

ADEQ's Waste Inspections and Compliance Unit

**Webinar: *RCRA and Hazardous Waste
Regulations*
February 15, 2017**



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Brought to you by:

- The Western Sustainability Pollution Prevention Network
- The Arizona Department of Environmental Quality

Webinar Agenda

- | | |
|----------|------------------|
| 10:00 AM | Webinar Overview |
| 10:05 | Presentation |
| 10:45 | Q&A |
| 11:00 AM | Adjourn |



Presented by: Ethan Leiter

ADEQ Waste Webinar: Hazardous Waste Top 10 Violations

Presented by:

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2017

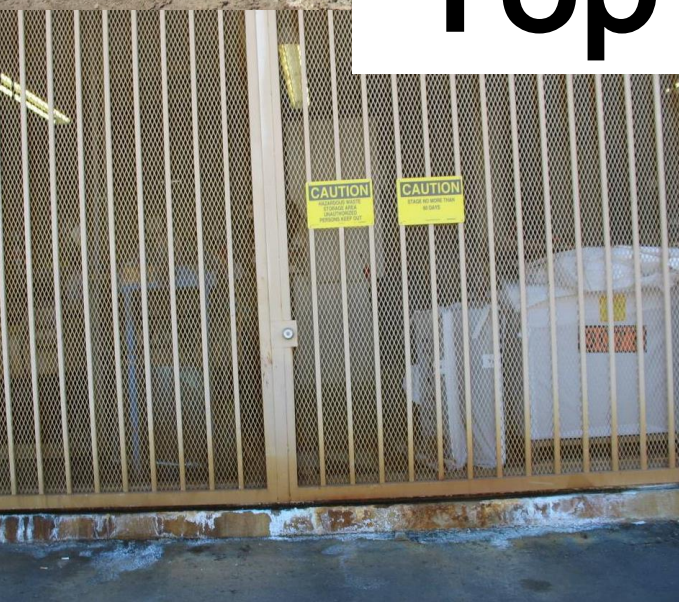


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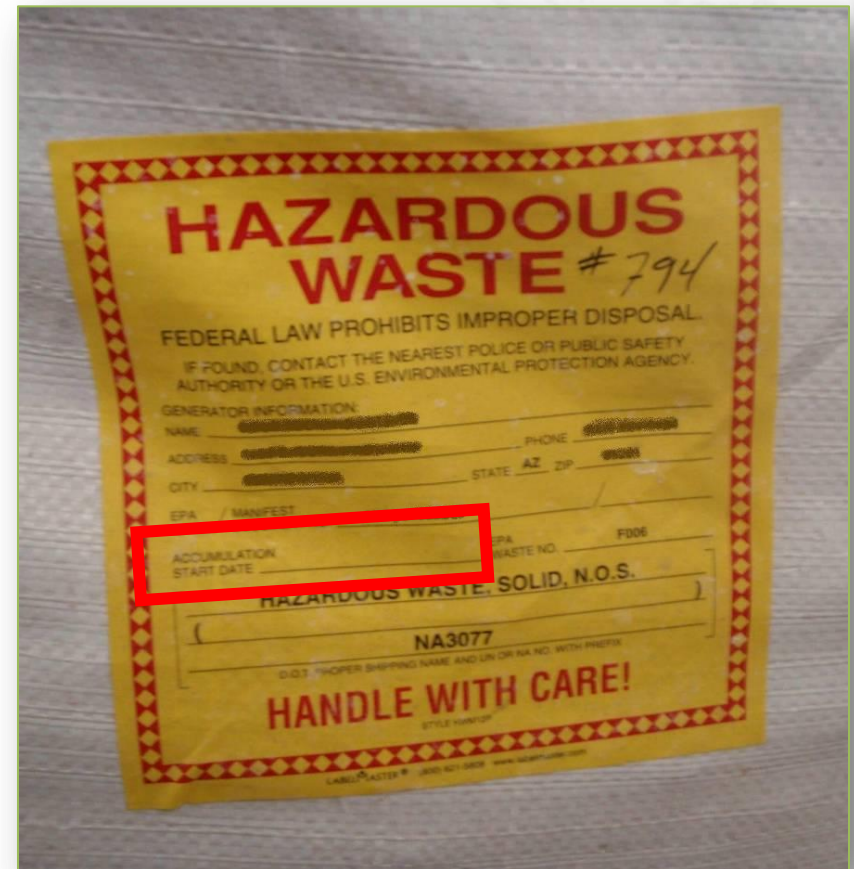


