

***BUREAU OF HAZARDOUS
WASTE COMPLIANCE &
ENFORCEMENT***

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*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
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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 6

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

