

# Quick Reference Guides for RCRA Contingency Plans Tips & Tricks

April 2, 2025

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[trinityconsultants.com](http://trinityconsultants.com)

# Introductions

Andy Ewald:

- ▶ Senior Consultant & Client Development for EPA Region 7:
  - Trinity Des Moines, IA Office
  - BS Mechanical Engineering, University of Iowa
- ▶ Focus Areas:
  - RCRA Compliance (Organic Air Emissions)
  - Client Development
  - Field Service Offerings (LDAR, audits, etc.)
- ▶ Outside Work: Snowboarding, guitar, music, fitness



# Agenda

1. Background
2. Missouri Status
3. On Site Notification
4. Emergency Coordinators
5. Hazardous Waste Tables
6. Mapping
7. Submission
8. Typical Violations
9. Missouri Examples
10. Tips & Tricks

# Background

# But First – Today’s Theme!

- ▶ April 2022 Memo on Quick Reference Guide FAQs **mentions 22 times to coordinate with your local emergency response agencies**
  - The memo is **10 pages long!**
  - RCRA Online (RO) 14943



This balancing may come about as part of the collaborative relationship that EPA encourages LQGs to establish with their local emergency responders. In addition to the arrangements LQGs must make with their local authorities under 40 CFR 262.256, EPA encourages LQGs to collaborate with local emergency responders while originally developing their QRG and whenever updates to the QRG may be necessary. Consulting with local emergency responders during QRG development should ensure that the most appropriate information is included. When questions arise, LQGs should first seek input from their local emergency responders to determine what will be most useful for them. Maintaining communication with first responders for any QRG updates will keep these authorities aware of changes at the facility that may affect their approach or ability to respond to any incidents.

# Quick Reference Guide - Background

- ▶ Generator Improvements Rule
  - Proposed September 25, 2015
  - Published November 28, 2016
  - Effective May 30, 2017
- ▶ Major generator changes:
  - Reorganization of regulations
  - Episodic generation provisions
  - Container labeling – hazards
  - **LQGs – Quick Reference Guides**
  - SQGs – renotifications
  - “Accurate” waste determinations

## ENVIRONMENTAL PROTECTION AGENCY

40 CFR Parts 257, 258, 260, 261, 262, 263, 264, 265, 266, 267, 268, 270, 271, 273, and 279

[EPA-HQ-RCRA-2012-0121; FRL 9947-26-OLEM]

RIN 2050-AG70

### Hazardous Waste Generator Improvements Rule

AGENCY: Environmental Protection Agency (EPA).

ACTION: Final rule.

**SUMMARY:** With this action, the United States Environmental Protection Agency (EPA) is finalizing revisions to the Resource Conservation and Recovery Act's (RCRA) hazardous waste generator regulatory program proposed on September 25, 2015. There are several objectives to these revisions. They include reorganizing the hazardous waste generator regulations to make them more user-friendly and thus improve their usability by the regulated community; providing a better understanding of how the RCRA hazardous waste generator regulatory program works; addressing gaps in the existing regulations to strengthen environmental protection; providing greater flexibility for hazardous waste generators to manage their hazardous waste in a cost-effective and protective manner; and making technical corrections and conforming changes to address inadvertent errors and remove obsolete references to programs that no longer exist. This final rule responds to the comments of EPA stakeholders, taking into consideration the mission of EPA and the goals of RCRA.

**DATES:** This final rule is effective on May 30, 2017. The incorporation by reference of certain publications listed in the regulations is approved by the Director of the Federal Register as of May 30, 2017.

**ADDRESSES:** The EPA has established a docket for this action under Docket ID No. EPA-HQ-RCRA-2012-0121. All documents in the docket are listed on the <http://www.regulations.gov> Web site. Although listed in the index, some information is not publicly available, including:

**FOR FURTHER INFORMATION CONTACT:** Jim O'Leary, U.S. Environmental Protection Agency, Office of Resource Conservation and Recovery, (MC: 5304P), 1200 Pennsylvania Ave. NW., Washington, DC 20460, (703) 308-8827, ([oleary.jim@epa.gov](mailto:oleary.jim@epa.gov)) or Kathy Lett, U.S. Environmental Protection Agency, Office of Resource Conservation and Recovery, (MC: 5304P), 1200 Pennsylvania Ave. NW., Washington, DC 20460, (703) 605-0761, ([lett.kathy@epa.gov](mailto:lett.kathy@epa.gov)).

