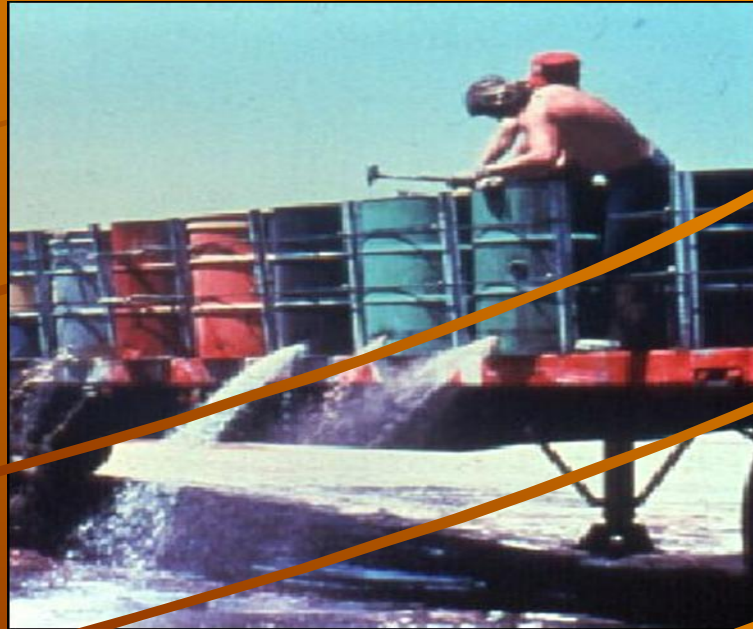


Resource Conservation and Recovery Act (RCRA)



Philadelphia, Pennsylvania
January 28, 2010

Solid Waste

These materials are solid wastes when ...				
	Reclaimed	Used in a manner constituting disposal	Burned for energy recovery, used to produce a fuel, or contained in fuels	Accumulated Speculatively
Spent Materials	↙	↙	↙	↙
Listed Sludges	↙	↙	↙	↙
Characteristic Sludges		↙	↙	↙
Listed By-products	↙	↙	↙	↙
Characteristic By-Products		↙	↙	↙
Commercial Chemical Products		↙*	↙*	
Scrap metal	↙	↙	↙	↙
 Material is a Solid Waste * If such management is consistent with the product's normal use, then the material is not a solid waste.				

Generator Responsibilities

Generator Status

- Status can change by month
- Allowable accumulation quantities and periods vary



Generator Responsibilities Waste Accumulation

◆ LQG

–no more than 90 days

◆ SQG

–no more than 180 days

Generator Responsibilities

Waste Accumulation

Containers

- Closed, good condition and waste compatible
- Inspections
- Secondary Containment
- Labeled “hazardous waste” & Dated

CLOSE CONTAINER WHEN NOT IN USE

HAZARDOUS WASTE

ACCUMULATION CONTAINER

OBSERVE SAFE HANDLING & PERSONAL PROTECTIVE PRACTICES

CONTENTS		
IN-PLANT CODE	START DATE	90-DAY DATE
GENERATION SOURCE		CONTACT
HAZARDOUS WASTE FACILITY CODE		

PERSONAL PROTECTIVE EQUIPMENT SIGNALS

☐ HARDHAT	☐ RESPIRATOR
☐ FACESHIELD	☐ FULL-FACE
☐ GOGGLES	☐ HALF-FACE
☐ GLOVES	☐ ORGANIC VAPOR
☐ COVERALL SUIT	☐ ACID VAPOR
☐ APRON	☐ DUSTS/MISTS
☐ BOOTS	☐ VENTILATION
	☐ GROUNDING

FORM NO 40-950 ©1996 L2000 100 BALDWIN AVE., JERSEY CITY, N.J. 07306

Satellite Accumulation

- ✦ Waste quantity
- ✦ Labeling requirements
- ✦ Containers
 - closed
 - good conditions
- ✦ Operator's control



Generator Responsibilities Training



- ✦ Training Plan
- ✦ Training program
- ✦ Training Records
- ✦ Annual review

Generator Responsibilities Preparation for Transport

- ✦ DOT rules for packaging, labeling, marking and placarding
- ✦ Manifests



Generator Responsibilities Contingency Plan



- ◆ Current, written plan
- ◆ Emergency procedures
- ◆ Emergency Equipment
- ◆ Designated coordinator

