RCRA Inspections

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Slide Key

Animation

Speaker Notes

Image credits when not owned by EPA appear in “Speaker Notes”

AGENDA

RCRA Inspections

- What is RCRA
- Preparing My Facility for an inspection
  - ✓Waste streams
  - ✓Generator regulations
  - ✓Hazardous Waste determinations
  - ✓Universal Wastes, focus on aerosol cans
  - ✓Solvent rags
  - ✓Generator classes/types

AGENDA

RCRA inspections - continued

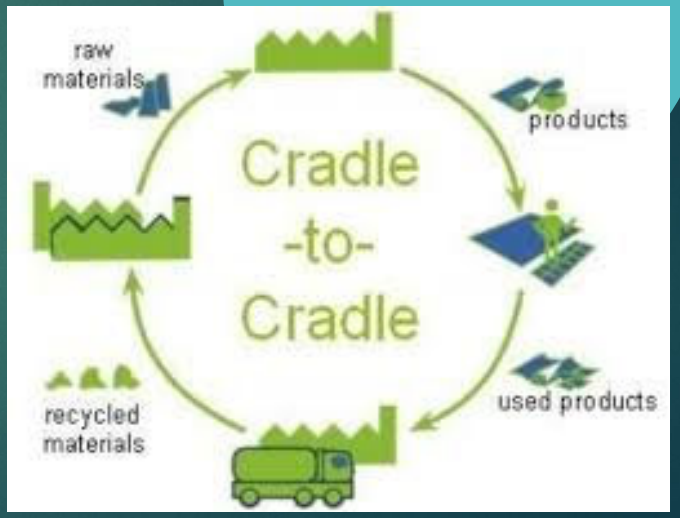
- Episodic Generation
- Consolidation
- EPA Inspection process
- Exploring compliance
- After the inspection
- Resources

What is RCRA?

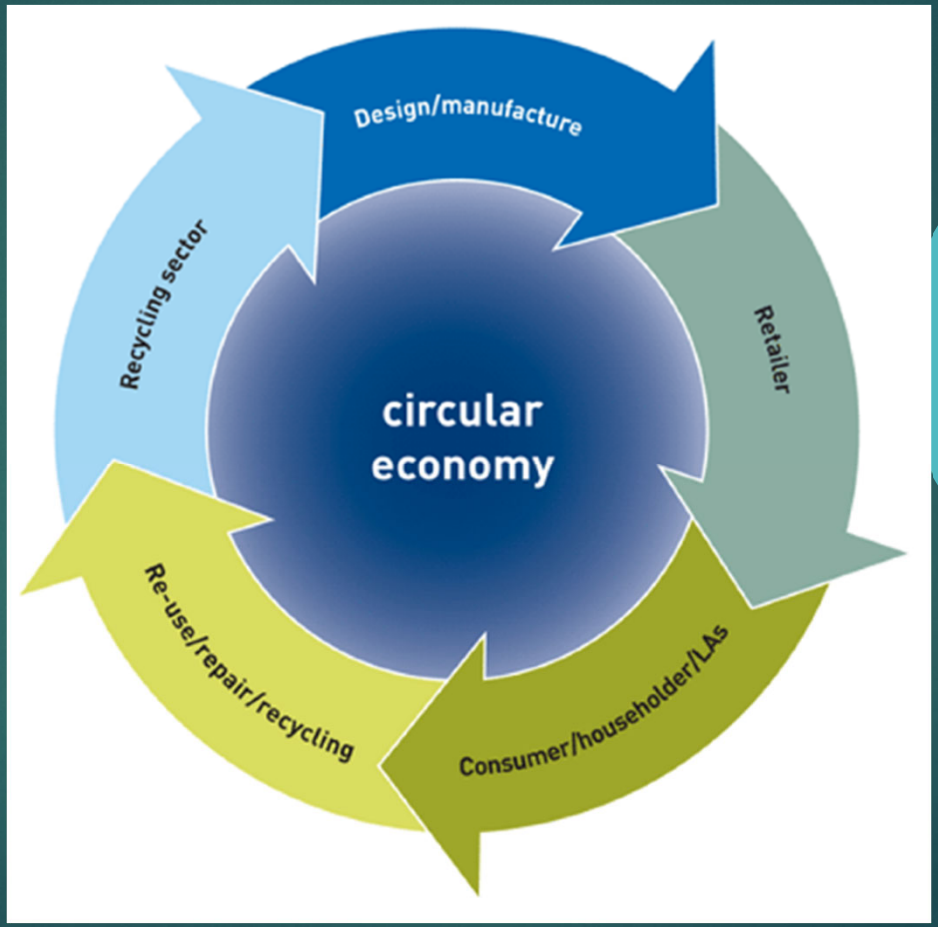
Resource Conservation and Recovery Act

RCRA

Authority to control
hazardous waste



What is RCRA?


Design/manufacture
Retailer
Consumer/householder/LAs
Re-use/repair/recycling
Recycling sector
circular economy

What is RCRA?

When hazardous waste is involved, those who:

- generate,
- transport,
- treat,
- store, and/or
- dispose.

What is RCRA?

- Regulations, guidance and policies ensure safe management & cleanup of hazardous waste
- Source reduction & beneficial reuse

Best Management Practices (a.k.a., risk management)

How to Prepare for an Inspection

- **Waste Stream List / Table**

  Know your generator size!!

- **Hazardous Waste Determinations**
- **Container Labeling / Closed**

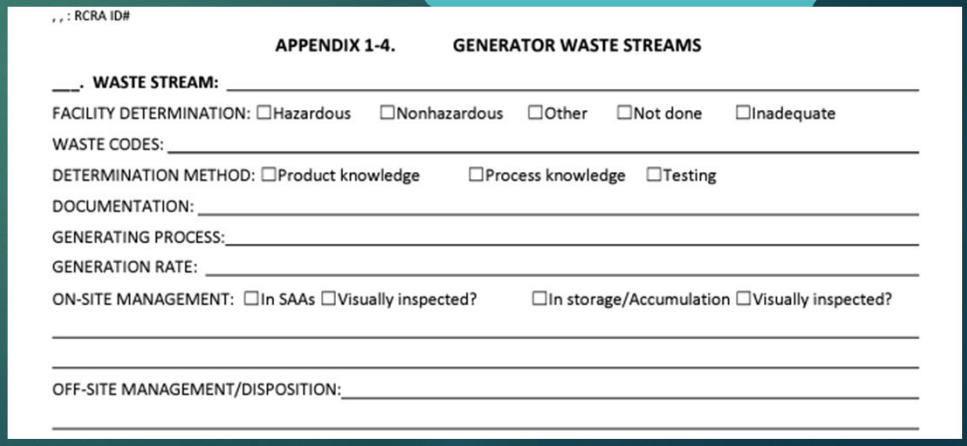
  Best Management Practices

- **Documentation**

262 subpart A

Waste Stream Table – Info Needed

1. Waste Stream Name
2. Generation Process
3. Waste Determination/ Waste Codes
4. Generation Rate (monthly)
5. Onsite Management
6. Off-site Management



, , : RCRA ID#

APPENDIX 1-4. GENERATOR WASTE STREAMS

___. WASTE STREAM: _____

FACILITY DETERMINATION: ☐Hazardous ☐Nonhazardous ☐Other ☐Not done ☐Inadequate

WASTE CODES: _____

DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☐Testing

DOCUMENTATION: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: ☐In SAAs ☐Visually inspected? ☐In storage/Accumulation ☐Visually inspected?

