

RCRA Updates

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Outline:

- Hurricane Florence Response
- Rulemaking
- Programmatic Activities



Hurricane Florence Response



Florence Response

- Swine Lagoons – 31 units discharged
- CCR – discharges
- Debris Management

Rulemaking

Coal Combustion Residual Rules

- 186 CCR units, made up of 51 landfills and 135 surface impoundments.
- Alabama and Georgia have submitted CCR permit program applications to EPA Region 4 for review/approval.



Aerosol Cans (Proposed Rule)



Aerosol Cans (Proposed Rule)

- Ease the burden on the retail sector by allowing aerosol cans to be treated as universal waste.
- Promote collection and recycling of cans
- Encourage the development of municipal and commercial programs to reduce the quantity of this waste going into landfills or combustors.

Aerosol Cans

- Container must be labeled or marked clearly with any of the following phrases: “Universal Waste- Aerosol Can(s)”, “Waste Aerosol Can(s)”, or “Used Aerosol Can(s)”;
- Storage of universal waste aerosol cans is limited to one year; and,
- No manifest is required for transport of universal waste.

Pharmaceutical Rule (Proposed)



Pharmaceutical Rule (Proposed)

- The Proposed Rule was published in the FR on September 25, 2015 (80 FR 58014)
- Only those pharmaceuticals that are already considered hazardous waste will be covered by the new rule
- Rule bans the disposing of HW pharmaceuticals to the sewer
- Sector-Specific standards

Hazardous Waste Generator Improvements Rule

- Revised the RCRA hazardous waste generator regulations to enhance flexibility, strengthen environmental protection, and improve compliance
- Final rule was published on November 28, 2016.
- The Rule was effective on May 30, 2017.



Hazardous Waste Generator Improvements Rule - Status

- Alabama – adopted, effective 04/06/18 – not submitted for authorization
- Florida – adopted, effective 06/18/18 – submitted for authorization
- Georgia – adopted, effective 09/28/17 – submitted for authorization
- Kentucky – adopted, effective 12/07/17 – submitted for authorization
- Mississippi – adopted, effective 05/24/18 – not submitted for authorization
- North Carolina – adopted, effective 03/01/18 – not submitted for authorization
- South Carolina and Tennessee – **not adopted**

E-Manifest Update



E-Manifest Update

- Oct 5, 2012, Hazardous Waste Electronic Manifest System (“E-Manifest Act”)
- June 30, 2018, EPA launched new fully electronic manifest tracking system, called e-Manifest



E-Manifest Update

- Generators, transporters, and receiving facilities have the **OPTION** of using the electronic system
- Receiving facilities are now required to submit all manifests to EPA and pay a fee per manifest, whether it be electronic or paper
- All manifest information will be made public

E-Manifest – Report Card

- Approximately 20% have been mailed in as paper manifests \$15
- 38,795 – Scanned Image Upload \$10
- 78,369 – Data + Image Upload \$6.50
- 720 – electronic \$5 manifests

e-Manifest Resources

- **EPA e-Manifest Site** <https://www.epa.gov/e-manifest>
- **EPA e-Manifest Fact Sheets**
www.epa.gov/e-manifest/fact-sheets-e-manifest-stakeholders
- **EPA e-Manifest Registration Information**
https://www.epa.gov/e-manifest/e-manifest-user-registration#who_register
- **EPA RCRAInfo Registration**
<https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>
- **EPA Frequently Asked Questions & Learning Zen**
<https://rcrainfoindustry.learningzen.com/PremiumServices/login/PortalRegistration.aspx>
- **Industry User System Demonstration (begin at 10:25)**
<http://epawebconferencing.acms.com/p9ceaf8n59e/>

Underground Storage Tank (UST) Regulation Changes



**Underground Storage Tank (UST)
Regulation Changes**

Effective October 13, 2018

New Operation and Maintenance Requirements

- Visual inspections of spill buckets (clearing of debris, etc) every 30-days.
- Equipment testing requirements every 3 years (release detection annually)
- Emergency Generator USTs must have release detection
- Field Erected Tanks and Airport Hydrant Systems regulated



Programmatic Activities

RCRA Corrective Action

The FY18 – FY22 Strategic Plan creates a focus on “Ready for Anticipated Use” for Superfund and Brownfields but also includes a Strategic Measure for RCRA.

The National Goal is to make 536 additional RCRA Corrective Action facilities RAU by 2022.

Fiscal Year	Region 4 RAU Target	National RAU Target
FY18	11	75
FY19	14	91
FY20	16	107
FY21	18	123
FY22	21	140

RCRA Permitting

Issue permits more quickly and modernize our permitting and reporting systems.

Strategic Measure

Accelerate permitting-related decisions

RCRA Inspection Reports

- 2016 – 110 days
- 2017 – 93 days
- 2018 – 55 days

RCRA Air Emissions NCI



RCRA Air Emissions NCI

- Bring national attention to the importance of the control of hazardous waste air emissions from RCRA units.
- Ensure the use of a full range of tools for controlling hazardous/toxic air emissions.
- Minimize the potential for uncontrolled air releases of hazardous wastes into the environment.

Air Emission NCI Scope

- RCRA Subpart AA: Regulates RCRA hazardous waste treatment unit process vents.
- RCRA Subpart BB: Regulates RCRA hazardous waste valves, flanges, pumps, compressors, pipe runs and pressure relief equipment.
- RCRA Subpart CC: Regulates RCRA hazardous waste tanks, surface impoundments, and containers.
- This equipment must be appropriately designed, monitored, and maintained to appropriately detect and limit releases of hazardous waste to the air.

Inspection Scope and Focus

- Utilizing next generation compliance tools
 - FLIR (Forward Looking Infrared) Camera
 - FID (Flame Ionization Detector)
 - PID (Photoionization Detector)
- Observation of tanks, containers, and ancillary equipment
- Sampling
- Records/paperwork review

Common Violations (National)

- Improperly monitored / inspected equipment
- Equipment leaks / failure to seal equipment
- Failure to tag equipment
- Failure to maintain records
- The majority of the cases are not against CAA major sources

Subpart CC



02/15/2018

Subpart CC



Subpart BB



Questions

