
FORT CAMPBELL ENVIRONMENTAL HANDBOOK
Guidance and Instruction
HAZARDOUS WASTE MANAGEMENT OVERVIEW

In 1976 Congress enacted the Resource Conservation and Recovery Act (RCRA). The RCRA statute was amended by the Solid Waste Disposal Act Amendments of 1980 and again by the Hazardous and Solid Waste Amendments (HSWA) of 1984. The Environmental Protection Agency (EPA) codified these laws by issuing regulations under Title 40 Code of Federal Regulations (40 CFR). These federal regulations are constantly being changed and updated. EPA has delegated the enforcement and authority to develop state regulations to states that develop a program that is at least as stringent as the EPA regulations. The States of Tennessee and Kentucky have been given this authority and each state has enacted its own regulations.

In order to determine whether a material is regulated as a hazardous waste, one must first determine whether the material is regulated as a solid waste because it has been or will be discarded or abandoned. A solid waste is defined as a spent material or by-product of a manufacturing process that is either of solid, semi-solid, liquid, or gaseous composition, and that has been used, and as a result of such use, can no longer be used for its originally intended purpose.

A solid waste is a hazardous waste if it has been specifically listed by EPA under 40 CFR Part 261, Subpart D, or it exhibits a characteristic that makes it a danger to human health, safety, or the environment. The lists issued by EPA include wastes generated from non-specific sources, specific sources, and discarded and off-specification chemical products.

The listed wastes are identified as:

F-List: Waste from non-specific sources

K-List: Waste from specific sources

P-List: Waste from commercial chemical products (acutely hazardous)

U-List: Waste from a commercial chemical product (toxic)

The characteristic wastes are generally identified by:

IGNITABILITY: (EPA Waste Code D001)

The waste has a flash point of less than 140 degrees Fahrenheit, or is not a liquid and is capable of causing fire through friction or spontaneous reaction, or is an ignitable compressed gas as defined by 49 CFR 173.300, or it is an oxidizer as defined by 49 CFR 173.51.

CORROSIVITY: (EPA Waste Code D002)

The waste is aqueous and has a pH of less than or equal to 2, or more than or equal to 12.5, or is a liquid and corrodes steel at a rate of 1/4 inch per year.

REACTIVITY: (EPA Waste Code D003)

The waste is explosive with air or water or is capable of spontaneous detonation at normal daytime temperatures.

TOXICITY: (EPA Waste Codes D004 through D043)

The waste is toxic because it contains leachable concentrations of particular metals, organics, or pesticides in excess of the amount specified by EPA.

There are two ways to make a hazardous waste determination:

- 1) Knowledge of the product or process generating the waste; or
- 2) By a chemical analysis.

FORT CAMPBELL ENVIRONMENTAL HANDBOOK
Guidance and Instruction
HAZARDOUS WASTE MANAGEMENT OVERVIEW

CURRENT REGULATIONS

Resource Conservation and Recovery Act, Title 40 Code of Federal Regulations 260 through 279, Title 49 Code of Federal Regulations, State of Tennessee Hazardous Waste Regulations, State of Kentucky Hazardous Waste Regulations, AR 200-1, Environmental Protection Enhancement, AR 420-47, Solid and Hazardous Waste Management, and Fort Campbell's Environmental Handbook.

GUIDANCE AND INSTRUCTIONS

The generator of a hazardous waste is responsible for the waste from the time it is first generated until its ultimate disposal ("Cradle to Grave" Concept). The definition of a generator is the person who first creates a hazardous waste or first makes a waste subject to regulation. There are certain requirements levied on the generator for waste determination and storage of hazardous waste.

There are two types of storage authorized by the regulations that do not require a permit issued by EPA or the State. They are: Accumulation Points and Satellite Storage Areas.

Accumulation Point (AP) storage areas are time driven and do not regulate the volume of hazardous waste stored. A specific hazardous waste that is being accumulated must be disposed of within 90 days and have various other requirements levied on them by regulations. There are only three APs authorized on Fort Campbell. They are DRMO, PWBC Environmental Division, and BACH (for medical wastes only).

Satellite Accumulation Point (SAPs) are storage areas that are volume driven and do not regulate the duration that hazardous waste is stored. Refer to the following Guidance and Instructions, "Satellite Accumulation Point".