_____

_____

OFF-SITE MANAGEMENT/DISPOSITION: _____

_____

262.16
262.17

How to Prepare for an Inspection

Container Management/Labeling / Closed

Best Management Practices

1. Label "*Hazardous Waste*"
2. Mark hazard nature: Flammable / Caustic / Toxic
3. Indicate accumulation start date
4. Keep closed, unless actively filling
5. Container in good condition – no dents, rust, or leaks

262.16
262.17

How to Prepare for an Inspection

Documentation

- Staff Training
- Manifests
- Safety Data Sheets
- Emergency Preparedness
  - ✓Contingency Plan (more later)
  - ✓Quick Reference Guide
  - ✓Arrangement with authorities
- Inspections

Hazardous Waste Determinations

*** FLASH *** BREAKING NEWS ***

FLASH *** BREAKING NEWS ***

- clarifications on:
  - ✓ GIR
  - ✓ Pharm
  - ✓ DSW

Federal Register / Vol. 88, No. 152 / Wednesday, August 9, 2023

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Parts 260, 261, 262, 264, 265, 266, 270, 271 and 441

[EPA–HQ–OLEM–2023–0081]; FRL 8687–01–OLEM

RIN 2050–AH23

Hazardous Waste Generator Improvements Rule, the Hazardous Waste Pharmaceuticals Rule, and the Definition of Solid Waste Rule; Technical Corrections

AGENCY: Environmental Protection Agency (EPA).

Hazardous Waste Determinations

Require some thinking and must be done for every solid waste stream generated at a facility.

- point of generation
  - ✓time and place
- representative sample

Hazardous Waste Determinations

Three options:

- Product Knowledge
- Process Knowledge
- Analytical Testing

262.11

Hazardous Waste Determinations

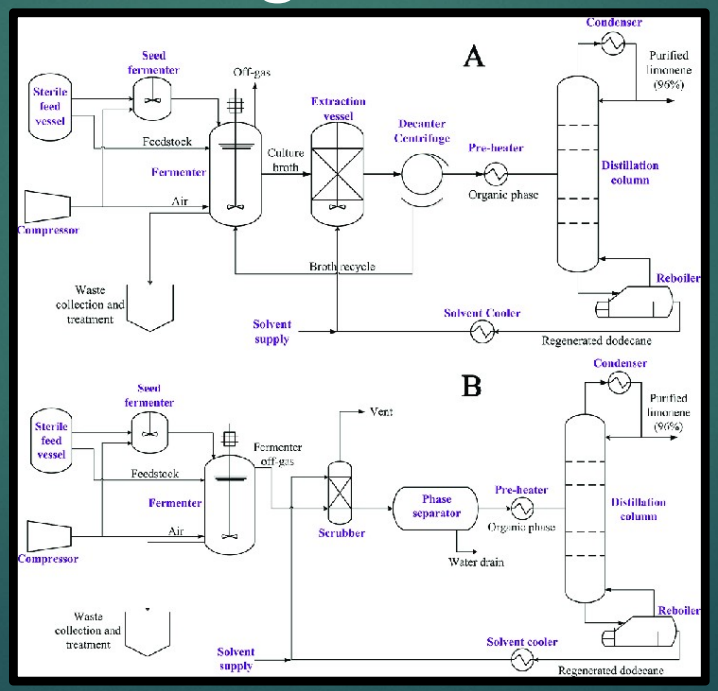
Product Knowledge

- SDS (Safety Data Sheets)
- MSDS (old school name – Material Safety Data Sheets)
- Product contents label

Hazardous Waste Determinations

Process Knowledge

- Process flow diagrams



261 subpart C

Hazardous Waste Determinations

Characteristic

- Ignitable **D001** flash point ≤ 140 ° F
- Corrosive **D002** pH ≤ 2 or ≥ 12.5
- Reactive **D003**
- Toxic **D004 – D043**

Hazardous Waste Determinations

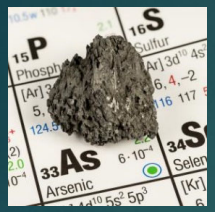
Analytical Testing

- Protocols for laboratory tests
- TCLP (Toxicity Characteristic Leaching Procedure) Test
  - ✓ chemical analysis process
  - ✓ simulates leaching through a landfill

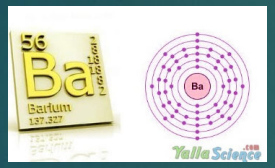
261.24

Hazardous Waste Determinations

Toxic Metals



5.0 ppm
(mg/L)



100.0 ppm
(mg/L)

1.0 ppm
(mg/L)

5.0 ppm
(mg/L)

5.0 ppm
(mg/L)

0.20 ppm
(mg/L)

1.0 ppm
(mg/L)

5.0 ppm
(mg/L)

261.24

Hazardous Waste Determinations

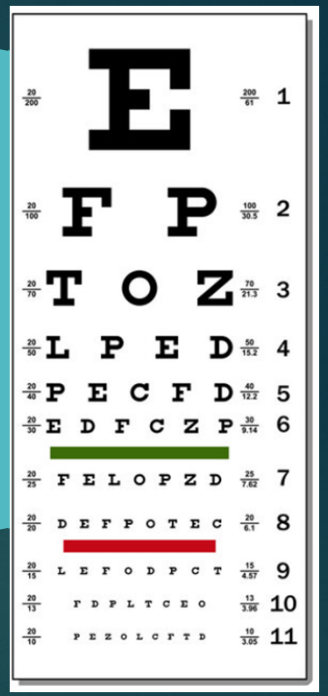
Toxic

Waste Code	Contaminant
D004	Arsenic
D005	Barium
D018	Benzene
D006	Cadmium
D019	Carbon tetrachloride
D020	Chlordane
D021	Chlorobenzene
D022	Chloroform
D007	Chromium
D023	Cresol, o-

Waste Code	Contaminant
D024	Cresol, m-
D025	Cresol, p-
D026	Cresol
D016	2,4-D
D027	Dichlorobenzene, 1,4-
D028	Dichloroethane, 1,2-
D029	Dichloroethylene, 1,1-
D030	Dinitrotoluene, 2,4-
D012	Endrin
D031	Heptachlor (and its epoxide)

Waste Code	Contaminant
D032	Hexachlorobenzene
D033	Hexachlorobutadiene
D034	Hexachloroethane
D008	Lead
D013	Lindane
D009	Mercury
D014	Methoxychlor
D035	Methyl ethyl ketone
D036	Nitrobenzene

Waste Code	Contaminant
D037	Pentrachlorophenol
D038	Pyridine
D010	Selenium
D011	Silver
D039	Tetrachloroethylene
D015	Toxaphene
D040	Trichloroethylene
D041	2,4,5-Trichlorophenol
D042	2,4,6-Trichlorophenol
D017	2,4,5-TP (Silvex)
D043	Vinyl chloride



Hazardous Waste Determinations

Listed

Non-specific and specific sources

- "F" non-specific sources (e.g., solvents)
- "K" specific sources
  - ✓Sources include

Wood treatment	Inorganic pigments	Organic chemicals	Explosives
Petroleum refining	Iron & steel	Primary aluminum	Vet pharmaceuticals
Ink formulation	coking	Secondary steel	

Listed - Chemicals

Discarded commercial & off-specification chemical products

- **Includes**

residues	containers	liners
rinsates	mixtures with other wastes	spill cleanup materials
	contaminated soils	

- **"U"** [standard]
- **"P" ACUTE hazardous**

Waste Stream Examples

- Used Oil and Oil Filters *
- Lead-Acid Batteries *
- Spent Fluorescent Lamps *
- Parts Washer Solvent (FP ≤ 140° F)
- Waste Acid / Base NaOH
- Waste Paint & Paint Related Wastes (Thinners)
- Spent Tires *
- Wash Bay Pit Sludge *
- Cloth rags and paper wipes ("Wipes Rule") *
- Anti-Freeze (<1995 lead) *
- General Trash *
- Cardboard for Recycling *
- Scrap Metals *
- Paint Booth Air Filters
- Spent Gasoline
- Wastewater sludge

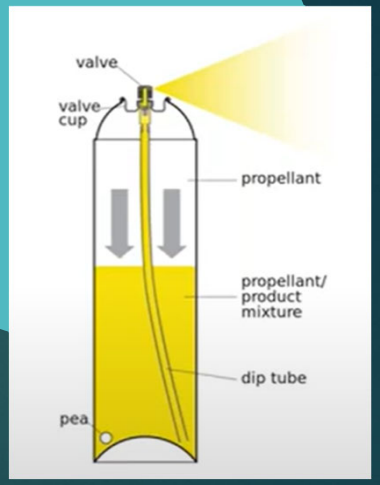
* **Generally, does not count towards monthly HW totals**