### SUPPLEMENTARY INFORMATION:

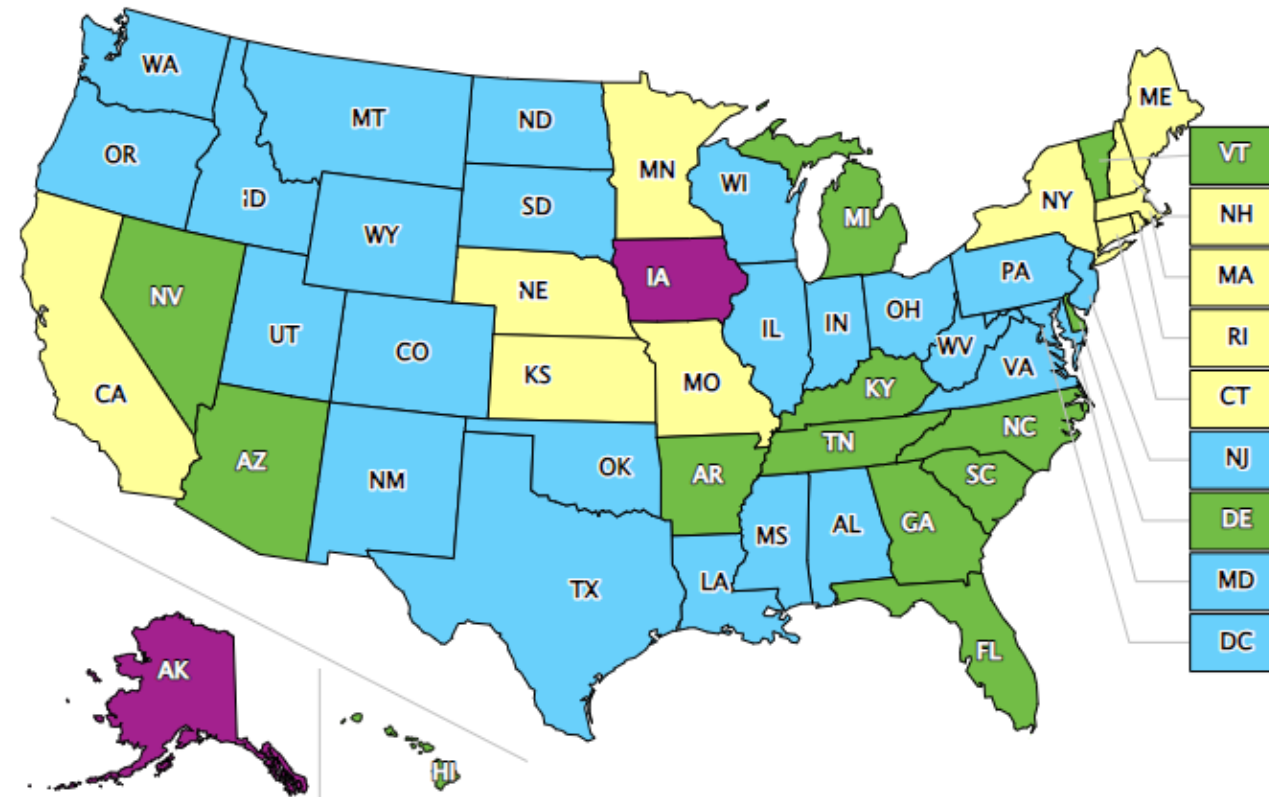
#### I. Table of Contents

The information presented in this preamble is organized as follows:

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- II. General Information
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  - B. Incorporation by Reference
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- V. Background
  - A. History of the Hazardous Waste Generator Program
  - B. Hazardous Waste Generator Demographics
- VI. Reorganization of the Hazardous Waste Generator Regulations and Organization of the Preamble
  - A. Moving and Integrating Regulations From 40 CFR 261.5 Into 40 CFR Part 262
  - B. SQG and LQG Conditions for Exemption (40 CFR 262.16 and 262.17)
  - C. EPA Identification Number (40 CFR 262.12)
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  - C. Definition of Central Accumulation Area (40 CFR 260.10)
- VIII. Detailed Discussion of Revisions to 40 CFR Part 261—Requiring Biennial Reporting for Owners or Operators of Facilities That Recycle Hazardous Waste Without Storing It (40 CFR 261.6(c)(2))
  - A. Introduction
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- XI. Detailed Discussion of Preparedness, Prevention, and Emergency Procedures Provisions for SQGs (40 CFR 262.16) and LQGs (40 CFR 262.17 and 40 CFR Part 262 Subpart M)
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- F. Revisions to Satellite Accumulation Area (SAA) Regulations for SQGs and LQGs (262.15)
- G. Accumulation of Hazardous Waste by SQGs and LQGs on Drip Pads and in Containment Buildings
- H. Special Requirements for Ignitable and Reactive Wastes for LQGs (40 CFR 262.17(a)(1)(vi))
- I. LQG Closure Regulations (40 CFR 262.17(a)(8))
- J. Documentation of Inspections of Waste Accumulation Units
- K. Allowing VSGQs To Send Hazardous Waste to LQGs Under the Control of the Same Person (40 CFR 262.14(a)(5)(viii) and 262.17(f))
- L. EPA Identification Numbers and Re-notification for SQGs and LQGs (40 CFR 262.18)
- M. Provision Prohibiting Generators from Disposing of Liquids in Landfills (40 CFR 262.14(b) and 262.35)
- N. Clarification of Biennial Reporting Requirements (40 CFR 262.41, 264.75 and 265.75)
- O. Extending Time Limit for Accumulation Under Alternative Requirements for Laboratories Owned by Eligible Academic Entities (40 CFR Part 262 Subpart K)
- P. Deletion of Performance Track and Project XL Regulations

# Quick Reference Guide – Where is it in effect?



- American Samoa
- Guam
- Northern Mariana Islands
- Puerto Rico
- Virgin Islands

- Authorized
- Adopted
- Administered by EPA Region
- Neither Adopted nor Authorized

Last updated on June 24, 2024

California Adopted July 1, 2024



# Quick Reference Guide – Eight Required

## 40 CFR 262.262(b) Elements

- (1) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid);
- (2) The estimated maximum amount of each hazardous waste that may be present at any one time;
- (3) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff;
- (4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes;
- (5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers;
- (6) The locations of water supply (e.g., fire hydrant and its flow rate);
- (7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and
- (8) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

# Quick Reference Guide (QRG) – Why Is This Needed?

80 FR 57959

- ▶ Contingency plans are too long to be useful in practice (at least for initial responses)
  - “QRGs should contain enough detail to be useful without being unwieldy” – April 2022 FAQ Memo
- ▶ Need a concise summary that emergency responders can utilize quickly
- ▶ Recall today’s theme: **coordinate with your local emergency responders!**

In discussions with EPA, emergency management professionals indicated that the length of the facility contingency plans prevents first responders from being able to fully review a facility’s contingency plan when responding to an emergency.<sup>89</sup> Instead, they need readily available information that describes what they must confront when they arrive at the scene. Once the incident is under control, the first responders can then review the detailed contingency plan to determine their next steps, if applicable. Thus, the Agency believes that a shorter document, such as an executive summary of the contingency plan would be more effective for an emergency responder when responding to an incident at a facility accumulating hazardous waste. As currently happens in practice, once the incident is under control, then the emergency responders can review the more detailed contingency plan if necessary for long-

<sup>89</sup> Notes from discussion with Phil Oakes and Jim Narva, International Association of Fire Marshalls, concerning Contingency Planning and Emergency Response Regulations, July 2012.

# On Site Notification

# On-Site Notification

- ▶ The description should include:
  - Fire alarms
  - Smoke alarms
  - Intercom systems
  - Radio networks
  - Evacuation alarms
  - Public address systems
- ▶ Be extremely clear about internal vs. external communication
- ▶ Note if any fire alarms notify the fire department automatically
- ▶ Provide the standard emergency announcement if possible



# Emergency Coordinators

# Emergency Coordinators

*How Many Should I Have?*

- ▶ Recommend minimizing the number of emergency coordinators (ECs) in the plan to two so that you don't need to update the plan as frequently.
- ▶ Make sure all ECs are familiar with the plan and are comfortable taking command in an emergency
- ▶ Outdated emergency coordinators is a very common violation



# Hazardous Waste Tables

# Types/Names of HWs in “Layman’s Terms”

40 CFR 262.262(b)(1) & (2)

- ▶ Need to identify the types/names of hazardous waste in layman’s terms and the associated hazards; also need maximum onsite
  - “Toxic paint wastes, spent ignitable solvent, corrosive acid”
- ▶ FAQ #7 – regulations **do NOT require specifying the SAA** associated with these HW descriptions (i.e., frequent changes in SAA waste accumulation types should not result in frequent QRG updates)

In addition, the regulations require that the QRG identify the wastes and associated hazards of the hazardous wastes that may be present in the facility overall, not in each SAA independently. **That is, generators are not required to link each hazardous waste to a given location in the QRG,** though some generators may choose to do so. For example, an LQG that accumulates the spent ignitable solvents ethyl ether and methanol at various locations across its facility would be considered in compliance for reporting the total quantity of spent ignitable solvents accumulated facility-wide in its QRG.

