

FOCUSED. RESPONSIVE. EXPERIENCED.

# ENVIRONMENTAL LAW GROUP

WWW.ENVIROLAWGROUP.COM

## Industrial and Hazardous Waste Issues

---

Knowing how your wastes are being managed and where they are going is vital to the operation and success of every business. Managing such wastes incorrectly or sending them to the wrong place can lead to significant short- or long-term liability.

ELG attorneys have expertise on all aspects of federal and state regulation of waste management activities.

IN PARTICULAR, WE HAVE ADVISED CLIENTS IN THE FOLLOWING AREAS:

### WASTE DETERMINATIONS

Assisting clients with understanding and navigating the legal intricacies of determining whether a waste is a "hazardous waste."

### GENERATOR SIZE DETERMINATION

Advising clients on determining the appropriate generator size requirements to apply to a facility as well as the short- and long-term implications of changes in generator size.

### COMPLYING WITH WASTE ACCUMULATION, STORAGE, TRANSPORTATION AND DISPOSAL REQUIREMENTS

Providing plant walk-throughs and reviews to verify that a facility is meeting the numerous management requirements under both the federal and state waste rules.

### RECYCLING AND POLLUTION PREVENTION

Implementing pollution prevention and waste minimization programs and advising on whether a waste can be recycled under federal and state rules

### RECENT EXAMPLES OF ELG'S WASTE EXPERIENCE INCLUDE:

- » Establishing waste analysis plans for profiling and sampling waste streams generated throughout a client's manufacturing process
- » Developing formats for contingency plans and job descriptions that have received compliments from regulators during enforcement inspections
- » Assisting with developing and conducting annual hazardous waste training for numerous clients
- » Negotiating a PCB compliance agreement with EPA
- » Negotiating national waste hauling agreements for solid and hazardous waste disposal and management
- » Conducting numerous applicability analyses regarding point-of-generation locations and issues for F037, F038, K169, K050, K051 and other hazardous waste listings applicable to refinery or petrochemical operations
- » Negotiating numerous consent agreements and final orders with EPA for hazardous waste violations

## Industrial and Hazardous Waste Issues

- » Guiding clients through the various stages of closure under both federal and state hazardous waste rules for tanks, storage areas, lagoons, land treatment units and solid waste management units
- » Assisting in establishing and renewing the different types of financial assurance documentation for permitted facilities and for less than 90-day storage tanks
- » Advising clients when issues arise as their waste is in transit, including spills, rejected loads and wrong destinations

