

COMMON VIOLATIONS

- 1) Making Hazardous Waste Determinations
- 2) LACK OF Training
- 3) Open Containers
- 4) Labeling – MISSING, IMPROPER
- 5) Satellite Accumulation
- 6) Tank Management
- 7) Preparedness and Prevention
- 8) Contingency Plans
- 9) LDR VIOLATIONS
- 10) Used Oil

HELPFUL WEBSITES

www.EPA.gov (review your state regs as well)

<http://echo.epa.gov/> (enforcement search engine)

PTP offers training: www.EHSprogress.com for DOT HAZMAT, HAZWOPER, RCRA Check out our training calendar!



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*Serving the regulated community for 25 years
1990 - 2015*

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HAZWOPER training is key towards compliance with hazardous waste management and emergency response. Talk to PTP about HAZWOPER training.

Completing a Manifest?

Remember you need DOT HAZMAT training as well. 49CFR 172.700

RCRA

Hazardous Waste Management



Fundamentals for Compliance

GENERATORS OF HAZARDOUS WASTE

CHARACTERISTIC WASTE, 40 CFR...

§ 261.21 Characteristic of ignitability.

D001 WASTE

Flash liquids, with FP < 140F, flammable gases, Flammable solids, oxidizers

§ 261.22 Characteristic of corrosivity.

D002 WASTE

Aqueous or liquid, pH ≤ 2 or ≥12.5

§ 261.23 Characteristic of reactivity.

DOO3 WASTE

Extreme reaction, violent, normally unstable

§ 261.24 Toxicity characteristic,

TCLP DOO4 – D043 WASTE



F – NON-SPECIFIC

K – SPECIFIC

P – ACUTE CHEMICALS

U – NON-ACUTE



UNIVERSAL WASTE

BATTERIES ♦ LAMPS

MERCURY CONTAINED EQUIPMENT

PESTICIDES

STATES CAN HAVE MORE

THE TCLP LIST

	Contaminant	(mg/L)
D004	Arsenic	5.0
D005	Barium	100.0
D018	Benzene	0.5
D006	Cadmium	1.0
D019	Carbon tetrachloride	0.5
D020	Chlordane	0.03
D021	Chlorobenzene	100.0
D022	Chloroform	6.0
D007	Chromium	5.0
D023	o-Cresol	200.0
D024	m-Cresol	200.0
D025	p-Cresol	200.0
D026	Cresol	200.0
D016	2,4-D	10.0
D027	1,4-Dichlorobenzene	7.5
D028	1,2-Dichloroethane	0.5
D029	1,1-Dichloroethylene	0.7
D030	2,4-Dinitrotoluene	0.13
D012	Endrin	0.02
D031	Heptaclor	0.008
D032	Hexachlorobenzene	0.13
D033	Hexachlorobutadiene	0.5
D034	Hexachloroethane	3.0
D008	Lead	5.0
D013	Lindane	0.4
D009	Mercury	0.2

	Contaminant	(mg/L)
D014	Methoxychlor	10.0
D035	Methyl ethyl ketone	200.0
D036	Nitrobenzene	2.0
D037	Pentachlorophenol	100.0
D038	Pyridine	35.0
D010	Selenium	1.0
D011	Silver	5.0
D039	Tetrachloroethylene	0.7
D015	Toxaphene	0.5
D040	Trichloroethylene	0.5
D041	2,4,5-Trichlorophenol	400.0
D042	2,4,6-Trichlorophenol	2.0
D017	2,4,5-TP (Silvex)	1.0

1. LQG: 90 DAYS
2. SQG – 180 DAYS
3. Weekly Inspections
4. Satellite Accumulation

HAZ WASTE Generator Status

LQG: ≥ 1,000 kg /mo, >1kg acute/mo

SQG: >100 kg, < 1000 kg /mo

CESQG: ≤100 kg/month
≤1 kg/month of acute