



RCRA HAZARDOUS WASTE MANAGEMENT COURSE AGENDA

Topics are presented in the form of lecture, guided discussion, Q & A, and practical exercises.

Introduction and Authorities

- What is the Resource Conservation and Recovery Act?
- Structure of the Code of Federal Regulations
- Preparing for inspections
- Civil and criminal fines and penalties
- Liability under CERCLA
- Federal vs. State programs

Hazardous Waste Identification

- Definition and identification of a solid waste
- Using the recycling table
- Speculative accumulation and legitimate recycling
- Regulatory exclusions and reliefs
- Definition of hazardous waste
- Hazardous waste characteristics and listings
- "Mixture," "contained-in," and "derived-from" rules
- Hazardous waste determination records

Accumulating Hazardous Waste

- Generator category determination
- Important concepts: RCRA vs. DOT empties, nonacute vs. acute hazardous wastes
- Notification and ID numbers
- Biennial reporting
- Very small quantity generator exemption
- Exemption rules and training requirements for satellite accumulation, small quantity generators, and large quantity generators
- Episodic generation
- Summary table for container management
- Managing universal wastes and used oil
- Reclamation of spent lead-acid batteries
- Hazardous waste pharmaceuticals
- Types of treatment excluded from permitting

Land Disposal Restrictions (LDRs)

- Purpose and applicability of LDRs
- Three-step determination process: significant waste codes, treatment standards, and underlying hazardous constituents
- Alternative treatment standards for lab packs and hazardous debris
- Preparing various LDR compliance documents

Emergencies and Releases

- Required elements for emergency preparedness and prevention
- Elements of a contingency plan
- Emergency procedures for large and small quantity generators
- RCRA and CERCLA release reporting and procedures
- Reportable quantities calculations and special rules for mixtures
- SARA Title III reporting and procedures

Off-site Shipments

- Overview of hazardous materials classification
- Proper Shipping Names
- Marking requirements
- Shipping papers
- The Uniform Hazardous Waste Manifest, electronic Manifests (e-Manifests), and rules for completion
- Manifest discrepancies, rejected shipments, and exception reporting

Management Systems

- Reasons for maintaining waste documentation
- Recordkeeping requirements by document type
- Documenting waste ID
- Additional DOT and OSHA training mandates
- Pollution prevention efforts
- The Federal Register

Help, Support, and Follow-up Resources

Review

Certification Quiz