

***BUREAU OF HAZARDOUS
WASTE COMPLIANCE &
ENFORCEMENT***

**PETER TAYLOR, CHMM
SOUTHERN FIELD OFFICE
(856) 614-3650**

*HOW DID I GET MYSELF IN
THIS MESS*



*AND
HOW DO I GET MYSELF OUT*



WHAT ARE YOUR CHANCES? FEEL LUCKY

NUMBER OF FACILITIES INSPECTED	3451
NUMBER WITH VIOLATIONS	1466
AVERAGE VIOLATIONS PER FACILITY	3

YOUR CHANCES OF BEING OUT OF COMPLIANCE ARE	43%
--	------------

NO GRACE PERIOD GRACE PERIOD

PRIORITY VIOLATIONS

261.11-FAILURE TO DETERMINE

262.12(a)-FAILURE TO HAVE EPA ID #

**262.20(a)-FAILURE TO PREPARE HAZARDOUS
WASTE MANIFEST**

WHY?

CESQG - FLAMMABLE PETROLEUM PRODUCTS TO TSD ON A BILL OF LADING OR SOLUTIONS WITH WRONG pH

SOLUTION!

SEND TO USED OIL FACILITY OR MAKE SURE TSD KNOWS IT SHOULD GO FOR ENERGY RECOVERY OR MAKE SURE SOLUTION IS STABLE & METER IS CALABRATED.

PRIORITY VIOLATION

270.10(E-F)-ILLEGAL TSDF

\$\$\$\$

WHY?

ABANDONED OR FORGOTTEN CONTAINERS

SOLUTION!

**TREAT YOUR CHEMICALS AND WASTE
LIKE THEY ARE PRODUCTS!**

GOOD CONTAINERS

LABELED

INVENTORIED

STORED ORDERLY

PRIORITY VIOLATIONS

265.31-DISCHARGE OF A HAZARDOUS WASTE

**NJAC 7:1.11(A) - DISCHARGE, HAZARDOUS
SUBSTANCE**

COMMON VIOLATIONS 1

**262.34(a) - FAILURE TO SHIP OFF WASTE
WITHIN 90 DAYS**

**262.34(d) - FAILURE TO SHIP OFF WASTE
WITHIN 180/270 DAYS**

262.34(a)2 - ACCUMULATION START DATE

COMMON VIOLATIONS 2

ACCUMULATION AREA

262.34(A)3 - HAZARDOUS WASTE LABEL

SATELITE AREA

**262.34(C)(1)(ii) - “HAZARDOUS WASTE*”
LABEL *OR OTHER WORDS DESCRIBING
THE MATERIAL**

COMMON VIOLATIONS 3

LQG

**265.51(A) - FAILURE TO HAVE
CONTINGENCY PLAN.**

265.54 - FAILURE TO UPDATE PLAN.

SQG

**262.34(d)5 - FAILURE TO HAVE
CONTINGENCY PLAN.**

COMMON VIOLATIONS 4

PREPAREDNESS & PREVENTION

**265.37 - AGREEMENT WITH POLICE
DEPARTMENTS, FIRE DEPARTMENTS,
EMERGENCY RESPONSE CONTRACTORS, &
HOSPITALS**

COMMON VIOLATIONS 5

CONTAINER MANAGEMENT

265.171 - CONTAINERS IN GOOD CONDITION

265.173 - CONTAINERS SEALED WHEN NOT IN USE

265.174 - INSPECTIONS: DOCUMENT

265.35 - AISLE SPACE 18/30”

COMMON VIOLATIONS 6

TRAINING

265.16(a)(1) - FAILURE TO PROVIDE TRAINING.

REFRESHER

265.16(C) - FAILURE TO PROVIDE

265.16(D) - MAINTAIN RECORDS

COMMON VIOLATIONS 7

N.J.A.C. 7:26G-3.2(B) - FEE PAYMENTS

**262.41(A) - SUBMIT HAZARDOUS WASTE
REPORT**

**262.40(A)-MANIFESTS FOR 3 YEARS: LDR
FORMS**

USED OIL VIOLATIONS

N.J.A.C. 7:26A-6.4(d)1- FAILURE TO COMPLY WITH SPCC REGULATIONS.

N.J.A.C. 7:26A-6.4(D)5-FAILURE TO INITIATE RESPONSE TO RELEASES.

N.J.A.C. 7:26A-6.4(D)4 - USED OIL CONTAINERS & FILL PIPES LABELED "USED OIL"

UNIVERSAL WASTE VIOLATIONS

- 1. DISASSEMBLING OR PROCESSING VARIOUS UNIVERSAL WASTES.**
 - 2. FAILURE TO DETERMINE IF A PROCESSED UNIVERSAL WASTE BECOMES A HAZARDOUS WASTE.**
 - 3. OVER PACKING UNIVERSAL WASTE THAT ARE OR COULD LEAK.**
 - 4. ACCUMULATING UNIVERSAL WASTES OVER ONE YEAR.**
- 1. FAILURE TO LABEL UNIVERSAL WASTES PROPERLY.**
 - 2. FAILURE TO KEEP REQUIRED RECORDS.**

Mercury switch violations

N.J.S.A. 13:1E-99.87-FAILURE TO REMOVE SWITCH

N.J.S.A. 13:1E-99.87- FALSELY REPRESENTING THAT SWITCHES HAVE BEEN REMOVED

- 1. FAILURE TO HANDLE SWITCHES PROPERLY**
- 2. FAILURE TO KEEP RECORDS**

QUESTIONS

