

RRI'S COMPREHENSIVE RCRA WASTE WORKSHOP



Course 603 - Syllabus

Length: 4 days

Target: Waste generators, managers, and compliance personnel who are responsible for complying with or

overseeing the compliance of the RCRA hazardous waste characterization, storage, operations and land

disposal restrictions regulations.

Prerequisite: None

Intensity: __Mild X_Medium __Challenging Extreme

Objectives & Topics:

Module 1: Introduction to the RCRA Waste Regulations

Define the objectives, scope and applicability of the EPA RCRA hazardous waste regulations.

- 1. Explain, in general terms, what is RCRA.
- 2. Recognize the other Laws/Acts that interact with RCRA waste management requirements.
- 3. Recognize the difference between State adoption and State authorization.
- 4. Identify the layout of the RCRA hazardous waste regulations.
- 5. Locate the definition of terms associated with the RCRA waste regulations.

Module 2: Definition and Designation of Solid and Hazardous Waste

Determine if, and to what extent, a given waste is subject to the RCRA hazardous waste regulations.

- 1. Illustrate the flow of the general thought process for defining a waste.
- 2. Identify the requirements for waste determinations.
- 3. Define solid waste.
- 4. Apply exemptions/exclusions to the definition of solid waste.
- 5. Define hazardous waste.
- 6. Apply exemptions/exclusions to the definition of hazardous waste.
- 7. Characterize and designate, by assigning waste codes, a given waste.
- 8. Recognize the importance of the "point of generation."

Module 3: Special Wastes

Identify those wastes that are managed under an alternative management syste<mark>m.</mark>

- 1. Explain that materials requiring "sanitization" do not meet the definition of waste.
- 2. Identify the point of generation of waste for materials destined for sanitization.
- 3. Define "universal wastes".
- 4. Identify how universal wastes are characterized for purposes of waste management.
- 5. Define "used oil".
- 6. Identify how used oil is characterized for purposes of waste management.
- 7. Define "regulated asbestos containing material".
- 8. Identify how asbestos is characterized for purposes of waste management.
- 9. State those materials/wastes that are commonly identified as being 'recycled'.
- 10. Identify the disposition of common recyclable materials.
- 11. Explain the difference between LLW and MLLW.



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Module 4: Storage and Management of Wastes

Recognize the waste management requirements for a given accumulation or storage area.

- 1. List the waste accumulation/storage types.
- 2. Identify the purpose for a <55-gallon accumulation site.
- 3. Explain the waste management controls necessary to have a <55-gallon accumulation site.
- 4. Select the operating conditions that must be met for a <55-gallon accumulation site to be in compliance.
- 5. Identify the purpose for a ≤90-day waste site.
- 6. Explain the waste management controls necessary to have a ≤90-day waste site.
- 7. Select the operating conditions that must be met for a ≤90-day waste site to be in compliance.
- 8. List the pros and cons between a <55-gallon accumulation site and ≤90-day waste site.
- 9. Explain what a RCRA hazardous waste management Permit is.
- 10. Explain the waste management controls that must be met for comp<mark>liant operations of a given permitted storage site.</mark>
- 11. Select the operating conditions that must be met to operate a permitted storage site.
- 12. Describe the differences in the requirements and management controls for RCRA hazardous waste and non-RCRA hazardous waste storage.
- 13. Define, in general terms, "treatment" as it applies to RCRA hazardous waste management.
- 14. Explain why treatment of hazardous waste must be carefully considered before starting the operation.
- 15. Identify common waste management/operations that, although appear be treatment, are allowed in non-permitted processing units.
- 16. Describe the differences in the requirements and management controls for Universal Waste storage.
- 17. Describe the differences in the requirements and management controls for Used Oil storage.
- 18. Describe the differences in the requirements and management controls for PCB waste ballast
- 19. Describe the differences in the requirements and management controls for storage or hazard and non-hazardous Recyclable Materials.
- 20. Describe the differences in the requirements and management controls for Asbestos waste storage.
- 21. Describe the differences in the requirements and management controls for Scrap Metal storage.
- 22. State the container management requirements associated with a given accumulation/storage site.



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Module 5: The LDRs and Treatment Standards

Explain the LDR requirements applicable to a given hazardous waste.

- 1. State the objectives of the LDR regulations.
- 2. Define terms specific to the LDR regulations.
- 3. Recognize the layout of the LDR regulations.
- 4. Explain the term "Best Demonstrated Available Technology".
- 5. Decipher information from the LDR treatment table.
- 6. Identify the required sampling technique for a given waste.
- 7. Apply a given waste code from the Point of Generation.
- 8. Apply the requirements for an Underlying Hazardous Constituent.
- 9. State available treatment standard exemptions and exclusions.

Module 6: Selecting the Treatment Standards

Select the applicable LDR treatment requirement(s) for a given hazardous waste.

- 1. Explain the "thought process" for selecting the appropriate treatment standard(s).
- 2. Explain the prohibition on dilution of wastes.
- 3. Select the optimal treatment plan for a given waste.

Module 7: <u>Miscellaneous Treatment Options</u>

Describe the alternate LDR treatment options available for hazardous wastes...

- 1. Identify the alternate treatment options for labpack wastes.
- 2. Identify the alternate treatment options for contaminated soils.
- 3. Identify the alternate treatment options for hazardous debris.
- 4. Identify the alternate management options for used oil.
- 5. Identify the alternate management options for universal wastes.
- 6. Identify the alternate treatment options for radioactive-mixed waste.

Module 8: Other Land Disposal Restrictions Requirements

Determine the management requirements applicable to the LDR regulations..

- 1. Determine the LDR requirements for treatment residues.
- 2. Explain the requirements concerning the restricted waste storage prohibition.
- 3. Select the appropriate LDR paperwork for a given waste.
- 4. Select the information that must appear of the appropriate paperwork for a given LDR waste.

Module 9: Waste Avoidance, Recycling, and Processing Activities

Recognize the common waste avoidance, recycling, and processing activities, and the exclusions or special allowances for these material/wastes.

- 1. Recognize the difference between "waste avoidance" and "waste recycling".
- 2. Explain the purpose of Pollution Prevention (P2).
- 3. Identify common waste avoidance opportunities.
- 4. List the more common materials and waste recycled.
- 5. State the options and requirements for recycling spent lead acid batteries.
- 6. State the options and requirements for recycling precious metals.
- 7. State the options and requirements for recycling scrap metal.
- 8. Identify the exceptions and requirements for the management of empty containers.