



# How Do I Manage My Remediation Waste?

Information presented in this publication is intended to provide a general understanding of the statutory and regulatory requirements governing remediation waste. This information is not intended to replace, limit or expand upon the complete statutory and regulatory requirements found in the Illinois Environmental Protection Act and Title 35 of the Illinois Administrative Code of Regulations.

Are you making plans to clean up your site? By doing so, you will generate remediation waste. Once remediation waste is excavated or disturbed, you are considered a waste generator. As a waste generator, you are responsible for the proper management of the waste. Remediation waste is regulated to protect human health and the environment. The requirements are dependent on the contaminants in the waste. Therefore, you must be able to characterize your re-remediation waste to comply with the regulations that apply during the waste's removal and final disposal. This fact sheet will guide you through this process.



waste and/or nonhazardous waste. Before you generate any remediation waste, you must characterize the waste as hazardous or nonhazardous and develop an appropriate plan for management and treatment or disposal. Once your remediation waste is generated, it must be managed IMMEDIATELY. You must be mindful of the management of your remediation waste especially if it is hazardous waste. This fact sheet discusses the identification of, as well as the requirements associated with, remediation waste.

## ? What Is Remediation Waste?

Remediation waste is special waste generated by implementing a cleanup and most likely consists of contaminated soil, water or demolition debris. For more information on special waste, contact the Office of Small Business to receive a copy of the fact sheet "Do I Have A Special Waste?" Remediation waste can be hazardous



## ? Is My Remediation Waste a Hazardous or Nonhazardous Waste?

Determination of whether your remediation waste is a hazardous or nonhazardous waste is based on knowledge of the characteristics of the waste or by sampling and analysis of the waste at a laboratory. Hazardous waste is divided into two categories: listed and characteristic. A listed hazardous waste can be found on the Illinois Environmental Protection Agency's (Illinois EPA) hazardous waste list. This list can be obtained from the Office of Small Business or can be found at [www.ipcb.state.il.us/title\\_35/main.htm#g](http://www.ipcb.state.il.us/title_35/main.htm#g) (Part 721, Subpart D). If your waste is not a listed waste, you must determine if it is a characteristic hazardous waste.

A characteristic hazardous waste exhibits a characteristic that poses a hazard to human health and the environment. These characteristics are ignitability, corrosivity, reactivity and toxicity. Knowledge of these characteristics also helps determine precautions that must be taken to ensure the safety of those involved in its proper treatment and disposal. If your remediation waste exhibits one of these characteristics, your waste is a characteristic hazardous waste.

In some instances your waste may be a mixture of several different wastes including both listed and characteristic. If you have determined your waste is hazardous by either characteristic, listed or both, **proceed to the question Why is the Amount of Hazardous Waste Generated Important to Know?** If you are uncertain about the characteristics of your waste, you should make arrangements to have the waste analyzed at a laboratory. Contact the Office of Small Business for more information on characterizing your soil or waste. If your remediation waste is not covered by the definition of a characteristic or listed waste, your waste is nonhazardous. Proceed to the question **What Are My Requirements As A Nonhazardous Waste Generator?**

**? Why is the Amount of Hazardous Waste Generated Important to Know?**

If your remediation waste is hazardous, you must comply with regulations governing hazardous waste generation, treatment and disposal. There are three categories of hazardous waste generators, conditionally exempt small-quantity, small quantity and large quantity. These categories are based on the amount of waste generated.

Most likely you are a large quantity generator (LQG). A LQG generates over 1,000 kilograms (2,200 pounds) per month of hazardous waste or over 1 kilogram (2.2 pounds) per month of acute hazardous waste. For more information on generator size contact the Office of Small Business to receive a copy of the fact sheet "How Do I Manage My Hazardous Waste?" All LQGs are required to have both a U.S. Environmental Protection Agency (U.S. EPA) and Illinois EPA generator identification (ID) number. The U.S. EPA and Illinois EPA both use these numbers to track and monitor hazardous waste activities. For more information on how to obtain generator ID numbers, contact the Office of Small Business



to receive a copy of the fact sheet "Does My Business Need Generator Identification Numbers and Manifests."