261.9 & Part 273

Universal Waste

All classes of GEN may follow the Universal Waste Rules

- Batteries (not lead-acid)
- Pesticides
- Mercury-Containing Equipment
- Lamps
- Aerosol Cans
- *Under consideration – solar panels & lithium ion batteries*



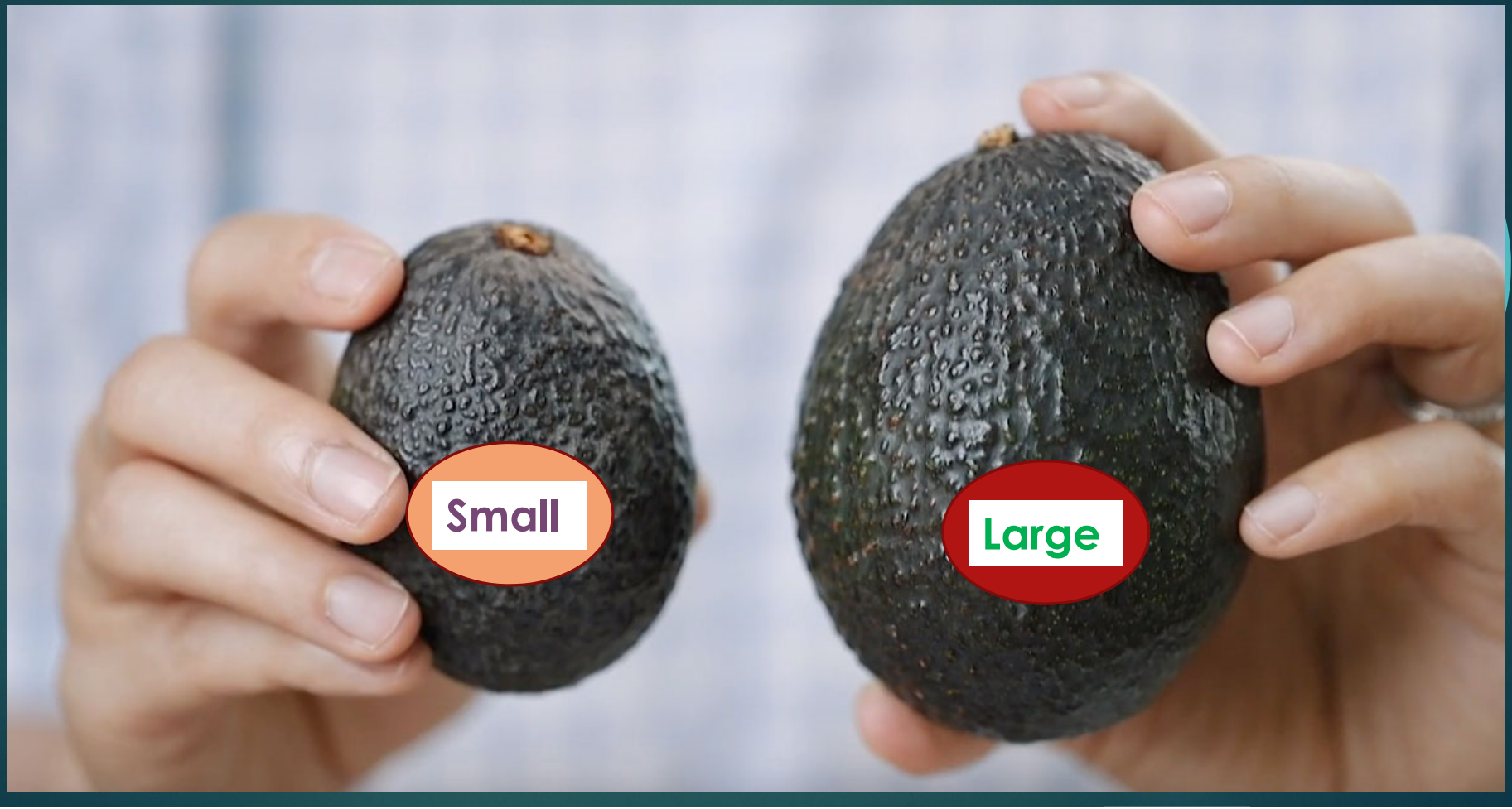
Universal Waste

- Promote collection & recycling
- Common waste streams for many Generators
- Streamlined regulations
- Not included in monthly Generator calculations
- Label “Universal Waste” according to type
- Maximum one year onsite
- Closed box/container

Part 273

Universal Waste

28



Part 273

Universal Waste – Aerosol Cans

- **Training - more stringent for Large Quantity Handlers**
- **Labeling – "Universal Waste – Aerosol Cans"**
- **Puncture and drain – but no releases to harm human health or environment**

Part 273.13(e)

Universal Waste – Aerosol Cans

Puncturing

- No releases to harm human health or environment
- Written procedures maintained onsite to safely puncture & drain
- Employees trained on proper procedures

Part 273.13(e)

Universal Waste – Aerosol Cans

Puncturing

- Can contents drained/transferred immediately to container
- Must do hazardous waste determination when drained
- Must have spill kit
- Spills and leaks must be clean promptly

Part 266.80

Lead-Acid Batteries

- Promote recycling
- Part 266 subpart G
- Need not include in Generator calculation

279 subpart C

Used Oil & Filters

- Label "Used Oil"
- Not included in Generator calculation
- Container regulations, even for VSQG
- Puncture and hot drain oil filters
- IDNR requires oil filters be recycled

261.4(a)(26)

Solvent Contaminated Wipes

in real life

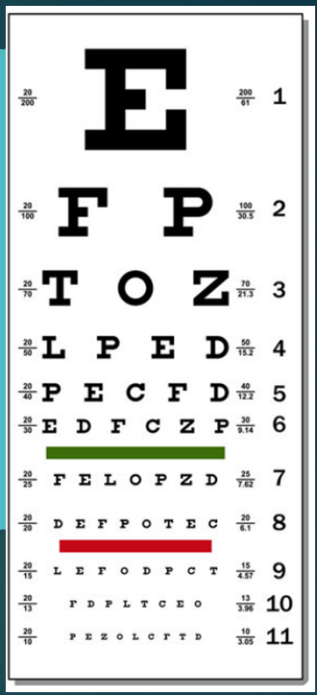
- May solvent–contaminated wipes (F003 or F005) be laundered on-site and the washwater discharged to a POTW?
- If the washwater dischage fails TCLP, what should the facility do?

261.4(a)(26)

Solvent Contaminated Wipes

Solvent-Contaminated Wipes Final Rule

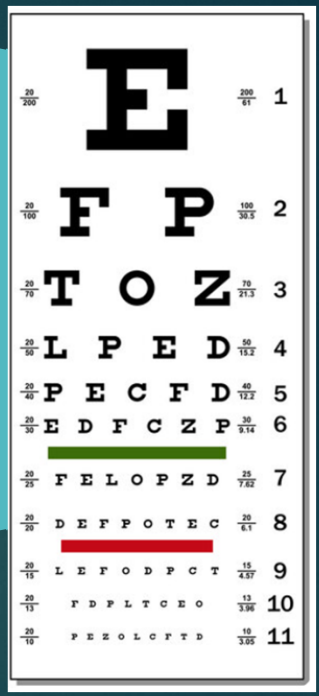
Storage Requirements	Wipes must be accumulated, stored, and transported in non-leaking, closed containers that can contain free liquids, should they occur.	
Labeling	Containers must be labeled "Excluded Solvent-Contaminated Wipes."	
Accumulation Time Limits	Generators may accumulate wipes up to 180 days from the start date of accumulation prior to being sent for cleaning or disposal.	
Recordkeeping	Generators must maintain documentation that includes: ➢ name and address of the laundry, dry cleaner, landfill, or combustor ➢ documentation that the 180-day accumulation time limit is being met ➢ description of the process the generator is using to meet the "no free liquids" condition.	
Condition of Wipes Prior to Transport	Wipes must contain no free liquids prior to being sent for cleaning or disposal and there may not be free liquid in the container holding the wipes. "No free liquids" condition is defined in 40 CFR 260.10 and is based on the EPA Methods Test 9095B (Paint Filter Liquids Test) or other authorized state standard.	
Management of Free Liquids	Free liquids removed from the wipes or from the wipes container must be managed according to applicable hazardous waste regulations in 40 CFR parts 260 through 273.	
Eligible Handling Facilities	Must go to a laundry or dry cleaner whose discharge, if any, is regulated under sections 301 and 402 or section 307 of the Clean Water Act.	Must go to a combustor regulated under section 129 of the Clean Air Act or to a hazardous waste combustor, boiler, or industrial furnace regulated under 40 CFR parts 264, 265, or 266 subpart H. Must go to a municipal solid waste landfill regulated under 40 CFR part 258 (including § 258.40) or to a hazardous waste landfill regulated under 40 CFR parts 264 or 265.
Storage at Handling Facilities	Must store wipes in non-leaking, closed containers that are labeled "Excluded Solvent-Contaminated Wipes." Containers must be able to contain free liquids should they occur.	
Management of Free Liquids by Handling Facilities	Free liquids removed from the wipes or from the container holding the wipes must be managed according to applicable hazardous waste regulations in 40 CFR parts 260 through 273.	



