



# Mastering RCRA and DOT Manifest Certification

## *The Regulatory Toolbox*

---

### COURSE AGENDA

#### **Day One**

7:30 AM **Registration/Coffee**

8:00 AM **The Resource Conservation and Recovery Act – A Historical Overview**

- A brief historical review of some of the events leading up to the passage of the Resource Conservation and Recovery Act (RCRA).
- Implementing RCRA in the real world.

9:00 AM **Break**

9:15 AM **The Regulatory Toolbox**

- Picking the right tool for the job (knowing which regulations apply) – the crucial distinction between hazardous materials, substances, and waste and the regulations applicable to each category.
- The regulatory software store – tracking down the regulatory references, guidance documents, and clarifying letters you'll need to do the job right.
- Keeping your toolbox current – recommendations for keeping abreast of new or developing regulations.
- Incorporating new tools – how new regulations are implemented in authorized states.

10:15 AM **Break**

10:30 AM **Hazardous Waste Identification – Part 1; An in-depth look at the requirements and mechanics for identifying hazardous waste.**

- Hazardous waste identification requirements that are often misunderstood and common waste identification problems.
- The definition of solid waste and why it's important.
- Listed vs characteristic waste.

## Mastering RCRA Agenda Continued...

- Identifying listed wastes:
  - F-listed waste, K-listed waste, and Commercial Chemical Products (P and U-listed waste).
  - Characterizing spent solvents – the true scope of the solvent listings; really understanding the 10% solvent rule.
  - Commercial Chemical Products – the scope of the listing criteria.
  - Listed waste identification exercise.

11:45 AM      **Lunch on your own or with colleagues**

1:00 PM      **Hazardous Waste Identification – Part 1, Continued:**

- Identifying characteristic wastes.
  - Ignitable wastes
  - Corrosive wastes
  - Reactive wastes
  - Toxicity characteristic wastes
- Assigning characteristic codes to listed waste; when and why it's required.

2:00 PM      **Break**

2:15 PM      **Hazardous Waste Identification – Part 1, Continued:**

- Characteristic waste identification exercise.
- Mixture Rule and Derived-from Rule.

3:15 PM      **Break**

3:30 PM      **Hazardous Waste Identification – Part 1, Continued:**

- Comprehensive waste identification exercise.

4:15 PM      **End of Day 1**

## **Day Two**

7:30 AM      **Registration/Coffee**

8:00 AM      **Hazardous Waste Identification – Part 2; additional issues in waste identification.**

- Exemptions from the definition of solid waste.
- Solid wastes that are excluded from RCRA regulation.
- The significance of 40 CFR Appendix VII and VIII.

9:00 AM      **Break**

9:15 AM      **Recycling Hazardous Waste**

- Recycling hazardous waste the EPA way.
- The five categories of recyclable materials.
- The four types of recycling activities.
- Recycling activities exempt from the definition of solid waste.

- 40 CFR 261.6 and 40 CFR 266 special categories of recyclable materials.
- Universal Waste Rule (including recent additions)

10:15AM **Break**

10:30AM **Recycling Exercise**

11:00AM **Managing Used Oil**

- Used oil defined.
- The used oil mixture rule; mixtures of listed waste vs. mixtures of characteristic waste.
- Rebutting the “Rebuttable Presumption”.
- The significance of on-spec vs. off-spec used oil.
- Testing requirements (?) for used oil.
- Used oil generator requirements.
- Burning used oil.
- Used oil spills.

11:45AM **Lunch on your own or with colleagues**

1:00PM **Hazardous Waste Generator Requirements**

- Generator categories – large quantity, small quantity and conditionally exempt small quantity generators; episodic generators.
- Accumulating hazardous waste.
- Container/tank management requirements.
- Air emission requirements.

2:00PM **Break**

2:15PM **Hazardous Waste Generator Requirements, Continued:**

- Preparing for accidents and contingency planning.
- Personnel training requirements.
- Satellite accumulation – glitches and common problems.
- Recordkeeping and reporting.

