

Restricted Waste Management Inspection Program



Southern Nevada Health District
Environmental Health Division
Solid Waste & Compliance Section

Why is SNHD performing this inspection?



- The Southern Nevada Health District acting on behalf of the District Board of Health is the Solid Waste Management Authority with Clark County Nevada as defined in NRS 444.495.
- NRS 444.580 gives the District Board of Health the authority to adopt regulations and issue permits.
- Solid Waste Management Authority Regulations (SWMAR) updated August 2015.

Solid Waste & Compliance Programs



- Permitted Disposal Facilities (PDF)
 - Plan Review
 - Inspections/Permitting
- Underground Storage Tanks (UST)
 - Plan Review
 - Inspections/Permitting
- Solid Waste Investigations/Illegal Dumping
- Restricted Waste Management Program (RWMP)
 - Inspections/Permitting

Solid Waste Defined



- **Solid Waste** means all putrescible and non-putrescible refuse in solid or semi-solid form, including, but not limited to, garbage, rubbish, junk vehicles, ashes or incinerator residue, street refuse, dead animals, demolition waste, construction waste, sewage, solid or semi-solid commercial and industrial waste.

Restricted Waste Management Program



- Previously known as the Waste Management Audit Program.
- Chapter 4-3.01 of the SWMAR states:
 - “Generators of Restricted Wastes are subject to permitting by the Solid Waste Management Authority and shall comply with the requirements of Section 4-3.”

Restricted Waste Defined



- **RESTRICTED WASTE** means a solid waste with properties that make it dangerous or potentially harmful to human health and/or the environment and is prohibited from disposal in a solid waste landfill. Restricted Wastes includes Hazardous Waste, Universal Waste, and Special Waste.
 - Does not include Household Hazardous Waste or Household Solid Waste.



Special Waste Definition



- **SPECIAL WASTE** means a solid waste that requires special handling, trained people and/or special disposal methods. Special Waste includes, but is not limited to, Asbestos Containing Waste, Medical Waste, Restricted Waste, Waste Tires, used motor oil, and used anti-freeze.



Exemptions



- Facilities may be exempt from obtaining a Restricted Waste Management Permit if they are currently inspected by:
 - Environmental Protection Agency (USEPA) under the Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection.
 - Examples: LQG, SQG
 - Nevada Department of Environmental Protection (NDEP) under the Hazardous Waste Management Program.
 - Examples: LQG, SQG
 - Publicly Owned Treatment Works (POTW) under a National Pollution Discharge Elimination System (NPDES) permit.
 - Examples: Car Washes
 - Solid Waste Management Authority as a permitted Solid Waste Management Facility.
 - Examples: Material Recovery Facilities

Exemptions Continued



- Facilities may be exempt from obtaining a Restricted Waste Management Permit if:
 - The Restricted Waste generated per calendar year is:
 - Less than 1 (gallon) or 8 (eight) pounds.
 - Not elemental Mercury or categorized as an Acutely Hazardous Waste as defined by 40 CFR 261.33.
 - Compliant with the minimum standards and requirements set forth in Chapter 4-3.02;
 - The only Restricted Waste generated is:
 - Universal Waste-excluding lead acid batteries.
 - Untreated Medical Waste.

RWM Standards

- Per 4-3.02 Minimum Standards for Generators of Restricted Waste:
 - Generators of Solid Waste must make a Solid Waste Determination through Generator knowledge or evidence of laboratory results that demonstrate Solid Waste generated is not a Restricted Waste.
 - Ex: SDS, TCLP (7-11)
 - **WASTE DETERMINATION** means a process undertaken by a solid waste generator to determine if Solid Waste being generated is a Restricted Waste, Special Waste, and/or a Hazardous Waste.



RWM Standards Cont.

- Restricted Waste Storage Standards:
 - Restricted Waste must be stored, staged and kept separate from Solid Waste.
 - A container used to store Restricted Waste must:
 - Be structurally sound;
 - Not pose a spill risk;
 - Be compatible with the characteristic(s) of Restricted Waste (s) being stored inside;
 - Be kept closed when not in use.



RWM Standards Cont.

- A container used to store Restricted Waste must be labeled according to its contents and the label must be readily visible and legible.
- If more than one type of Restricted Waste is stored in a container, the Restricted Wastes must be chemically compatible.
- Documentation proving proper disposal of all Restricted Wastes must be kept onsite or readily available for review upon date of inspection for three (3) years.
- Generators of Restricted Waste must comply with all requirements of federal, state, and local laws and regulations governing the operation, management, transport, storage and/or disposal of Restricted Waste.



RWM Permits



- RWMP Categories:
 - Category I Restricted Waste Management Permit
 - All facilities qualifying as a Restricted Waste Generator will initially fall into this category
 - Physically inspected annually
 - Category II Restricted Waste Management Permit
 - Facilities that are eligible may apply for reclassification and be approved by RWMP Supervisor
 - Must submit annual Restricted Waste Management Self Assessment
 - Physically inspected once every three years

RWMP Reclassification Eligibility Requirements

- Generators of Restricted Waste eligible for a Category II Restricted Waste Management Permit must:
 - Generate less than 50 gal or 400 lbs of Restricted Waste in a single calendar year;
 - Not generate Acutely Hazardous Waste as defined by 40 CFR 261.33;
 - Must be compliant with the requirements of the Restricted Waste Management Program listed above in Chapter 4-3.02.



RWMP Reclassification Revocation



- A Category II Restricted Waste Management Permit may be revoked for any of the following:
 - Failure to submit Annual Restricted Waste Management Self Assessment before expiration date of current permit;
 - A Restricted Waste Management Inspection identifies that the Generator of Restricted Waste is outside of eligibility requirements for reclassification.

RW Landfill Disposal



- **Per 4-3.04 Disposal by Landfilling**
 - No person shall dispose of, or offer for disposal, a restricted waste in a municipal solid waste landfill in Clark County.
 - The inadvertent or unintentional disposal of a restricted waste in a municipal solid waste landfill shall not be considered a violation of these regulations.

Reclassification/Exemption Application



- If you have questions or would like to apply for an Exemption or to be Reclassified:
 - RWMI@SNHDMAIL.org