



Connecticut Department of
Energy & Environmental Protection
Bureau of Materials Management and Compliance Assurance
Waste Engineering and Enforcement Division

Hazardous Waste Management (RCRA*) Compliance Plan

General Business Information

Facility name:

Facility address:

US EPA Identification Number:

Type of activities performed:

Plan date/Date of last revision:

Purpose of this Plan

The purpose of this Plan is to outline the requirements for managing hazardous waste at this facility. This plan should also be used to supplement employee training and should be provided to all employees who have waste management responsibilities, as well as being readily available on the facility floor. This plan is not a complete compilation of regulatory guidance, nor is it a substitute for state or federal regulations. This plan is a facility-specific guide to hazardous waste management procedures that are compliant with Connecticut's Hazardous Waste Management Regulations. [Connecticut's Hazardous Waste Management Regulations](#) are codified in Sections 22a-449 (c)-100 through 119 and 22a-449(c)-11 of the Regulations of Connecticut State Agencies (RCSA). The Connecticut Hazardous Waste Management Regulations incorporate by reference the federal hazardous waste management regulations found in Title 40, Parts 260 through 279 of the Code of Federal Regulations (CFR) with certain changes.

- ▶ **This plan is maintained by the following personnel:**

- ▶ **Frequency at which this plan will be reviewed and updated:**

- ▶ **The following personnel have hazardous waste management responsibilities and are familiar with this Plan:**

* "RCRA" is the federal Resource Conservation and Recovery Act, the federal law that sets standards to ensure that hazardous wastes are stored, handled, recycled and disposed of safely.

Identify Hazardous Waste Generator Category

It is important to correctly determine your facility's hazardous waste generator category because different sets of regulatory requirements apply to each of the generator categories, with Large Quantity Generators of hazardous waste having the most requirements, and Conditionally Exempt Small Quantity Generators the fewest. To determine this facility's generator category, use your hazardous waste determinations to complete the [Hazardous Waste Generator Category Worksheet](#).

For information regarding each generator category, review the [Determining Hazardous Waste Generator Category](#) fact sheet.

- ▶ **This facility's hazardous waste generator category is:**
 - Conditionally-Exempt Small Quantity Generator
 - Small Quantity Generator
 - Large Quantity Generator

- ▶ **The maximum amount of waste generated per calendar month as allowed by this category is:**
 - No more than 100 kg AND no more than 1 kg acute wastes.
 - Between 100 and 1,000 kg AND no more than 1 kg acute wastes.
 - 1,000 kg or more OR more than 1 kg acute wastes.

- ▶ **The maximum amount of waste stored on-site at any one time as allowed by this category is:**
 - No more than 1,000 kg AND no more than 1 kg acute wastes.
 - More than 1,000 kg OR more than 1 kg acute wastes.

- ▶ **Waste must be sent off-site for proper disposal within the following number days from the date of generation:**
 - (LQG Required) 90
 - (SQG Required) 180
 - (CESQG) Not applicable – no time limit applies

If this facility exceeds its allowable generation rate in a calendar month due to a unique occurrence or an unforeseeable/infrequent event, it must comply with the more stringent regulations associated with the higher generator category during the occurrence/event. If the exceedence becomes routine or is the result of a recurring event, the facility must re-evaluate its generator category and notify the Department of Energy and Environmental Protection (DEEP) of its new category by completing and submitting [EPA Form 8700-12](#) to:

*Connecticut Department of Energy and Environmental Protection
Bureau of Materials Management and Compliance Assurance
Waste Engineering and Enforcement Division
79 Elm Street, 4th Floor
Hartford, CT 06106-5127*

Waste Minimization

Waste minimization is the most effective strategy for reducing the amount of hazardous waste a facility generates. A few ways to accomplish this include purchasing raw materials in the smallest practical size and quantity, avoiding overstocking material, and replacing toxic materials with non-toxic materials.

