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Hazardous Waste in Your Community

The mission of the U.S. Environmental Protection Agency (EPA) is to protect human health and safeguard the environment. One way EPA helps fulfill its mission is by regulating the management and disposal of hazardous wastes under the Resource Conservation and Recovery Act (RCRA). RCRA has the following three general goals: To protect human health and the environment · To reduce waste while conserving energy and natural resources · To reduce or eliminate the generation of hazardous waste.

Hazardous wastes are generated and managed in a variety of different settings, possibly even in your own community. In order to meet the goals of RCRA and to safeguard human health and the environment in all settings, EPA has established a "cradle-to-grave" waste management system, where hazardous wastes are regulated by EPA from the point they are first created ("cradle") until they reach final disposal ("grave"). This fact sheet will help you understand what requirements must be met under RCRA in order to manage hazardous waste in a safe and protective manner.

The three parties involved in the cradle-to-grave lifecycle of a hazardous waste are: generators; transporters; and treatment, storage, or disposal facilities (TSDFs).

Generators

A generator is any business or individual who initiates the production of a hazardous waste or who first causes the waste to become subject to RCRA regulations (e.g., by importing hazardous waste from a foreign country into the United States, or by cleaning up a site contaminated with a hazardous waste).

A wide variety of facilities, common in most communities, can be hazardous waste generators. For example, small businesses such as dry cleaners and gas stations, or large-scale operations such as chemical manufacturing plants, might produce hazardous waste as a result of normal business operations. RCRA's generator regulations are based on EPA's understanding that these businesses are not heavily involved in hazardous waste management. EPA requires generators to comply with various "good housekeeping" rules that ensure the waste is properly identified and managed but do not overly burden the generators' business practices.

RCRA regulations also recognize that not all businesses produce the same quantities of hazardous waste. Since managing

a larger volume of waste can present a greater risk, persons or facilities that generate larger volumes are subject to more stringent regulations. Under RCRA, EPA identifies three classes of generators based on the amount of waste they produce in a calendar month: large quantity generators (LQGs), small quantity generators (SQGs), and conditionally exempt small quantity generators (CESQGs).

Of the three generator categories, LQGs are subject to the most rigid regulations, including the following:

- Obtain an EPA identification number prior to managing hazardous waste. These are unique numbers used to track generators' activities.
- Comply with manifest requirements when shipping hazardous waste off site. The manifest is a document that accompanies the shipment and serves as a tracking mechanism.
- Limit the accumulation of hazardous waste to 90 days or less.
- Accumulate hazardous waste only in specified units: containers, tanks, drip pads, and containment buildings.
- Develop a personnel training program, contingency plans, and emergency procedures.
- Submit a "Biennial Report" to EPA every other year describing hazardous waste generation and management activities.

Hazardous Waste Generator Classification

LQGs:
- ≥ 1,000 kg (2200 lbs.) hazardous waste
- > 1 kg (2.2 lbs.) acute hazardous waste
- > 100 kg (220 lbs.) spill cleanup material containing acute hazardous waste

SQGs:
- Between 100 and 1,000 kg hazardous waste

CESQGs:
- ≤ 100 kg hazardous waste
- ≤ 1 kg acute hazardous waste
- ≤ 100 kg spill cleanup material containing acute hazardous waste

Transporters

Hazardous waste transporters are responsible for hauling waste between generation and treatment facilities by highway, air, water, or rail. In order to ensure consistent requirements, EPA's transporter regulations have been developed jointly with the U.S. Department of Transportation (DOT). DOT has established extensive standards for the transportation of hazardous materials, including container labeling, vehicle placarding, emergency response, and packaging standards.

In addition to the DOT transportation requirements, EPA has added the following provisions under RCRA:

SQGs follow less stringent standards, but they also have restrictions on their waste management processes and must comply with the following:

- Obtain an EPA identification number prior to managing hazardous waste.
- Comply with manifest requirements when shipping hazardous waste off site.
- Limit waste accumulation to no more than 180 days (or 270 days if the receiving facility is more than 200 miles from the generator).
- Accumulate hazardous waste only in tanks or containers.
- Never accumulate more than 6,000 kg of hazardous waste on site at any one time.
- Designate an emergency coordinator and follow limited emergency response procedures.

CESQGs are subject to minimal regulation, including the following:

- Never accumulate more than 1,000 kg of hazardous waste on site at a given time.
- Ensure proper delivery of the hazardous waste to a facility that is registered under RCRA to recycle, treat, store, or dispose of solid or hazardous waste.

- Obtain an EPA identification number before legally transporting hazardous waste.
- Do not accept a shipment of hazardous waste for offsite transportation unless it is accompanied by a manifest. Rail and water transporters may carry a shipping paper instead of a manifest; the manifest will be forwarded to the next highway carrier or the TSDF.

