

The Top Ten RCRA-Hazardous Waste Problems

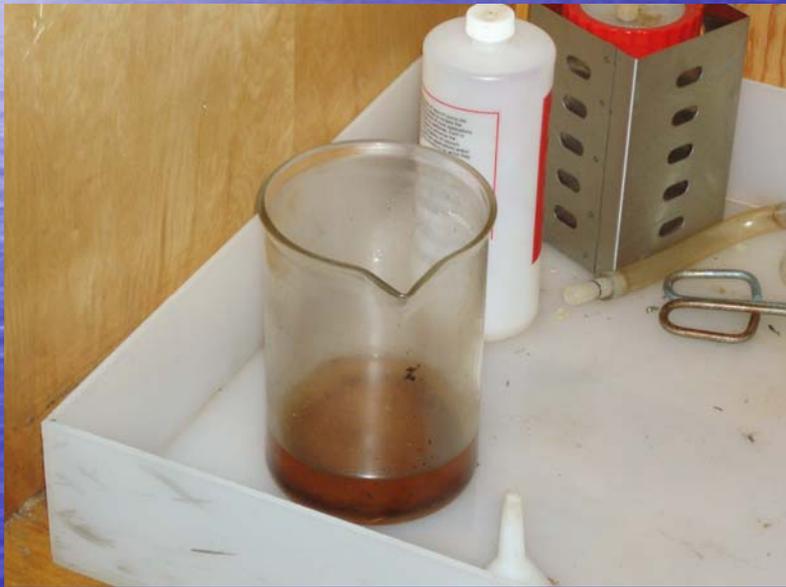
Federal Environmental Symposium
East

June 2, 2008

RCRA-Hazardous Waste

Top Ten most Common Problems

1. Failure to properly mark containers



Unlabeled, Uncovered



Illegible Accumulation Start Date



RCRA-Hazardous Waste Top Ten most Common Problems

2. Open Containers





DEC 5 2006



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3. Improper disposal of a hazardous waste



Several of these still contain chemicals



These vials were found in trash



RCRA-Hazardous Waste Top Ten most Common Problems

4. Improper management of Satellite Accumulation Areas

Some unlabeled containers Not labeled "HW", not "closed", cylinder

RCRA-Hazardous Waste Top Ten most Common Problems

5 and 6. Storage greater than 90 days or 180 days/Failure to regularly inspect and maintain documentation (in many states)



Violation? Facility must make a determination if these are still useable chemicals and not just abandoned or discarded.

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7. Improper management of Universal Waste (labeling, dating, and open containers)



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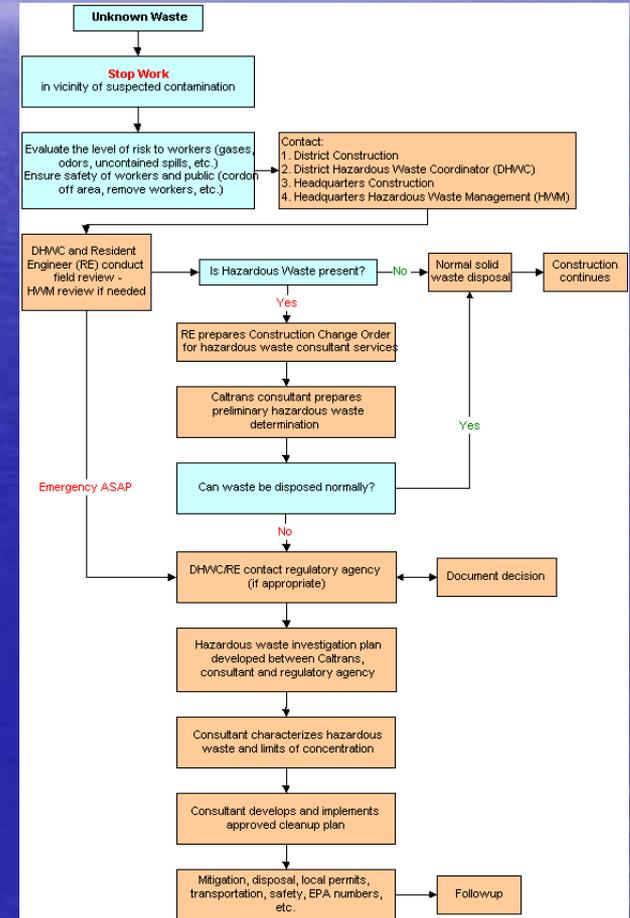
8 and 9. Inadequate contingency plan/
personnel training records

GENERAL RECORD (Type 11)
SPWY Form 10001 (10-88)
K/A 0100 - P. 10-1000
REV. 10-1-01

PERIOD COVERED: FROM 3/10/86 TO

3-DIVISION TRAINING RECORD

NAME	DIVISION			CITY			STATE			COUNTRY		
	1	2	3	4	5	6	7	8	9	10	11	12
BTC5 A.A. ALFA	X	X	X	X	X	X	X	X	X	X	X	X
BTC6 B.B. BRAVO	X	X	X	X	X	X	X	X	X	X	X	X
BTC7 C.C. CHARLIE	X	X	X	X	X	X	X	X	X	X	X	X
BT1 D.D. DELTA	X	X	X	X	X	X	X	X	X	X	X	X
BT1 E.E. ECHO	X	X	X	X	X	X	X	X	X	X	X	X
BT7 F.F. FOXTROT	X	X	X	X	X	X	X	X	X	X	X	X
BT2 G.G. GOLF	X	X	X	X	X	X	X	X	X	X	X	X
BT2 H.H. HOTEL	LV	LV	LV	LV	LV	LV	X	X	X	X	X	X
BT3 I.I. INDIA	X	X	X	X	X	X	NA	X	X	X	X	X
BT3 J.J. JULLIET	X	X	X	X	X	X	NA	X	X	X	X	X
BT3 K.K. KILO	X	X	X	X	X	X	NA	X	X	X	X	X
BT3 L.L. LIMA	X	X	X	X	X	X	NA	X	X	X	X	X
REA M.M. MIKE	LIA	X	X	X	X	X	X	X	X	X	X	X



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10. Management of Used Oil













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Thank you

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