

State of Connecticut

Department of Environmental Protection

RCRA COMPLIANCE REMINDER

A FACT SHEET AND COMPLIANCE GUIDE FOR LARGE QUANTITY GENERATORS OF HAZARDOUS WASTE

This sheet has been prepared as a compliance aide for large quantity generators of hazardous waste (“LQGs”). It contains numerous helpful reminders designed to help LQGs keep their hazardous waste management systems at the highest level of compliance -- and ready for an inspection by DEP. Please note that this sheet is provided only as a compliance aid, and should not be considered comprehensive guidance or a substitute for the regulations. Please also note that this sheet assumes that your compliance documents and systems were previously at near or full compliance, and may only be in need of updates or fine-tuning.

Hazardous Waste Determinations

- Are determinations for all the solid wastes generated at your facility complete and on file? Some frequently overlooked wastes include: speedi-dri and other absorbents, rags, filters, blasting, buffing, or baghouse dusts, floor sweepings, spray painting wastes (spray booth filters, maskants, overspray, etc.), waste oils, tumbling wastes, water soluble coolants, antifreeze, and fluorescent penetrants.
- Have your determinations been updated annually?
- If you use generator knowledge for any of your determinations, have you documented that information?
- Do these determinations account for all possible waste codes, including any contaminants that might come from any of the raw materials used, or which might be carried over from other processes?
- Are there any new waste streams which are lacking determinations?
- Are there any old, obsolete, or past shelf-life virgin materials that should be inventoried and cleaned out--or any old process tanks or equipment with materials still in them?
- Do you regularly check your trash barrels and dumpsters to be sure no inappropriate wastes are being thrown in them?

Use of Manifest

- Are manifests used for all shipments of hazardous waste, and are they properly filled out?
- Are copies of all manifests sent to DEP and retained at the facility for at least three years?

Container Management

- Are containers of hazardous waste stored only in satellite or 90-day storage areas?
- Are there any new storage areas being used? If so are these new areas in compliance with the applicable satellite or 90-day area requirements?
- Are all containers in satellite areas *and* in 90-day areas properly marked?
- In addition to being properly marked, are all containers in 90-day areas also properly dated?
- Is there adequate aisle space in each 90-day area to view every container in storage?
- Do all 90-day areas storing liquid wastes have an impervious base and berm?
- Are “No Smoking” signs posted in all 90-day areas where ignitable wastes are stored?
- Are all your satellite areas in compliance (i.e., are all containers properly marked and kept

closed and in good condition; is there less than 55 gallons per satellite area; and is any waste in excess of 55 gallons transferred to a 90-day area within 3 days)?

Tank Management

- Are hazardous waste tanks inspected daily, and are all inspections logged and retained?
- Have all tanks had the proper P.E. certification?
- Are all tanks supplied with an impervious base and secondary containment?

Contingency Plan

- Does your Plan contain procedures for spills and fires or explosions, an evacuation plan with primary and alternate escape routes, and a list of emergency equipment (with locations and descriptions of capabilities), and are all of these up-to-date?
- Is the list of emergency coordinators correct and up-to-date?
- Have there been any changes in operations, plant layout, materials used, or waste management practices since you last revised your Contingency Plan?
- Have you attempted to make emergency arrangements with local fire and police departments and local hospitals, and have you sent them copies of the Contingency Plan (including any revisions)?

Inspection Schedule and Log

- Are all container and tank storage areas and all safety and emergency equipment regularly inspected, and are these inspections properly recorded?
- Are inspections conducted at least *weekly* for containers, at least *daily* for tanks, and at least monthly for safety and emergency equipment?
- Are all inspection deficiencies followed up with remedial actions, and is all of this fully recorded in the inspection log?

Personnel Training

- Have all employees whose jobs involve hazardous waste been given initial hazardous waste training and the required annual updates? Is this clearly documented?
- Does your training cover everything it should (e.g., waste handling, storage requirements, record-keeping, inspections, and implementation of Contingency Plan)?

General/Other

- Used Oil: Have you tested for total halogens, marked containers and tanks “used oil,” and stored used oil in areas with an impervious base and secondary containment?
- Universal Waste: Are all universal wastes properly marked, stored, and disposed of/recycled?
- Are you complying with the appropriate rules for any hazardous wastes that you recycle?
- Have you filed your latest hazardous waste generator biennial report?
- Have you stopped using a container or tank storage area? If so, did you comply with generator closure requirements (DEP has prepared a guidance document on this issue – see below for contact information to obtain a copy).
- Do you have a waste minimization program, and is it documented?
- Have your waste generation rates changed? If so, and if you now generate less than LQG quantities of hazardous waste, you should apply for a status change. Call DEP at the telephone number below for further assistance in this matter.
- Are your files neat, organized, and complete, and are they stored in a location where a DEP inspector would be able to view them, even if you were out for the day?