



# RCRA 101 - DOCUMENTATION & RECORDKEEPING

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# Recordkeeping

Large Quantity Generators (LQG) & Small Quantity Generators (SQG)  
40 CFR Subpart D Part 262.40

- LQG recordkeeping requirements - 40 CFR 262.40 - 40 CFR 262.43
- SQG recordkeeping requirements - 40 CFR 262.44
- VSQG not required to keep records, but it is recommended to keep any records.
- To view regulations, please visit: <https://www.ecfr.gov/current/title-40/section-262.40>

# Hazardous Waste Determinations

## 40 CFR 262.11(f)

- LQG & SQG must maintain records that support the hazardous waste determination for at least three (3) years from the date the waste was last sent to a TSDF.
- Records can include sample test/analysis results, waste profiles, safety data sheets (SDS), etc.
- Information regarding waste origin, composition, process production knowledge, and SDS can support using generator knowledge.





# Manifests

## 40 CFR 262.40(a)

- LQG's & SQG's must keep a copy of each manifest for at least three (3) years from the date the waste was shipped off site.
- A signed copy from the destined facility (TSDF) must be kept.
- Manifests should be provided to the inspector at the time of inspection.
- Electronic records are acceptable but again should be accessible during inspection.
- It is recommended that VSQG's also keep manifests for at least three years as proof that hazardous waste is managed properly and to show VSQG status.

# Signed Manifest

- Generator is responsible for ensuring accuracy prior to signing the manifest and after it has been inputted into RCRAinfo by the TSDF.

- For further information regarding manifests, please visit:

Hazardous Waste Manifest Instructions

993269

Form Approved OMB No. 2050-0039

Please print or type.

**UNIFORM HAZARDOUS WASTE MANIFEST**

1. Generator ID Number: [REDACTED] 2. Page 1 of 7 3. Emergency Response Phone: [REDACTED] 4. Manifest Tracking Number: [REDACTED]

5. Generator's Name and Mailing Address: [REDACTED] (if different than mailing address)

6. Transporter 1 Company: [REDACTED] U.S. EPA ID Number: [REDACTED]

7. Transporter 2 Company Name: [REDACTED] U.S. EPA ID Number: [REDACTED]

8. Designated Facility Name and Site Address: [REDACTED] U.S. EPA ID Number: [REDACTED]

Facility's Phone: [REDACTED] TXD 000 838 896

Sa	Hbl	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
			No.	Type				
X		UN1993, WASTE FLAMMABLE LIQUIDS, n.o.s., (CYCLOHEXANE), 3, II, RQ (D001)	1	DM	179	K	D001	OUT92/9H
X		UN1993, WASTE FLAMMABLE LIQUIDS, CORROSIVE, n.o.s., (ETHANOL, SULFURIC ACID), 3 (6), II, RQ (D001)	1	TP	11788	K	D001	OUT9409H
X		UN1992, WASTE FLAMMABLE LIQUIDS, TOXIC, n.o.s., (NAPHTHA, BENZOYL METHYL COCAINE), 3 (6.1), II, RQ (D001)	1	DM	78	K	D001	OUT92/9H
X		UN1992, WASTE FLAMMABLE LIQUIDS, TOXIC, n.o.s., (NAPHTHA, BENZOYL METHYL COCAINE), 3 (6.1), II, RQ (D001)	2	DM	227	K	D001	OUT92/9H

14. Special Handling Instructions and Additional Information: [REDACTED]

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Officer's Printed/Typed Name: [REDACTED] Signature: [REDACTED] Month: [REDACTED] Day: [REDACTED] Year: [REDACTED]

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: [REDACTED] Date leaving U.S.: [REDACTED]

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: [REDACTED] Signature: [REDACTED] Month: [REDACTED] Day: [REDACTED] Year: [REDACTED]

Transporter 2 Printed/Typed Name: [REDACTED] Signature: [REDACTED] Month: [REDACTED] Day: [REDACTED] Year: [REDACTED]

