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
  – \( \leq 220 \text{lbs. hazardous waste} \), and/or
  – \( \leq 2.2 \text{lbs acutely hazardous waste} \)

• SQG:
  – \( > 220 \text{lbs.} < 2,200 \text{ lbs. hazardous waste} \), and/or
  – \( \leq 2.2 \text{lbs acutely hazardous waste} \)

• LQG:
  – \( > 2,200 \text{lbs. hazardous waste} \), and/or
  – \( > 2.2 \text{lbs. acutely hazardous waste} \)
MAXIMUM ACCUMULATION

On site at any one time:

• CESQG:
  – $\leq 2,200$lbs. hazardous waste, and/or
  – $\leq 2.2$lbs. Acutely hazardous waste.

• SQG:
  – $\leq 13,200$lbs. Hazardous waste and/or
  – $\leq 2.2$lbs 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
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 TSDF 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 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

<table>
<thead>
<tr>
<th></th>
<th>CESQG Conditionally Exempt Small Quantity Generator [261.5]</th>
<th>SQG Small Quantity Generator</th>
<th>LQG Large Quantity Generator</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Monthly Generation Limits</td>
<td>( \leq 220 \text{ lbs haz. waste} ) &amp;/( \leq 2.2 \text{ lbs acute haz. waste} )</td>
<td>( &gt;220 \text{ lbs but} &lt;2200 \text{ lbs haz. waste} ) &amp;/( \leq 2.2 \text{ lbs acute haz. waste} [262.34(d)] )</td>
<td>( &gt;2200 \text{ lbs haz. waste or} &gt;2.2 \text{ lbs acute haz. waste} )</td>
</tr>
<tr>
<td>2) Accumulation Quantity Limits</td>
<td>( \leq 2200 \text{ lbs haz. waste} ) &amp;/( \leq 2.2 \text{ lbs acute haz. waste} )</td>
<td>( \leq 13,200 \text{ lbs haz. waste} ) &amp;/( \leq 2.2 \text{ lbs acute haz. waste} ) [262.34(d)]</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)], extensions granted? [262.34(d)]</td>
<td>90 days [262.34(a)], extensions granted? [262.34(b)] \ Yes - Region NJDEP Regional Office [262.12]</td>
</tr>
<tr>
<td>4) EPA ID Number Required</td>
<td>No - Voluntary (See NJX program information)</td>
<td>Yes – Contact: Region II USEPA212-637-4106 [262.12]</td>
<td>Yes - Contact: Region II USEPA212-637-4106 [262.12]</td>
</tr>
<tr>
<td>5) Hazardous Waste Manifest 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</td>
</tr>
<tr>
<td>6) Manifest Copy Retention</td>
<td>None – voluntary</td>
<td>3 years [262.40(a)]</td>
<td>3 years [262.40(a)]</td>
</tr>
<tr>
<td>7) Exception Reporting (failing to receive copy of manifest with TSDF operator signature)</td>
<td>None</td>
<td>None - but within 60 days generator must submit copy of manifest with note that signed TSDF copy is missing [262.42(b)]</td>
<td>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)]</td>
</tr>
<tr>
<td>8) Land Disposal Restriction</td>
<td>None</td>
<td>Required for certain haz. wastes. Keep your copy for 3 years [268.7]</td>
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</tr>
<tr>
<td>9) Biennial Report</td>
<td>None</td>
<td>None [262.44]</td>
<td>Submitted on each even year to report on manifest activity for previous odd year [262.41][1]</td>
</tr>
<tr>
<td>11) Haz. Waste Training</td>
<td>None</td>
<td>Basic – waste handling familiarization &amp; emergency procedures (no drills required) [262.34(d)(5)(iii)]</td>
<td>Full training (no drills required) [265.16]</td>
</tr>
<tr>
<td>12) Preparedness &amp; Prevention</td>
<td>None</td>
<td>Familiarize fire, police, hospital &amp; have emergency response contractor agreement (formal fire inspection not required) [265.30-37]</td>
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</tr>
<tr>
<td>13) Contingency Plan</td>
<td>None</td>
<td>Basic plan - By the phone: Emer. Coord., name &amp; #, fire dept. #, &amp; locat. of fire ext. &amp; alarm &amp; spill</td>
<td>Complete plan [265.50-56]</td>
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</tbody>
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CONTACT

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