This facility minimizes its waste by:

- ▶ **Substituting raw materials for less hazardous alternatives:** Yes No
If yes, provide a detailed description:

- ▶ **Reducing water usage:** Yes No
If yes, provide a detailed description:

- ▶ **Implementing energy efficiency initiatives:** Yes No
If yes, provide a detailed description:

- ▶ **Using closed loop processes:** Yes No
If yes, provide a detailed description:

- ▶ **Other:** Yes No
If yes, provide a detailed description:

Hazardous waste handling, storage and disposal

All generators of hazardous waste must ensure their wastes are properly managed from the point of waste generation through waste treatment or final disposal in order to minimize or eliminate potential releases of hazardous waste to the environment.

- ▶ **Describe the methods used to ensure storage limits for this facility's generator category are not exceeded:**

- ▶ **Are inspections performed?** Yes No

- ▶ **Indicate the frequency of inspections and the items/areas to be inspected (include a copy of the inspection schedule and log):**

(Review DEEP's [Sample Inspection Log for Hazardous Waste Containers](#) and [List of Equipment, Structures and Areas to be considered for Inclusion in an Inspection Schedule.](#))

- ▶ **Who will be responsible for performing the inspections?**

Who will act as alternate(s)?

- ▶ **Locate the hazardous waste storage areas:**

Describe how waste(s) stored in these areas are managed including how the potential for an uncontrolled release of hazardous waste is minimized and how reactive, ignitable, and incompatible wastes are safely stored:

- ▶ **Locate the satellite waste storage areas:**

Describe how satellite containers are managed (include procedures for labelling, dating, and moving satellite containers into the hazardous waste storage area):

- ▶ **Is hazardous waste accumulated in tanks? Yes No If yes, describe how the tanks and their piping and secondary containment systems are managed including how the potential for an uncontrolled release of hazardous waste is minimized and how reactive, ignitable, and incompatible wastes are safely stored:**

- ▶ **Is hazardous waste treated on-site? Yes No If yes, describe the treatment process. Include a standard operating procedure for operating and servicing the treatment system.**

- ▶ **Describe how this facility safely and properly disposes of its hazardous waste:**

- ▶ **Identify who schedules/arranges for waste disposal:**

Identify who is responsible for preparing/signing the manifest:

Manifests and land disposal restrictions must be maintained on-site for at least 3 years, where are these records kept?

- ▶ **Identify this facility's licensed waste transportation and disposal contractors and include their contact information:**

Personnel Training

Training employees who have job responsibilities which include the handling or management of hazardous waste is critical to reducing the potential for mistakes or handling waste in a way that might threaten or harm human health and the environment. Training must be both job specific as well as inclusive of the regulatory requirements for managing hazardous waste for your facility’s generator category. DEEP offers a [Hazardous Waste Management Online Training Course](#) through its website to satisfy the state regulatory training component. In addition to the on-line training, job specific training should occur on-site.

- ▶ **Describe the training requirements which must be met to comply with this facility’s generator category:**

- ▶ **The following employees have hazardous waste responsibilities requiring training:**

- ▶ **List job titles and descriptions of positions with waste management responsibilities:**

- ▶ **The table below outlines this facility’s hazardous waste management training schedule*:**

Employee	Job Title	Waste Management Responsibilities	Last trained on	Next training due by

**Attach additional sheets as needed.*

Universal Waste

There are five waste streams that can be managed as a universal waste in Connecticut. These universal wastes are: (1) Batteries; (2) Mercury-containing equipment; (3) Certain pesticides; (4) Lamps (including but not limited to fluorescent, neon and mercury vapor lamps); and (5) Used electronics. Universal wastes must be managed in a certain way and generally, cannot be stored on-site for greater than one year. DEEP's [Universal Waste Rule fact sheet](#) provides detailed information concerning the proper management of universal waste.

▶ **Identify each universal waste generated at this facility:**

Batteries: Yes No

If yes, identify type(s), quantity and generation frequency:

Mercury-containing equipment: Yes No

If yes, identify type(s), quantity and generation frequency:

Pesticides: Yes No

If yes, identify the pesticide type(s), quantity and generation frequency:

Lamps: Yes No

If yes, identify type(s), quantity and generation frequency:

Used electronics: Yes No

If yes, identify type(s), quantity and generation frequency:

- ▶ **This facility's universal waste handler status is:** Small Quantity Handler
 Large Quantity Handler

Used Oil

Used oil managed improperly can lead to pollution of soil, groundwater, and surface water. Commercial and industrial businesses generating used oil must manage their used oil in compliance with Connecticut's used oil regulations; specifically, generators of used oil must label their used oil "Used Oil", store the used oil within impervious secondary containment, and test the used oil for total halogen content. For information on the proper management of used oil, refer to DEEP's [Proper Management of Used Oil fact sheet](#) which includes links to guidance documents and regulatory citations.