262.11(a)(i)

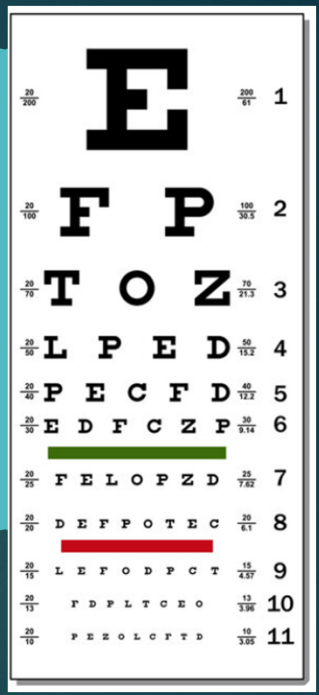
Solvent Contaminated ~~Wipes~~ RAGS

	Solvent-Contaminated Reusable Wipes	Solvent-Contaminated Disposable Wipes
Regulation Citation	40 CFR 261.4(a)(26) (Solid Waste Exclusion)	40 CFR 261.4(b)(18) (Hazardous Waste Exclusion)
Description	Solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes, provided the conditions of the exclusion are met.	Solvent-contaminated wipes that are sent for disposal are not hazardous wastes, provided the conditions of the exclusion are met.
Includes	➢ Wipes containing one or more F001-F005 listed solvents listed in § 261.31 or the corresponding P- or U- listed solvents found in § 261.33, including: - Acetone - Benzene - n-Butanol - Chlorobenzene - Creosols - Cyclohexanone - 1,2-Dichlorobenzene - Ethyl acetate - Ethyl benzene - 2-Ethoxyethanol - Isobutyl alcohol - Methanol - Methyl ethyl ketone - Methyl isobutyl ketone - Methylene chloride - Tetrachloroethylene - Toluene - 1,1,2- Trichloroethane - Trichloroethylene *(*For reusable wipes only.)* - Xylenes ➢ Wipes that exhibit a hazardous characteristic resulting from a solvent listed in part 261. ➢ Wipes that exhibit only the hazardous characteristic of ignitability when containing one or more non-listed solvents.	
Does not include	➢ Wipes that contain listed hazardous waste other than solvents. ➢ Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents.	➢ Wipes that contain listed hazardous waste other than solvents. ➢ Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents. ➢ Wipes that are hazardous waste due to the presence of trichloroethylene.



262.11(a)(i)

Solvent Contaminated ~~Wipes~~ RAGS



Includes

- Wipes containing one or more F001-F005 listed solvents listed in § 261.31 or the corresponding P- or U- listed solvents found in § 261.33, including:

- Acetone	- Isobutyl alcohol
- Benzene	- Methanol
- n-Butanol	- Methyl ethyl ketone
- Chlorobenzene	- Methyl isobutyl ketone
- Creosols	- Methylene chloride
- Cyclohexanone	- Tetrachloroethylene
- 1,2-Dichlorobenzene	- Toluene
- Ethyl acetate	- 1,1,2- Trichloroethane
- Ethyl benzene	- Trichloroethylene *(*For reusable wipes only.)*
- 2-Ethoxyethanol	- Xylenes

- Wipes that exhibit a hazardous characteristic resulting from a solvent listed in part 261.
- Wipes that exhibit only the hazardous characteristic of ignitability when containing one or more non-listed solvents.

262.11(a)(i)

Solvent Contaminated ~~Wipes~~ RAGS

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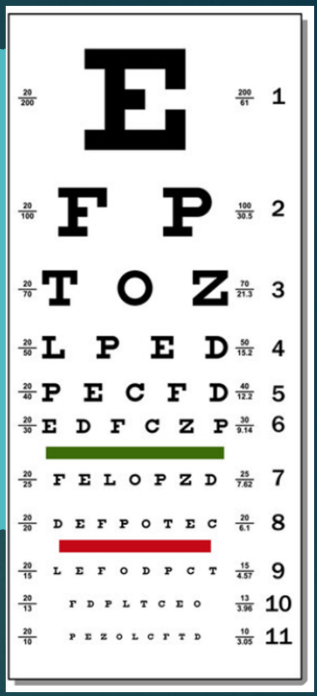
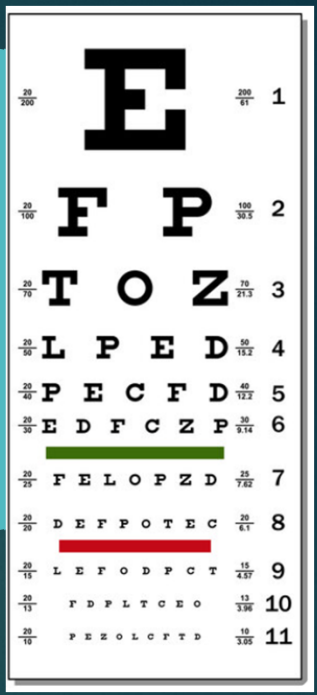


262.11(a)(i)

Solvent Contaminated ~~Wipes~~ RAGS

Does not include	➢ Wipes that contain listed hazardous waste other than solvents. ➢ Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents.	➢ Wipes that contain listed hazardous waste other than solvents. ➢ Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents. ➢ Wipes that are hazardous waste due to the presence of trichloroethylene.



261.4(a)(26)

Solvent Contaminated Wipes

in real life

- May solvent–contaminated wipes (F003 or F005) be laundered on-site and the washwater discharged to a POTW?

YES! These rags only had F003 and F005 solvent.

Facility needs to make sure there was one-time notice to the POTW (who then allows the discharge), complying with 40 CFR 403.12(p).

261.4(a)(26)

Solvent Contaminated Wipes

in real life

- If the washwater dischage fails TCLP, what should the facility do?

Make sure the POTW is given due notice of the presence of hazardous waste and the POTW authorize such discharge.

261.33(e)

ACUTE Hazardous Waste

Generator Regulations - Class

Generator Class	Amount Hazardous Waste Generated in any Single Month
VERY SMALL Quantity Generator - **VSQG**	
SMALL Quantity Generator - **SQG**	
LARGE Quantity Generator - **LQG**	

262 subpart A

Generator Regulations - Accumulation

Generator Class	On-site Technical Requirements	Accumulation Time Limits
VSQG		
SQG		
LQG		

262 subpart A

Generator Regulations – Responsiveness

Generator Class	Personnel Training	Contingency Plan & Emergency Procedures	Preparedness & Prevention
VSQG			
SQG			
LQG			

262 subpart A

Generator Regulations – Administration

Generator Class	Manifest	Biennial Report	Recordkeeping – waste testing, manifests, biennial reports, & exception reports
VSQG			
SQG			
LQG			

Generator Regulations – SQG or VSQG

Episodic Generation Opportunities

- Maintain VSQG/SQG status
- Does NOT count on Generator Status/Class
- 60 days from generation to manifest off-site
- Mandatory notice to EPA must be met!