# Example Table

Hazardous Waste	Hazard	Maximum Amount	Exposure Type
Paint Related Waste (Liquid)	Ignitable; D001; UN1993 (Flammable Liquid) ERG 128	Five, 55-gallon drums (2,065 pounds)	<ul style="list-style-type: none"> <li>• Call 911 or emergency medical service.</li> <li>• Ensure that medical personnel are aware of the material(s) involved and take precautions to protect themselves.</li> <li>• Move victim to fresh air if it can be done safely.</li> <li>• Give artificial respiration if victim is not breathing.</li> <li>• Administer oxygen if breathing is difficult.</li> <li>• Remove and isolate contaminated clothing and shoes.</li> <li>• In case of contact with substance, immediately flush skin or eyes with running water for at least 20 minutes.</li> <li>• Wash skin with soap and water.</li> <li>• In case of burns, immediately cool affected skin for as long as possible with cold water. Do not remove clothing if adhering to skin.</li> <li>• Keep victim calm and warm.</li> </ul>
Spent Adhesives	Ignitable D001 UN1993 (Flammable Liquid) ERG 128	Eight, 55-gallon drum (3,520 pounds)	<ul style="list-style-type: none"> <li>• Call 911 or emergency medical service.</li> <li>• Ensure that medical personnel are aware of the material(s) involved and take precautions to protect themselves.</li> <li>• Move victim to fresh air if it can be done safely.</li> <li>• Give artificial respiration if victim is not breathing.</li> <li>• Administer oxygen if breathing is difficult.</li> <li>• Remove and isolate contaminated clothing and shoes.</li> <li>• In case of contact with substance, immediately flush skin or eyes with running water for at least 20 minutes.</li> <li>• Wash skin with soap and water.</li> <li>• In case of burns, immediately cool affected skin for as long as possible with cold water. Do not remove clothing if adhering to skin.</li> <li>• Keep victim calm and warm.</li> </ul>

UN & ERG numbers helpful

# Don't group too many types of waste together

Waste streams should be based on hazard, waste profile, and how they are shipped out

These toxic chemicals include metals, pesticides, aromatic organics, halogenated solvents, non-halogenated solvents, and ignitables

Hazardous Waste	Hazard	Maximum Amount	Exposure Type
Waste Toxic Liquids	F001, F002, F004, F005, D007, and D026, D043 (ignitable and toxic) (UN2810)	8 x 55-gallon drum(s)	<p><b>If inhaled:</b> After inhalation: fresh air. If breathing stops: immediately apply artificial respiration, if necessary, provide oxygen.</p> <p><b>In case of skin contact:</b> After contact with skin: rinse skin with running water for at least 20 minutes. Wash skin with soap and water. Immediately take off contaminated clothing.</p> <p><b>In case of eye contact:</b> After eye contact: rinse with running water for at least 20 minutes.</p> <p><b>If ingested:</b> Clean mouth with water and drink plenty of water.</p>

# Recall the ERG Flowchart

- ▶ **Ultimate goal** – determine the guide number to determine response procedures
  - **UN/NA number** is helpful

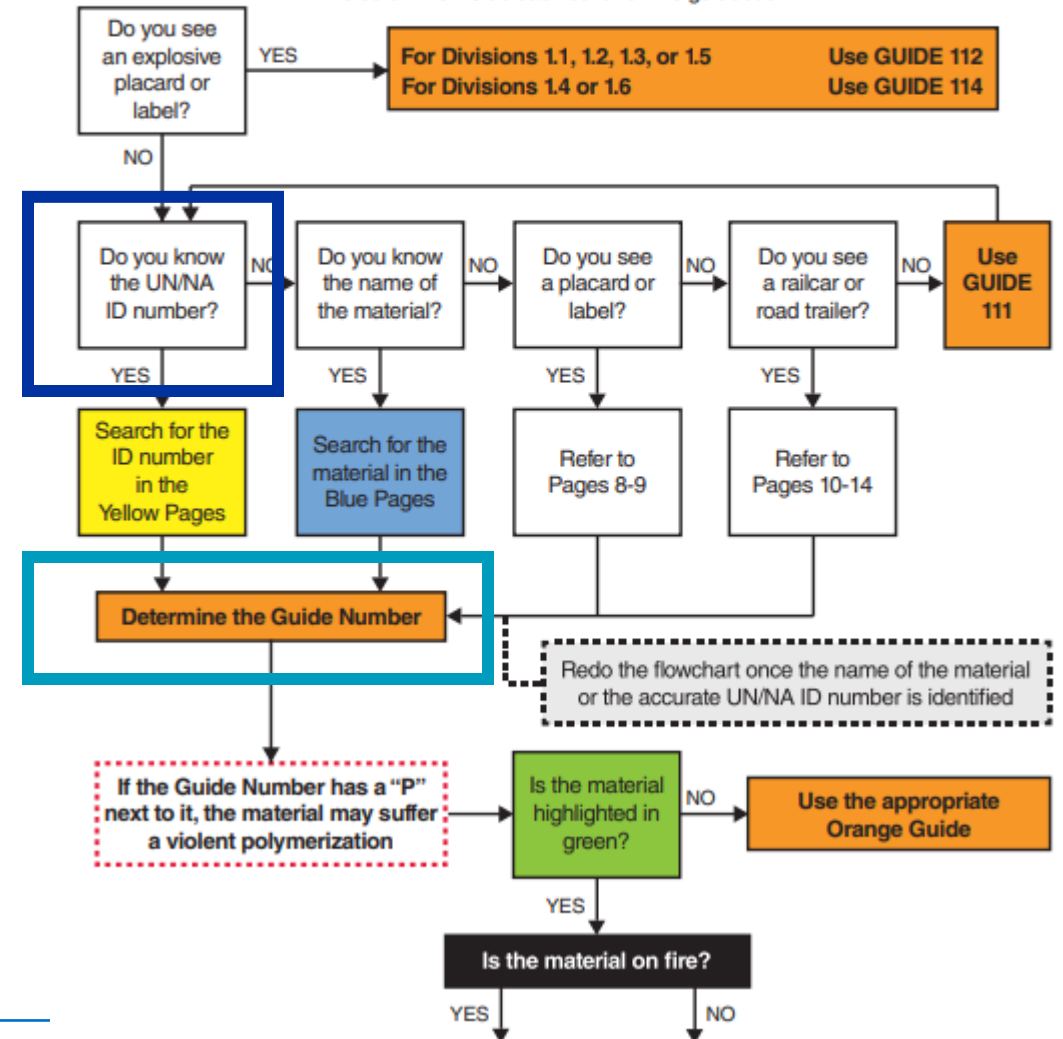
Source: 2020 Emergency Response Guidebook (DOT, PHMSA)

## HOW TO USE THIS GUIDEBOOK

**RESIST RUSHING IN!**

**APPROACH INCIDENT FROM UPWIND, AND UPHILL AND/OR UPSTREAM  
STAY CLEAR OF ALL SPILLS, VAPORS, FUMES, SMOKE, AND POTENTIAL HAZARDS**

**WARNING:** DO NOT USE THIS FLOWCHART if more than one hazardous material/dangerous good is involved. Immediately call the appropriate emergency response agency telephone number listed on the inside back cover of this guidebook.



