When it comes to hazardous waste regulations, many of the most commonly cited management mistakes are easy to identify and correct. Read on for an overview of 25 common and correctable hazardous waste management errors. This list will help you spot red flags in your current waste management operations to ensure successful, violation-free inspections.

Executive Summary
Hazardous Waste Training and Recordkeeping

RCRA training and recordkeeping violations are among the most common and easiest-to-spot incidents of noncompliance. When an inspector visits your facility, training records and other documentation are often the first items he or she will ask to see.

For information on the RCRA training standard, watch our RCRA Training explainer video.

**COMMON RCRA TRAINING MISTAKES:**

- Failure to provide initial or annual refresher RCRA training for personnel
- Incomplete facility training plans
- Incomplete or non-existent RCRA training records
- Employees signing the Hazardous Waste Manifest with no DOT hazmat training

**COMMON RCRA RECORDKEEPING MISTAKES:**

- Inadequate contingency planning
- No proof of container and tank inspections, or missing information
- Failure to create or maintain a waste minimization plan
Containers, Tanks, and Storage Areas

EPA’s RCRA regulations set specific requirements for how, where, and how long facilities may manage and store containers and tanks containing hazardous waste. Check your containers for these commonly missed elements and make sure your site complies with the rules for storage areas and accumulation time.

COMMON RCRA CONTAINER AND ACCUMULATION MISTAKES:

- Containers missing accumulation start dates
- Non-empty containers containing hazardous waste residues disposed of in regular trash
- Satellite containers not closed or not properly closed
- Satellite containers not marked with the words “Hazardous Waste” or other identifying words
- Storing waste for longer than the 90 days, 180 days, or 270 days allowed
- Failure to post emergency information at small quantity generator facilities
- Incompatible wastes stored improperly

Hazardous Waste Identification

Identifying hazardous wastes and making accurate determinations is a critical first step to compliance. But making the determination is not enough. EPA requires thorough recordkeeping to “show your work.”

Accurate and timely records help to back up your compliance decisions and create a paper trail that shows you made every effort to comply with RCRA regulations.

COMMON HAZARDOUS WASTE ID MISTAKES:

- Failure to identify hazardous waste or make a hazardous waste determination
- Failure to document use of RCRA exclusions
- Failure to document “generator knowledge” used to make a hazardous waste determination
Universal Waste

EPA allows generators to manage common industrial wastes like batteries, lamps, pesticides, and mercury-containing equipment under a relaxed set of standards found at 40 CFR 273. That said, universal waste management is not a free-for-all. To qualify for relief, universal wastes must be managed according to specific standards.

In March 2018, EPA proposed adding aerosol cans to the universal waste program.

COMMON RCRA UNIVERSAL WASTE MISTAKES:

- Universal waste labels with no indication of “type” of waste (e.g., “batteries” or “lamps”)
- Unacceptable abbreviations (e.g., “bat” for “batteries”)
- Failure to mark or indicate the accumulation start date
- Improper storage that does not prevent release to the environment
- Lamp boxes not closed properly

Managing Hazardous Waste in Laboratories

Often, lab workers are surrounded by chemicals at work—on shelves, in cabinets, under the sink, and elsewhere. Regardless of where they are found, chemical containers must be kept in good condition.

If an inspector finds clearly abandoned chemicals in your lab, EPA will consider the chemicals hazardous waste and expect that you manage them in accordance with RCRA.

- Unlabeled containers and “mystery brown bottles”
- Degraded, broken, or dusty containers
- Disposing of non-empty chemical containers in the regular trash
RCRA Training—Live or Online

Meet EPA’s annual RCRA training mandate and get up to speed on historic updates to the hazardous waste rules. EPA’s “Generator Improvements Rule” made landmark changes to the regulations, contingency plan requirements, marking and labeling rules, and much more.

Build the knowledge and skills to keep your site in compliance with RCRA. With public workshops in cities nationwide and online courses available anytime, anywhere, getting your RCRA training has never been so easy.

CHECK OUT THESE RCRA TRAINING OPTIONS NOW:

- RCRA Hazardous Waste Management (Initial)
- RCRA Hazardous Waste Management (Refresher)
- Advanced RCRA Hazardous Waste Management

Or, see the full catalog at Lion.com/RCRA

STATE HAZARDOUS WASTE TRAINING:

- Texas Hazardous & Industrial Waste Management
- California Hazardous Waste Management (Initial)
- California Hazardous Waste Management (Refresher)
- Storing Hazardous Waste in California - Ops
- New York Hazardous Waste Management
- Washington Dangerous Waste Management
- Massachusetts Hazardous Waste Management