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Hazardous Waste Determination ???



## Small Quantity Generator Training; Topics

- Episodic Generation
- Containers & Tanks
- The Manifest
- Land Disposal Restriction
- Emergency Planning & Preparedness
- Employee Training

# Episodic Generation

- If you periodically exceed your normal generation rate :
  - infrequent cleanouts, unforeseeable spills, etc.
- What requirements apply ??

**\* Re-evaluate your generator classification often!! \***

<i>Episodic Generator If Monthly Generation Rate Exceedance is an Unforeseeable/Infrequent Event</i>	<i>Change Generator Status If Monthly Generation Rate Exceedance is a Common Occurrence</i>
<ol style="list-style-type: none"><li>1. <i>Manage generated waste in compliance with applicable generator classification (at least for that month)</i></li><li>2. <i>Document monthly generation rates</i></li><li>3. <i>Document accumulation rates</i></li><li>4. <i>Minimize potential for reoccurrence of episodic generation</i></li></ol>	<ol style="list-style-type: none"><li>1. <i>Notify DEEP in writing</i></li><li>2. <i>Complete <a href="#">Form 8700-12</a> which can be found at <a href="http://www.epa.gov">www.epa.gov</a> and submit to DEEP.</i></li><li>3. <i>Comply with new generator classification requirements</i></li></ol>

# We're an SQG...So Now What?

- Containers, Tanks, Buildings ~~Buildings~~
- Container Management Options
  - *Satellite Accumulation Area (SAA)*
    - *a.k.a. POG, satellites*
  - *Hazardous Waste Container Storage Areas*
    - *a.k.a. CSAs, LT-180 areas*
- Requirements for all RCRA containers:
  - *Labeled*
  - *Sound condition*
  - *Compatible with materials*
  - *Closed*



# Container Rules

- What is a Satellite Accumulation Area?
  - Located at or near point of generation
  - Under control of an operator
  - Quantity limits: do not exceed 55-gal per waste type or one quart of acutely hazardous waste
  - Marked: **“Hazardous Waste”** and description of waste
  - Containers in good condition, closed, compatible





# Container Rules

- What happens when the SAA quantity limit is met?
  - *Mark the container with date when quantity limit was met*
  - *Bring waste container to a fully regulated storage/accumulation area **within 3 days***
  - *Consider pre-transport marking and labeling if not already on container*
    - *“Hazardous Waste” and description of contents*
    - *Generator’s name & address*
    - *Generator’s EPA ID #*
    - *Manifest number*
    - *DOT shipping name and ID number*
  - *Inspect weekly*
  - *Ship off-site within 180-days*

**HAZARDOUS WASTE**

STATE AND FEDERAL LAW PROHIBITS IMPROPER DISPOSAL  
IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY  
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR NAME \_\_\_\_\_ 24 HR. PHONE ( ) \_\_\_\_\_  
ADDRESS \_\_\_\_\_  
CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_  
EPA ID NO. \_\_\_\_\_ MANIFEST DOCUMENT NO. \_\_\_\_\_  
EPA WASTE NO. \_\_\_\_\_ ACCUMULATION START DATE / / \_\_\_\_\_

CONTENTS, COMPOSITION  
PROPER DOT SHIPPING NAME \_\_\_\_\_  
TECHNICAL NAME (S) \_\_\_\_\_  
UNNA NO. WITH PREFIX \_\_\_\_\_

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS OR TOXIC WASTES

# Container Storage

- HW container storage areas are required to have:
  - *Secondary containment*
    - *Containment Volume? 10% of all stored containers or 100% vol. of largest container*
  - *Impervious base*
    - *Poly spill pallets*
    - *Epoxy coated concrete*
    - *Sheet metal*



*Warning signs (Consider - not RCRA required for SQG's)*

- *No smoking signs (flammable or reactive)*





# Container Storage

- HW storage areas are required to have:
  - *Aisle space*
    - *Suggest 30 inches between rows of drums and/or case by case*
  - *Separate incompatibles (waste/waste and/or waste/materials)*
    - *Acid from alkali*
    - *Flammable from corrosives*

*(Consider - Not RCRA required for SQG's)*

- *50 foot buffer from property line*
  - *Ignitable and reactive waste*



# When is a container RCRA Empty?

- DOT, OSHA and EPA all have different definitions of “empty”
- Only RCRA (EPA’s) definition considered for this program
- Applies to containers or liner



**EMPTY**

RECEIVING COMPANY: \_\_\_\_\_

DATE: \_\_\_\_\_

DEPARTMENT: \_\_\_\_\_

SUPERVISOR'S SIGNATURE: \_\_\_\_\_

THIS DRUM IS EMPTY FOR EPA STANDARDS. DO NOT FILL OVER OR IN OR BEHIND DRUMS ON THE SIDE OF OF THE DRUM. ALL DRUMS AND BONDS ARE TIGHT.