Top 10 Violations



- 1. Improper labeling, dating, and closing of hazardous waste containers**
2. Emergency Coordinator/Contingency Plan
- 3. Failure to perform a Waste Determination**
- 4. Improper treatment, storage, or disposal of hazardous waste**
- 5. Providing Training/Training records/Training Plan**
- 6. Universal Waste Issues**
7. Improper/inaccurate hazardous waste generator status determination
- 8. Preparedness & Prevention/Emergency Equipment**
9. Weekly Inspections/Weekly Checklists
10. Registration and generation fees

1) Improper Labeling and Dating (SQG & LQG requirement)



Ex. Hazardous Waste Storage Containers



Ex. Hazardous Waste Satellite Accumulation Containers



Violation Examples: Closing Containers

1) Open Containers of Hazardous Waste (SQG, LQG requirement)

- Must be closed, except when actively adding or removing waste



Violation Examples: Uncontained & Open



3) Failure to perform a Waste Determination

- All waste generated on site need to be evaluated.
 - (CESQG, SQG, LQG requirement)



Violation Examples: Waste Determinations



- Keep supporting documentation on file (i.e. SDS, laboratory analysis, etc.) (required)
- Updated accordingly
 - Anytime your products/process change
 - ADEQ recommends to update profile every 3 years

4) Improperly treating hazardous waste or unpermitted treatment



Who Can “Treat” Hazardous Waste?

Answer: It depends.

Treatment, Storage, & Disposal Facilities (TSDFs)	Permitted under 40 CFR Part 264 Interim Status under 40 CFR Part 265
Transporters	May only consolidate hazardous wastes with the same DOT shipping description in containers or tanker trucks at transfer facilities if the waste has been manifested to same permitted TSDF

Who Can “Treat” Hazardous Waste?

Answer: It depends.

Generators	LQGs/SQGs: Allowed to treat hazardous waste on-site without a permit provided you are in compliance with applicable provisions in 40 CFR 262.34 Treatment to meet LDRs requires a WAP (40 CFR 268.7(a)(5)) CESQGs: Allowed if meets one of conditions listed in 40 CFR 261.5(g)(3)(iii) through (vii). If does not meet, must have permit under Part 270 or operate in interim status under Parts 270 and 265 before treating or disposing of waste on site (40 CFR 261.5(g)(3)(i) & (ii)) Note: All Generators may <u>not</u> conduct Thermal Treatment without a permit (51 FR 10146, 10168; March 24, 1986)

Violation Examples: Uncontained



Violation Examples: Storage



Violation Examples: Disposal



Improper Disposal of Hazardous Waste (CESQG, SQG, LQG requirement)



Shipment/Disposal

- Generators must use a hazardous waste transporter who is registered with ADEQ and has a valid EPA ID #.
- Generators may ship to in-state TSDFs permitted with ADEQ or out-of-state TSDFs permitted in their respective states.

■ Hazardous Waste TSDFs in Arizona

- [Camp Navajo](#)
- [Clean Harbors Arizona, LLC \(CHA\)](#)
- [Conn-Selmer, Inc. \(CSI\)](#)
- [Heritage Environmental Services, LLC](#)
- Nammo Talley, Inc.
- [Safety-Kleen Corp. \(Chandler\)](#)
- U.S.A.F. Barry M. Goldwater Range, East Segment
- [U.S. Army Garrison Yuma Proving Ground](#)
- [U.S.M.C. Barry M. Goldwater Range, West Segment](#)
- [Universal Propulsion Company \(UPCO\) Corrective Action Facility](#)
- [University of Arizona - Page Trowbridge Ranch Landfill](#)
- [Veolia ES Technical Solutions, LLC](#)
- [World Resources Company](#)

- For more information, contact Anthony Leverock, Permits & Plan Review Unit Manager, at (602)771-4160.

