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Hazardous Waste Enforcement: U.S. Environmental Protection Agency and Frederick, Maryland, Training and Shooting Center Enter into Expedited Settlement Agreement

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The United States Environmental Protection Agency (“EPA”) and Heritage Training and Shooting Center, LLC (“Heritage”) entered into a January 6th Expedited Settlement Agreement (“ESA”) addressing alleged violations of the Resource Conservation and Recovery Act (“RCRA”) regulations. See Docket No. RCRA-03-2023-0027.

The ESA provides that Heritage owns and operates a firearms training and shooting range (“Range”) with retail and rental services in Frederick, Maryland.

The Range is stated to have submitted a notification to the Maryland Department of Environment on May 7, 2015, that it was a Small Quantity Generator (“SQG”) of hazardous waste. A RCRA ID Number was assigned to the Range.

Representatives of EPA are stated to have conducted a Compliance Evaluation Inspection at the Range on February 10, 2022. Based on the observations during the inspection, the ESA provides that the Range failed to comply with certain requirements of Subtitle C of RCRA and its implementing regulations.

The Range allegedly failed to meet the following conditions of the generator permit exemption:

- Failure to keep satellite accumulation area (“SAA”) containers closed during periods when waste was not added or removed into and from them
- Failure to label its SAA containers with the words “Hazardous Waste”
- Failure to properly label the containers within the hazardous waste accumulation area (“HWAA”) and mark the containers with an accumulation start date
- Failure to maintain an inspection log or summary of the inspections
- Failure to conduct weekly inspections of its HWAA
- Failure to maintain at least two feet of aisle space in the HWAA
- Failure to have an adequate waste management training program
- Failure to provide annual refresher training in hazardous waste management to its personnel

A civil penalty of \$6,250 is assessed.

A copy of the ESA can be downloaded [here](#).