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number: [REDACTED] U.S. EPA ID Number: [REDACTED]

18b. Alternate Facility (or Generator): [REDACTED] U.S. EPA ID Number: [REDACTED]

Facility's Phone: [REDACTED]

18c. Signature of Alternate Facility (or Generator): [REDACTED] Month: [REDACTED] Day: [REDACTED] Year: [REDACTED]

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. H040 2. H040 3. H040 4. H040

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a

Printed/Typed Name: [REDACTED] Signature: [REDACTED] Month: [REDACTED] Day: [REDACTED] Year: [REDACTED]

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete.

DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM

# Manifest Tracking Log

- Manifest log can be used to keep track of signed manifests.
- Not required.
- Helpful to determine if exception report is required.

[illegible][illegible]



# Exception Reports

## 40 CFR 262.40(b)

- If an **LQG** does not receive a signed copy of the manifest from the destined facility/TSDF within 45 days of the date the waste shipped by the initial transporter, the LQG must contact the transporter or TSDF to determine the status and location of their waste.
- If the **LQG** still has not received a copy of the signed manifest from the TSDF within 60 days of the date the waste was initially shipped by the transporter, the LQG then must submit an Exception Report to the Department.
  - ✓ Exception report should include a legible copy of the manifest.
  - ✓ Signed cover letter explaining efforts to locate waste and the outcome of those efforts.
- If an **SQG** has not received a copy of the signed manifest by the TSDF within 60 days of the date the waste was initially shipped by the transporter, they must submit an Exception Report to the Department.
  - ✓ Exception Report can be the manifest itself with an indication on the manifest or attached sheet of paper that it has not received confirmation of delivery.
- Exception Reports must be kept on record for at least three (3) years.

# Land Disposal Restriction Form (LDR)

40 CFR Part 268.7(a)(6,8)

- LQG & SQG must complete a Land Disposal Restriction (LDR) form if their hazardous waste does not meet the treatment standards documented in the table under 40 CFR 268.40 or if they choose not to make the determination whether the waste must be treated prior to land disposal.  
<https://www.ecfr.gov/current/title-40/part-268/subpart-D>
- The LDR is a one-time written notice that must be completed with each initial shipment of hazardous waste to each TSDF.
- A copy of each LDR must be kept on record for at least three years from the date the waste was last sent to the TSDF.



# Signed LDR Form

- Inspector will need to review the signed LDR form for each hazardous waste stream being generated and/or sent to another TSDF.
- Typically kept with manifests.

CleanEarth

## Land Disposal Restriction Notification

Generator Name: \_\_\_\_\_ EPA Number: \_\_\_\_\_

Generator Address: \_\_\_\_\_

Manifest Tracking Number: \_\_\_\_\_

### Instructions

Column 1: List the Manifest Line number or Manifest Line item.  
 Column 2: Identify all U.S. EPA hazardous Waste Codes that apply to this shipment.  
 Column 3: Choose the appropriate treatability group: Non-Wastewater (NWW) or Wastewater (WW).  
 Column 4: Enter the appropriate Subcategory (per 40 CFR 268.40), if applicable, and also enter "Contaminated Soil" or "Debris" if the waste will be treated using one of the alternative treatment technologies provided by 268.49 (c)-soil, or 268.45- debris.  
 Column 5: Enter the letter of the appropriate paragraph from below (see Appendix 1 for other options if needed).  
 Column 6: For F001-F005, please enter the Reference Number(s) located below for the constituents in your waste stream subject to treatment.  
 Column 7: For F039, and/or D001-D043, and/or Debris & contaminated soil please list the reference numbers listed in Appendix 2 for any Underlying Hazardous Constituents.

