



RCRA-C Compliance

Information for Pharmacies and Others

Facility Compliance Plans

This outline provides **general** information on the development and implementation of a facility compliance plan for facilities subject to the RCRA-C hazardous waste generator regulations (not including treatment, storage, or disposal facilities (TSDFs)). It can be used to develop plans that are tailored and scaled to specific facilities. This outline is not meant to address every compliance scenario that could occur. Users of this outline are responsible for ensuring that all facility-specific issues are addressed.

- 1. Identify Hazardous Wastes**
 - Review all facility waste streams/processes and identify all solid wastes generated.
 - Complete hazardous waste determinations for all solid wastes (including universal wastes).
 - Review exemptions and exclusions.
- 2. Determine Monthly Generation Rates for all Regulated Hazardous Wastes**
 - Identify “routine” wastes and generation rates.
 - Identify any wastes with variable generation rates.
 - Identify wastes generated only occasionally (“episodic” wastes) and monthly rates.
- 3. Determine Facility Category**
 - Large Quantity Generator (LQG)
 - Small Quantity Generator (SQG)
 - Conditionally Exempt Small Quantity Generator (CESQG)
- 4. Determine Applicable Facility Standards**
 - General Standards (e.g., EPA ID No., notices (to local emergency response agencies, transporters, disposal facilities), waste analysis, security, inspections, training, location (e.g., separation distances for flammables), etc.)
 - Additional Standards (e.g., preparedness and prevention, contingency plan, manifesting, recordkeeping, reporting, closure, financial assurance, etc.).
- 5. Determine Hazardous Waste Management Standards**
 - Containers
 - Tank systems (if applicable)
 - Other units

- 6. Develop Specific Compliance Measures to Meet all Standards**
 - General Facility Standards
 - Additional Facility Standards
 - Hazardous Waste Management Standards
 - Develop boilerplate forms, checklists, inspection reports, etc.
- 7. Implement Compliance Measures**
 - Develop compliance calendar.
 - Implement procedures.
 - Maintain compliance binder (compilation of all records needed to demonstrate compliance).
- 8. Audit Compliance**
 - Complete periodic compliance self-audits (at least annually).
 - Use of NYSDEC compliance checklists.
- 9. Review, Refine, and Repeat**
 - Review: review steps 1-6 above and adjust as necessary.
 - Refine: based upon results of audits, refine compliance measures.
 - Repeat: continue implementation of compliance plan, audit, and refine as needed.