# CAMEO – What is it?

- ▶ Joint Project between EPA and National Oceanic and Atmospheric Administration
- ▶ Database of Hazardous Materials



## CAMEO Chemicals

[Home](#)

[Help](#)

### Search Chemicals

[New Search](#)

[Modify Search](#)

[Search Results](#)

### MyChemicals

chemicals: 0

[View MyChemicals](#)

[Predict Reactivity](#)

[Mobile Site](#)

### Database of Hazardous Materials



#### [Search](#)

Find response information for thousands of hazardous materials, including fire and explosion hazards, health hazards, firefighting techniques, cleanup procedures, protective clothing, and chemical properties.



#### [MyChemicals](#)

Build a list of chemicals. For example, substances involved in an incident response (such as a train derailment) or chemicals stored in your community.



#### [Reactivity](#)

See what hazards might occur if chemicals in your MyChemicals collection are mixed together.

# How can CAMEO Help Develop the QRG

- ▶ Look up UN number, CAS, or chemical name on CAMEO to obtain needed information.

## Search

Enter a chemical name or identification number to begin searching for datasheets.

[How does this search work?](#) ▶

Name *(not case sensitive)*

CAS Number *(with or without dashes)*

UN/NA Number *(4-digit number)*

**Other ways to find chemicals**

[Advanced Search](#)   [Browse](#)

Tip: If the waste is a mixture of multiple waste codes and chemicals, look up the UN to ascertain exposure and treatment instructions. May need to work with local responders.

# “Unique” or “Special” Treatment

40 CFR 262.262(b)(3)

- ▶ Need to identify any hazardous wastes where exposure requires “unique” or “special” treatment by medical or hospital staff
- ▶ FAQ #2 – specifies three factors to consider when making this determination:
  - Are first responders and/or medical facilities **likely to have the required treatment in their inventories**? (e.g., hydrofluoric acid burns require calcium compounds that ambulances and some hospitals do not keep in stock)
  - Will local emergency responders **need special PPE** (e.g., respirators, hazmat suits, etc.) to **enter the facility**, treat a patient, or otherwise respond to any incidents?
  - Could an exposed patient or first responder **spread contamination to outside locations or other personnel** when transported away from the scene? (e.g., chemical weapons decommissioning facility may need to notify hospitals of decontamination procedures)

# Example Table

Hazardous Waste	Hazard	Maximum Amount	Exposure Type
Waste Toxic Liquids	F001, F002, F004, F005, D007, and D026, D043 (ignitable and toxic) (UN2810)	8 x 55-gallon drum(s)	<p><b><u>If inhaled:</u></b> After inhalation: fresh air. If breathing stops immediately apply artificial respiration, if necessary, provide oxygen.</p> <p><b><u>In case of skin contact:</u></b> After contact with skin: rinse skin with running water for at least 20 minutes. Wash skin with soap and water. Immediately take off contaminated clothing.</p> <p><b><u>In case of eye contact:</u></b> After eye contact: rinse with running water for at least 20 minutes.</p> <p><b><u>If ingested:</u></b> Clean mouth with water and drink plenty of water.</p>

May need to work with local responders to properly complete

# “Unique” or “Special” Treatment Interpretation

- ▶ Remains tricky to decipher – **coordination through local responders remains the best path**
  - Check SDSs
  - Check DOT/PHMSA ERG
  - Check CAMEO
- ▶ Best practice? – including response and treatment procedures for all hazardous waste types
  - Negative – removes emphasis from “unique” or “special” treatment (separate column alleviates this)
  - **Positive – thorough**



# “Unique” or “Special” Treatment – Examples

- ▶ Do not perform mouth-to-mouth resuscitation if victim ingested or inhaled the substance.
- ▶ Severe hydrofluoric acid burns require treatment with calcium compounds that many ambulances and some hospitals do not keep in stock.
- ▶ Contact Chemtrec for emergency medical treatment information at 1-800-424-9300. If in eyes, wash eyes for several minutes.