Manifest Line Number or Manifest Line Item	U.S. EPA Hazardous Waste Codes	Check One		Sub-Category	How Must This Waste Be Managed?	Regulated Constituents For F001-F005	Underlying Hazardous Constituents for F039, and/or D001-D043, and/or Debris or soil
		NWW	WW				
1 - HOME2.1	D001,D005,D007,D008,D035,D039	Yes			A		1124,1220,1247,1248,1251,1252,1258,1261,1279,1282
2 - HOME8B	D002	Yes			A		1263,1271
3 - HOMEPESTINC	D016	Yes			A		1261
5 - HOME3	D001,D018,D035	Yes			A		1004,1124,1150,1220,1248,1250,1252,1282

### Column 5 Waste Management Codes

A	THIS RESTRICTED WASTE REQUIRES TREATMENT TO THE APPLICABLE STANDARD. This waste must be treated to the applicable performance based treatment standard set forth in 40CFR Part 268 Subpart C, 268.32, Subpart D, 268.40 or RCRA Section 3004(d) prior to land disposal.
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### Column 6 F001-F005 Reference Numbers

### Column 7 D001-D043 Reference Numbers

1004 Acetone	1124 Ethyl benzene	1150 Methanol	1220 Toluene
1247 D008 - LEAD	1248 D001 - High TOC Ignitable (>10% total organic carb	1250 D018 - BENZENE	1251 D007 - CHROMIUM
1252 D035 - METHYL ETHYL	1258 D005 - Barium managed	1261 D016 - 2,4-D	1263 D002 - Corrosive

# Waste Analysis Plan

## 40 CFR 268.7(a)(5,8)

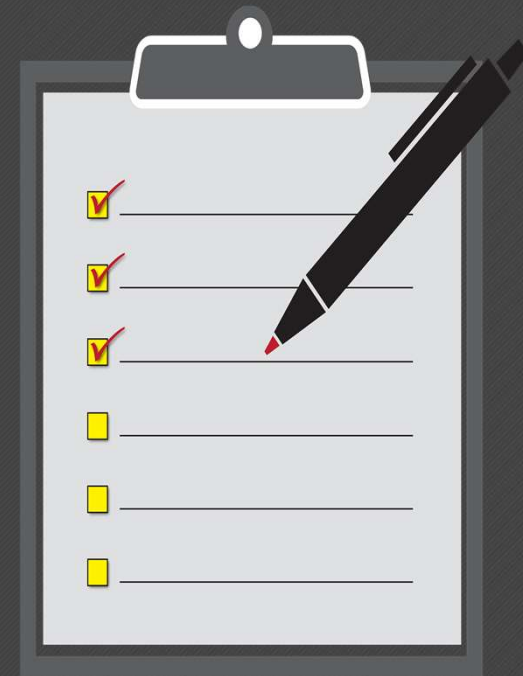
- LQG & SQG must have a Waste Analysis Plan (WAP) if treating their own waste in 90-day or 180/270-day accumulation unit for the purpose of meeting the LDR treatment standard.
- If waste is being land disposed, generator will need to notify TSDf that waste treatment standards are met.
- WAP must be kept on site for three years from the date the waste was last sent to on-site treatment.





# Inspection Records

- LQG & SQG's must conduct weekly inspections of the 90-day/180-day (270-day if shipped > 200 miles) central accumulation areas (CAA).
- Although it is not required in the regulations, it is recommended to keep weekly inspection records/logs for 3 years to show that inspections are being conducted.
- LQG with a HW tank(s) must keep required inspection records for at least 3 years from date of inspection. [40 CFR 265.195(g)]



# CAA Inspection Log

- Generators are recommended to document weekly inspections of Central Accumulation Area.
- This log format is not required but is provided by NJDEP for guidance.

