



Hazardous Waste Management (RCRA*) Compliance Plan

General Business Information

Facility name: Enter facility name

Facility address: Enter facility address

US EPA Identification Number: Enter this facility's ID Number

Type of activities performed: Describe activities performed

Plan date/Date of last revision: Click here to enter date(s)

Purpose of this Plan

The purpose of this Plan is to outline the requirements for managing hazardous waste at this facility. This plan should also be used to supplement employee training and should be provided to all employees who have waste management responsibilities, as well as being readily available on the facility floor. This plan is not a complete compilation of regulatory guidance, nor is it a substitute for state or federal regulations. This plan is a facility-specific guide to hazardous waste management procedures that are compliant with Connecticut's Hazardous Waste Management Regulations. [Connecticut's Hazardous Waste Management Regulations](#) are codified in Sections 22a-449 (c)-100 through 119 and 22a-449(c)-11 of the Regulations of Connecticut State Agencies (RCSA). The Connecticut Hazardous Waste Management Regulations incorporate by reference the federal hazardous waste management regulations found in Title 40, Parts 260 through 279 of the Code of Federal Regulations (CFR) with certain changes.

- ▶ **This plan is maintained by the following personnel:** Enter name(s) and/or job title(s)
- ▶ **Frequency at which this plan will be reviewed and updated:** Indicate review period
- ▶ **The following personnel have hazardous waste management responsibilities and are familiar with this Plan:** Enter name(s) and/or job title(s)

* "RCRA" is the federal Resource Conservation and Recovery Act, the federal law that sets standards to ensure that hazardous wastes are stored, handled, recycled and disposed of safely.

Hazardous Waste Determinations

A hazardous waste determination is a procedure used to determine whether a solid waste is a hazardous waste. Any person who generates solid waste must determine if that waste is a hazardous waste. Generators are responsible for making hazardous waste determinations. Hazardous waste determinations must be updated every 12 months and whenever the process generating a waste changes. Documentation of such determinations must be retained in the facility's operating records.

Use the [Hazardous Waste Determination Summary Sheet](#) to determine which of the wastes you generate are hazardous and to document information about each of your wastes.

- ▶ **This facility generates the following wastes*:**

Point of Waste Generation	Waste Description	Hazardous?	Non-Hazardous?	Waste Code(s)
		<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	
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		<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	

**Attach additional sheets as needed. Hazardous waste determinations must be made and maintained for each of these wastes.*

- ▶ **Who is responsible for updating hazardous waste determinations at this facility?**
Enter name(s) and/or job title(s)
- ▶ **Where are hazardous waste determinations kept?** Identify location

Identify Hazardous Waste Generator Category

It is important to correctly determine your facility's hazardous waste generator category because different sets of regulatory requirements apply to each of the generator categories, with Large Quantity Generators of hazardous waste having the most requirements, and Conditionally Exempt Small Quantity Generators the fewest. To determine this facility's generator category, use your hazardous waste determinations to complete the [Hazardous Waste Generator Category Worksheet](#).

For information regarding each generator category, review the [Determining Hazardous Waste Generator Category](#) fact sheet.

- ▶ **This facility's hazardous waste generator category is:** Click to choose a category
- ▶ **The maximum amount of waste generated per calendar month as allowed by this category is:** Click to choose an amount
- ▶ **The maximum amount of waste stored on-site at any one time as allowed by this category is:** Click to choose an amount
- ▶ **Waste must be sent off-site for proper disposal within** Click to choose a number **days of its generation.**

If this facility exceeds its allowable generation rate in a calendar month due to a unique occurrence or an unforeseeable/infrequent event, it must comply with the more stringent regulations associated with the higher generator category during the occurrence/event. If the exceedence becomes routine or is the result of a recurring event, the facility must re-evaluate its generator category and notify the Department of Energy and Environmental Protection (DEEP) of its new category by completing and submitting [EPA Form 8700-12](#) to:

*Connecticut Department of Energy and Environmental Protection
Bureau of Materials Management and Compliance Assurance
Waste Engineering and Enforcement Division
79 Elm Street, 4th Floor
Hartford, CT 06106-5127*

Waste Minimization

Waste minimization is the most effective strategy for reducing the amount of hazardous waste a facility generates. A few ways to accomplish this include purchasing raw materials in the smallest practical size and quantity, avoiding overstocking material, and replacing toxic materials with non-toxic materials.

This facility minimizes its waste by:

- ▶ **Substituting raw materials for less hazardous alternatives:**
If yes, provide a detailed description:

- ▶ **Reducing water usage:**
If yes, provide a detailed description:

- ▶ **Implementing energy efficiency initiatives:**
If yes, provide a detailed description:

- ▶ **Using closed loop processes:**
If yes, provide a detailed description:

- ▶ **Other, provide a detailed description:** _____

Hazardous waste handling, storage and disposal

All generators of hazardous waste must ensure their wastes are properly managed from the point of waste generation through waste treatment or final disposal in order to minimize or eliminate potential releases of hazardous waste to the environment.