In addition, generators of hazardous waste and hazardous waste treatment, storage or disposal (TSD) facilities are required to file an "Annual Hazardous Waste Report" by March 1 of each year. Forms within the "Annual Hazardous Waste Report" that must be completed are also based on your generator size and on your on-site waste management status. Forms and instructions for completion are provided in the report. For more information on the "Annual Hazardous Waste Report," contact the Office of Small Business.

**? What Are My Requirements as A Nonhazardous Waste Generator?**

A nonhazardous waste generator is required to have an Illinois EPA generator ID number. For more information on obtaining an Illinois EPA generator ID number, contact the Office of Small Business. There are also restrictions on disposal options of nonhazardous waste discussed under What Do I Do With My Remediation Waste? If your nonhazardous waste contains polychlorinated biphenyls (PCBs) there are additional federal regulations that apply. Contact U.S. EPA at 312-353-2291 for more information.

Generators of nonhazardous special waste who send their waste out-of-state for disposal and nonhazardous special waste (TSD) facilities are required to file a "Nonhazardous Special Waste Annual Report" by February 1 of each year. Forms and instructions for completion are provided in the report. For more information on the "Nonhazardous Special Waste Annual Report," contact the Office of Small Business.

**? What Do I Do With My Remediation Waste?**

Options for managing your remediation waste include off-site treatment or disposal or on-site management. Each option is discussed below.

**Off-Site Treatment and Disposal**

Hazardous remediation waste can be accumulated in containers (such as roll-off boxes and drums) and tanks prior to being sent off-site for disposal. There are requirements associated with the types of containers/tanks used, labeling,



## On-Site Management

On-site management means that you will treat, store or dispose of your remediation waste on your property after it has been generated. If you choose to do this then you must have Illinois EPA approval. The best means of obtaining approval is by submission of a remedial action plan (RAP) to the Illinois EPA. A RAP documents your plans to manage the waste on-site while complying with all applicable standards and regulations. This option requires significant validation of your decision to manage the waste on-site as well as extensive explanation of how you will be able to remain in compliance during the on-site management process. It must be noted that permits from the Bureau of Water, Land or Air may also be required for your proposed on-site management activities. Specific issues concerning RAPs and on-site management of hazardous and nonhazardous wastes are discussed below.

and operation of the area where the containers/tanks are placed on the property. These requirements can be found at [www.ipcb.state.il.us/title\\_35/main.htm#g](http://www.ipcb.state.il.us/title_35/main.htm#g) (Part 722, Subpart C). No permit is required for this activity if the appropriate tanks or containers are used and the waste is sent off-site within 90 days.

There are significant restrictions on the transport and disposal of hazardous wastes. Hazardous wastes must be transported by a licensed hazardous waste hauler to a licensed hazardous waste treatment or disposal facility. The hazardous waste must be accompanied by an Illinois Uniform Hazardous Waste Manifest. This manifest is a shipping document that tracks the hazardous waste from its point of generation to its final disposal site. For more information on manifests, see the fact sheet “Does My Business Need Generator Identification Numbers and Manifests?” For information on licensed hazardous waste haulers and treatment or disposal facilities, contact the Office of Small Business.

Hazardous remediation waste can be managed on-site in temporary units (roll-off boxes and drums) or corrective action management units (CAMUs). In general, these units are used for the on-site treatment or disposal of hazardous remediation waste. A RAP permit must be obtained prior to managing this waste in temporary units or before beginning construction of a CAMU. The application for this permit must contain detailed information about the proposed waste management activity. CAMUs are usually required for large volumes of hazardous waste and include landfills, surface impoundments and waste piles.