# Mapping

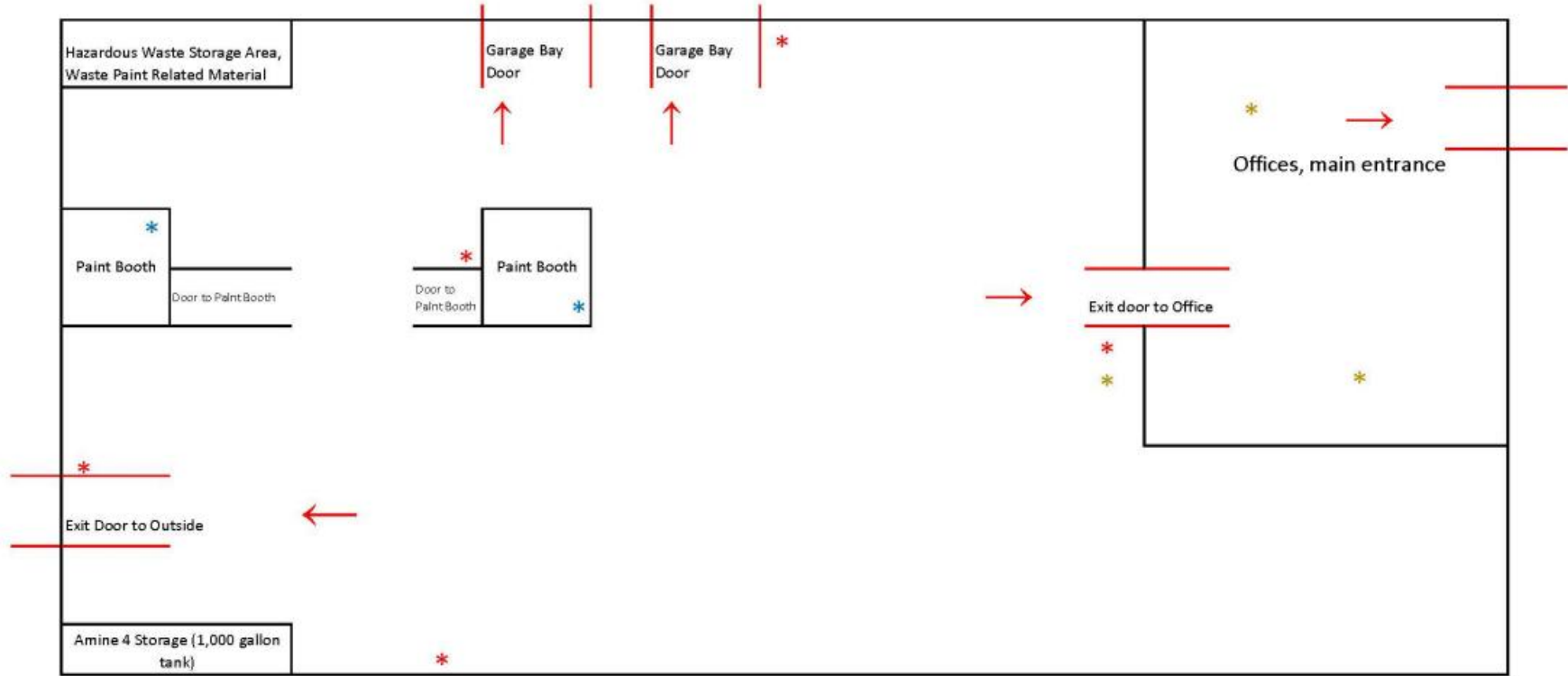
# Map of Hazardous Waste Locations

40 CFR 262.262(b)(4)

- ▶ Need a map showing where hazardous wastes are generated, accumulated, and treated AND ingress routes for accessing these wastes
  - Satellite Accumulation Areas (SAAs), Central Accumulation Areas (CAAs), Treatment Units
- ▶ FAQ #4 – radius (size) of the maps will **depend on the size and complexity of the generator site** (the map should help first responders identify and access areas where hazardous waste is likely to be present)
- ▶ FAQ #6 – temporary SAAs and CAAs MUST be included on the map
- ▶ FAQ #8 – SAA locations that change frequently may be able to mark the general region or buildings they are located (coordinate with local emergency responders)

# Example Site Map

- ▶ Can we improve?
  - North arrow
  - Reference to outside (parking)
  - More facility internal identifiers?
  - Amount of hazardous waste?



- \* Satellite Accumulation Area for Paint Related Waste Material (D001, F003, F005)
- \* Fire Alarms (ring on-site only, there are no fire alarms that notify off-site personnel)
- \* Telephone for off-site notification of emergency
- Indicates evacuation route out of the building.

Note 1: Hazardous waste (paint related waste) is generated and accumulated inside each of the two paint booths, and is accumulated in the hazardous waste storage area. Amine 4 can be a hazardous waste if it is off-specification and it is generated and accumulated in the SW corner at the Amine 4 tank.

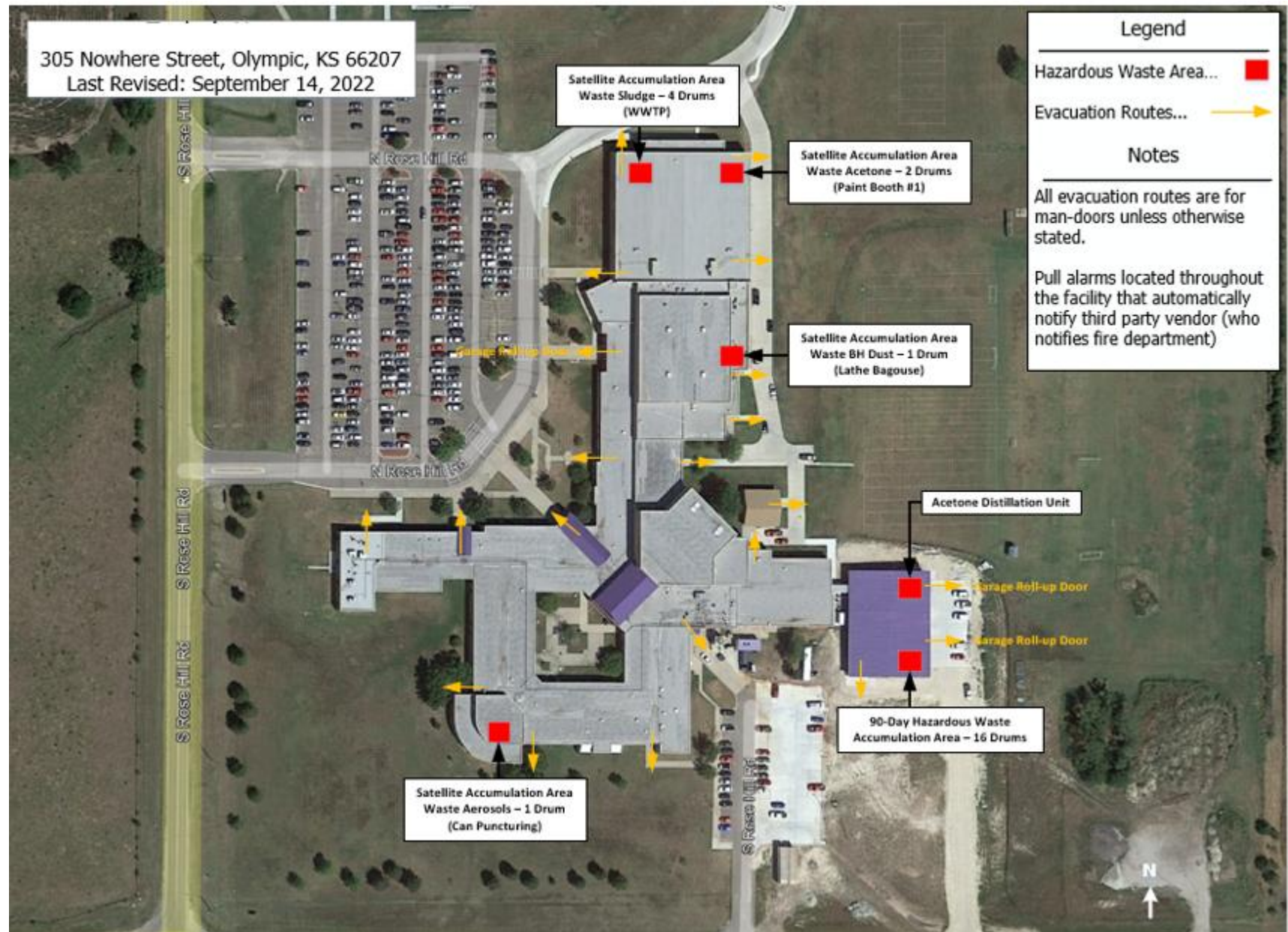
Note 2: Smoke detectors are located throughout the office and main warehouse on the ceiling, in a grid about every 25 feet. Smoke detectors are connected to an automatic sprinkler system.