■ 5) Training

- Incomplete Training Plan
- Missing Training Records



6) Universal Waste Issues



Violation Examples: Universal Waste



Broken Lamps

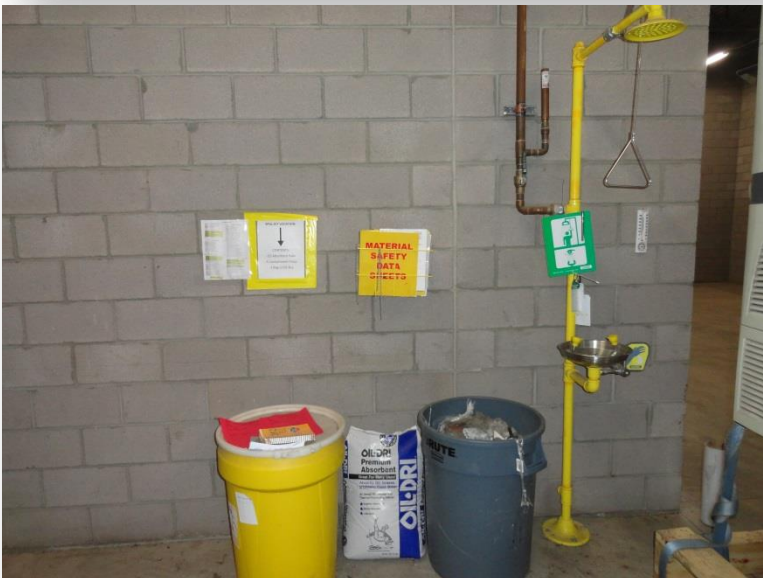
- Once a lamp breaks, it releases mercury vapors into the air so it is important to ensure the immediate cleanup and containment of the lamp debris.
- Make sure your facility has proper procedures for reporting and managing broken lamps.
- “*Accidentally*” broken lamps and their debris can be managed as universal waste, whereas, “*intentionally*” broken lamps and their debris must be managed as hazardous waste
 - Unless other exemptions apply (i.e. lamps were generated in a household or a CESQG facility)

Tips for Compliance: Universal Waste





- 8) Emergency Equipment
(40 CFR 265 Subpart C):
 - Maintained to minimize possibility of fire, explosion, or release
 - Equipped with:
 - Internal communications or alarm system
 - Telephone **or** walky-talkies capable of summoning emergency assistance from local emergency authorities
 - Portable fire extinguishers, spill control equipment, **and** decontamination equipment
 - Water at adequate volume and pressure to supply water or sprinklers or water spray systems
 - Adequate aisle spacing
 - “No Smoking” sign

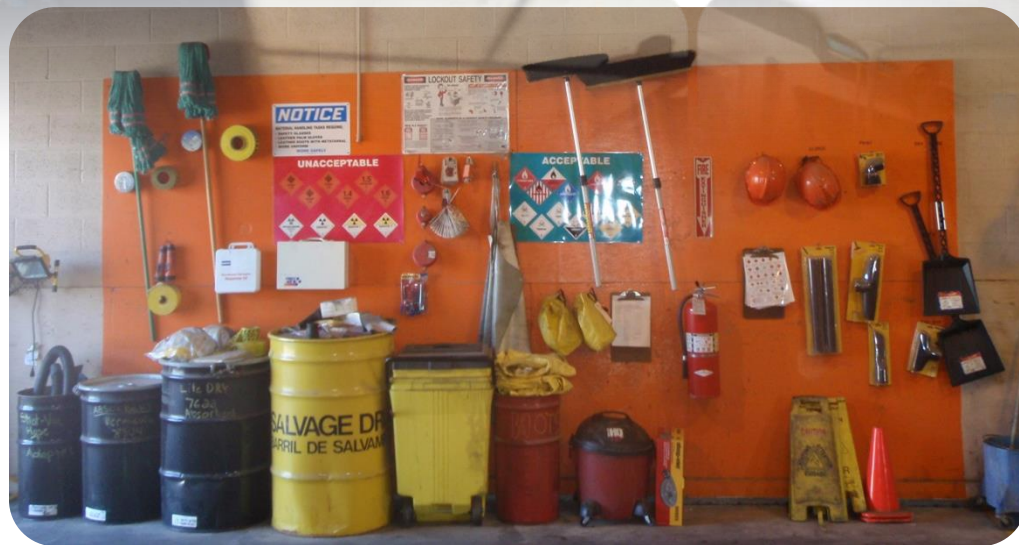


Violation Examples: Facility Preparedness & Prevention

- Not having all required equipment
- Accessibility/aisle spacing
- Not testing and maintaining equipment



Tips for Prevention: Facility Preparedness & Prevention



NEED HELP?

- Contact the HWICT for regulatory interpretations or Technical Assistance (TA) Meetings.
- Review the lists of major and minor violations found in the Compliance & Enforcement Handbook.
- Consult ADEQ or EPA website
- Look to your specific industry for tips on how to comply with the regulations.
- Call the HWICT for assistance!!!

Resources



- <https://public.govdelivery.com/accounts/AZDEQ/subscriber/new>
- **ADEQ Hazardous Waste's Website (inspection checklists)**
<http://www.azdeq.gov/environ/waste/hazwaste/index.html>
- **Managing Hazardous Waste, a Handbook for Small Businesses (2014)**
<http://www.azdeq.gov/environ/waste/hazwaste/download/managehw.pdf>
- **Fact Sheet: Managing Universal Waste Lamps for Businesses (2014)**
http://www.azdeq.gov/environ/waste/hazwaste/download/ADEQ_FS-14-10.pdf

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■ Thank you!