

Compliance Evaluation Inspections and Waste Minimization

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Introduction and Explanation

- Compliance Evaluation Inspection
 - Tour of the facility
 - Record review
 - Conclusion
 - Report
 - Enforcement
 - Waste Determinations and Waste Minimization

Satellite Accumulation

- §262.14 Conditions for exemption for VSQG
- §262.15 - Satellite accumulation area regulations for small and large quantity generators
- 55-gallons of Hazardous Waste or 1 quart or 1 kilogram of acute Hazardous Waste

Satellite Accumulation

- Hazardous Waste Containers
 - Closed
 - Labeled
 - NOT dated
 - Good condition
- Additional Waste Streams
 - Aerosol cans
 - Other recyclables or solid wastes
- 72 hours to remove to Central Accumulation Area when full



Solvent-Contaminated Wipes

- Reusable wipes
 - Excluded from solid waste provided the following
- Disposable wipes
 - Excluded from hazardous waste provided the following
- Non-leaking, closed containers, compatible with the wastes
- Containers must include “Excluded Solvent-Contaminated Wipes”
- The allowable accumulation time is 180-days
- Does not include
 - Other contaminated wipes by listed or characteristic hazardous wastes

Solvent-Contaminated Wipes

- Condition of Wipes
 - No Free Liquids (readily separate under ambient conditions)
- Management of Free Liquids as Hazardous Waste
- Eligible facilities
 - Reusable - regulated laundry or dry cleaner (CWA)
 - Disposable - incinerator or regulated landfill (CAA or C/D)