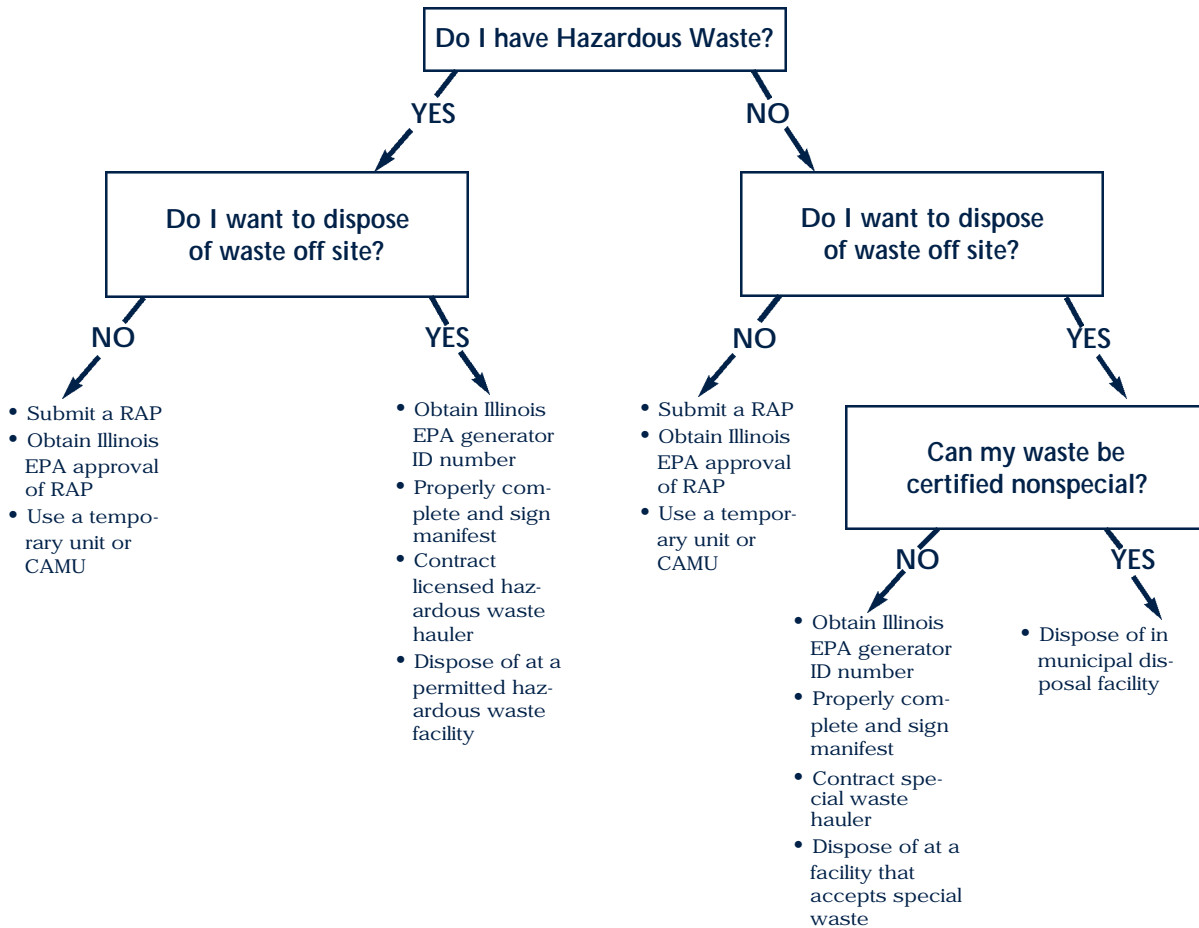
Nonhazardous waste can be disposed of at a licensed special waste disposal facility transported there by contracting a special waste hauler. Special waste disposed of in Illinois is also required to be accompanied by an Illinois Uniform Hazardous Waste Manifest. Some nonhazardous wastes may be certified as nonspecial waste. Once this is done, it can be disposed of as general municipal waste at a properly licensed disposal facility. A waste that has been certified as nonspecial waste does not require a generator ID number, license for transport, or manifest. Check with your permitted disposal facility about specific requirements for certification. For more information on nonspecial waste certification, contact the Office of Small Business to receive a copy of the fact sheet, “Do I Have A Special Waste?”

A RAP permit is not required to treat or store nonhazardous remediation waste on-site. If nonhazardous remediation waste will be disposed of on-site, then the design and operating requirements for nonhazardous waste landfills must be met.

### ? Where Do I Get More Information?

For additional information on remediation waste and other environmental requirements in Illinois, please call the Illinois EPA Office of Small Business Help Line toll-free at 1-888-EPA 1996. All calls are considered confidential, and the caller can remain anonymous. You can also visit the Illinois EPA website at [www.epa.state.il.us](http://www.epa.state.il.us).

The following flow chart shows the disposal options discussed in the previous paragraphs.



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