# Site Map Example

We can still improve!

This map shows evacuation

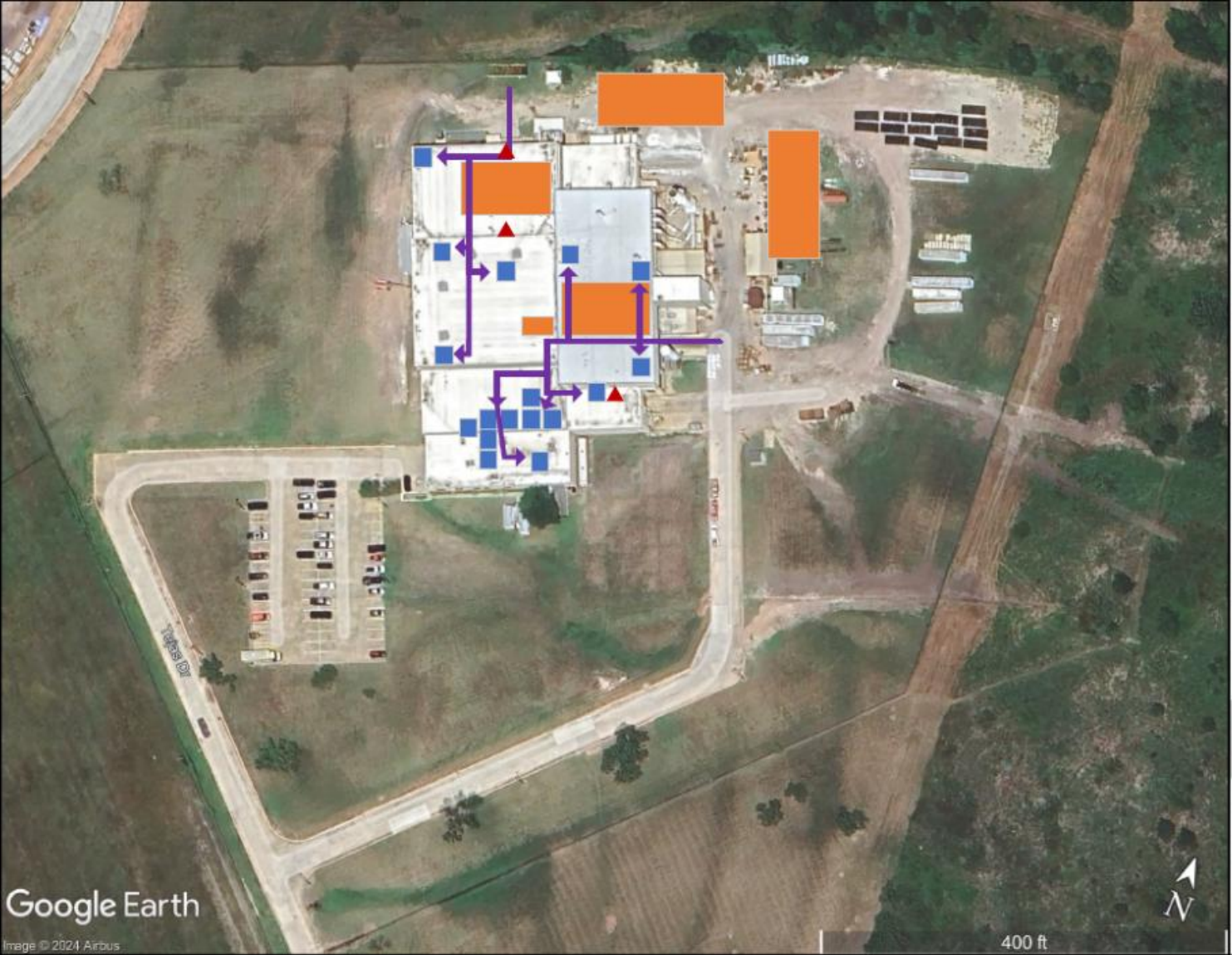
Add ingress routes to SAA and CAA



# Ingress Mapping

Do emergency responders know how to access the hazardous waste accumulation areas?

Do they know the best external entrances?



<b>Legend</b>
▲ Spill Kit
■ Satellite Accumulation Area
■ Hazardous Waste Accumulation Area
➔ Response ingress route