WEEKLY CONTAINER STORAGE AREA INSPECTION LOG

ITEM/WEEK	WEEK OF ____	WEEK OF ____	WEEK OF ____	WEEK OF ____	WEEK OF ____
Containers in good condition, not leaking?					
Containers closed when not in use?					
Containers properly marked?					
Container markings visible?					
Containers stored longer than allowed?					
Containers segregated by waste type?					
Ignitable or reactive waste stored >50' from property line?					
Adequate aisle space?					
Spill control, communication, safety, & fire equipment present?					
Name, date, and time of person performing inspection					
Corrective action taken (Use separate sheet as necessary)					



# Training Records-LQG

## 40 CFR 262.17(a)(7)(v)

- LQG training records should include:
  - ✓ Explanation of training given on hazardous waste management procedures, how to respond effectively to emergencies, emergency procedures, emergency equipment/emergency systems.
  - ✓ Training can be done electronically, classroom setting or on the job training. If on the job training is given, it should be documented on what was done.
  - ✓ Document dates new employees completed training ( must be within 6 months of start date).
  - ✓ Document dates of employee's annual review of the initial training.
- LQG's must keep record of annual training of current employees until closure of facility and former employees must be kept for 3 years after the date the employee last worked at the company.
- Records can be kept electronically or paper documentation.

## Training Records-LQG (cont.)

- LQG's must also keep documentation of:
  - ✓ Name of employee and job title for each position related to hazardous waste management.
  - ✓ Written job description for each hazardous waste management position.
  - ✓ Written description of the type and amount of introductory and continuing training that will be given to employees in this position.



# Training Records - SQG

## Emergency Procedures - 40 CFR 262.16(b)(9)(iii)

- Training records are not required for SQGs, but it is recommended to keep documentation of any training given to employees.
- Training should include that employees are thoroughly familiar with proper waste handling and emergency procedures.
- Questions that NJDEP inspector may ask:
  - What if a container leaks?
  - What if there is a fire?
  - Are there procedures in place?



# Preparedness & Prevention Records

40 CFR 262.256(b) - LQG

40 CFR 262.16(b)(8)(vi)(B) - SQG

- LQG & SQG must maintain records documenting:
  - ✓ Arrangements with local emergency responders (Fire Dept, Police Dept., Haz Mat Team, OEM).
  - ✓ Arrangements with emergency response contractor & equipment suppliers.
  - ✓ Correspondence to local hospitals explaining potential injuries that can occur from hazardous wastes handled at facility.





# Contingency Plans - LQG

## 40 CFR 262.262

- LQG required to maintain a copy of the contingency plan/emergency plan and all revisions on site.
- Can use other prepared emergency plan (such as SPCC Plan) and amend the plan to incorporate hazardous waste management requirements in compliance with 40 CFR 262.261 (required content of contingency plan).
- Must submit copies of the contingency plan and all revisions to local emergency responders.
- Show proof to inspector that contingency plan has been submitted to locals by certified mail receipt, email correspondence, etc.



# Quick Reference Guide - LQG

## 40 CFR 262.262(b)

- Maintain a quick reference guide (QRG) of the site's contingency plan.
- QRG is required for a facility that became a LQG after 5/30/2017 (Generator Improvement Rule came into effect) or an existing LQG that amended their contingency plan after that date.
- Must submit QRG to local emergency responders and resubmit it with any updates/revisions along with the contingency plan.
- Show proof that the QRG has been submitted to locals.
- For further information regarding QRG, please visit:  
[https://www.ecfr.gov/current/title-40/part-262/subpart-M#p-262.262\(b\)](https://www.ecfr.gov/current/title-40/part-262/subpart-M#p-262.262(b))



