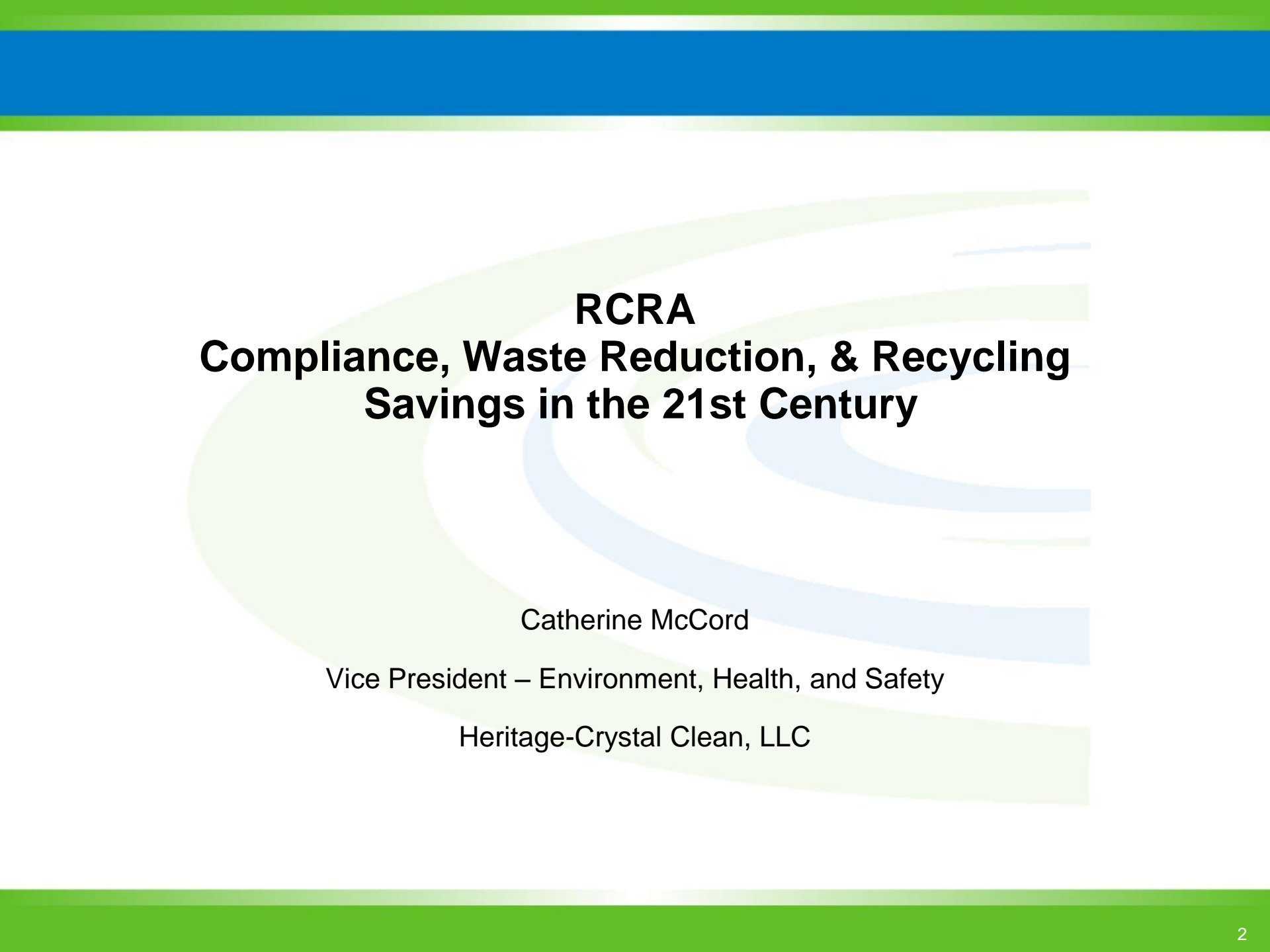


CT DEEP - HWAC Public Forum

**Co-sponsored by CBIA and Heritage-Crystal Clean
Hosted by CBIA
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RCRA Compliance, Waste Reduction, & Recycling Savings in the 21st Century

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I. Compliance

II. Waste Reduction & Recycling

III. Planning for Regulatory Change

I. COMPLIANCE

How to most easily comply with hazardous waste requirements?

I. Compliance - Fundamentals

A. Waste characterization

- Know what you have
- Review (M)SDSs of feedstocks / ingredients
- Use of generator knowledge
- Evaluate process changes that can impact waste characteristics
- Don't overbuy supplies / feedstocks
- Analytical
- Assistance - COMPASS hotline at 1-888-424-4193, M-F, 8:30 a.m. to 4:30 p.m.