**Figure 1-5**  
**Hazardous Waste Map**



# Street Map of Surrounding Area & Water Supply

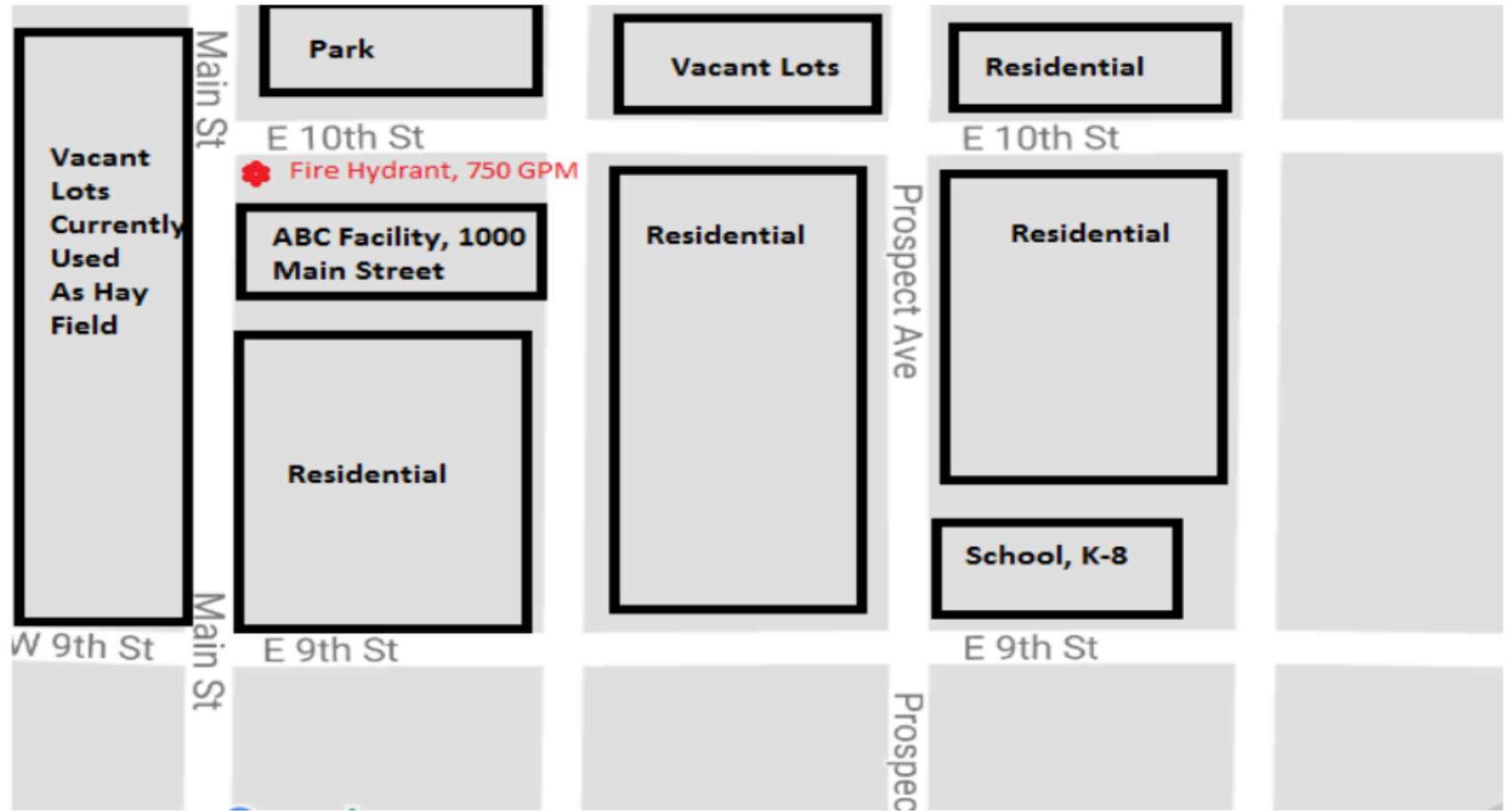
40 CFR 262.262(b)(5) & (6)

- ▶ Street map showing the facility in relation to surrounding businesses, schools, and residential areas is required
  - Locations of water supply (fire hydrants and flow rates) also commonly shown – not required on maps
- ▶ FAQ #5 – radius (size) of the street maps will **depend on the size and complexity of the generator site** (the map should help first responders understand the facility’s local context)
  - Urban vs. rural considerations
  - Consider “expected mobility of any environmental releases and anticipated minimum evacuation distances”
    - ◆ DOT/PHMSA ERG

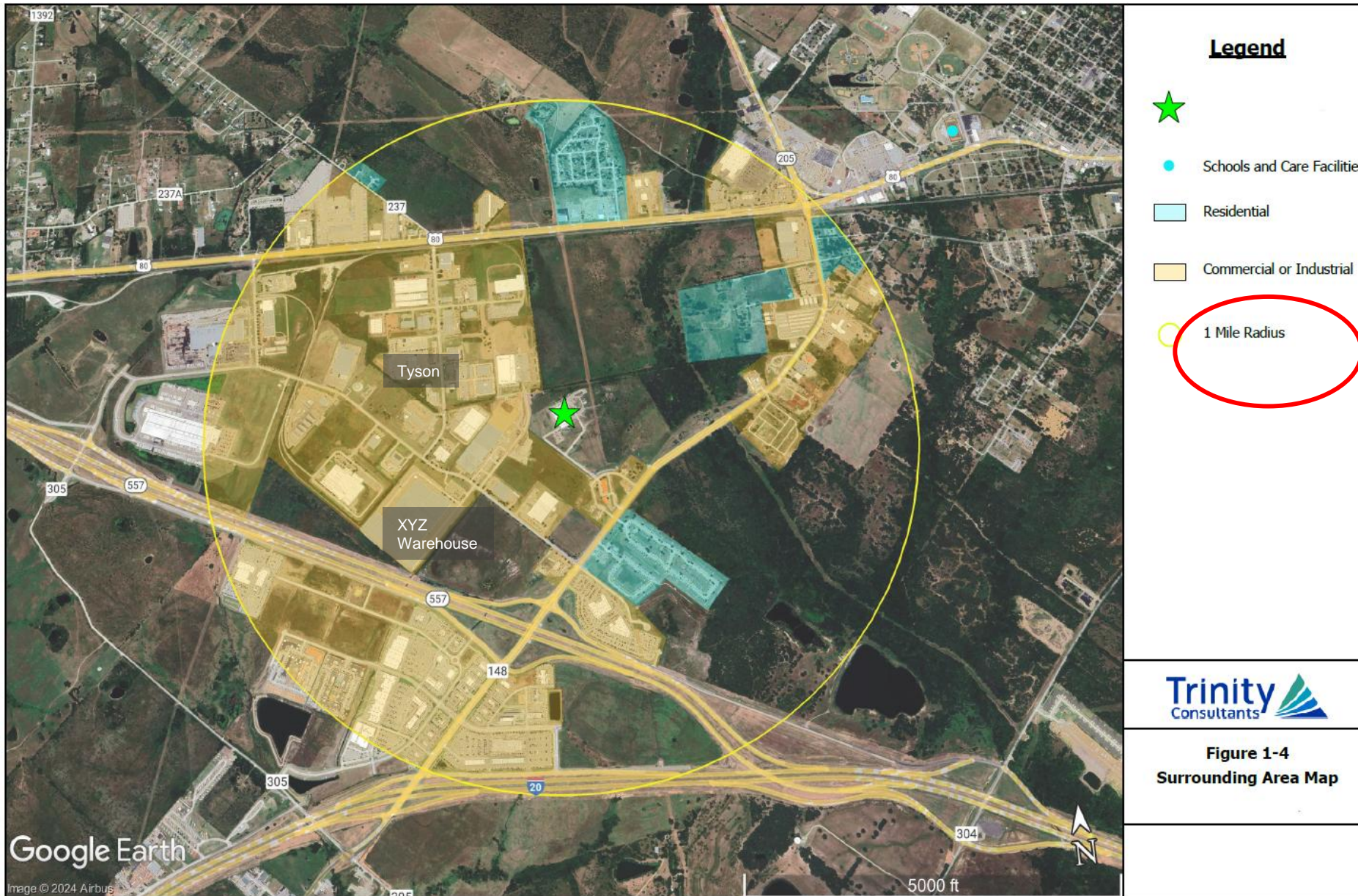
# Street Map Example

Street Map

- ▶ Can we improve?
  - North arrow
  - Aerial Imagery
  - Location of Fire Dept.
  - Name & Phone of Businesses



# Example Street Map



# Submission

# Submission



- ▶ The rules indicate that you must submit the QRG when you next submit an updated hazardous waste contingency plan to responders.
- ▶ Violations being issued when a facility does not have a QRG in states where a QRG is now required.
- ▶ Call the emergency responders and ask them about what format and transmission method they prefer. Hospitals may only want the sections that pertain to them.
- ▶ Must submit a copy of the plan to the Local Emergency Planning Committee (LEPC)

# Digital Waste Tracking Systems

*Not a Substitute for a Quick Reference Guide*

- ▶ Subpart M did not require or prohibit the use of software or other digital approaches to transmit the QRG.
- ▶ Work with local responders to determine the best format for submittal.
- ▶ Waste Tracking software cannot be used as a replacement for the QRG.

