HOW DID I GET MYSELF IN THIS MESS
AND
HOW DO I GET MYSELF OUT
WHAT ARE YOUR CHANCES?
FEEL LUCKY

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

YOUR CHANCES OF BEING OUT OF
COMPLIANCE ARE                      43%

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

$$$$

WHY?

ABANDONED OR FORGOTTEN CONTAINERS
SOLUTION!

TREAT YOUR CHEMICALS AND WASTE LIKE THEY ARE PRODUCTS!

GOOD CONTAINERS LABELED INVENTORYED STORED ORDERLY
PRIORITY VIOLATIONS

265.31-DISCHARGE OF A HAZARDOUS WASTE

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

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

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