I. Compliance - continued

B. Determine Generator Status

- Generator Status is determined by generation rate per month, not amount shipped off-site
- Evaluate strategies for managing your generation rate, thus your generator status
- Regulations that apply are determined by generator status

I. Compliance - continued

C. Generator Size

- Large Quantity Generators (LQGs)
- Small Quantity Generators (SQGs)
- Conditionally-Exempt Small Quantity Generators (CESQGs)

Generator Size Restrictions

Generator Category	Accumulation Time Limit	Monthly Generation Limit (per calendar month)	Total Accumulation Limit (on-site at any one time)
CESQG	None	100 kg (220 lb) 1 kg (220 lb) <u>acute HW</u>	1000 kg (2200 lb) 1 kg (2.2 lb) <u>acute HW</u>
SQG	180 Days	100 - 1000 kg (2200 lb) 1 kg (220 lb) <u>acute HW</u>	1000 kg (2200 lb) 1 kg (2.2 lb) <u>acute HW</u>
LQG	90 Days	No limit.	No limit.

Acute Hazardous wastes are wastes that are particularly toxic or hazardous. Examples include all “P” wastes (e.g., P106, Sodium Cyanide) and certain pesticide production wastes (e.g., F020 – F023, F026, F027).

I. Compliance - continued

D. Regulations

- Much of the CT DEEP hazardous waste regulations have adopted by reference the federal 40 CFR 260 -279 requirements
- Some additional state-regulated (CT-Regulated Wastes)

I. Compliance - continued

E. Get Organized

- Record keeping requirements determined by generator status
- Folders for information or notation of where information can be found
- Manifests (generator and returned copies)

I. Compliance - continued

F. Environmental Management Systems

- Frame-work for compliance
- Particularly helpful for larger facilities or more complex operations

I. Compliance - continued

G. CT DEEP “Policy On Incentives For Self-Policing”

- Effective October 23, 1996**
- Designed to effect greater compliance**
- Encouraging voluntary discovery, disclosure, and correction through use of audits and self evaluation**
- Designed to detect and correct violations, periodic evaluation without fear of retaliation**
- Procedures for the prompt and appropriate correction of any violations**
- Make changes to prevent future violations.**

I. Compliance – Self Policing Policy cont

- **Incentives for Self-Policing.**
 - 1) **No Gravity-Based Penalties:**
 - 2) **Reduction of Gravity-Based Penalties by 75 %**
 - 3) **Administrative consent orders – no referral to A.G.**
 - 4) **DEEP will not use an environmental audit report to initiate a civil or criminal enforcement action**
 - 5) **The regulated entity agrees to take steps to prevent a recurrence of the violation; no patterns of repeat offenses of same violations**



II. WASTE MINIMIZATION AND REDUCTION STRATEGIES

Waste Reduction – Key Principals

- Reduce volume near the point of generation
- Reuse or extend the use of materials, whenever possible
- Reducing waste:
 - reduces consumption of non-renewable and renewable resources
 - conserves energy
 - reduces pollution from additional manufacturing and transportation of goods
 - reduces use of landfills and resource recovery facilities

Waste Minimization - Examples

- More effective cleaning equipment (i.e., paint gun)
- More effective cleaners - right cleaner for right application
- Health and Safety benefits of using safer products- less injuries
- Use alternate cleaners; result in non-hazardous waste
- Use filtration systems to extend life of cutting fluids
- Used oil as a renewable resource – re-refining recycling option

Ideas to Reduce or Reuse

- Buy used equipment
- Waste exchanges for sources of certain chemicals or products.
- Look for products that use less packaging
- Buying in bulk, for example, can reduce packaging and save money.
- Buy reusable over disposable items.
- Maintain and repair products and equipment

Additional Benefits

- Limit CERCLA liabilities by:
 - Not landfilling wastes
 - Selective vendors
- Minimize carbon / pollution footprint
- Improving compliance

Waste Exchanges

The Reuse Marketplace...

- is a free regional network to find, sell, trade, or give away reusable and surplus items that would otherwise be disposed.
- Businesses, institutions, governments, and organizations in the states of CT, DE, MA, NJ, NY, RI, and VT are eligible to create accounts and to post listings. .
- The website is administered by the Northeast Recycling Council (NERC)
- <http://www.reusemarketplace.org>

New Regulations

- Hazardous waste -E-manifest
- Air - Parts cleaner changes – restriction of solvents



Comments and Questions