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

262.13-FAILURE TO HAVE EPA ID #

262.20(A)-FAILURE TO PREPARE HAZARDOUS WASTE MANIFEST
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
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
COMMON VIOLATIONS 2

ACCUMULATION AREA
262.34(A)3 - HAZARDOUS WASTE LABEL

SATTELITE AREA
2662.34(C)(1)(ii) - “HAZARDOUS WASTE*” LABEL
*OR OTHER WORDS DESCRIBING THE MATERIAL
COMMON VIOLATIONS 3

5.51(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
COMMON VIOLATIONS 4

PREPAREDNESS & PREVENTION

265.37 - AGREEMENT WITH POLICE DEPARTMENTS, FIRE DEPARTMENTS, EMERGENCY RESPONSE CONTRACTORS, & HOSPITALS
COMMON VIOLATIONS 5

CONTAINER MANAGEMENT

265.171 - CONTAINERS IN GOOD CONDITION
265.173 - CONTAINERS SEALED WHEN NOT IN USE
265.174 - INSPECTIONS: DOCUMENT
265.35 - AISLE SPACE 18/30”
COMMON VIOLATIONS 6

TRAINING

265.16(B) - FAILURE TO PROVIDE TRAINING
265.16(C) - FAILURE TO PROVIDE REFRESHER
265.16(D) - MAINTAIN RECORDS
COMMON VIOLATIONS 7

N.J.A.C. 7:26A-6.4(D)4 - USED OIL CONTAINERS & FILL PIPES LABELED “USED OIL”

262.40(A) - MANIFESTS FOR 3 YEARS: LDR FORMS

262.41(A) - SUBMIT HAZARDOUS WASTE REPORT

NJAC 7:26G-3.2(B) - FEE PAYMENTS
QUESTIONS