# Updates

- ▶ Must be updated, if any of the 8 elements are impacted
- ▶ New waste streams
- ▶ General location of SAA change
- ▶ CAA location change
- ▶ Design, construction, operation or other circumstance that materially increases potential of fires, explosions or other releases of HW
- ▶ Emergency Coordinators Change
  - If an LQG's emergency coordinator changes, an update to the contingency plan and QRG are required.
  - The LQG may be able to submit the new emergency coordinator's contact information as a single-page amendment to the QRG rather than submitting an entirely new QRG that is otherwise identical to the previous one.
  - LQGs should check with their local emergency responders to ensure adding the amendment will not create problems for the responders



# On-Site Emergency Response

*How to Work with Local Responders*

- ▶ Even if your facility has on-site emergency responders, you are still subject to the same QRG requirements as facilities with no on-site responders
- ▶ A large event may require off-site responders
- ▶ EPA encourages on-site responders to collaborate with off-site responders in preparing the QRG and share with off-site responders.
- ▶ Facilities with the Authority Having Jurisdiction (AHJ) waiver does not extend to QRG provisions.

# Typical Violations

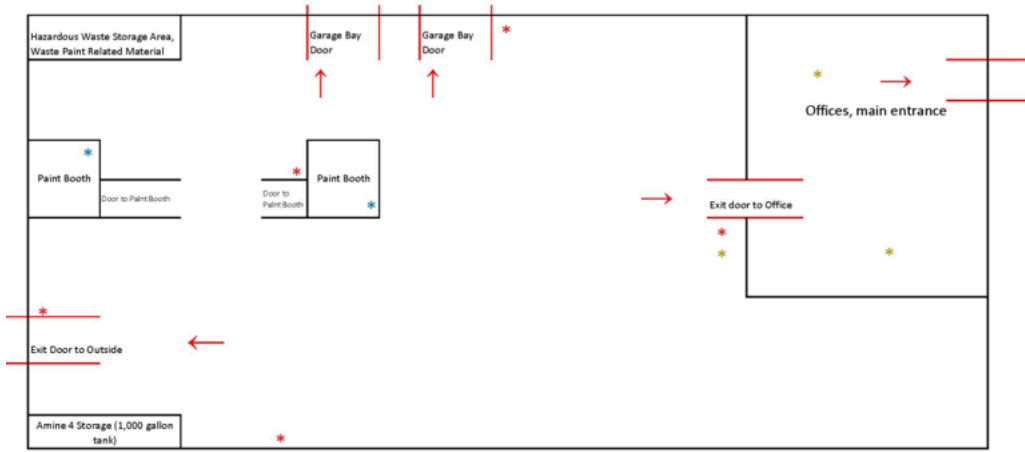
# Common QRG Violations

- ▶ Outdated emergency coordinator information
- ▶ Missing fire hydrant flow rates
- ▶ Missing Unique Treatment Following Exposure
- ▶ Name of waste stream in layman's terms
- ▶ Identification of On-Site Notification System



# Common Map Violations

- ▶ Missing satellite accumulation areas
- ▶ Ingress routes to access hazardous waste missing
- ▶ Fire hydrant location not provided



# Missouri Examples

# Missouri Examples

In addition to the common typical violation mentioned earlier

- ▶ Listing more emergency coordinators than the primary and secondary ECs only
- ▶ Training
  - Lacking contingency plan review in the annual training!!!
  - Having the training material saved for each year of the training
- ▶ Listing the maximum amount of hazardous substance instead of the hazardous waste
- ▶ Flammable and toxic hazardous waste in tanks not modeled for airborne distance
- ▶ Lacking documented submittal of the update plan
- ▶ Housekeeping
  - **A BIG DEAL!!!!**
- ▶ Documented tank inspections



# Tips & Tricks

# Random Tips & Tricks

- ▶ Have an Intern prepare the site maps
- ▶ FAQ 10B – opening a new SAA does not necessarily require an update to the QRG (not considered a “material increase” in the risk posed by hazardous waste)
  - New hazards from new hazardous waste streams would trigger an update
- ▶ Watch out for changes to emergency response coordinators
- ▶ Need emergency response equipment **and their capabilities** in Contingency Plan



Source: Contingency Plans and the Quick Reference Guide, John Dotterweich (NJDEP)

# Random Tips & Tricks

- ▶ QRG Can be a stand-alone document or part of the Contingency Plan but should be a separate section.
- ▶ If the facility spans multiple jurisdictions, ensure the QRG is submitted to all jurisdictions.
  - Consider splitting QRG into multiple sections relevant to each jurisdiction.
  - Collaborate with each responder on the best approach



Source: Contingency Plans and the Quick Reference Guide, John Dotterweich (NJDEP)



## Concluding Thoughts

- ▶ Coordinate with your local emergency responders for an effective Quick Reference Guide (and RCRA Contingency Plan)

# Helpful Links

- ▶ Final Rule, History, Links to Resources, etc.  
<https://www.epa.gov/hwgenerators/final-rule-hazardous-waste-generator-improvements>
- ▶ State Adoption of Generator Improvements Rule  
<https://www.epa.gov/hwgenerators/where-hazardous-waste-generator-improvements-rule-effect>
- ▶ Generator Improvements Rule – EPA Presentation  
<https://www.epa.gov/hwgenerators/presentation-slides-workshop-hazardous-waste-generator-improvements-rule>
- ▶ FAQs on Rule Implementation  
<https://www.epa.gov/hwgenerators/frequent-questions-about-implementing-hazardous-waste-generator-improvements-final>
- ▶ April 2022 Memo on Quick Reference Guide FAQs (RO 14943)  
<https://rcrapublic.epa.gov/rcraonline/details.xhtml?rcra=14943>
- ▶ Trinity Article: RCRA Quick Reference Guides – What is Really Required?  
<https://www.trinityconsultants.com/news/rcra-quick-reference-guides-what-is-really-required>

**Questions?**





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