



RCRA REGULATIONS: TIPS TO MINIMIZE WASTE AND SAVE MONEY

Midwest Air & Waste Management
Association

September 12, 2024 Webinar



AGENDA

RCRA Overview

Definitions, Exclusions and Exemptions

RCRA OVERVIEW

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Regulations found in 40 CFR parts 239 through 282

- Parts 239 through 259 - solid waste management regulations (solids, liquids, and gases)
- Parts 260 through 273 - hazardous waste management regulations
- Other regulations include:
 - Part 279 – Used oil
 - Part 280 through 282 – USTs



IDENTIFY

Make hazardous waste determinations at the point of generation

Document hazardous waste determinations

Consider documenting non-hazardous waste determinations



COUNT

Generator status determines which rules apply

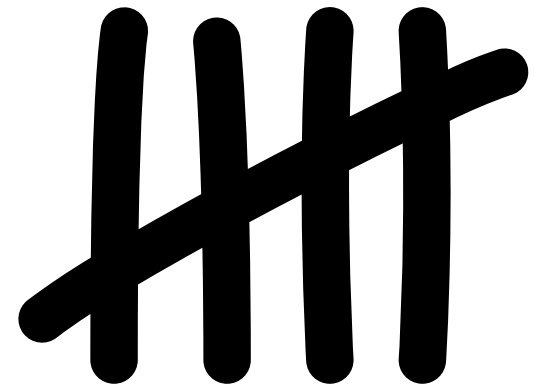
Acute hazardous wastes are accounted for separately from non-acute

Hazardous waste generator status is based on the volume of hazardous waste generated in a calendar month

Generator status can fluctuate from month to month

Universal waste doesn't count toward generator status;
Hazardous waste reclaimed on site does

“Eligible academic institutions” might want to count lab wastes separately



NOTIFY

Submit your notification of hazardous waste activity to EPA (or the delegated agency) and keep it current

Point of contact and waste codes being used

Types of universal wastes and used oil activities

For “eligible academic institutions”, decide on use of optional alternative rules for lab wastes

Understand and plan to make timely submittals going forward, where applicable.

- Biennial reports
- Manifest exceptions



MANAGE

Appropriate containers with lids and labels

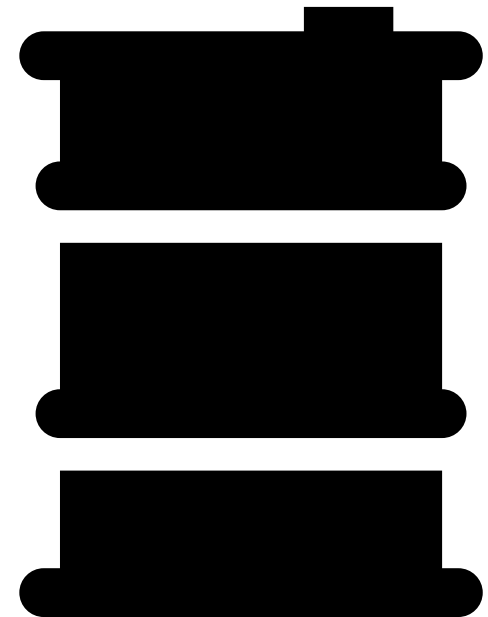
Accounting

Inspections

Emergency preparedness

Training

Preparation for transportation



TRANSPORT

Use a licensed transporter

Use a hazardous waste manifest

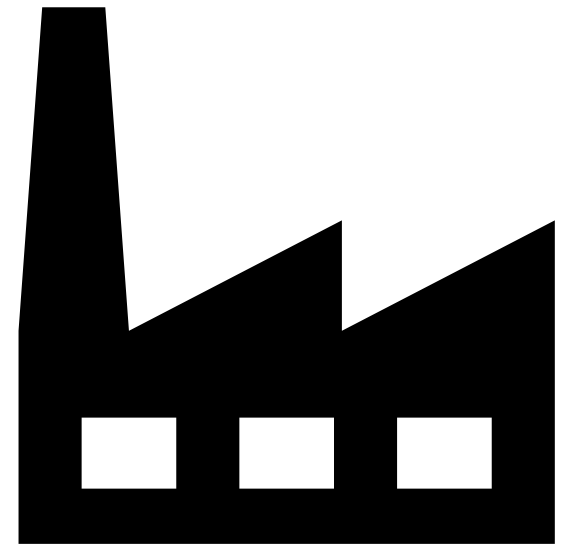
Understand where you are sending waste

If applicable, understand whether the waste will meet land disposal restrictions before you send it off



RECYCLE, TREAT, DISPOSE

Confirm the waste arrived at the facility you sent it to



DEFINITIONS, EXCLUSIONS AND EXEMPTIONS

RCRA GOLDEN RULE #1

261.2(a)(1)

Before a material can be hazardous wastes, it must first meet the definition of “solid waste:”

- any garbage or refuse
- sludge from a wastewater treatment plant, water supply treatment plant, or air pollution control facility
- other **discarded** material, resulting from industrial, commercial, mining, and agricultural operations, and from community activities

SOLID WASTE

261.2(a)(2)

A solid waste is any material that is **discarded** by being:

- Abandoned
- Recycled in Certain Ways
- Inherently Waste-Like
- A Discarded Military Munition

HAZARDOUS WASTE

- Solid waste
 - Unless excluded from the definition solid or hazardous waste
- Listed or characteristically-hazardous waste
 - Unless delisted hazardous waste

SOLID WASTE EXCLUSIONS - EXAMPLES

Domestic sewage

Point source discharges

Radioactive waste

Remnants of in-situ mining

Secondary materials returned to the original process that they were generated from

Shredded circuit boards

Primary mineral processing spent materials

Hazardous secondary materials used to make zinc fertilizers

Used cathode ray tubes

Hazardous secondary materials that are reclaimed under certain conditions

Solvent-contaminated wipes

HAZARDOUS WASTE EXCLUSIONS - EXAMPLES

Oil, Gas, and Geothermal Wastes

Fossil Fuel Combustion Wastes

Mining and Mineral Processing Wastes

Petroleum Contaminated Media and Debris from USTs

Spent CFC Refrigerants

Used Oil Filters and Distillation Bottoms

Landfill Leachate or Gas Condensate Derived from Certain Listed Wastes

HAZARDOUS WASTE EXEMPTIONS - EXAMPLES

Samples

Used oil that is recycled

Residues in RCRA empty containers

DEA-controlled substances

RCRA GOLDEN RULE #2

The hazardous waste determination for each solid waste **must** be made at the point of waste generation

- before any dilution, mixing, or other alteration of the waste occurs, and
- at any time in the course of its management that it has, or may have, changed its properties as a result of exposure to the environment or other factors that may change the properties of the waste such that the RCRA classification of the waste may change

THANK YOU!

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Don't mix the streams!

