



Connecticut Department of Energy and Environmental Protection



RCRA Small Business Enforcement Policy

- Implemented as a pilot in June 2013
- Designed to provide penalty relief to eligible small businesses entering into consent orders to resolve RCRA violations
- Goal to reduce public and private resources spent negotiating penalties to allow for an increased focus on compliance
- Applied to 3 consent order cases, 4th is pending
 - 2 CESQGs, 1 SQG
 - # of full-time employees ranged from 2 to 38
- Waived a total gravity-based penalty of \$84,700
- Website: www.ct.gov/deep/hazardouswaste



RCRA Small Business Enforcement Policy

- Reviewed and approved by the Office of the Attorney General & EPA Region 1

| | Pre-SBEP (< 50 FTEs only) | Post-SBEP |
|-------------------------------------|---------------------------|-----------|
| Average Final Penalty | \$25,050 | \$4,608 |
| Average # of Days to Order Issuance | 388 days | 175 days |

For more information contact:

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Connecticut Department of Energy and Environmental Protection

Proposal to State-list Waste Pharmaceuticals as a Universal Waste

September 26, 2013

Presented by Robert Isner

HWAC Meeting /DEEP



Connecticut Department of Energy and Environmental Protection

History

- EPA proposal to add hazardous waste pharmaceuticals to Universal Waste Rule published on 12/2/08.
- Due to extensive and conflicting comments, EPA decided to not finalize the 2008 proposal.
- DEEP is proposing to State-list waste pharmaceuticals as a universal waste.



Tentative Schedule

- Receive stakeholder input on key issues outlined below - fall 2013
- Complete internal draft of the proposal - winter 2013
- Complete core of proposed regulations - spring 2014
- Hold Stakeholder meeting(s) - summer 2014
- Public notice proposed regulations – fall 2014



Example Key Issues

- How should the terms “pharmaceutical” and “pharmaceutical universal waste” be defined?
 - Should drugs from Appendix A of NIOSH Publication No. 2012-150 and Appendix VI: 2-1 of the OSHA Technical Manual be managed as a universal wastes?
- What types of tracking records should be required to be kept by generators (manifest v. other)?
- What type of training should be required by small quantity handlers of universal waste?
- Must accumulation containers be kept closed?



Questions?

- HWAC listserv will be used to send and receive responses to key issues (fall 2013)
imalserv@list.ct.state.ct.us
- Contact Michele DiNoia with any follow-up questions.
 - e-mail at Michele.DiNoia@ct.gov
 - phone at (860) 424-3816

