

What Are My Requirements Under RCRA?



Hazardous Wastes at Brownfields Sites

Hazardous wastes generated at brownfields sites are subject to all applicable requirements of ADEM Administrative Code, Division 14 (Industrial Hazardous Waste Rules / Regulations).



Hazardous Wastes at Brownfields Sites

Discarded commercial chemical products (including abandoned chemical products left onsite by the property's previous owner / operator) may be subject to hazardous waste requirements.





Hazardous Wastes at Brownfields Sites

Unwanted office equipment (including spent fluorescent lamps and CRT monitors) left onsite by the property's previous owner / operator may be subject to hazardous waste requirements.





Hazardous Wastes at Brownfields Sites

Remediation wastes (including soil and debris) contaminated with hazardous constituents may be subject to hazardous waste requirements.





Hazardous Wastes at Brownfields Sites

Discarded personal protective equipment (including gloves and boot covers) contaminated with hazardous constituents may be subject to hazardous waste requirements.





Hazardous Wastes at Brownfields Sites

Investigation-derived wastes (such as purge water removed from groundwater monitoring wells) contaminated with hazardous constituents may be subject to hazardous waste requirements.





Basic Hazardous Waste Generator Requirements

Anyone who generates a hazardous waste must meet three basic requirements:

- Determine if the wastes he/she generates are hazardous
- Know how much hazardous waste he/she generates
- Properly dispose of all hazardous wastes he/she generates



Waste Determinations

A person who generates a waste must determine if it is a hazardous waste by using:

- Analytical testing
- Generator knowledge

Examples of hazardous wastes:

- Excavated soils contaminated with trichloroethylene from a former dry cleaning operation (F002)
- Debris from the demolition of a wastewater treatment system at a former electroplating operation (F006)
- An abandoned container of unused MEK left onsite by the property's previous owner / operator (U159)

Examples of hazardous wastes:

- Abandoned CRT monitors left onsite by the property's previous owner / operator (D008)
- Spent fluorescent lamps left onsite by the property's previous owner / operator (D009)
- Debris from the demolition of a building / structure that was painted with lead-based paint (D008)



Generator Status

A person who generates a hazardous waste must know how much hazardous waste he/she generates per month.



Generator Status

Sites that generate greater than or equal to 220 pounds of hazardous waste per month must obtain an EPA Identification Number from the Department.



Generator Status

Sites that generate less than 220 pounds of hazardous waste per month are not required to obtain an EPA Identification Number.



Disposal of Hazardous Wastes

Hazardous wastes may be sent to approved / permitted treatment facilities, storage facilities, or landfills.

Hazardous wastes may not be disposed in construction & demolition landfills.



Disposal of Hazardous Wastes

Before any hazardous wastes may be disposed in a landfill located in Alabama, the person who generated those wastes must obtain a waste preapproval from the Department.

- Hazardous wastes generated at brownfields sites are subject to all applicable industrial hazardous waste rules / regulations
- A waste determination should be performed on all wastes generated at brownfields sites
- Brownfields sites that generate hazardous wastes should track how much hazardous waste they generate per month
- Hazardous wastes generated at brownfields sites should only be disposed in appropriate (i.e., approved and/or permitted) landfills



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