“LET’S SUMMARIZE THE HAZARDOUS WASTE REGULATIONS”

Hazardous Waste Handler Seminar
New Jersey State Police Building, Robbinsville, NJ
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RCRA MADE EASY?
WHAT IS RCRA?

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

- Our nation's 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
<table>
<thead>
<tr>
<th>REQUIREMENTS</th>
<th>CESQG Conditionally-Exempt Small Quantity Generator</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 but &gt;2.2 lbs acute hazardous waste</td>
<td>≤220 lbs but &gt;2.2 lbs acute hazardous waste</td>
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<tr>
<td>2) Accumulation Quantity Limits</td>
<td>≤2200 lbs hazardous waste &amp; ≤2.2 lbs acute hazardous waste</td>
<td>&gt;2200 lbs hazardous waste or &gt;2.2 lbs acute hazardous waste</td>
<td>No limit</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 [e], extension granted? [f]</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 - unless waste is reclaimed pursuant to 262.20(e)(1)</td>
<td>Yes - Contact: Region II USEPA 212-637-4106 [262.12]</td>
</tr>
<tr>
<td>5) Manifest Copy Retention</td>
<td>None - voluntary</td>
<td>3 years [262.40(a)]</td>
<td>3 years [262.40(a)]</td>
</tr>
</tbody>
</table>
| 6) Exception Reporting | None | 1 generator must contact initial transporter or TSDF operator within 30 days of shipping date [262.42(a)] | 1 generator must contact initial transporter or TSDF operator within 30 days of shipping date 
2 generator must submit written exception report within 45 days of shipping date to NDEP [262.42(a)] |
| 7) Land Disposal Restriction | None | Required for certain hazardous wastes. Keep your copy for 3 years | Required for certain hazardous wastes. Keep your copy for 3 years |
| 8) Biennial Report | None | Submitted on each even year to report on manifest activity for previous odd year | [262.44] |
| 10) Haz. Waste Training | None | Basic – waste handling familiarization & emergency procedures (voluntary) | Full training (voluntary required) |
| 11) Preparedness & Prevention | None | Familiarize fire, police, hospital & have emergency response contractor agreement (formal fire inspection not required) | Familiarize fire, police, hospital & have emergency response contractor agreement (formal fire inspection not required) |
| 12) Contingency Plan | None | Basic plan – by the phone: Emergency Coord., name & #, fire dept., & locat. of fire extinguishers, spill equipment | Complete plan |
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:
  
  \[ \geq 2,220 \text{ lbs. hazardous waste, or} \]
  
  \[ > 2.2 \text{ lbs. acute hazardous waste} \]
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

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