

Robinson+Cole

RCRA at Forty

A LANDMARK ENVIRONMENTAL LAW GROWS UP
(IS FORTY THE NEW TWENTY?)

FOR
CONN. DEPARTMENT OF
ENERGY + ENVIRONMENTAL
PROTECTION (FALL, 2016)



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- VISITING SCHOLAR and FACULTY, WESLEYAN UNIVERSITY - (COLLEGE of the ENVIRONMENT)

Birth of a Program

- A Brief Family History

- Solid Waste Disposal Act (1965)
- Resource Recovery Act (1970)
- Resource Conservation and Recovery Act (1976)

- Who Am I?



- Self Discovery: leg, arms, hands—SW, HW, USTs
- “Cradle to Grave”...so young to be concerned with mortality

Growing Pains

- Mass Confusion: EPA ID #(s) and Notifications—Generator, Transporter, TSD
- RCRA will wReCk – yA!)—Is that wastewater treatment or hazardous waste storage & disposal?
 - Tensions between new requirements and CWA.
- What is “EVIL” without the “V”? EIL!
 - Environmental Impairment Liability (EIL) insurance.

The Teen Years

- You Can't Go Out Like That!
 - LDR=Limited Dress Code or Land Disposal Regulation?
- Go Clean Your Room! (Corrective Action)
 - You are too old for SMURF or SWMU for you.
 - Clean up all SWMUs, not just SD locations.



Adulthood + Relationships

- **Healthy Marriage**

- RCRA sites and cleanups have “meaningful relationships with:
 - Connecticut Transfer Act
 - Connecticut Remediation Standard Regulations
 - TSCA—PCB cleanups
 - CERCLA ARARs



Golden Years

- **Staying nimble (is 40 the new 20?)**
 - Definition of solid waste— “What’s that you say? When is it solid waste?”
 - Recycling, Reclamation, Beneficial Use and Reuse



Questions?

- Any questions can be directed to Earl Phillips
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- Thanks for your time and attention!