

Most Common Violations

Most Common RCRA Violations

Waste Determinations

- Fail to determine if waste is hazardous;
- Fail to document how the determination was made;
 - Process Knowledge
 - Analytical
- Fail to document all waste streams (haz, nonhaz, recycled, etc.);
- Improper assignment of waste codes.
 - P- and U- Codes apply only to pure unused chemicals and to unused products where a P- or U- code is the sole active ingredient.
 - ICR-Only Listed Waste (List of 29 of them)
 - Most common one being F003. It is only applicable if D001 applies.
 - F001 is applicable only to large scale degreasing operations.

40 CFR § 262.11

Most Common RCRA Violations

Container Labeling

- Label as “Hazardous Waste.”
- Labels must be legible.
- Must contain hazard(s) of contents.
- Any existing content labels need to be removed or sprayed/blacked out.
- Must have the accumulation start date present for storage containers only.
- Ensure storage dates on the containers do not exceed the time allotment on-site.



40 CFR § 262.17(a)(5) – LQG

40 CFR § 262.16(b)(6) – SQG

Most Common RCRA Violations

Training

- Not providing adequate training
- Not having documentation (PowerPoint, sign-in sheets, etc.)
- Not covering Universal Waste
- Employee handling waste and not trained
 - 6 months to train

40 CFR § 262.17(a)(7) – LQG

40 CFR § 262.16(b)(9)(iii) – SQG



Most Common RCRA Violations

Contingency and Emergency Preparedness Plans

- Up-to-date contents
- Change in Emergency Coordinator
- Posting of Emergency Coordinator
- Training to Plan

40 CFR § 262.17(a)(6) – LQG

40 CFR § 262.16(b)(9) – SQG



Most Common RCRA Violations

Open Containers

- Containers must be closed at all times unless adding or removing waste
- Funnels left open and/or not latched
- Missing bungs
- Containers overflowing

40 CFR § 262.17(a)(1)(iv)(A) – LQG

40 CFR § 262.16(b)(2)(iii)(A) – SQG

Most Common RCRA Violations

Satellite Accumulation Requirements

- Containers not near the point of generation and under the control of the operator
- More than one satellite of same waste stream
- Not labeled properly
- Not closed properly

40 CFR § 262.15

Most Common RCRA Violations

Storage Inspections

- Weeks missing
- Time missing from inspection
- Date missing from inspection
- Not documenting corrective actions
- Containers damaged, leaking and not documented
- Do not initial the inspection form, only print and sign it with your full name

40 CFR § 262.17(a)(1)(v) – LQG

40 CFR § 262.16(b)(2)(iv) – SQG



Most Common RCRA Violations

Universal Waste Requirements

- Proper packaging of Universal Waste to prevent releases to environment
 - Open containers
- Labeling properly: “Universal Waste – Lamps”
 - Not “Bad Bulbs”
- Dating immediately
- Shipping off-site within 1 year
- Training employees

40 CFR § 261.9, Part 273

Most Common RCRA Violations

Used Oil

- Label containers as “Used Oil”
 - Not “Bad Oil”



40 CFR § 279

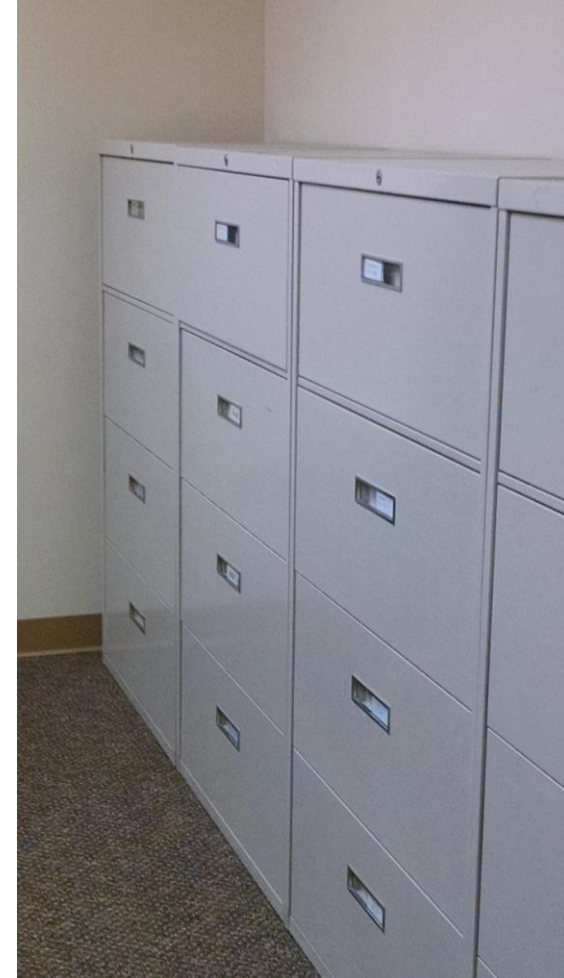
Most Common RCRA Violations

Recordkeeping

- Missing copies of manifests and LDRs
- Missing Biennial/Annual Reports
- Missing Exception Reports
- Missing Waste Determinations
- Integration of all documentation

40 CFR § 262.40 - 262.43 – LQG

40 CFR § 262.44 – SQG



Most Common RCRA Violations

Top Ten RCRA Violations:

1. Waste Determinations
2. Container Labeling
3. Training
4. Contingency Plans
5. Open Container
6. Satellite Accumulation Requirements
7. Inspections
8. Universal Waste Requirements
9. Used Oil
10. Recordkeeping