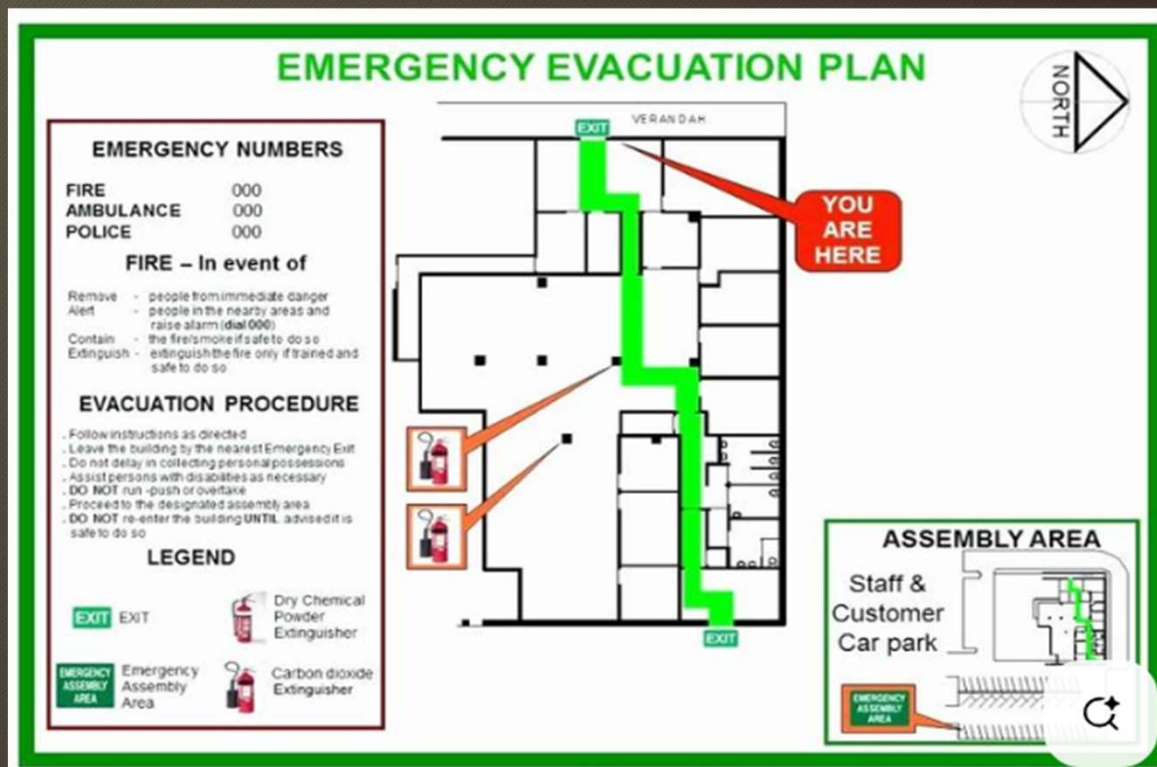


## Emergency Procedures - SQG

### 40 CFR 262.16(b)(9)(ii)

- Post the following information next to telephones and in the areas directly involved in the generation or accumulation of hazardous waste:
  - ✓ Name and phone number of emergency coordinator.
  - ✓ Site map or description of location of fire extinguishers, spill control material and alarm if applicable.
  - ✓ Telephone number of local fire department (unless there is a direct alarm).
- If SQG complies with LQG contingency plan requirements, SQG emergency procedures are not required.

# Example-SQG Emerg. Procedure Posting





## Biennial Reports - LQG

### 40 CFR 262.40(b)

- Keep a copy of each hazardous waste biennial report for at least three years from the due date of the report.
- Can be kept electronically or paper documentation.
- Not required for SQG.



# Export Records

## 40 CFR 262.83(i)

- LQG & SQG must keep copies of required documents including:
  - ✓ Notification of intent to export
  - ✓ EPA acknowledgement of consent
  - ✓ Manifest/shipping documents sent by last US transporter (3 years from date of shipment)
  - ✓ EPA Annual report (3 years from due date)
  - ✓ Exception reports
  - ✓ Export contract





# Additional RCRA Records

## 40 CFR 262.43

- LQG & SQG may be required to provide additional records regarding quantities and disposition of hazardous wastes.



# Compliance Assistance

The compliance assistance packet is the best resource for generators to determine compliance status.

