

RCRA MADE EASY

Let's Summarize the
Hazardous Waste
Requirements



WHAT IS RCRA ?

- Resource
- Conservation &
- Recovery
- Act



HISTORY OF RCRA

- 1965 - Solid Waste Disposal Act-Title II of Clean Air Act (Research & Data Collection)
- 1970 – Resource Recovery Act (Energy Recovery)
- 1976 – Resource Conservation and Recovery Act (Cradle to Grave)
- 1984 Hazardous Waste & Solid Waste Amendments (Land Disposal Regulations)



RCRA IS:

- Our nations primary law governing the disposal of solid & hazardous waste

WHY?

- To address the increasing problem of municipal & industrial waste



GOALS

- **Protect** human health & the environment from the hazards of waste disposal
- **Conserve** energy & natural resources
- **Reduce** or eliminate the generation of waste wherever feasible
- **Ensure** that wastes are managed in an environmentally sound manner



WASTE MANAGEMENT

“Cradle to Grave”

- Generation
- Accumulation
- Transportation
- Treatment
- Disposal
- Post-disposal



GENERATOR CATEGORIES

- **CESQG:**
 - Conditionally Exempt Small Quantity Generator
- **SQG:**
 - Small Quantity generator
- **LQG:**
 - Large Quantity Generator



MONTHLY GENERATION LIMITS

- CESQG
 - \leq 220lbs. hazardous waste, and/or
 - \leq 2.2lbs acutely hazardous waste
- SQG:
 - $> 220\text{lbs.} < 2,200$ lbs. hazardous waste, and/or ≤ 2.2 lbs acutely hazardous waste
- LQG:
 - $\geq 2,200$ lbs. hazardous waste, and/or
 - > 2.2 lbs. acutely hazardous waste



MAXIMUM ACCUMULATION

On site at any one time:

- CESQG:
 - \leq 2,200lbs. hazardous waste, and/or
 - \leq 2.2lbs. Acutely hazardous waste.
- SQG:
 - \leq 13,200lbs. Hazardous waste and/or
 - \leq 2.2lbs acutely hazardous waste
- LQG: No Limit.



ACCUMULATION TIME LIMITS

- CESQG:
 - No Time Limit.
- SQG:
 - 180 days or
 - 270 days if destination is >200 miles.
- LQG: 90 days

30 day extensions can be granted.



EPA ID NUMBER REQUIRED?

- CESQG:
 - No (voluntary, includes fee.)
- SQG:
 - Yes
- LQG:
 - Yes

To obtain an EPA ID number contact USEPA
Region II at (212) 637-4106



MANIFEST REQUIRED

- CESQG:
 - No (voluntary).
- SQG:
 - Yes [Unless waste is reclaimed pursuant to 40 CFR 262.20(e)(1)].
- LQG:
 - Yes, for all hazardous waste.



MANIFEST/LDR RETENTION

Generator & TSDf copy of manifest & LDR forms should be kept together

- CESQG:
 - None.
- SQG:
 - 3 years.
- LQG:
 - 3 years.

Must be available for inspection



EXCEPTION REPORTS

An Exception Report is submitted when a signed manifest is not received from the Treatment, Storage & Disposal Facility (TSDF)



EXCEPTION REPORTS

- CESQG: None
- SQG:
 - Within 60 days of shipping must submit copy of manifest with a note that signed TSD copy has not been received.
- LQG:
 - Must contact initial transporter or TSD within 35 days of shipping date.
 - Must submit written Exception Report to NJEDP within 45 days of shipping date



LAND DISPOSAL RESTRICTION

Land Disposal Notifications or Certifications are required for the disposal of hazardous waste. These notifications or certification should be kept with the manifest when required.