262 subpart L

Generator Regulations – SQG or VSQG

Episodic Generation

- Must have EPA ID Number (even if VSQG)
- Must be manifested (even if VSQG)
- Mark "Episodic Hazardous Waste" & Hazard Nature
- Must name emergency coordinator

Generator Regulations – SQG or VSQG

Episodic Generation Opportunities

- No more than two events in a calendar year
- Two event types
- 1st event automatic
- 2nd event must be petitioned

Planned

Unplanned

Generator Regulations – SQG or VSQG

Planned Episodic Generation

- Plan and prepare - e.g., tank clean outs or inventory removal
- At least 30 days notice to EPA using Notification of RCRA Subtitle C Activities

(Site Identification Form/EPA Form 8700-12)

262 subpart L

Generator Regulations – SQG or VSQG

Unplanned Episodic Generation

- "Act of nature" - e.g., flood or process upset
- Within 72 hours of event notice to EPA using Notification of RCRA Subtitle C Activities

  (Site Identification Form/EPA Form 8700-12)

Generator Regulations – VSQG only

Consolidation Opportunities

- Corporate relationship to LQG
- Containers marked "Hazardous Waste" and markings to indicate nature of hazard(s)
- LQG provides notification it receives to consolidate using Notification of RCRA Subtitle C Activities

  (Site Identification Form/EPA Form 8700-12)
- Send hazardous waste to the LQG

RCRA Inspector Process In the office/off-site

- Data Review
- File Review
- Remote Visual Review

RCRA Inspector Process
In the office/off-site

Data Review

- Site Verification Report
- e-Manifest Report (last 3 years)
  - ✓ Review waste streams
  - ✓ Estimated Amounts per month
  - ✓ Outlier months (perhaps episodic events)

RCRA Inspector Process
In the office/off-site

File Review

- Previous Inspections
- Previous Findings
- Response to Findings

RCRA Inspector Process
In the office/off-site

Remote Visual Review

- Aerial Views
- Ground Views

RCRA Inspector Process On-site

Collect information and data necessary to determine compliance with the applicable regulatory and statutory requirements

- **Discussion**
- **Visual Inspection**
- **Record Review**

RCRA Inspector Process On-site

Discussion

- Legal requirements
- Logistics
- Facility operations
- Waste generation
- Waste management

RCRA Inspector Process On-site

Visual Inspection

- Active waste generation and management areas
- Satellite Accumulation Area(s) (SAA)
- Central Accumulation Area (CAA)
- Areas where waste mismanaged/spilled/disposed
  - ✓ Bone Yard
  - ✓ Trash Cans
  - ✓ Inventory
  - ✓ Dumpsters

RCRA Inspector Process On-site

Record Review

- Manifests
- Invoices
- Training
- Prevention & Planning
  - ✓ Inspections
  - ✓ Contingency Plan
  - ✓ Quick Reference Guide
  - ✓ Position Descriptions

Most Common RCRA Violations (Preliminary Finding)

- Hazardous Waste Determinations
- Container Labeling
- Training
- Contingency Plans
- Open Containers
- Solvent contaminated wipes

Most Common RCRA Violations (Preliminary Finding)

- Satellite Accumulation (SAA) Requirements
- Weekly Container Inspections (CAA)
- Universal Waste Requirements
- Used Oil
- Recordkeeping
- Episodic Event Notification - no or late notice

262.18(d)

What is Small Quantity Generator Re-Notification?

- SQGs are required to re-notify every four years
- Update your notification – complete & submit Notification of RCRA Subtitle C Activities
  (Site Identification Form/EPA Form 8700-12)
- Re-notification is NOT the same as Iowa's annual fee/registration
- The next re-notification deadline is September 1, 2025

279.64

Auto Service Center
250-gal Used Oil
VSQG

279.64

Auto Service Ctr
55-Gal Used Oil Drum
VSQG

279.23 &
279 subpart G

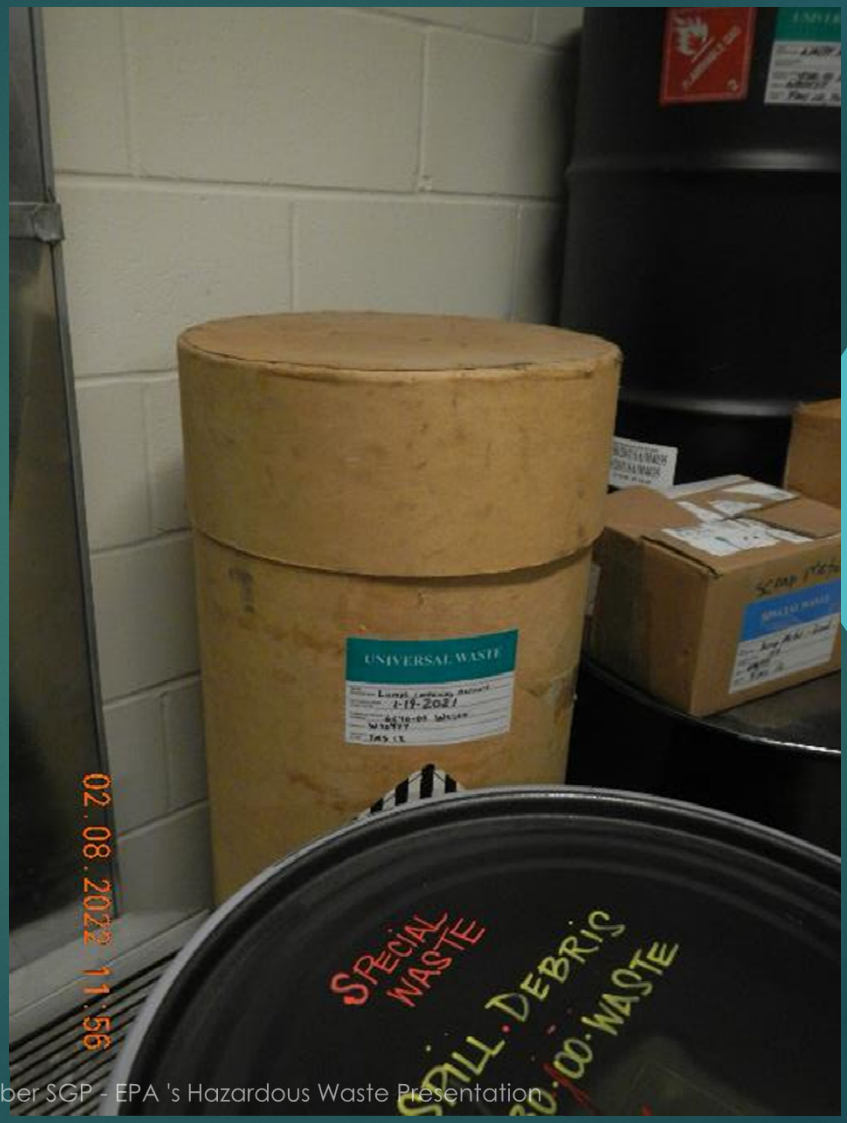
Auto Service Ctr
250,000 BTU Used-Oil Burner
VSQG
Max 0.5M BTU

Small [273 subpart B]

Large [273 subpart C]

Small [273 subpart B]

Large [273 subpart C]



US Army NG
UW-Lamps
SQG

Small [273 subpart B]

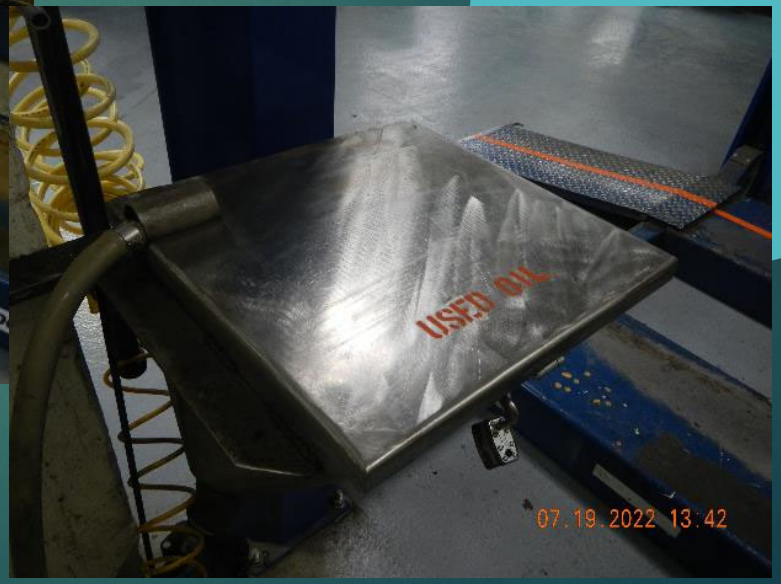
Large [273 subpart C]

