



# FACT SHEET

## Hazardous Waste Top 10 Compliance Issues and How to Fix Them

- 1. Failure to make hazardous waste determinations.** Any person who generates a solid waste [must determine if that waste is a hazardous waste](#). Generators are responsible for making hazardous waste determinations. A generator should initially determine if his/her waste is excluded from regulation. Excluded wastes are found in [40 CFR 261.4](#). If your waste is not excluded by 40 CFR 261.4, then you must determine if it is a [listed hazardous waste](#). If your waste is not excluded or listed, then you must determine if it is a characteristic hazardous waste. A waste is a characteristic waste if it exhibits the properties of ignitability, corrosivity, reactivity, or toxicity as defined in 40 CFR 261, Subpart C. An initial characterization must be done on each waste stream and a re-characterization must be performed at least every twelve months, or whenever there is a process change.
- 2. Personnel training requirements not met.** [Personnel training](#) is required for large quantity generators of hazardous waste (LQGs). Small quantity generators (SQGs) also have training requirements, but they are different than the requirements for LQGs. The training of personnel involved in the management of hazardous waste is key to ensure that hazardous wastes are handled properly, to prevent spills, fires, and other accidents, and to ensure that any emergencies that do occur are responded to quickly and appropriately. DEEP has FREE online hazardous training that SQGs and LQGs can use as part of their personnel training program - see [DEEP's Hazardous Waste Management Online Training Course page](#).
- 3. Inspection schedule not developed and/or followed.** A generator must develop and follow a [written inspection schedule](#) that must be kept at the facility; identify the types of problems to be looked for during an inspection; and specify the frequency of inspection for all items on the schedule.
- 4. Inspection log not present or missing information.** A generator must inspect his facility for any deficiencies which may cause or lead to a release of hazardous waste or which may pose a threat to human health and [record inspections in an inspection log or summary](#). It is highly recommended that the generator design an inspection log that specifically lists out all the items that must be checked during an inspection. For your assistance, a [Sample Log format](#) is available.
- 5. Unmarked hazardous waste.** [Containers must be marked](#) with the words "hazardous waste" and other words that identify the contents of each container, such as "flammable", "acid", "alkaline", "cyanide", "reactive", "explosive", "halogenated solvent," or the chemical name. If marking of containers less than one gallon in size is infeasible, the locker, rack, or other device used to store the container may be marked with this information instead. Containers must be marked with the date of accumulation (i.e., the date waste was first placed in each container). For wastes that are first accumulated in satellite containers, the date of accumulation begins when the waste is moved from the satellite accumulation area to the hazardous waste container storage area.

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6. **Inadequate aisle space.** [Adequate aisle space](#) must be maintained between containers to allow for unobstructed movement of personnel, fire protection equipment, and decontamination equipment in the event of an emergency. A minimum of 30-inch aisle space is recommended.
  7. **Accumulation start date missing.** Containers must be marked with the [date of accumulation](#) (i.e., the date waste was first placed in each container). For wastes that are first accumulated in [satellite containers](#), the date of accumulation begins when the waste is moved from the satellite accumulation area to the hazardous waste container storage area.
  8. **Hazardous waste kept onsite over 90 days.** An LQG may store most hazardous wastes onsite for [no longer than 90 days](#). On or before this date, the LQG must arrange to have the waste shipped off-site by a [permitted hazardous waste transporter](#) to a [permitted Treatment, Storage or Disposal Facility \(TSDF\)](#).
  9. **Secondary containment not present or inadequate.** Containers must be stored in areas that have [secondary containment](#) to prevent run-off of accumulated liquids. The base of the area must be free of cracks and gaps, and must be sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed. Secondary containment systems must also be able to contain the volume of the largest container or 10% of the volume of all containers in storage (whichever is greater). Secondary containment may be achieved in a variety of ways including installing berms around the storage area or using pre-fabricated spill containment pallets.
  10. **Failure to follow recycling requirements.** [Recycling](#) is [mandatory](#) in Connecticut. **Everyone must recycle.** That includes residents, whether living in a single or multi-family building, every business including non-profits, and all public and private agencies and institutions (e.g., colleges, hospitals, local and state government agencies). **It's the Law!** Visit [RecycleCT](#) to learn about the benefits of recycling.

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*This fact sheet is intended for informational purposes only based on the information available as of the date of its publication and does not represent a formal jurisdictional determination by which DEEP or any other permitting authority referenced will be bound. Information contained in this fact sheet does not represent a comprehensive list of all permit requirements potentially applicable, which in most cases can only be determined on a site-specific basis. It is intended only to provide information on permits that may be required. Refer to the most current statutes, regulations, and public acts for specific language pertaining to each permit. It is your responsibility to comply with all applicable laws. Contact DEEP ([DEEP.CONCIERGE@ct.gov](mailto:DEEP.CONCIERGE@ct.gov)) with questions regarding a specific site or project.*

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