

## Notes from Compliance University: Hazardous Waste Management

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Sign up for DEP's mailing list to receive notices of regulation changes and hearings

- <http://www.mass.gov/dep/public/reglist.htm>

Important to keep up to date with state regulations – they are more strict than federal regs (310 CMR 30 <http://www.lawlib.state.ma.us/300-399cmr.html>)

EPA's RCRA training modules are a helpful resource to get an overview of specific regulatory topics (e.g., hazardous waste, air emissions, permits and interim status, etc.)

<http://www.epa.gov/epaoswer/hotline/rmods.htm>

- Important to periodically evaluate your hazardous waste (HW) vendor. Consider: quality of destination site, thoroughness of documentation, willingness to assist you with reduction strategies
- Remember that the generator is the party responsible for the identification of HW  
Companies that manufacture, use, store, distribute chemicals should be familiar with the Chemical Facility Anti-Terrorism Standards enforced by the Dept. of Homeland Security

[http://www.dhs.gov/xprevprot/programs/gc\\_1169501486179.shtm](http://www.dhs.gov/xprevprot/programs/gc_1169501486179.shtm)

Strive to meet NFPA code to minimize risk of lawsuit and keep insurance rates down

<http://www.nfpa.org/categoryList.asp?categoryID=124&URL=Codes%20and%20Standards&cookie%5Ftest=1>

- Understand difference between VSQG, SQG, LQG (very small, small, large quantity generator) and remember different regs that apply to each
- Be sure that you get the uniform manifest back to confirm that waste arrived at proper site
- Keep all records forever to be able to demonstrate good judgment in a civil suit (statute of limitations only refers to length of time in which state agency can file suit)
- Emergency plans should address both preventative and responsive measures. Remember to address flooding risks
- Have an Integrated Contingency Plan that consolidates all emergency plans for easy access and to be able to see the “full picture”
- Costs associated with hazardous waste management activities should be allocated to the production department, not the environmental area, to provide the company with an accurate accounting of the cost of using these materials in the operations, which includes the purchasing, insurance, and disposal
- Remember: What's cheap is expensive in this business