

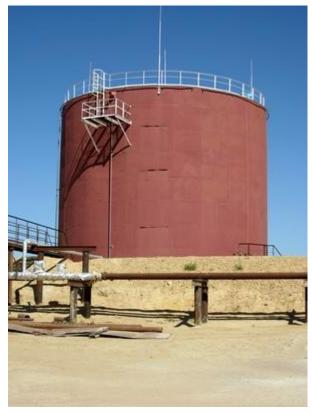


RCRA Waste Handlers:

Generators, Transporters and TSDFs

Prof. Tracy Hester

Environmental Law Oct. 16, 2019





RCRA Generators –

- -- Largest universe of hazardous waste handlers
- -- Key exemptions:
 - --- 90-day storage
 - Small quantity generators,Conditionally Exempt SQGs
 - --- Recycling
 - --- Product tank exemption







RCRA Transporters

- Least regulated part of hazardous waste chain
- -- Key requirement: manifesting and exception reporting
- Limited storage and transfer station authorization
- -- Under DOT and HazMat separate regulation
- -- International shipments



Hazardous Waste TSDFs: HazWaste Landfills

- Large cells, liners, groundwater monitors
- Staging treatment areas
- Highly controversial



Hazardous Waste TSDFs: Incineration Facility

- Six 9s destruction efficiency
- Fluidized bed, rotary kiln, etc.
- Note ash disposal unit



Hazardous Waste TSDF: Injection Wells

- -- Smallest footprint
- -- Associated tankage
- -- Casing testing, annulus integrity





Hazardous Waste TSDFs: Treatment Technologies

- -- Vitrification, Waste-to-Energy, Plasma Furnaces, Stabilization
 - -- Residue and staging
 - Waste classification (derivedfrom rule, waste code carrythrough)
 - --- TSD requirements for staging
 - Limits on use of resulting material, energy costs





Professor Tracy Hester University of Houston Law Center

tdheste2@central.uh.edu 713-743-1152 (office)