

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

**PETER TAYLOR, CHMM  
SOUTHERN FIELD OFFICE  
(856) 614-3650**

*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**

***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*

## **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**

# **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(a)(1) - 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*