- ▶ **Describe the methods used to ensure storage limits for this facility's generator category are not exceeded:** Click here to enter text.
- ▶ **Are inspections performed?** Yes/No
- ▶ **Indicate the frequency of inspections and the items/areas to be inspected (include a copy of the inspection schedule and log):** Click here to enter text.
(Review DEEP's [Sample Inspection Log for Hazardous Waste Containers](#) and [List of Equipment, Structures and Areas to be considered for Inclusion in an Inspection Schedule.](#))
- ▶ **Who will be responsible for performing the inspections?** Enter name(s) and/or job title(s)
Who will act as alternate(s)? Enter name(s) or job title(s)
- ▶ **Locate the hazardous waste storage areas:** Click here to enter text.
Describe how waste(s) stored in these areas are managed: Click here to enter text.
- ▶ **Locate the satellite waste storage areas:** Click here to enter text.
Describe how satellite containers are managed (include procedures for labelling, dating, and moving satellite containers into the hazardous waste storage area):
Click here to enter text.
- ▶ **Is hazardous waste accumulated in tanks?** Yes/No
If yes, describe how the tanks and their piping and secondary containment systems are managed: Click here to enter text.
- ▶ **Is hazardous waste treated on-site?** Yes/No
If yes, describe the treatment process. Include a standard operating procedure for operating and servicing the treatment system.
Click here to enter text.
- ▶ **Describe how this facility safely and properly disposes of its hazardous waste:**
Click here to enter text.
- ▶ **Identify who schedules/arranges for waste disposal:** Enter name(s) and/or job title(s)
Identify who is responsible for preparing/signing the manifest:
Enter name(s) and/or job title(s)
Manifests and land disposal restrictions must be maintained on-site for at least 3 years, where are these records kept? Click here to enter text.
- ▶ **Identify this facility's licensed waste transportation and disposal contractors and include their contact information:** Click here to enter text.

Emergency Preparedness and Response

Development and implementation of emergency plans and procedures and maintenance of the proper emergency response equipment are necessary to minimize both the potential for a hazardous waste release and the impact of such a release on human health and the environment. Emergency preparedness and response procedures must be designed to minimize hazards from fires, explosions, and any unplanned sudden or non-sudden release, including threats posed by natural catastrophic disasters.

Large quantity generators are responsible for maintaining a formal contingency plan which must be kept on-site and provided to local and state emergency responders. Review DEEP's [Hazardous Waste Contingency Plan fact sheet](#) for detailed information about hazardous waste management contingency planning.

Small quantity generators are responsible for maintaining and posting an emergency response poster.

Conditionally exempt small quantity generators must be prepared for an emergency but do not require a formal plan or a posting.

- ▶ **Discuss emergency preparedness and response procedures implemented at this facility (e.g., is a contingency plan or posting in place?):**

Click here to enter text.

- ▶ **Identify the facility's emergency coordinator(s) and back-up coordinator(s) and how to contact them:**

Enter name(s) and/or job title(s) with on and off-duty contact information

- ▶ **List phone numbers for emergency response agencies:** Click here to enter text.

- ▶ **Include a site map showing evacuation routes and emergency exits and the location of waste storage and satellite areas, spill response kits, fire extinguishers and alarms, first aid kits, eye wash stations, etc.**

Personnel Training

Training employees who have job responsibilities which include the handling or management of hazardous waste is critical to reducing the potential for mistakes or handling waste in a way that might threaten or harm human health and the environment. Training must be both job specific as well as inclusive of the regulatory requirements for managing hazardous waste for your facility’s generator category. DEEP offers a [Hazardous Waste Management Online Training Course](#) through its website to satisfy the state regulatory training component. In addition to the on-line training, job specific training should occur on-site.

- ▶ **Describe the training requirements which must be met to comply with this facility’s generator category:** Click here to enter text.

- ▶ **The following employees have hazardous waste responsibilities requiring training:**
Enter name(s) and job title(s)

- ▶ **List job titles and descriptions of positions with waste management responsibilities:**
List job title(s) with descriptions of each

- ▶ **The table below outlines this facility’s hazardous waste management training schedule*:**

Employee	Job Title	Waste Management Responsibilities	Last trained on	Next training due by

*Attach additional sheets as needed.

Universal Waste

There are five waste streams that can be managed as a universal waste in Connecticut. These universal wastes are: (1) Batteries; (2) Mercury-containing equipment; (3) Certain pesticides; (4) Lamps (including but not limited to fluorescent, neon and mercury vapor lamps); and (5) Used electronics. Universal wastes must be managed in a certain way and generally, cannot be stored on-site for greater than one year. DEEP's [Universal Waste Rule fact sheet](#) provides detailed information concerning the proper management of universal waste.

