

10 Frequent Hazardous Waste Violations

1. Failure to mark the words “Hazardous Waste” on containers at 90/180-day accumulation points or at satellite accumulation points. Frequently containers of hazardous or universal waste are not properly labeled.
2. Failure to maintain adequate aisle space at 90/180-day accumulation points. Aisle space must be adequate for weekly inspections and for emergency response access.
3. Failure to determine which wastes are hazardous. Many hazardous wastes are disposed of as trash or down drains as non hazardous waste.
4. Not safely segregating incompatibles. Frequently hazardous waste is stored near other chemicals (or wastes) that are incompatible. Usually, it is because site personnel didn't know they were incompatible or didn't determine compatibility.
5. Failure to have a contingency plan or failure to keep it up-to-date. A common problem we see is the failure to describe arrangements with local emergency responders; failure to identify the type, location, and capabilities of emergency equipment; and failure to identify the name, address, and phone numbers (including home number) of emergency coordinators (or failure to update the information when the emergency coordinators change).
6. Failure to inspect containers at least weekly at 90/180-day accumulation points and failure to inspect tanks daily. Keep in mind that the inspections must be documented. Weekly is typically defined as every seven days.
7. Failure to have appropriate emergency equipment at a 90-day accumulation area. On-site emergency equipment should reflect the hazards associated with the stored waste. At a minimum, you should have internal communication equipment and suitable equipment to control the types of spills or fires that could occur. Recovery containers and personal protective equipment that your personnel would wear if they were to respond to an incident must be on hand.
8. Containers or tanks that are in poor condition. Common problems include corroded drums, hazardous waste on the outside of the container, compromised container integrity and no secondary containment.
9. Failure to close containers. Although there is not a definitive rule on how containers must be closed at satellite accumulation areas, they should be closed well enough to ensure that no hazardous waste can escape from the container.
10. Storing hazardous waste beyond the authorized time limits. Most states allow you to accumulate hazardous waste for an unlimited amount of time at a satellite accumulation area (provided you don't exceed 55 gallons of non acute waste). You can only store hazardous waste at an accumulation point for 90 days if you are a large quantity generator and 180 days if you are a small quantity generator (270 days for wastes shipped over 200 miles). Wastes can be forgotten and stored past the time limits if containers are not dated at 90-day accumulation areas.