- ▶ **Does this facility generate used oil?** Yes No
If yes, describe which processes generate the used oil:

- ▶ **Describe how and where used oil is managed at this facility:**

- ▶ **Where are total halogen determinations kept?**

Closing Hazardous Waste Storage Areas and Tank Systems

Small and large quantity generators who discontinue using an area or tank in which hazardous wastes are/were stored or who are changing their operating status to conditionally exempt small quantity generator must document decontamination of that area or tank.

DEEP provides guidance on how generators can compliantly close former storage areas in two documents [Draft RCRA Closure Guidance for Generators Who Store Less Than 90 Days Container Storage Areas and Tank Systems](#) and [Guidance for Implementing and Documenting Closure \(Waste Removal and Decontamination\) for Indoor RCRA Hazardous Waste Container Storage Areas](#).

The following hazardous waste container storage areas and/or tank systems will require closure when no longer in use or when this facility’s generator category is changed to conditionally exempt small quantity generator or non-handler:

Storage Area/Tank System Description	Location	Date Closed

Biennial Reporting

Certain handlers of hazardous wastes are required to file a biennial report summarizing their hazardous waste activity for odd-numbered years. Large quantity generators and treatment, storage and disposal facilities are required to complete and submit the biennial report; however, conditionally exempt and small quantity generators who retain their large quantity generator notification also file these reports. Biennial reports must be completed and submitted in March of each even-numbered year. Answers to frequently asked questions and additional information concerning biennial reporting, as well as links to the reporting forms, are available on DEEP's [Biennial Hazardous Waste Report fact sheet](#).

- ▶ **This facility is subject to biennial reporting requirements:** Yes No

Recordkeeping

Recordkeeping requirements are addressed throughout this compliance plan. As a best management practice, a hazardous waste generator should maintain a centralized and organized recordkeeping system at its facility. Unless otherwise specified, three years is typically the minimum retention period for documents related to hazardous waste management (e.g., waste determinations and waste profile sheets, land disposal restrictions, manifests, personnel training records). Because hazardous waste generators are responsible for their wastes from point of generation through final disposal, it is encouraged that generators permanently retain documentation that can be used in the future to prove that hazardous waste was properly managed, minimizing long-term liabilities.

- ▶ **Describe the recordkeeping and document retention system employed by this facility:**

Suggested Attachments to this Plan:

- ▶ Copies of Hazardous Waste Determinations
- ▶ Copies of Inspection Logs
- ▶ Emergency Response Plan/Contingency Plan
- ▶ Copies of training certificates
- ▶ Compliance Calendar
- ▶ Applicable Regulatory Guidance Documents
- ▶ Storage Area Closure Documentation
- ▶ Business Recycling Profile

Links to Other Useful Resources on [DEEP's website](#):

- ▶ [RCRA Help!](#)
- ▶ [COMPASS – Hazardous Waste Compliance Assistance Program](#)
- ▶ [Hazardous Waste Advisory Committee](#)
- ▶ [Business Recycling Assistance](#)
- ▶ [Small Quantity Generator Handbook](#)
- ▶ [Conditionally Exempt Small Quantity Generator Handbook for Hazardous Waste Handlers](#)
- ▶ [Permitted Transporter List](#)
- ▶ [Permitted Facility List](#)
- ▶ [List of Certified Environmental Testing Laboratories](#)
- ▶ [Bringing Small Business Waste to Household Hazardous Waste Collections](#)
- ▶ [Non-RCRA Hazardous Waste \(Connecticut Regulated Waste\)](#)

Certification of Document

“I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law.”

Signature of chief executive officer or a duly authorized representative of such officer, as those terms are defined in Section 22a-430-3(b)(2) of the RCRA, and by the individual(s) responsible for actually preparing this document