

RCRA 101

Tom Farrell, CHMM

New Jersey Department of Environmental Protection

Bureau of Hazardous Waste Compliance &
Enforcement

Southern Field Office

856-614-3640

What is RCRA?

- A. Really Complicated Regulatory Act
- B. Resource Conservation and Recovery Act
- C. Ridiculously Cumbersome Ruthless Act
- D. All of the Above

What is RCRA?

The Resource Conservation and Recovery Act (RCRA) was passed in 1976 as an amendment to the Solid Waste Disposal Act. Amendments were added to expand the program in 1984. The program set three goals:

- To protect human health and the environment.
- To reduce waste and conserve energy and natural resources.
- To reduce or eliminate the generation of hazardous waste as expeditiously as possible.

What is a "Hazardous Waste"?

A. Radioactive Waste

B. Medical Waste

C. Wastes which are
Flammable, Corrosive,
Reactive or Toxic

Two Types of Hazardous Waste

CHARACTERISTIC



Ignitable: Flash Point $< 140^{\circ}$ Fahrenheit



Corrosive: pH ≤ 2 or ≥ 12.5



Reactive: Explosive, Water Reactive, Cyanide or Sulfide bearing waste



Toxic: Will generate leachate containing heavy metals, solvents or pesticides

LISTED



Defined by USEPA as hazardous waste based upon process generating waste or according to chemicals involved

Generator Classifications

- **Conditionally Exempt Small Quantity Generator**
 - IN ANY MONTH, generates < 220 lbs./month (if acute, < 2.2 lbs./month)
 - Stores < 2,200 lbs. (if acute, <2.2 lbs.)
- **Small Quantity Generator**
 - IN ANY MONTH, generates between 220 & 2,200 lbs./month (if acute, < 2.2 lbs./month)
 - Stores up to 13,200 pounds (if acute, < 2.2 lbs.)
- **Large Quantity Generator**
 - IN ANY MONTH, generates > 2,200 lbs. (if acute, > 2.2 lbs./month)
 - Stores > 13,200 lbs. (if acute, > 2.2 lbs.)

Acute Hazardous Waste

An Acute Hazardous Waste is designated by a "P" number as its waste code. Acute hazardous waste exerts its toxicity with exposure to smaller quantities and in a shorter period of time than non-acute hazardous waste.

Sites that generate, in any single calendar month, or, accumulate at any time, > 1 kg (2.2 lbs.) of acute hazardous waste are a RCRA LQG. Such sites must comply with all LQG requirements, including the submission of a Biennial Hazardous Waste Report for that reporting year.

Storage Time Limits

- CESQG can store waste indefinitely. However once total quantity reaches 2,200 pounds facility becomes an SQG.
- SQG's can generally store waste for up to 180 days.
- LQG's can generally store waste for up to 90 days.

EPA Identification Number

- SQG's and LQG's are required to obtain a USEPA identification number. In Region II call 212-637-4106 to obtain number.
- CESQG's are not required to obtain a USEPA identification number. May want to get an NJX identification number which can be obtained by calling 609-292-7081.

Exception Reporting Requirements

- LQG's:
 - Generator must contact initial transporter or the TSDF operator within 35 days of shipping date.
 - Generator must submit to NJDEP written exception report within 45 days of shipping date.
- SQG's
 - Not required to submit exception report.
 - After 60 days Generator must submit to NJDEP a copy of manifest with note that signed TSDF copy is missing.

Land Disposal Restriction Form

- SQG's and LQG's required to use Land Disposal Restriction Notification or Certification Form for initial shipment and if waste stream changes.
- Must keep copies of form for 5 years from shipping date.

Biennial Report

- LQG's required to submit a report every two years summarizing waste shipments such as waste types, quantities, transporter and TSDF facilities utilized.

Inspections

- SQG's
 - Weekly for hazardous waste storage containers
 - For hazardous waste storage tanks: Daily/weekly per 40 CFR 265.201(c)
 - Document findings in Inspection Log
- LQG's
 - Weekly for hazardous waste storage containers
 - For hazardous waste storage tanks: Daily/bimonthly/yearly per 40 CFR 265.195
 - Document findings in Inspection Log

Inspection Log

- Condition of containers?
- Containers closed when not in use?
- Containers marked "Hazardous Waste" and dated?
- Container markings visible?
- Containers stored longer than allowed?
LQGs = 90 days SQGs = 180/270
- Containers segregated according to waste type?
- Containers of ignitable or reactive waste 50' from property line? (LQG only)
- Adequate aisle space?
- Spill control, safety, communication, and fire control equipment present?
- Name, date, and time of person performing inspection
- Corrective action taken (Use separate sheet as necessary)

WEEKLY CONTAINER STORAGE AREA INSPECTION LOG

ITEM/WEEK	WEEK OF ____	WEEK OF ____	WEEK OF ____	WEEK OF ____	WEEK OF ____
Are containers in good condition, not leaking?					
Are containers closed when not in use?					
Are containers marked "Hazardous Waste" and date?					
Are container markings visible?					
Are containers stored longer than allowed? LQCs = 90 days SQCs = 180/270					
Are containers segregated according to waste type?					
Are containers of ignitable or reactive waste 50' from property line? (LQCs only)					
Is there adequate aisle space?					
Is there spill control, safety communication, and fire control equipment present?					
Name, date, and time of person performing inspection					
Corrective action taken (Use separate sheet as necessary)					

Hazardous Waste Training

- SQG's
 - Basic waste handling familiarization & emergency procedures
 - Documentation not required but recommended
- LQG's
 - Full training
 - Initial & Annual refresher
 - Documentation required

Preparedness & Prevention

- Familiarize fire, police, hospital & have emergency response contractor agreement.

Contingency Plan

- SQG's
 - Basic plan by the phone: Emergency Coordinator name & telephone #, Fire Department telephone #, Location of fire extinguisher, alarm & spill equipment.
- LQG's
 - Complete plan

Worksheet 1 Fill in and post this information next to your telephone.

EMERGENCY RESPONSE INFORMATION

Emergency Coordinator

Name: _____

Telephone: _____

Fire Extinguisher

Location(s): _____

Spill-Control Materials

Location(s): _____

Fire Alarm (if present)

Location(s): _____

Fire Department

Telephone: _____



Worksheet 2 Fill in and post this information next to your telephone. Make sure all employees read and are familiar with its contents.

EMERGENCY RESPONSE PROCEDURES

In the event of a spill:

Contain the flow of hazardous waste to the extent possible, and as soon as is possible, clean up the hazardous waste and any contaminated materials or soil.

In the event of a fire:

Call the fire department and, if safe, attempt to extinguish the fire using a fire extinguisher.

In the event of a fire, explosion, or other release that could threaten human health outside the facility, or if you know that the spill has reached surface water:

Call the National Response Center at its 24-hour number (800 424-8802). Provide the following information:

Our company name:

Our address:

Our U.S. EPA identification number:

Date of accident

Time of accident

Type of accident (e.g., spill or fire)

Quantity of hazardous waste involved

Extent of injuries, if any

Estimated quantity and disposition of recovered materials, if any

