

***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*

<b>NUMBER OF FACILITIES INSPECTED</b>	<b>3451</b>
<b>NUMBER WITH VIOLATIONS</b>	<b>1466</b>
<b>AVERAGE VIOLATIONS PER FACILITY</b>	<b>3</b>

<b>YOUR CHANCES OF BEING OUT OF COMPLIANCE ARE</b>	<b>43%</b>
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**NO GRACE PERIOD    GRACE PERIOD**

# **PRIORITY VIOLATIONS**

**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 OR SOLUTIONS WITH WRONG pH**

# **SOLUTION!**

**SEND TO USED OIL FACILITY OR MAKE SURE TSD KNOWS IT SHOULD GO FOR ENERGY RECOVERY OR MAKE SURE SOLUTION IS STABLE & METER IS CALABRATED.**

# **PRIORITY VIOLATION**

**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**



# **PRIORITY VIOLATIONS**

**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**

## SATELITE AREA

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

# ***COMMON VIOLATIONS 3***

## **LQG**

**265.51(A) - FAILURE TO HAVE  
CONTINGENCY PLAN.**

**265.54 - FAILURE TO UPDATE PLAN.**

## **SQG**

**262.34(d)5 - FAILURE TO HAVE  
CONTINGENCY PLAN.**

# **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.**

## REFRESHER

**265.16(C) - FAILURE TO PROVIDE**

**265.16(D) - MAINTAIN RECORDS**

# **COMMON VIOLATIONS 7**

**N.J.A.C. 7:26G-3.2(B) - FEE PAYMENTS**

**262.41(A) - SUBMIT HAZARDOUS WASTE  
REPORT**

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



# USED OIL VIOLATIONS

**N.J.A.C. 7:26A-6.4(d)1- FAILURE TO  
COMPLY WITH SPCC REGULATIONS.**

**N.J.A.C. 7:26A-6.4(D)5-FAILURE TO INITIATE  
RESPONSE TO RELEASES.**

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

# **UNIVERSAL WASTE VIOLATIONS**

- 1. DISASSEMBLING OR PROCESSING VARIOUS UNIVERSAL WASTES.**
  - 2. FAILURE TO DETERMINE IF A PROCESSED UNIVERSAL WASTE BECOMES A HAZARDOUS WASTE.**
  - 3. OVER PACKING UNIVERSAL WASTE THAT ARE OR COULD LEAK.**
  - 4. ACCUMULATING UNIVERSAL WASTES OVER ONE YEAR.**
- 1. FAILURE TO LABEL UNIVERSAL WASTES PROPERLY.**
  - 2. FAILURE TO KEEP REQUIRED RECORDS.**

# **Mercury switch violations**

**N.J.S.A. 13:1E-99.87-FAILURE TO REMOVE SWITCH**

**N.J.S.A. 13:1E-99.87- FALSELY REPRESENTING THAT SWITCHES HAVE BEEN REMOVED**

- 1. FAILURE TO HANDLE SWITCHES PROPERLY**
- 2. FAILURE TO KEEP RECORDS**

# *QUESTIONS*

