



RCRA Non-Compliance at Federally-Owned Medical Facilities

U.S. Environmental Protection Agency

October 23, 2018



Overview

- Hazardous Waste Determination
- Generator Status
- Use & Management of Containers
- Records
- HW Manifests
- Universal Waste/Other
- Compliance Assistance Resources/Pharma Rule



Common Violation #1: Hazardous Waste Determination

- Waste Types
 - Characteristic (D waste codes)
 - Listed (F, K, P and U)
- Hazardous waste determination
 - Analytical test results
 - Process knowledge
- What documentation is required for a waste stream to be characterized?



Common Violation #2: Generator Status

- Generator category
 - Very Small Quantity Generator (VSQG) – less than 100 kilograms (kg) per month
 - Small Quantity Generator (SQG) – between 100 kg and 1000 kg per month
 - Large Quantity Generator (LQG) – greater than 1,000 kg per month
- Failure to obtain hazardous waste generator ID
- Operating under an incorrect generator classification



Common Violation #3: Use and Management of Containers

- **Satellite Accumulation/Storage Areas**
 - Failure to label/date
 - Failure to close containers
 - Satellite to satellite transfer
 - Store waste for greater than permitted times/volumes



Common Violation #4: Use and Management of Containers

- Central Accumulation/Storage Areas
 - Failure to label/date drums
 - Failure to close containers
 - Storage for greater than 90/180 days



Common Violation #5: Records

- Weekly inspections
- RCRA specific training
- Contingency plan
- Emergency procedures
- Waste determinations
- Manifests
- Land disposal restriction forms



Common Violation #6: Hazardous Waste Manifests

- Failure to complete (shipping on bills of lading)
- Failure to use EPA ID number
- Signatures / dates
- Manifest discrepancies
- Exception reporting



Common Violation #7: Universal Waste

- Failure to demonstrate accumulation times
- Failure to have system in place to manage
- Failure to close containers
- Failure to label containers



Common Violation #8: Waste Treatment

- Evaporation/heat treatment/drain disposal
- Abandonment in place/orphaned chemicals
- Storage in lab hoods



Common Violation #9: Storage of Incompatible Wastes

- Failure to separate incompatible hazardous wastes
- Failure to provide protection between the incompatible hazardous wastes, such as a dike, berm, or wall



Compliance Assistance Resources

- FedCenter.gov (e.g., Facility Regulatory Tour → Medical Facilities)
- RCRA Federal Agency Network
- RCRA Online





HW Pharms Rule

- Currently under OMB review, and expected to be released from OMB shortly
- EPA signature of the final rule will follow
- 3 public webinars planned
 - Dates/registration information released soon (FedCenter will post this information)
 - EPA may add dates, and is willing to speak at events sponsored by others



Ask the Inspector: Q&A with EPA Inspectors



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