Poultry Processor
LQH/VSQG

262.15

Lab
TCE
Open Container
LQG

279.64



Pet Food
Used Oil
SQG

VSQG
262.14

Al Anodizer
NaOH
Poly Drum
VSQG

279.22

Al Anodizer
Used Oil
VSQG

Small 273 subpart B

Large 273 subpart C

Body Shop
UW-Lamps
VSQG

262.15

Tire Mfg
Heptane SAA
LQG

261.4(b)(18)


Paint and Solvent Rags
EMCO#03-037-19WTE
EXCLUDED SOLVENT-CONTAMINATED WIPES NON RCRA MATERIAL
DO NOT OVERFILL
S
08.08.2023 12:06


Our Disaster Recovery Plan Goes Something Like This...
HELP!
HELP!
DILBERT™
By Scott Adams

Ed's Dirty Picture Show

262.11(a)

262.17(a)(1)(iv) & 17(a)(5)(i)

262.17(a)(1)(iv) & 17(a)(5)(i)

262.17(a)(1)(ii)

262.17(a)(1)(vii)


Caustic Flakes
F007
NH_4OH
Nickel Chloride
F006
Sodium Cyanide
Nickel Strip
Nitric Acid
Muriatic Acid

Small [273 subpart B]

Large [273 subpart C]

279.22(c)

262.251

Section 3005

Section 3005

Section 3005

Section 3005

Section 3005

Section 3005

After the inspection

After the inspection

What Happens To The Report

- Determine facility compliance status
- Review any additional information from facility
- Request additional information as necessary
- Make compliance determination

After the inspection

Compliance choices

- No violations
  - ✓ Send case closure letter (No Further Action)
- Violations are minor and resolved
  - ✓ Send case closure letter (Notice of Noncompliance)
- Violations are significant or unresolved
  - ✓ Formal enforcement action

After the inspection

Enforcement Responses

- Expedited Settlement Agreement (ESA)
  - ✓ Non-negotiable terms of settlement "take-it-or-leave-it"
  - ✓ Used when lesser violations and lower penalties

- Pre-filing Letter
  - ✓ Notice EPA plans to file administrative complaint
  - ✓ Invite to discuss violations and penalty
  - ✓ Typically 60 days to negotiate
  - ✓ Goal is Consent Agreement/Final Order (CAFO)

After the inspection

Enforcement Responses

- Unilateral or Negotiated Administrative Order
  - ✓ Eminent and substantial endangerment
- Referral to Department of Justice
  - ✓ Large enforcement case
  - ✓ Multi-media violations
  - ✓ National significance
  - ✓ Goal is Consent Decree (CD)

Resources

, , : RCRA ID#

PROJECT	RCRA COMPLIANCE EVALUATION INSPECTION CHECKLIST
FACILITY	
ADDRESS	
CITY	
STATE	
RCRA ID#	
LEAD INSPECTOR	

CHECKLIST ROADMAP

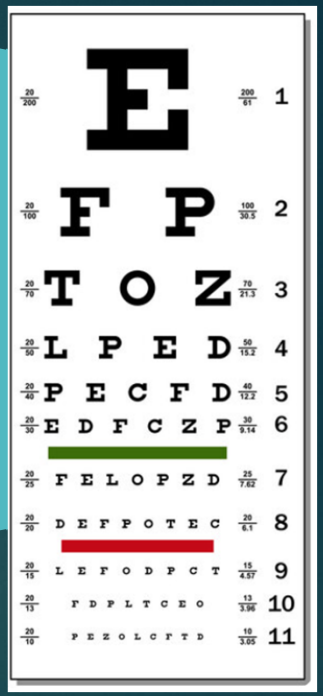
CHECKLIST	APPLICABILITY	INCLUDED?
APPENDIX 1-1. DRIVE-BY	All	
APPENDIX 1-2. SITE ENTRY AND INBRIEFING	All	
APPENDIX 1-3. FACILITY BACKGROUND	All	
APPENDIX 1-4. GENERATOR WASTE STREAMS	All	
APPENDIX 1-5. OFF-SITE WASTE STREAMS	TSDFs	
APPENDIX 1-6. RECORDS REVIEW		
A. VERY SMALL QUANTITY GENERATOR (VSQG) REQUIREMENTS	VSQG	
B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS	SQG	
C. LARGE QUANTITY GENERATOR (LQG) REQUIREMENTS	LQG	
D. TREATMENT, STORAGE, AND DISPOSAL FACILITY (TSDF) REQUIREMENTS	TSDF	
APPENDIX 1-7. VISUAL REVIEW		
A. SATELLITE ACCUMULATION AREA(S)	SQG, LQG, TSDF (SAA)	
B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS		
1. Required Response Equipment and Hazard Management	SQG (all)	
2. Container Accumulation Area	SQG (Containers)	
3. Tank Accumulation Area(s)	SQG (Tanks)	
C. LARGE QUANTITY GENERATOR (LQG) REQUIREMENTS		
1. Required Response Equipment	LQG (all)	
2. Container Accumulation Area	LQG (Containers)	
3. Tank Accumulation Area(s)	LQG (Tanks)	
D. TREATMENT, STORAGE, AND DISPOSAL FACILITY (TSDF) REQUIREMENTS		
1. Required Response Equipment	TSDF (all)	
2. Container Accumulation Area	TSDF (Containers)	
3. Tank Accumulation Area(s)	TSDF (Tanks)	
E. USED OIL		
1. Prohibitions	Used Oil (all)	
2. Standards for Used Oil Generators and Used Oil Collection/Aggregation Points	Used Oil Generators, Used Oil Collection/Aggregation	
3. Standards for Used Oil Collection/Aggregation Points	Used Oil Collection/Aggregation	
F. UNIVERSAL WASTE (UW)		
1. General	SQH	
2. Universal Waste Lamps	SQH (lamps)	
3. Universal Waste Batteries	SQH (batteries)	
4. Universal Waste Mercury-Containing Equipment (MCE)	SQH (MCE)	
5. Universal Waste Pesticides	SQH (pesticides)	
APPENDIX 1-8. EXIT BRIEFING	All	

, , : RCRA ID#

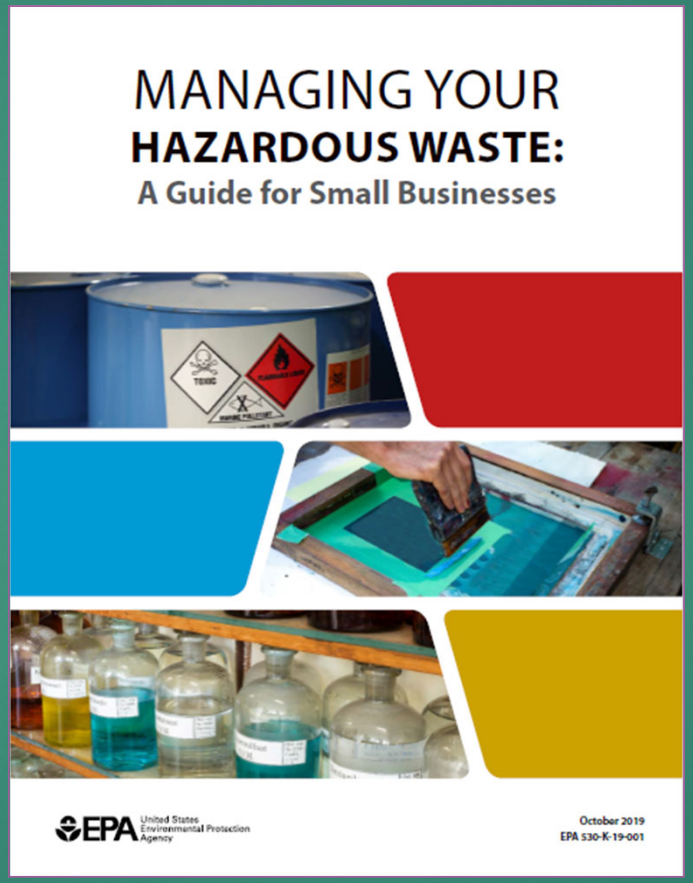
PROJECT	RCRA COMPLIANCE EVALUATION INSPECTION CHECKLIST
FACILITY	
ADDRESS	
CITY	
STATE	
RCRA ID#	
LEAD INSPECTOR	

