HOW DID I GET MYSELF IN THIS MESS
AND

HOW DO I GET MYSELF OUT
WHAT ARE YOUR CHANCES?
FEEL LUCKY

2004
NUMBER OF FACILITIES INSPECTED 3451
NUMBER WITH VIOLATIONS 1466
AVERAGE VIOLATIONS PER FACILITY 3

YOUR CHANCES OF BEING OUT OF COMPLIANCE ARE 43%
VIOLATIONS WITH MANDATORY PENALTY

261.11-FAILURE TO DETERMINE
262.12(a)-FAILURE TO HAVE EPA ID #
262.20(a)-FAILURE TO PREPARE HAZARDOUS WASTE MANIFEST

NO Grace Period
WHY?

CESQG - FLAMMABLE PETROLEUM PRODUCTS TO TSD ON A BILL OF LADING

SOLUTION!

SEND TO USED OIL FACILITY OR MAKE SURE TSD KNOWS IT SHOULD GO FOR ENERGY RECOVERY.
VIOLATIONS WITH MANDATORY PENALTY

270.10(E-F)-ILLEGAL TSDF
$$$$

WHY?

ABANDONED OR FORGOTTEN CONTAINERS
SOLUTION!

TREAT YOUR CHEMICALS AND WASTE LIKE THEY ARE PRODUCTS!

GOOD CONTAINERS Labeled
INVENTORIED
STORED ORDERLY
VIOLATIONS WITH MANDATORY PENALTY

265.31-DISCHARGE OF A HAZARDOUS WASTE

NJAC 7:1.11(A) - DISCHARGE, HAZARDOUS SUBSTANCE

NO Grace Period
COMMON VIOLATIONS 1

262.34(a) - FAILURE TO SHIP OFF WASTE WITHIN 90 DAYS
262.34(d) - FAILURE TO SHIP OFF WASTE WITHIN 180/270 DAYS
262.34(a)2 - ACCUMULATION START DATE

Grace Period Violations.
COMMON VIOLATIONS 2

ACCUMULATION AREA
262.34(A)(3) - HAZARDOUS WASTE LABEL

SATELITE AREA
262.34(C)(1)(ii) - “HAZARDOUS WASTE*” LABEL
*OR OTHER WORDS DESCRIBING THE MATERIAL

NO Grace Period!
COMMON VIOLATIONS 3

265.51(A) - LQG CONTINGENCY PLAN
BIGGEST PROBLEM: 265.54 - FAILURE TO UPDATE

262.34(D)(5) - SQG CONTINGENCY PLAN
BIGGEST PROBLEM: 262.34(d)5 - FAILURE TO HAVE ONE

NO Grace Period  Grace Period Violation
COMMON VIOLATIONS 4

PREPAREDNESS & PREVENTION

265.37 - AGREEMENT WITH POLICE DEPARTMENTS, FIRE DEPARTMENTS, EMERGENCY RESPONSE CONTRACTORS, & HOSPITALS

Grace Period Violation
COMMON VIOLATIONS 5

CONTAINER MANAGEMENT

265.171 - CONTAINERS IN GOOD CONDITION

NO Grace Period

265.173 - CONTAINERS SEALED WHEN NOT IN USE

265.174 - INSPECTIONS: DOCUMENT

265.35 - AISLE SPACE 18/30”

Grace Period Violations
COMMON VIOLATIONS

TRAINING

265.16(a)(1) - FAILURE TO PROVIDE TRAINING

NO Grace Period

265.16(C) - FAILURE TO PROVIDE REFRESHER

265.16(D) - MAINTAIN RECORDS

Grace Period Violations
COMMON VIOLATIONS 7

N.J.A.C. 7:26A-6.4(D)4 - USED OIL CONTAINERS & FILL PIPES LABELED “USED OIL”
NJAC 7:26G-3.2(B) - FEE PAYMENTS

262.41(A) - SUBMIT HAZARDOUS WASTE REPORT
262.40(A)-MANIFESTS FOR 3 YEARS: LDR FORMS

Grace Period Violations
QUESTIONS