Land Disposal Restrictions

- ✦ Generator determination
- ✦ Generator Paperwork
 - Notification or
 - Certification



Top Five Haz W/aste Problems

✓ Improper Management of Universal Waste

✓ Fluorescent Light Bulbs

✓ Batteries

✓ Near or at the Point of Generation

✓ Open Containers

✓ Label Containers





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08.02.2007

Top Five Haz W/aste Problems

✓ Training

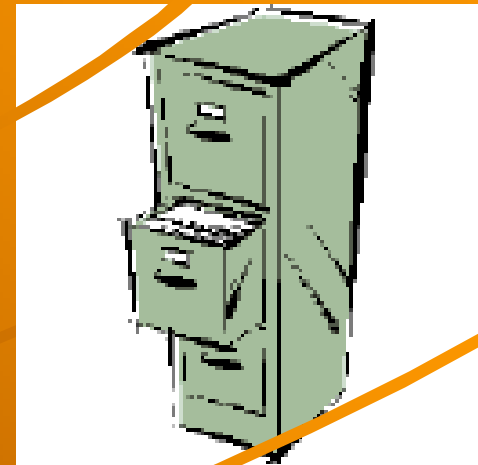
✓ Pre-transport preparations

✓ 90 days or 180 days



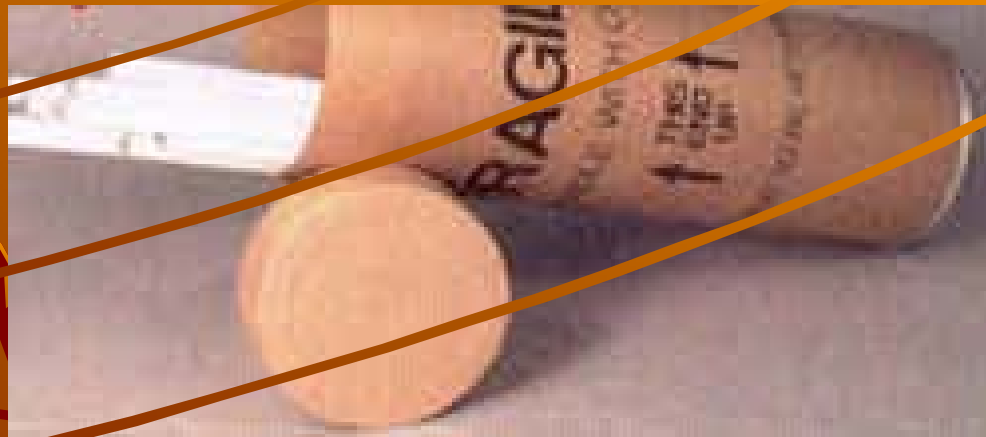
Record-keeping and Reporting

- ◆ Biennial Reports
- ◆ State Reports
- ◆ Exception Reports
- ◆ Records Retention



Top Five Problems

◆ Universal Waste



Questions

José J. Jiménez

Office of Enforcement Compliance
and

Environmental Justice

US EPA-Region III

1650 Arch Street

Philadelphia, PA 19103

215-814-2148





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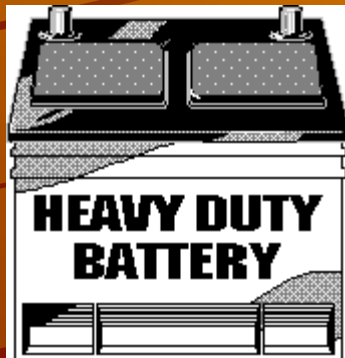
CHEMICAL WASTE
SATELLITE
ACCUMULATION

06.26.2008



RCRA Issues

- ✦ Satellite Accumulation Areas
- ✦ Universal Wastes
- ✦ Steel Aerosol Cans
 - Regulated if cans have not been punctured and still contain significant liquids
- ✦ Lead-based paint debris from residences
 - Can be disposed in a municipal landfill under the household waste exclusion
 - October 23, 2001; 66 FR 53535



2/2/2010



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