CHECKLIST ROADMAP

CHECKLIST	INCLUDED?
APPENDIX 2-1. LAND DISPOSAL RESTRICTIONS	
APPENDIX 2-2. EPISODIC GENERATION	
A. VERY SMALL QUANTITY GENERATOR (VSQG) REQUIREMENTS	
B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS	
APPENDIX 2-3. RCRA AIR EMISSIONS	
A. PROCESS VENTS (SUBPART AA)	
B. EQUIPMENT LEAKS (SUBPART BB)	
C. TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS (SUBPART CC)	
APPENDIX 2-4. WASTES RECEIVED FROM VERY SMALL QUANTITY GENERATORS	
APPENDIX 2-5. USED OIL	
A. TRANSPORTERS AND TRANSFER CENTERS (SUBPART E)	
B. PROCESSORS AND RE-REFINERS (SUBPART F)	
C. BURNERS WHO BURN OFF-SPECIFICATION USED OIL FOR ENERGY RECOVERY (SUBPART G)	
D. USED OIL FUEL MARKETERS (SUBPART H)	
APPENDIX 2-6. UNIVERSAL WASTE	
A. LARGE QUANTITY HANDLER	
B. TRANSPORTERS (SUBPART D)	
C. DESTINATION FACILITIES (SUBPART E)	
D. IMPORT (SUBPART F)	

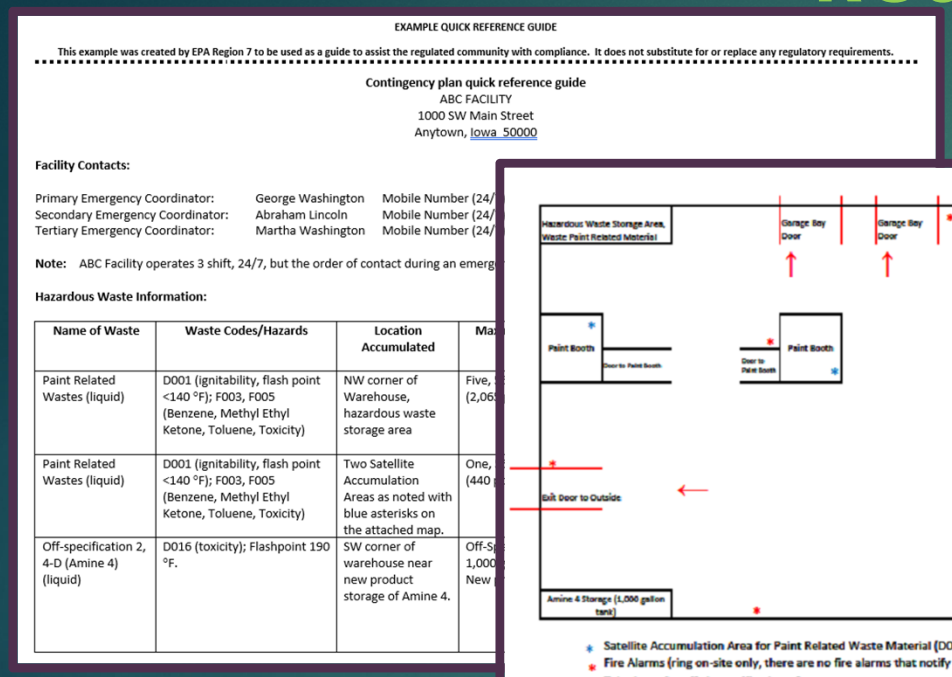


Resources


MANAGING YOUR
HAZARDOUS WASTE:
A Guide for Small Businesses
EPA United States Environmental Protection Agency
October 2019
EPA 530-K-19-001

262.11(a)(i)

Resources



EXAMPLE QUICK REFERENCE GUIDE

This example was created by EPA Region 7 to be used as a guide to assist the regulated community with compliance. It does not substitute for or replace any regulatory requirements.

Contingency plan quick reference guide
ABC FACILITY
1000 SW Main Street
Anytown, Iowa 50000

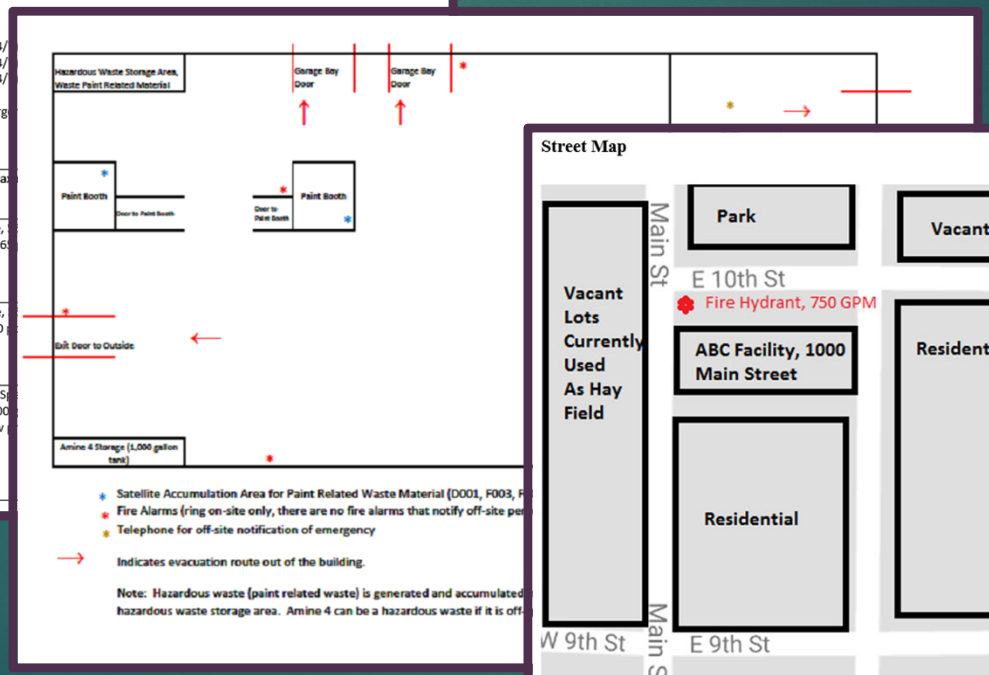
Facility Contacts:

Primary Emergency Coordinator:	George Washington	Mobile Number (24/
Secondary Emergency Coordinator:	Abraham Lincoln	Mobile Number (24/
Tertiary Emergency Coordinator:	Martha Washington	Mobile Number (24/

Note: ABC Facility operates 3 shift, 24/7, but the order of contact during an emerg

Hazardous Waste Information:

Name of Waste	Waste Codes/Hazards	Location Accumulated	Ma
Paint Related Wastes (liquid)	D001 (ignitability, flash point <140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity)	NW corner of Warehouse, hazardous waste storage area	Five, (2,06
Paint Related Wastes (liquid)	D001 (ignitability, flash point <140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity)	Two Satellite Accumulation Areas as noted with blue asterisks on the attached map.	One, (440
Off-specification 2, 4-D (Amine 4) (liquid)	D016 (toxicity); Flashpoint 190 °F.	SW corner of warehouse near new product storage of Amine 4.	Off-S 1,000 New



Quick Reference Guide

262.11(a)(i)

