5])</th>
<th>SQG (Small Quantity Generator)</th>
<th>LQG (Large Quantity Generator)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Monthly Generation Limits</td>
<td>≤ 220 lbs haz. waste &amp; ≤ 2.2 lbs acute haz. waste *</td>
<td>≤220 lbs but &lt;220 lbs haz. waste &amp; ≤ 2.2 lbs acute haz. waste *</td>
<td>≤220 lbs haz. waste or ≥ 2.2 lbs acute haz. waste *</td>
</tr>
<tr>
<td>2) Accumulation Quantity Limits</td>
<td>&lt; 2200 lbs haz. waste &amp; ≤ 2.2 lbs acute haz. waste onsite</td>
<td>≤31,200 lbs haz. waste &amp; ≤ 2.2 lbs acute haz. waste onsite</td>
<td>&gt; 2200 lbs haz. waste or ≥ 2.2 lbs acute haz. waste *</td>
</tr>
<tr>
<td>3) Accumulation Time Limits</td>
<td>Unlimited</td>
<td>180 days (262.34(d)); 270 days if receiving facility &gt;200 miles [10]; extensions granted? [10]</td>
<td>90 days (262.34(a)); extensions granted? [262.34(b)]</td>
</tr>
<tr>
<td>4) EPA ID Number Required</td>
<td>No - voluntary (See NJX program information)</td>
<td>Yes - Contact: Region II USEPA 212-637-4106</td>
<td>Yes - Contact: Region II USEPA 212-637-4106</td>
</tr>
<tr>
<td>5) Hazardous Waste Manifest Required</td>
<td>No - voluntary (See NJX program information)</td>
<td>Yes - unless waste is reclaimed pursuant to 262.20(e)(1)</td>
<td>Yes [262.20]</td>
</tr>
<tr>
<td>6) Manifest Copy Retention</td>
<td>None - voluntary</td>
<td>3 years</td>
<td>3 years [262.40(a)]</td>
</tr>
<tr>
<td>7) Exception Reporting (failing to receive copy of manifest with TSDF operator signature)</td>
<td>None</td>
<td>None - but within 60 days generator must submit copy of manifest with note that signed TSDF copy is missing</td>
<td>1) generator must contact initial transporter or the TSDF operator within 35 days of shipping date [262.42(a)(1)] 2) generator must submit written exception report within 45 days of shipping date NSDEP</td>
</tr>
<tr>
<td>8) Land Disposal Restriction notification/certification accompanying shipments</td>
<td>None</td>
<td>Required for certain haz. wastes; keep copy for 3 years</td>
<td>Required for certain haz. wastes; keep copy for 3 years [266.7]</td>
</tr>
<tr>
<td>9) Biennial Report</td>
<td>None</td>
<td>None</td>
<td>Submitted on each even year to report on manifest activity for previous odd year [262.44]</td>
</tr>
<tr>
<td>11) Haz. Waste Training</td>
<td>None</td>
<td>Basic - waste handling familiarization &amp; emergency procedures (no drills required)</td>
<td>Full training (no drills required)</td>
</tr>
<tr>
<td>12) Preparations &amp; Prevention</td>
<td>None</td>
<td>Familiarize first, police, hospital &amp; have emergency response contractor agreement (formal fire inspection not required)</td>
<td>Familiarize first, police, hospital &amp; have emergency response contractor agreement (formal fire inspection not required)</td>
</tr>
<tr>
<td>13) Contingency Plan</td>
<td>None</td>
<td>Basic plan - By the phone: Fire Co., name &amp; #, fire dept., #, &amp; location, fire ext. &amp; alarm &amp; spill equipment</td>
<td>Complete plan</td>
</tr>
</tbody>
</table>
GENERATOR CATEGORIES

• CESQG: Conditionally Exempt Small Quantity Generator

• SQG: Small Quantity Generator

• LQG: Large Quantity Generator
MONTHLY GENERATION LIMITS

• CESQG:
  \[ \leq 220 \text{ lbs. hazardous waste}, \text{ and/or} \]
  \[ \leq 2.2 \text{ lbs. acute hazardous waste} \]

• SQG:
  \[ > 220 \text{ lbs. but} < 2,220 \text{ lbs. hazardous waste}, \text{ and} \]
  \[ \leq 2.2 \text{ lbs. acute hazardous waste} \]
MONTHLY GENERATION LIMITS

• LQG:

  > 2,220 lbs. hazardous waste, or
  > 2.2 lbs. acute hazardous waste
ACCUMULATION QUANTITY LIMITS

• CESQG:
  \[ \leq 2,220 \text{ lbs. hazardous waste, and/or} \]
  \[ \leq 2.2 \text{ lbs. acute hazardous waste} \]

• SQG:
  \[ \leq 13,200 \text{ lbs. hazardous waste, and} \]
  \[ \leq 2.2 \text{ lbs. acute hazardous waste} \]

• LQG:
  No limit
ACCUMULATION TIME LIMITS

- CESQG: No Limit
- SQG:
  - 180 Days
  - 270 Days if destination > 200 miles
- LQG:
  - 90 Days
- Extensions can be granted
EPA ID NUMBER REQUIRED?

- CESQG: No (voluntary, includes fee)
- SQG: Yes
- LQG: Yes
MANIFEST REQUIRED?

- CESQG: No
- SQG: Yes (unless waste is reclaimed pursuant to 262.20(e)1)
- LQG: Yes
MANIFEST COPY RETENTION

• CESQG: None (voluntary)

• SQG: 3 years

• LQG: 3 years
EXCEPTION REPORTING

- Report submitted when signed manifest is not received from Treatment, Storage & Disposal Facility (TSDF)

- CESQG: None

- SQG: None, but within 60 days must submit copy of manifest with note that signed TSDF copy has not been received
EXCEPTION REPORTING

• LQG:
  – Must contact initial Transporter or TSDF within 35 days of shipping date
  – Must submit written Exception Report to NJDEP within 45 days of shipping date
LAND DISPOSAL RESTRICTION

• CESQG: None

• SQG:
  – Required for some waste
  – Must keep for 3 years

• LQG:
  – Required for some waste
  – Must keep for 3 years
BIENNIAL REPORT

• CESQG: None

• SQG: None

• LQG:
  Submitted on each even year to report on manifest activity from previous odd year
FACILITY INSPECTIONS

• CESQG: None

• SQG:
  – Weekly for container areas
  – Daily/Weekly for tanks

• LQG:
  – Weekly for container areas
  – Daily/Bimonthly/Yearly for tanks
TRAINING REQUIREMENTS

• CESQG: None

• SQG:
  – Basic (waste handling familiarization and emergency procedures)

• LQG:
  – “Full” training (annual, documented, facility specific)
PREPAREDNESS & PREVENTION

• CESQG: None

• SQG:
  – Familiarize fire, police, hospital and have an emergency response contractor agreement

• LQG:
  – Familiarize fire, police, hospital and have an emergency response contractor agreement
CONTINGENCY PLAN

• CESQG: None

• SQG:
  – Post Emergency Coordinator name and number, fire department number, and location of fire extinguishers, spill control material, and fire alarm(s) near the telephone

• LQG: Complete Plan
Helpful Links

• http://www.nj.gov/dep/
• RCRA Online
• https://yosemite.epa.gov/osw/rcra.nsf/search1?OpenForm