

COMPLIANCE FOR LARGE QUANTITY GENERATORS OF HAZARDOUS WASTES

Did you know that two of the top violations reported by Illinois EPA and U.S. EPA compliance inspectors is the lack of specific annual **RCRA hazardous waste training** and missing or out-of-date **hazardous waste contingency plans**?

Recent federal fines levied against Chicago area companies for typical RCRA violations have exceeded \$100,000. Because U.S. EPA attorneys recognize the unfair advantage that non-compliance benefits violators, the fines are ultimately set to far exceed the initial cost of compliance.

To be in compliance, large quantity generators of hazardous waste (i.e. generate more than 2200 pounds in a single month) must follow many requirements; including:

- Have a **hazardous waste contingency plan** and employee job descriptions for their waste management duties.
- Submit copies of the contingency plan to the agencies that would be asked to respond in case of emergency, including police, fire and hazmat responders.
- Perform annual **hazardous waste management training** for employees that handle the wastes or sign the manifests.
- Properly **label and date** the hazardous waste containers.
- Keep **meticulous records** including annual employee training records, as well as documentation that the contingency plan was sent to the responding agencies.

Admiral Environmental has extensive experience assisting companies comply with these requirements. We are able to prepare the Contingency Plan and conduct the required training that is specific to your facility.

Please give us a call.

Philip A. Twomey, P.E.

PS: If you are not sure if you will be a Large Quantity Generator for 2012, we can review your 2012 hazardous waste manifests to determine your status. Just give me a call and we can get it arranged.