LAND DISPOSAL RESTRICTION

- CESQG:
 - None
- SQG:
 - Must be kept for 3 years*
- LQG:
 - Must be kept for 3 years*

Land Disposal Notifications or Certifications



BIENNIAL REPORTS

- CESQG:
 - None
- SQG:
 - NONE
- LQG:
 - Submitted on March 1st of each even year to report waste generated in the previous odd year



GENERATOR 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 & emergency procedures)
- LQG:
 - Documented, Facility specific training by a qualified personnel within 6 months of hire and then annually



PREPAREDNESS & PREVENTION

- CESQG:
 - None
- SQG:
 - Familiarize fire, police, hospital & have an emergency response contractor agreement
- LQG:
 - Familiarize fire, police, hospital & have an emergency response contractor agreement



CONTINGENCY PLAN

- CESQG:
 - None
- SQG:
 - Post emergency coordinator name & number, local emergency numbers, & location of extinguishers, spill control material, & fire alarm(s) near telephone.
- LQG:
 - Complete, detailed, & up to date facility specific contingency plan. 40 CFR 262.34(a)(4)



REQUIREMENTS	CESQG Conditionally Exempt Small Quantity Generator [261.5]	<u>SQG</u> Small Quantity Generator	<u>LOG</u> Large Quantity Generator
1) Monthly Generation Limits	≤ 220 lbs haz. waste &/or ≤ 2.2 lbs acute haz. waste	>220 lbs but <2200 lbs haz. waste & ≤2.2 lbs acute haz. waste [262.34(d)]	≥2200 lbs haz. waste or >2.2 lbs acute haz. waste
2) Accumulation Quantity Limits	*≤ 2200 lbs haz. waste &/or ≤ 2.2 lbs acute haz waste	≤13,200 lbs haz. waste & ≤2.2 lbs acute haz waste onsite [262.34(d)]	No limit
3) Accumulation Time Limits	Unlimited	180 days [262.34(d)], 270 days if receiving facility >200 miles [(e)], extensions granted? [(f)] Yes – Contact: Region NJDEP Regional Office [262.12]	90 days [262.34(a)], extensions granted? [262.34(b)] Yes - Region NJDEP Regional Office [262.12]
4) EPA ID Number Required	No – Voluntary (See NJX program information)	Yes – Contact:Region II USEPA212-637-4106 [262.12]	Yes - Contact:Region II USEPA212-637-4106 [262.12] [
5) Hazardous Waste Manifest Required	No - Voluntary(See NJX program information)	Yes - unless waste is reclaimed pursuant to 262.20(e)(1)	Yes
6) Manifest Copy Retention	None – voluntary	3 years [262.40(a)]	3 years [262.40(a)]
7) Exception Reporting (failing to receive copy of manifest with TSDF operator signature)	None	None - but within 60 days generator must submit copy of manifest with note that signed TSDF copy is missing [262.42(b)]	1) generator must contact initial transporter or theTSDF 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	None	Required for certain haz. wastes. Keep your copy for 3 years [268.7]	Required for certain haz. wastes. Keep your copy for 3 years [268.7]
9) Biennial Report	None	None [262.44]	Submitted on each even year to report on manifest activity for previous odd year [262.41]1)
10) Inspections	None	1) Daily /weekly for haz. waste storage tanks [265.201(c)] 2) Weekly for haz. Waste accumulation containers [265.174]	1) Weekly for haz. Waste storage containers [265.174] 2) Daily/bimonthly/yearly for haz. waste storage tanks (log required) [265.195]
11) Haz. Waste Training	None	Basic – waste handling familiarization & emergency procedures (no drills required) [262.34(d)(5)(iii)]	Full training (no drills required) [265.16]
12) Preparedness & Prevention	None	Familiarize fire, police, hospital & have emergency response contractor agreement (formal fire inspection not required) [265.30-37]	Familiarize fire, police, hospital & have emergency response contractor agreement (formal fire inspection not required) [265.30-37]
13) Contingency Plan	None	Basic plan - By the phone: Emer. Coord., name & #, fire dept. #, & locat. of fire ext. & alarm & spill	Complete plan [265.50-56]

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