▶ **Identify each universal waste generated at this facility:**

Batteries:
If yes, identify type(s), quantity and generation frequency:

Mercury-containing equipment:
If yes, identify type(s), quantity and generation frequency:

Pesticides:
If yes, identify the pesticide type(s), quantity and generation frequency:

Lamps:
If yes, identify type(s), quantity and generation frequency:

Used electronics:
If yes, identify type(s), quantity and generation frequency:

- ▶ **This facility's universal waste handler status is:** [Click to choose a status](#)
- ▶ **Indicate how each universal waste is managed and its storage time tracked while on-site:**
[Click here to enter text.](#)
- ▶ **Describe how each universal waste will be sent off-site for disposal/recycling, including the name and contact information of each transporter and disposal contractor:**
[Click here to enter text.](#)
- ▶ **Describe the training requirements which must be met to comply with this facility's generator category:** [Click here to enter text.](#)

Used Oil

Used oil managed improperly can lead to pollution of soil, groundwater, and surface water. Commercial and industrial businesses generating used oil must manage their used oil in compliance with Connecticut’s used oil regulations; specifically, generators of used oil must label their used oil “Used Oil”, store the used oil within impervious secondary containment, and test the used oil for total halogen content. For information on the proper management of used oil, refer to DEEP’s [Proper Management of Used Oil fact sheet](#) which includes links to guidance documents and regulatory citations.

- ▶ **Does this facility generate used oil? Yes/No**
If yes, describe which processes generate the used oil:

- ▶ **Describe how and where used oil is managed at this facility:**
Click here to enter text.
- ▶ **Where are total halogen determinations kept?**
Click here to enter text.

Closing Hazardous Waste Storage Areas and Tank Systems

Small and large quantity generators who discontinue using an area or tank in which hazardous wastes are/were stored or who are changing their operating status to conditionally exempt small quantity generator must document decontamination of that area or tank.

DEEP provides guidance on how generators can compliantly close former storage areas in two documents [Draft RCRA Closure Guidance for Generators Who Store Less Than 90 Days Container Storage Areas and Tank Systems](#) and [Guidance for Implementing and Documenting Closure \(Waste Removal and Decontamination\) for Indoor RCRA Hazardous Waste Container Storage Areas](#).

The following hazardous waste container storage areas and/or tank systems will require closure when no longer in use or when this facility’s generator category is changed to conditionally exempt small quantity generator or non-handler:

Storage Area/Tank System Description	Location	Date Closed

Biennial Reporting

Certain handlers of hazardous wastes are required to file a biennial report summarizing their hazardous waste activity for odd-numbered years. Large quantity generators and treatment, storage and disposal facilities are required to complete and submit the biennial report; however, conditionally exempt and small quantity generators who retain their large quantity generator notification also file these reports. Biennial reports must be completed and submitted in March of each even-numbered year. Answers to frequently asked questions and additional information concerning biennial reporting, as well as links to the reporting forms, are available on DEEP's [Biennial Hazardous Waste Report fact sheet](#).

- ▶ **This facility is subject to biennial reporting requirements**

Recordkeeping

Recordkeeping requirements are addressed throughout this compliance plan. As a best management practice, a hazardous waste generator should maintain a centralized and organized recordkeeping system at its facility. Unless otherwise specified, three years is typically the minimum retention period for documents related to hazardous waste management (e.g., waste determinations and waste profile sheets, land disposal restrictions, manifests, personnel training records). Because hazardous waste generators are responsible for their wastes from point of generation through final disposal, it is encouraged that generators permanently retain documentation that can be used in the future to prove that hazardous waste was properly managed, minimizing long-term liabilities.

- ▶ **Describe the recordkeeping and document retention system employed by this facility:**
Click here to enter text.

Suggested Attachments to this Plan:

- ▶ Copies of Hazardous Waste Determinations
- ▶ Copies of Inspection Logs
- ▶ Emergency Response Plan/Contingency Plan
- ▶ Copies of training certificates
- ▶ Compliance Calendar
- ▶ Applicable Regulatory Guidance Documents
- ▶ Storage Area Closure Documentation
- ▶ Business Recycling Profile

Links to Other Useful Resources on [DEEP's website](#):

- ▶ [RCRA Help!](#)
- ▶ [COMPASS – Hazardous Waste Compliance Assistance Program](#)
- ▶ [Hazardous Waste Advisory Committee](#)
- ▶ [Business Recycling Assistance](#)
- ▶ [Small Quantity Generator Handbook](#)
- ▶ [Conditionally Exempt Small Quantity Generator Handbook for Hazardous Waste Handlers](#)
- ▶ [Permitted Transporter List](#)
- ▶ [Permitted Facility List](#)
- ▶ [List of Certified Environmental Testing Laboratories](#)
- ▶ [Bringing Small Business Waste to Household Hazardous Waste Collections](#)
- ▶ [Non-RCRA Hazardous Waste \(Connecticut Regulated Waste\)](#)

Certification of Document

“I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law.”

Signature of chief executive officer or a duly authorized representative of such officer, as those terms are defined in Section 22a-430-3(b)(2) of the RCSA, and by the individual(s) responsible for actually preparing this document