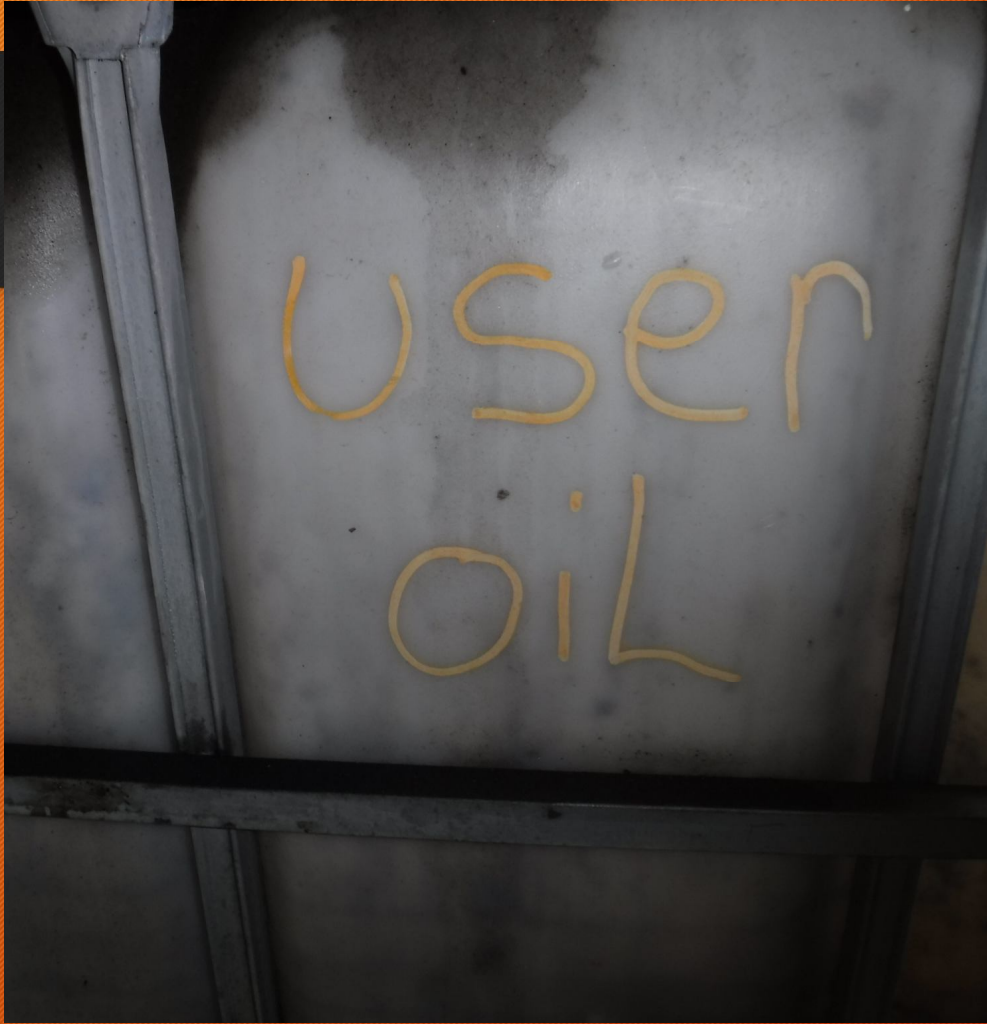
Universal Wastes

- Universal Wastes (UW):
 - 40 CFR Part 273
 - Batteries (exception to the closed container regulation)
 - Auto batteries included in both §266 and under UW
 - Fluorescent bulbs and lamps
 - Mercury containing equipment
 - Pesticides
- Used Oil
 - 40 CFR Part 279

UW Accumulation

- Universal Waste Containers
 - Closed
 - Labeled
 - Dated
- Lead Acid Batteries
 - UW or §266
- Oil Change Retailers
 - Auto batteries
 - Used Oil
- Next: what not to do





Central Accumulation Area

- **§262.16 Conditions for exemption for a small quantity generator that accumulates hazardous waste - 180 day**
- **§262.17 Conditions for exemption for a large quantity generator that accumulates hazardous waste**
- Other regulated units under these citations include:
 - Tanks
 - Containment Buildings
 - Drip Pads

Central Accumulation

- Aisle space
- Closed containers in good conditions
- Daily and/or Weekly inspections
 - Container condition
 - Leaks or spills
 - Correct labels
 - Date within appropriate time frame
 - Quantity of drums



RCRA regulated units

- Tanks
 - §265 Subpart J
 - For SQG: Treatment or accumulation of hazardous waste in tanks must comply with §265.17(b)
- Drip Pads
 - Subpart W of 40 CFR part 265
- Containment Buildings
 - 40 CFR part 265 subpart DD
- Organic Air Emissions
 - AA, BB, CC, may be included via Title V air permit

Record Review

- Manifests and Land Disposal Restrictions
 - 3 years worth of records
- Contingency Plans
 - Correct format per 262 Subpart M
 - Arrangements with Emergency Response authorities
- Training
 - Job Title
 - Job Description
 - Type and Amount of Training
 - Must be kept until closure or 3 years after the employee last worked
- Weekly Inspections

Additional Documentation

- Annual Reports - SQG & LQG
- RCRA Permits - TSDF
- Daily tank inspections
- AA, BB, CC Organic Air emissions

Final Report

- Typically 30 - 45 days from the time of the inspection
- Report or Notice of Violation
- Formal or Informal Enforcement
- Agreed Orders

Environmental Management System

- Waste Determination
 - An accurate determination as to whether that waste is a hazardous waste
 - If so, possible non-hazardous replacements
- Waste Minimization
 - Reduce, Reuse, Recycle
 - Expired materials
 - Excess materials
 - RCRA Certification required for SQG and LQG

Waste Minimization

- May be implemented into a larger EMS
 - Set your goals
- Organizational support
 - Management support
 - Waste minimization coordinator
- Characterization and generation
 - Non-hazardous replacements
- Assessments, Implementation, and Evaluation
 - Commitment to the program
- Celebration
 - Recognize and acknowledge success by team members

Final Thoughts

- Good Housekeeping and Organization
- <https://www.epa.gov/hwgenerators/hazardous-waste-generator-regulatory-summary>
- Any Questions?
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