- COMPLIANCE ASSISTANCE

## HAZARDOUS WASTE GENERATOR CATEGORIES & DOCUMENTATION

[Code of Federal Regulations (40 CFR) references in brackets in table below]

REQUIREMENTS	VSQG Very Small Quantity Generator [262.14]	SQG Small Quantity Generator [262.16]	LQG Large Quantity Generator [262.17]
1) Monthly Generation Limits	≤220 lbs. haz. waste & ≤2.2 lbs. acute haz. waste* [262.14(a)]	>220 lbs. but <2200 lbs. haz. waste & ≤2.2 lbs. acute haz. waste* [262.16(a)]	≥2200 lbs. haz. waste or >2.2 lbs. acute haz. waste* [262.17(a)]
2) Accumulation Quantity Limits	≤2200 lbs. haz. waste & ≤2.2 lbs. acute haz. waste onsite [262.14(a)]	≤13,200 lbs. haz. waste & ≤2.2 lbs. acute haz. waste onsite [262.16(b)]	No Limit
3) Accumulation Time Limits	Unlimited	180 days [262.16(b)(1)], 270 days if receiving facility >200 miles [(c)], extensions granted? [(d)]	90 days [262.17(a)], extensions granted [(b), (c), (d), & (e)]
4) EPA ID Number Required	None – Voluntary	Yes – Contact NJDEP registration 609-292-7081. [262.18(a)]	Yes – Contact NJDEP registration 609-292-7081. [262.18(a)]
5) Hazardous Waste Manifest Required	None - Voluntary	Yes [262.20(a)(1)]	Yes [262.20(a)(1)]
6) Manifest Copy Retention	None - Voluntary	3 years [262.40(a)]	3 years [262.40(a)]
7) Exception Reporting (failing to receive a copy of manifest with TSDF signature)	None	None – but within 60 days generator must submit copy of manifest with note that signed TSDF copy is missing to NJDEP. [262.42(b)]	1) Generator must contact initial transporter or the TSDF operator within 35 days of shipping date [262.42(a)] 2) Generator must submit written exception report within 45 days of shipping date to NJDEP [262.42(a)]
8) Land Disposal Restriction notification/certification accompanying shipments	None	Required for certain haz. wastes. Keep your copy for 3 years. [268.7(a)(8)]	Required for certain haz. wastes. Keep your copy for 3 years. [268.7(a)(8)]
9) Biennial Report	None	None *Re-notification, must re-notify EPA starting in 2021 and every 4 years thereafter using EPA Form 8700-12. Must be submitted by September 1st of each notification year [262.18(d)]	Submitted on each even year to report on manifest activity for previous odd year [262.41]
10) Inspections	None	1) Weekly for haz. waste storage containers [262.16(b)(2)(iv)] 2) Daily – equipment monitoring and weekly/bimonthly/yearly (depending on equipment) for haz. waste storage tanks [(vii)]	1) Weekly for haz. waste storage containers [262.17(a)(1)(v)] 2) Daily – operating log and weekly/bimonthly/yearly (depending on equipment) for haz. waste storage tanks [265.195]
11) Haz Waste Training	None	Basic – waste handling familiarization & emergency procedures [262.16(b)(9)(iii)]	Full training [262.17(a)(7)(i)(A)]
12) Preparedness & Prevention	None	Make arrangements to familiarize fire, police, hospital & have emergency response contractor agreement [262.16(b)(8)(vi)]  Maintain documentation that arrangements exist or does not [(B)]	Make arrangements to familiarize fire, police, hospital & have emergency response contractor agreement [262.256]  Maintain documentation that arrangements exist or does not [(b)]
13) Contingency Plan	None	Emergency Procedures, basic plan by the phone: Emerg. Coord, name & #, fire dept. #, & location of fire ext. & alarm & spill equipment [262.16(b)(9)(ii)]	Complete Plan [262.260(a)]



QUESTIONS?????

