CONTENTS

1. REGULATIORY FRAMEWORK	1
1.1 Introduction	1
1.2 Environmental Agencies-Federal	1
1.3 Environmental Agencies-State	2
1.4 Hazardous Waste Statutes and Regulation	3
2. THE RESOURCE CONSERVATION AND RECOVERY ACT	11
2.1 Introduction	11
2.2 RCRA's Scope and Purpose	11
2.3 Wastes Reulated Under RCRA	12
2.4 Subtitle C Fundamentals	14
2.5 Hazardous Waste Generators	16
2.6 Hazardous Waste Transportation	18
2.7 Recordkeeping and Reporting	19
2.8 Land Disposal Restrictions	19
3. HAZARDOUS WASTE IDENTIFICATION AND CLASSIFICATION	23
3.1 Introduction	23
3.2 Definition of Hazardous Waste	23
3.3 Federal Laws Governing Hazardous Substances	24
3.4 Terminology Relating to hazardous Waste	24
3.5 RCRA Hazardous Wastes	25
3.6 "Listed" and "Characteristic" Hazardous Wastes	28
3.7 Hazardous Waste Classification	29
3.8 EPA Hazard Classes	29
3.9 Common Hazardous Wastes	30
4. HAAARDOUS WASTE GENERATORS	37
4.1 Introduction	37
4.2 Hazardous Waste Generator Categories	38
4.3 Determining the Waste Generator Category	40
5. HAZARDOUS WASTE STORAGE AND DISPOSAL	43
5.1 Introduction	43
5.2 Hazardous Waste Storage	43
5.3 Labeling	44
5.4 Emergency Response Plans	44
5.5 Recordkeeping and Reporting Requirements	45

5.6 Land Disposal Restrictions	46
5.7 RCRA Hazardous and Solid Waste Amendments	47
5.8 LDR Treatment Standards	49
5.9 LDR Variances	50
5.10 Waste Mixtures	50
5.11 Contaminated Soils	50
5.12 Waste Minimization	51
5.13 Sample Waste Minimization Program	52
6. HAZARDOUS WASTE REPORTING AND RECORDKEEPING	55
6.1 Introduction	55
6.2 RCRA Hazardous Waste Spill Reporting	55
6.3 Underground Storage Tank Releases	57
6.4 UST Corrective Actions	58
6.5 CERCLA Hazardous Waste Spill Reporting	60
6.6 Clean Water Act Hazardous Waste Spill Reporting	62
6.7 Developing a Contingency Plan	63
6.8 Emergency Coordinator	63
6.9 Hazardous Waste Recordkeeping	64
6.10 Hazardous Waste R ecordkeeping Checklist	68
7. HAZARD COMMUNICATION	71
7.1 Introduction	71
7.2 OSHA Hazard Communication Standard Requirements	72
7.3 Material Safety Data Sheets	72
7.4 Written Hazard Communication Plan	73
7.5 Employee Training Program	74
7.6 Emergency Planning and Community right-to Know Requirements	75
7.7 Reporting Spills or Releases	76
7.8 OSHA Asbestos Standard	81
7.9 Monitoring of Asbestos Exposure	82
8. TRANSPORTING HAZARDOUS WASTES	87
8.1 Introduction	87
8.2 Hazardous Materials Transportation Act	88
8.3 Resource Conservation and Recovery Act	89
8.4 Hazardous Waste Shipments Preparation	90
8.5 Hazard Class	91
8.6 DOT Shipment Number	91
8.7 Packaging Requirements	91
8.8 Used Batteries	92
8.9 Labels and Placards	93
8.10 Markings	94

8.11 Choosing a Reputable Transporter	95
8.12 Hazardous Waste Manifest Requirements	96
8.13 Manifest Exception Reports	98
8.14 Manifest Exemptions	98
8.15 Transporting Hazardous Wastes in Company Vehicles	99
9. HAZARDOUS WASTE LIABILITY INSURANCE	101
9.1 Introduction	101
9.2 Types of Coverage	102
9.3 The Current Problem	104
9.4 Standard CGL Policy	104
9.5 Duty to Defend	105
9.6 Types of Damages Covered by the CGL Policy	106
9.7 Definition of Occurrence	108
9.8 Trigger of Coverage	108
9.9 "Sudden and Accidental" Pollution Exclusion	110
9.10 The "Absolute Pollution Exclusion"	112
9.11 The "Owned Property" Exclusion	114
9.12 Insuring Against Environmental Risks	115
10. HAZARDOUS WASTE PENALTIES COSTS AND COMPLIANCE	117
10.1 Introduction	117
10.2 Hazardous Waste Penalties	117
10.3 Hazardous Waste management Costs	119
10.4 Hazardous Waste Audits	120
10.5 Preparing for an Audit	122
10.6 Performing an Audit	122
Appendix 1: U.S. EPA Regional Offices	127
Appendix 2: Federal Hazardous Waste Regulatory offices	131
Appendix 3: State Hazardous and Solid Waste Regulatory offices (HW/SW)	139
Appendix 4: RCRA Hazardous Wastes	151
Appendix 5: EPA Notification of Hazardous Waste Activity	171
Appendix 6: Tier One Form	191
Appendix 7: Tier Two Form	197
Appendix 8: Appendix E to Hazard Communication Standard (Advisory)-Guideli	nes for
Employer-	
Compliance	205
Appendix 9: Sample Material Safety Data Sheet	219
Appendix 10: Toxic Chemical Release Inventory Reporting form R	223
Appendix 11: EPA Catalogue of Hazardous and Solid Waste Publications	345
List Of Regulations and Statutes References in Text	345
Index	349