

What Is Hazardous Waste? (from <http://www.epa.gov/epaoswer/hazwaste/id/infocus/dryclean.pdf>)

To be considered hazardous waste, a material first must be classified as a solid waste. EPA defines solid waste as garbage, refuse, sludge, or other discarded material (including sludges, liquids-solids, sludges, and contained gases materials). If your waste is considered solid waste, you must then determine if it is hazardous waste. Wastes are defined as hazardous by EPA if they are specifically named on one of four lists of hazardous wastes (listed wastes) or if they exhibit one of four characteristics (characteristic wastes). Each type of RCRA hazardous waste is given a unique hazardous waste code using the letters D, F, K, P, or U and three digits (e.g., D001, F005, P039).

Listed Wastes. Wastes are listed as hazardous because they are known to be hazardous to human health and the environment when not managed properly, regardless of their concentrations. The lists include the following three types of waste:

Non-Specific Source Wastes. These are material-specific wastes, such as solvents, generated by several different industries. Waste codes range from F001 to F039. Examples include perchloroethylene (perc), trichlorethane (TCA), and chlorofluorocarbons (CFC-113).

Specific Source Wastes. These are wastes from specifically identified industries. Waste codes range from K001 to K161. Dry cleaning facilities typically do not generate specific source wastes.

Dangerous Commercial Chemical Products. Off-site products, container residue, spill residue runoff, or active ingredients that have spilled or are unused and that have been, or are intended to be, discarded. Waste codes range from P001 to P205 and U001 to U411. An example is unused perc (U210) from dry cleaning facilities. Some states adopt more stringent requirements for facilities handling hazardous waste.

Characteristic Wastes. Even if your waste does not appear on one of the hazardous waste lists, it still might be regulated as hazardous waste if it exhibits any of the following characteristics:

Ignitable. Ignitable wastes create fires under certain conditions or are spontaneously combustible, and have a flash point less than 60 °C (140 °F). Examples are TCA and CFC-113, spent filter cartridges, and dry cleaning residues from perc recovery and treatment, as well as Stoddard's solvent. The waste code for these materials is D001. Petroleum dry cleaners using higher flash point solvents might be exempt from regulation.

Corrosive. Corrosive wastes are acids or bases that are capable of corroding metal containers, such as storage tanks, drums, and barrels. Battery acid is a good example. The waste code for these materials is D002.

Reactive. Reactive wastes are unstable under “normal” conditions. They can cause explosions, toxic fumes, gases, or vapors when mixed with water. Examples include lithium-sulfur batteries and explosives. The waste code for these materials is D003.

Toxic. Toxic wastes are harmful or fatal when ingested or absorbed. When toxic wastes are disposed of on land, contaminated liquid may drain (leach) from the waste and pollute ground water. Toxicity is defined by a lab procedure called the Toxicity Characteristic Leaching Procedure (TCLP). Waste codes for these range from D004 to D043.

AM I REGULATED BY RCRA OR SUPERFUND? SUPERFUND?

RCRA regulates the t_____, s_____, and d_____ of hazardous waste being generated now and in the future. Superfund was created to pay for the i_____, i_____, i_____, ranking, and c_____ of abandoned hazardous waste sites that people responsible for contamination are unable or unwilling to clean up.

How Are Generators Regulated?

Hazardous waste generators are divided into three categories, according to how much they generate in a calendar month: **L_____ Quantity Generators (LQGs)**. LQGs generate greater than or equal to _____ kg (approximately 2,200 lbs) of hazardous waste per month, or greater than 1 kg (approximately 2.2 lbs) of acutely hazardous waste per month.

S_____ Quantity Generators (SQGs). SQGs generate greater than _____ kg (approximately 220 lbs) but less than 1,000 kg of hazardous waste per month.

Conditionally E_____ Small Quantity Generators (CESQGs). CESQGs generate less than or equal to _____ kg of hazardous waste per month, and less than or equal to 1 kg of acutely hazardous waste per month. Some states do not recognize the CESQG class.

Under the federal RCRA requirements, your generator status might change from one m_____ to the next as the quantity of waste you generate changes. You must comply with whichever standard is applicable for a given month. In many cases, small businesses that fall into different generator categories at different times choose to always satisfy the more stringent requirements (usually state requirements) to simplify compliance. Generators must “count” the amount of waste generated in a calendar month, which involves adding up the total weight of all quantities of characteristic and listed waste generated at a particular facility. Certain wastes, such as those that are reclaimed or recycled continuously on site, are not counted under the federal regulations.

HOW IS USED OIL HANDLED?

RCRA contains special provisions for the management of used oil destined for r_____ or r_____. These management standards apply to oil refined from crude oil or any synthetic oil that has become contaminated through use by chemical or physical impurities. Used oil that will be recycled or reused is subject to special management standards, rather than the hazardous waste standards, unless it is treated as a waste (i.e., you decide to send the used oil for treatment and disposal rather than recovery or recycling).

HOW ARE UNDERGROUND STORAGE TANKS REGULATED?

If dry cleaning facilities store their perchloroethylene (perc) in underground storage tanks (USTs), they are subject to the UST regulations under RCRA. Among the regulatory requirements for USTs are c_____ protection, equipment for preventing spills and overfills, and implementation of a l_____ detection program that provides monitoring for leaks at least once every 30 days. The RCRA regulations contain many exclusions for wastes and waste management practices that are not considered to be hazardous. Some states, however, do not recognize the federal exclusions. As part of your solvent recovery operations, you probably generate wastewaters containing trace amounts of solvent. Most dry cleaners discharge this wastewater to a p_____ o_____ t_____ w_____ (POTWs) and, therefore, it is not considered a hazardous waste.