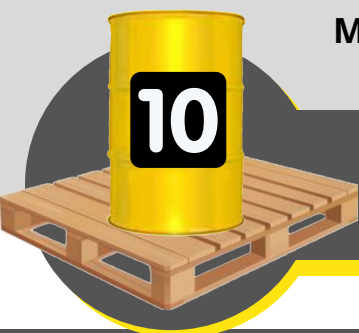


# COMMON HAZARDOUS WASTE & UNIVERSAL WASTE VIOLATIONS

Types of Resource Conservation and Recovery Act (RCRA) violations discovered through inspections by Fort Knox Environmental Management Division (EMD) are usually the same types of violations found within an Organization/Tenant or Unit.



## Top 10 RCRA Violations

- 1** Hazardous waste determinations (Done by EMD)
- 2** Emergency preparedness (Spill Kits)
- 3** Inspections (If needed)
- 4** Used oil (Labeled and properly stored)
- 5** Universal waste (Lamps, Aerosol cans, Batteries) properly labeled and containerized
- 6** Personnel training (Document all training & register for Environmental Officer Training)
- 7** Container management (Properly stored)
- 8** Tank management
- 9** Manifest/land disposal restrictions (Done by EMD)
- 10** Marking/dating (Done by EMD)

WHO DO I CALL FOR HELP?



- 624-3692
- 624-6598
- 624-8379

Examples of the pitfalls involved in a hazardous waste/universal waste determination are:

### Commonly missed waste streams

*(i.e., those that can be overlooked when identifying Hazardous Waste/Universal Waste):*

- Used absorbents
- Rags/wipes
- Off spec fuels
- Used antifreeze
- Grinding dusts and blasting media
- Filters
- Paint-related wastes
- Old/overstock unused products
- Batteries
- Empty aerosol cans
- Fluorescent lamps



## Strategies for ensuring compliance

- Follow up promptly with Environmental Management Division (EMD) on problems you discover during your facility inspections.
- Periodically review the facility's Environmental compliance program and update (perhaps annually).
- Meet with your staff frequently to keep them up to date, and remind them of their responsibilities.
- Create a list or handout that can be customized to the processes at your facility.
- Make periodic clean sweeps through the facility to find and dispose of (in accordance with regulatory requirements) any old chemicals and "contraband" materials (e.g., a favorite solvent/cleaner etc. brought in by a worker but not known to be at the facility).
- Perform self-audits.
- Ask for site specific training, courtesy inspections or a walk through from EMD.