Resources

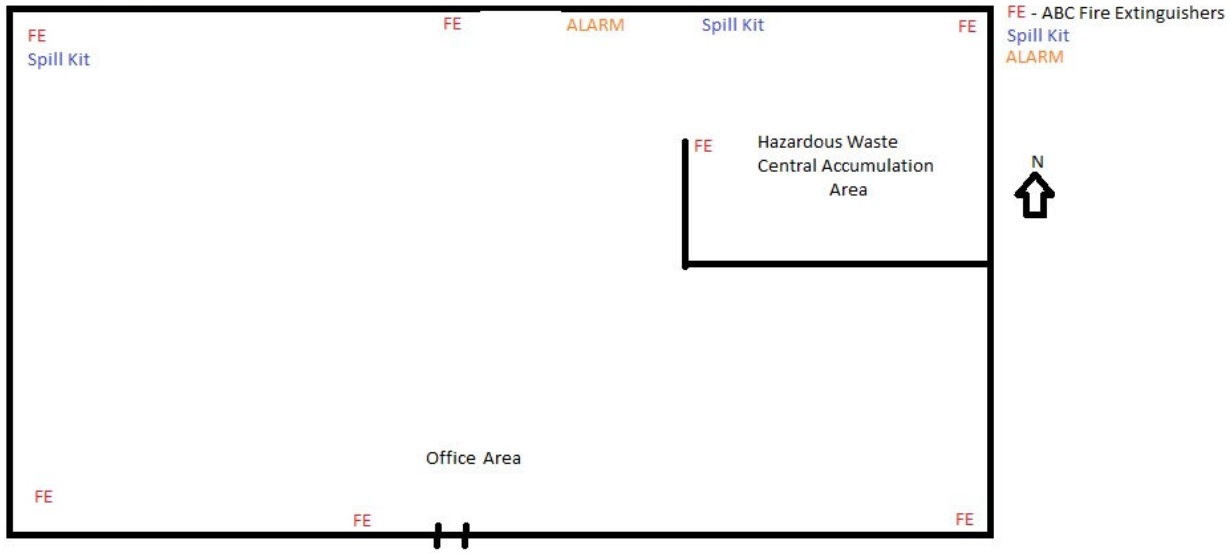
Small Quantity Generator Emergency Layout

Emergency Information

Emergency Coordinators:

Primary – Joe Black (515) 123-4567 Cell

Alternate – Don Shew (515) 765-4321 Cell



Fire Department Phone Number: 911

Resources

RCRA IN FOCUS

https://www.epa.gov/hwgenerators/resource-conservation-and-recovery-act-rcra-focus-hazardous-waste-generator-guidance

RCRA INFOCUS

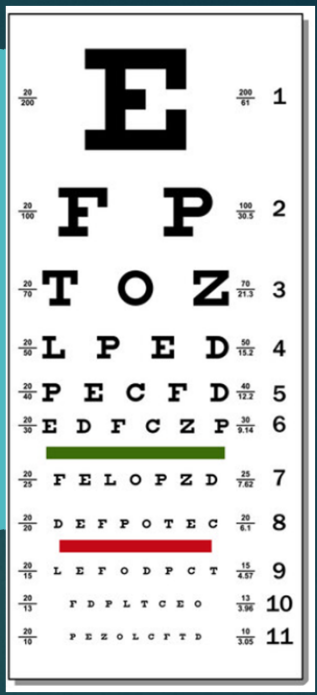
Resources

- Construction, Demolition, and Renovation (pdf) (1.13 MB, 530-K-04-005)
- Dry Cleaning Industry (pdf) (543.92 KB, 530-K-99-005)
- Dry Cleaning (Korean) (pdf) (4.39 MB, 530-K-99005K)
- Furniture Manufacturing and Refinishing (pdf) (308.56 KB, 530-K-03-005)
- Leather Manufacturing (pdf) (346.61 KB, 530-K-00-002)
- Motor Freight & Railroad Transportation (pdf) (344.97 KB, 530-K-00-003)
- Típico del Transporte de Carga por Carretera y Ferrocarril (pdf) (896.35 KB, 530-K-00-003S)
- Photo Processing (pdf) (675.52 KB, 530-K-99-002)
- Printing (pdf) (238.6 KB, 530-K-97-007)
- Imprenta (pdf) (497.43 KB, 530-K-97-007S)
- Textile Manufacturing (pdf) (329.26 KB, 530-K-02-028)
- Vehicle Maintenance (pdf) (370.75 KB, 530-K-99-004)
- Mantenimiento de Vehículos (pdf) (333.71 KB, 530-K-99-004S)

Resources

RCRA INFOCUS

PROCESS	**Radiator Repair**
Wastes Generated	Zinc chloride (coolant), chlorinated solvents, and lead solder.
Possible RCRA Waste Codes	D001, D002, D008, and F002.
Potential Recycling, Treatment, and Disposal Methods	▪ Collect and reclaim solvents. Store them separately, do not contaminate. ▪ Ship hazardous waste using a registered transporter to a hazardous waste TSDF for treatment and disposal.
Potential Pollution Prevention Methods	▪ Adjust process to reduce solvent use (e.g., use compressed air to blow out residual alkaline solution after removing from boil-out tank, then collect and return to tank). ▪ Employ lead-free or reduced lead solder. ▪ Use a recyclable type of radiator fluid and collect flushing liquid for reuse.
PROCESS	**Tire Replacement**
Wastes Generated	Scrap tires.
Possible RCRA Waste Codes	None.
Potential Recycling, Treatment, and Disposal Methods	▪ Ship scrap tires using a registered hauler to a scrap tire processor, such as a licensed energy recovery facility, or a reuse, retreading or recycling facility. ▪ Ship scrap tires using an appropriate hauler to a permitted, nonhazardous waste landfill. Be sure the landfill accepts tires.
PROCESS	**Shop Cleanup**
Wastes Generated	Used oil and drain or sump sludges contaminated with metals, petroleum, solvents, and spent rags and wipes.
Possible RCRA Waste Codes	D001, D002, D008, and F002.
Potential Recycling, Treatment, and Disposal Methods	▪ Properly store wastes in hazardous waste accumulation tanks or containers. ▪ Ship hazardous waste using a registered transporter to a hazardous waste TSDF for treatment and disposal.
Potential Pollution Prevention Methods	▪ Use good housekeeping practices to prevent contaminants from reaching the floor (drip pans, worker training and incentives, proper containers for wastes). ▪ Use less hazardous cleaners (biodegradable when possible). ▪ Do not use solvents for cleaning floors. ▪ Avoid disposing of partially used rags or absorbents. Use them to their limit.



Ed Buckner, P.E.

Buckner.Edwin@epa.gov

913.551.7621

Delbert Kelley

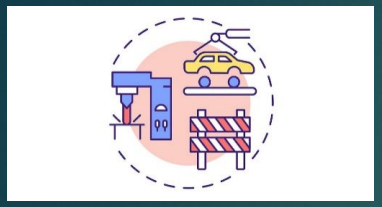
Kelley.Delbert@epa.gov

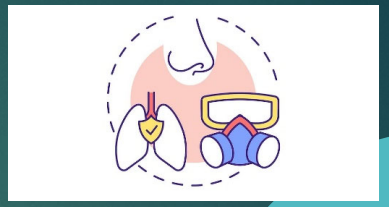
913.551.7371

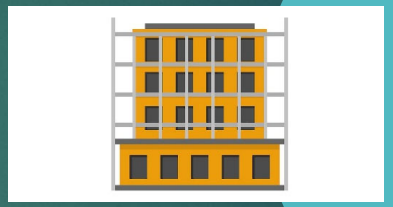
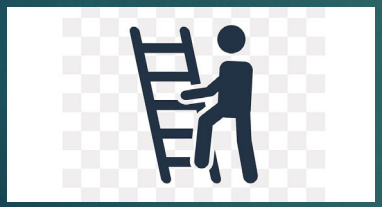
QUESTIONS?


THANK YOU

OSHA Top 10 of 2023



Who might be affected?

- Own, operate, service, repair, recycle, dispose or install equipment containing HFCs

When is it effective?

- This is a PROPOSED rule. It is NOT final.

What can I do now?

- You can view the overview at EPA's webpage.
- You can read the proposed rule ,
- You can make comments (the proposed rule tells how) until 18 December 2023.

- What does the rule propose?
  - ✓ Regulations for servicing, repair, disposal, or installation of equipment that involves HFCs.
  - ✓ Establish an Emissions Reduction and Reclamation Program for the management of certain HFCs and their substitutes (for both new and existing equipment