3:15PM **Break**

3:30PM **Treating Hazardous and Other Permitting Issues**

- When permits are required.
- Exceptions from permitting requirements.
- Advantages and disadvantages to having a RCRA permit.
- The permitting process.
- When post-closure permits are required.
- Permitting and RCRA Corrective Action.
- Remedial action plan vs. RCRA permit.

4:15PM **End of Day 2**

## Day Three

- 8:00AM      **Reporting Releases of Hazardous Waste/Substances**
- Regulatory requirements for release reporting.
  - When/where releases must be reported.
  - Reportable quantities.
  - What is meant by “into the environment”
  - Calculating the reportable quantity for mixtures and solutions.
  - Release reporting exercises.
- 9:00AM      **Break**
- 9:15AM      **The Land Disposal Restrictions (LDRs)**
- Historical basis for the LDRs and regulatory history.
  - Key provisions of the LDRs.
  - The LDR Notification and/or Certification Form; why the LDRs impact virtually all generators regardless of how the waste is to be managed.
  - Restricted vs. Prohibited waste.
  - The LDR treatment standards; concentration-based and technology-based.
  - Treatability groups; wastewater or non-wastewater?
  - Treatability group exercise.
- 10:15AM     **Break**
- 10:30AM     **The Land Disposal Restrictions (LDRs), *Continued*:**
- Understanding and using the 40 CFR 268.40 “Treatment Standards for Hazardous Waste” table.
  - The concept of “Subcategories” and knowing if your waste falls into one of them.
  - Subcategory identification exercise.
- 11:45AM     **Lunch on your own or with colleagues**
- 1:00PM      **The Land Disposal Restrictions (LDRs), *Conclusion*:**
- Universal Treatment Standards.
  - Understanding the concept of “Underlying Hazardous Constituents”.
  - Identifying and treating underlying hazardous constituents.
  - LDR Notification and Certification requirements.
  - Exercise – preparing the LDR notification form.
  - Applying the LDRs to characteristic wastes.
  - Alternate treatment standards for lab packs.
- 2:00PM      **Break**
- 2:15PM      **Managing Contaminated Media and Debris – An Overview**
- Understanding the “Contained-in Policy”.
  - Applying the LDRs to media and debris.
  - CERCLA and RCRA corrective action.
  - Investigation derived waste.
  - Developing cleanup standards.

3:00PM **Break**

3:15PM **Shipping Hazardous Waste**

- Manifesting mechanics and issues.
- An in-depth review of the new Hazardous Waste Manifest that will be required for all hazardous waste shipments in all states beginning on Sept. 5, 2006.
- A brief summary of DOT training and security plan requirements applicable to most hazardous waste generators.

4:00PM **RCRA Update**

- A brief summary of upcoming RCRA issues and/or changes.

4:15PM **Adjourn**

### ***Day Four***

8:00AM **DOT Training and Certification; Basic Training and Certification to provide for Signing Hazardous Waste Manifests**

- Overview of DOT regulations and shipping requirements.
- Hazard Awareness – identifying the hazards of hazardous materials.
- Hazard Communication – communicating hazards via labels, markings, placards and shipping papers.
- DOT requirements for shipping papers.
- Using the DOT Hazardous Materials Table.
- Preparing the US DOT Description for shipping papers and markings.
- Using Generic DOT descriptions.
- Packaging requirements for hazardous materials.
- Emergency response information requirements.
- Basic safety requirements and preparing for accidents.
- Shipping paper preparation exercises.

9:15AM **Break**

9:30AM **DOT Training and Certification, *Continued***

11:45AM **Lunch on your own or with colleagues**

12:45PM **DOT Training and Certification, *Continued***

3:00PM **DOT Certification Exam**

4:30PM **Course Adjourn**



**AARCHER INSTITUTE**  
*of* ENVIRONMENTAL TRAINING

910 Commerce Road  
Annapolis, MD 21401  
(410) 897-0037  
[training@aarcherinstitute.com](mailto:training@aarcherinstitute.com)

Visit us at [www.aarcherinstitute.com](http://www.aarcherinstitute.com)