Main Hazardous Waste Transporter Requirements

- Obtaining an EPA identification number.
- Ensuring that a manifest accompanies offsite shipments of hazardous waste.
- Managing hazardous waste spills.

- In the event that hazardous waste is discharged or spilled during transportation, take immediate action to protect human health and the environment. These response actions must include notifying appropriate authorities and blocking off the discharge area.
- Store hazardous waste only temporarily for up to 10 days during the normal course of transportation at a transfer facility (e.g., loading docks, parking areas).

Treatment, Storage, and Disposal Facilities

TSDFs provide temporary storage and final treatment or disposal for hazardous wastes. Since they manage large volumes of waste and conduct activities that may present a higher degree of risk, TSDFs are regulated more stringently than generators. Some common examples of TSDFs that could exist in your community include hazardous waste landfills, incinerators, and storage yards. The RCRA requirements that all TSDFs must meet are listed below:

- Obtain a permit from EPA detailing how the facility will be operated and what types of activities the facility is allowed to perform. TSDFs that were established prior to RCRA, or that have recently become subject to RCRA because of changes in regulations, are allowed to operate without a permit until their permit applications are processed. These facilities are called interim status facilities.
- Obtain an EPA identification number.
- Test all hazardous waste to ensure it is acceptable under individual facility standards.
- Maintain security systems, as well as perform routine inspections and provide adequate personnel training.
- Adopt measures to minimize and prevent accidents, such as fires or spills, and develop an emergency contingency plan.
- Meet recordkeeping and reporting requirements, including the manifest regulations to track waste. TSDFs also must maintain an operating record that details all waste receipts, treatment methods, and dates of treatment, storage, and disposal.
- Submit a "Biennial Report" to EPA detailing the facility's hazardous waste management activities.

TSDF Compliance Categories

- Permitting
- General facility standards
- Specific unit standards
- Financial assurance
- Closure
- Ground-water monitoring

In addition to these general facility standards, each TSDF must also comply with specific design and operating requirements for each hazardous waste management unit at the facility. A hazardous waste management unit is any unit acceptable under RCRA to store, treat, or dispose of hazardous waste. Acceptable waste management units could include tanks, containers, containment buildings, drip pads, surface impoundments, and waste piles. Acceptable hazardous waste disposal units are land treatment units, landfills, surface impoundments, and waste piles. The degree of regulation varies according to the unit's purpose (whether

it's for storage or disposal). In general, disposal units are regulated more stringently than storage units because the waste remains in a disposal unit permanently. There also are very strict regulations for combustion units, such as incinerators (which destroy hazardous waste by burning it) and boilers and industrial furnaces (which burn hazardous waste to recover energy or materials).

In preparation for their eventual closure, TSDFs must meet additional requirements to ensure the protection of human health and the environment after they have discontinued operations. The RCRA regulations pertaining to TSDF closure are as follows:

- From the time of opening, demonstrate that the TSDF will have enough money to properly close when necessary.
- Submit a closure plan during the permitting process that explains how and approximately when each waste management unit in the facility will close.
- Establish a system of wells to detect the groundwater migration of hazardous contaminants from any land-based disposal unit, such as a landfill or surface impoundment, during and after the active life of the facility.

How Can You Find out More About Hazardous Waste Generators and Handlers in Your Community?

Contact your state hazardous waste agency or the hazardous waste division of your EPA Regional Office.

Research facilities in your area by the name of the facility, identification number, or zip code under the RCRIS database. This database can be accessed on the Internet at the following address: <www.epa.gov/enviro/html/rcris/rcris_query_java.html>.

Would You Like More Information?

RCRA, Superfund, and EPCRA Hotline

Call 800 424-9346 or 703 412-9810 in the Washington, DC area. For the hearing impaired, the number is TDD 800 553-7672.

You also can access information via the hotline's Internet site at: <www.epa.gov/epaoswer/hotline>.

Additional Documents

These additional documents can help you learn more about the requirements for hazardous waste handlers. These documents are free and can be ordered from the RCRA Hotline. Reference the EPA document number (*EPA530...*) when ordering.

Understanding the Hazardous Waste Rules: A Handbook for Small Businesses—1996 Update, *EPA530-K-95-001*

Hazardous Waste Requirements for Large Quantity Generators, *EPA530-F-96-032*

RCRA Orientation Manual: 1998 Edition, *EPA530-R-98-004*

Contact Your State

Although EPA's federal regulations set the national standard for compliance, individual states often have regulations that are more stringent than the federal regulations. You should contact your state about its specific regulations. State environmental contacts are available from the RCRA Hotline.