



# Status of HW Program Implementation Activities

Hazardous Waste Advisory Committee  
November 29, 2018

# Topics for Today

- Hazardous Waste Regulations Update
- RCRA Generator Improvements Rule and Survey Results
- New EPA Rule Regarding the Management of Airbag Inflators
- Status of EPA's Pharmaceutical Rule
- EPA Region 1 & Region 1 States Letter to TSDFs
- Changes to DEEP's Hazardous Waste Online Training Course



# Hazardous Waste Regulations Update



- DEEP has continued its coordination with EPA to update CT's HW regulations in phases.
- First phase: update CT regs to 7/1/2008 federal regs.
  - Target date for public notice: next fall (2019).
- Work has started, revised CT regs being drafted now.
- Will retain "Incorporation by Reference" (IBR) format.\*
- Also plan to pick up rules for e-Manifest and certain portions of HW Generator Improvements Rule.
- 2nd/3rd phases: update to ~ current federal regs.

# RCRA Generator Improvements Rule and Survey Results



- “GIR” - Final Rule issued by EPA on 11/28/2016.
- Federal Effective Date - 5/30/2017.
- EPA web page with information on the rule:  
[www.epa.gov/hwgenerators/final-rule-hazardous-waste-generator-improvements](http://www.epa.gov/hwgenerators/final-rule-hazardous-waste-generator-improvements)
- Not effective in Connecticut until DEEP amends its regulations to adopt it.
- PA 17-242 - state law regarding GIR.
- DEEP is evaluating adoption of certain portions of the rule as part of the current HW regulation update.

# RCRA Generator Improvements Rule: DEEP Survey



- DEEP Survey Monkey survey June - July, 2018 to solicit feedback from stakeholders regarding the GIR.
- Sent to >1000 HWAC listserv members and HW notifiers.
- 129 responses received (13% response rate).
- Good mix of respondents:
  - Different generator types (LQG, SQG, CESQG).
  - Small, medium, large-sized companies.
  - Others (waste management companies, engineers, consultants, attorneys).

# Overview of Survey Results:



- >60% generally supported DEEP adoption of the GIR.
- However, of the 17 new provisions of the GIR only a few were highly rated for adoption by DEEP. In particular:
  - Consolidation of CESQG (VSQG) waste at LQG sites.
  - New requirements for episodic generation events.
  - Variance of 50-foot buffer zone requirement.
  - Clarification of hazardous waste determination requirements.
- ~70% of respondents favored adopting preferred parts of GIR first, and the rest later.

# GIR: Where Are We Going from Here?



- DEEP is looking closely at the provisions most favored by respondents for adoption by DEEP.
- Also looking at other provisions of the GIR.
- Will evaluate the different GIR provisions, and decide which ones to include in the current HW regulation update.
- Report to Legislature will be finalized soon.
  - Will be posted on DEEP's [HW Regulations Web Page](#).
  - Will include the Survey Results.

# New EPA Rule: Management of Airbag Inflators



- Interim Final Rule - recently signed by EPA administrator.
- “Interim Final” - effective upon issuance, but EPA still takes comments and issues a Final Rule later.
- EPA did this because there are ~20 Million defective Takata airbags currently in storage around the USA.
  - Provides for streamlined management of airbag inflators.
- Should appear in the Federal Register soon.
- Most likely will not apply in CT right away - stay tuned.
- EPA web page:  
[www.epa.gov/hw/interim-final-rule-safe-management-recalled-airbags](http://www.epa.gov/hw/interim-final-rule-safe-management-recalled-airbags)



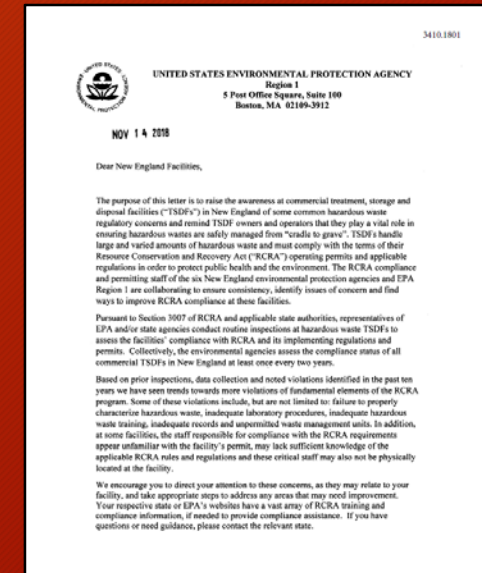
# Status of EPA's Pharmaceutical Rule



- EPA proposed rule issued 9/25/2015.
- Final Rule expected very soon.
- Until Final Rule is issued, it is unclear what the immediate impact in CT will be (if any).
- Most likely would be considered “less stringent” by EPA.
- As a result, would not be in effect in CT until CT regs are changed to adopt it.
- EPA web page:  
[www.epa.gov/hwgenerators/proposed-rule-management-standards-hazardous-waste-pharmaceuticals](http://www.epa.gov/hwgenerators/proposed-rule-management-standards-hazardous-waste-pharmaceuticals)

# EPA Region 1 & Region 1 States Letter to TSDFs

- Letter dated 11/14/2018 to commercial TSDFs in New England.
- Purpose:
  - Raise awareness at commercial TSDFs of some common regulatory concerns that have been noted in recent years.
  - Remind TSDFs of their vital role in ensuring that wastes are safely managed from “cradle to grave.”
- Common concerns that were noted relate to:
  - Waste characterization and testing;
  - Use of unpermitted units;
  - Recordkeeping; and,
  - TSDF personnel’s training & knowledge of permit conditions.



# Hazardous Waste Online Training Course



- Course has been upgraded and enhanced with the feedback received over the years.
- Second upgrade since first launched in 2011.
- A few of the upgrades:
  - Enhanced look and feel.
  - More consistent, streamlined approach to moving through the course.
  - Feedback provided by users has been incorporated to better clarify the content and exam questions.
  - Past problem with the wrong date on the course certificate: the course will refresh yearly - should solve the problem.
  - The course is now ADA compliant.

# Online Training Course (cont.)



- As of 11/28/18, the course has moved. If you are registering for your 2018 annual training, follow the instructions on the DEEP website:  
[www.ct.gov/deep/cwp/view.asp?a=2689&q=481076&deepNav\\_GID=1967](http://www.ct.gov/deep/cwp/view.asp?a=2689&q=481076&deepNav_GID=1967)
- If you have already started your 2018 training, you may log in to your existing account to complete your in-progress training for 2018.
- However, the “old” course will be taken off-line by December 27, 2018. If you cannot complete your training before then, you may continue your training in the new course. Simply register as instructed in the above link.

# Questions?



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