# A container is RCRA Empty If...

Acutely Hazardous Waste

AND

Triple Rinsed

OR

Liner removed

Non-Acutely HW

AND

Emptied using common methods

AND

< 1" remains

OR

Container is  $\leq 110$  gal and  $< 3\%$  by wt. remains\*

OR

Container is  $>110$  gal and  $< 0.3\%$  by wt. remains\*

Compressed gas  
(e.g., aerosols)

AND

Pressure  $\approx$  atm.

# Tank Talk

- Tank Systems
  - Tank
  - Ancillary equipment (i.e., pipes, valves, etc.)
  - Containment system
- Management Requirements
  - Avoid leaks/ruptures
  - Cover
  - Feed cut-off system
  - Inspect level daily
  - Inspect tank system weekly
  - Storage < 180-days (date! Or keep accumulation log)
  - Label “Hazardous Waste” with description of contents
  - Ignitable/reactive wastes → see NFPA code
  - Compatibility (waste/waste, waste /material, tank)



# Quiz!

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Container and tank management

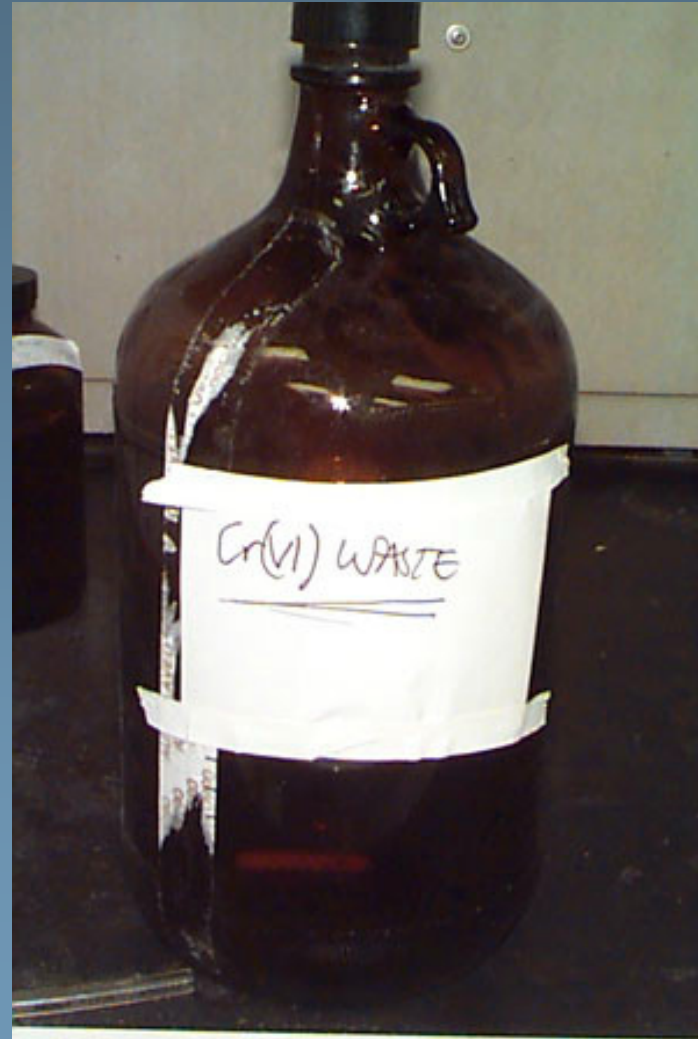


# Satellite Violations





# Satellite Violations



# Satellite Violations





# Storage Violations



# Storage Violations





# Storage Violations



# Waste Manifest Form

Please print or type. (Form designed for use on **elite (12-pitch) typewriter**.) Form Approved, OMB No. 2050-0039

**UNIFORM HAZARDOUS WASTE MANIFEST**

1. Generator ID Number 2. Page 1 of 3 3. Emergency Response Phone 4. Manifest Tracking Number

5. Generator's Name and Mailing Address Generator's Site Address (if different than mailing address)

Generator's Phone

6. Transporter 1 Company Name U.S. EPA ID Number

7. Transporter 2 Company Name U.S. EPA ID Number

8. Designated Facility Name and Site Address U.S. EPA ID Number

Facility's Phone

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Limit Wt./Vol.	13. Waste Codes
		No.	Type			
1						
2						
3						
4						

14. Special Handling Instructions and Additional Information

15. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.  
 I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.  
 Generator/Operator's Printed/Typed Name Signature Month Day Year

16. International Shipments  Import to U.S.  Export from U.S. Port of entry/exit  
 Transporter signature (for exports only) Date leaving U.S.

17. Transporter Acknowledgment of Receipt of Materials  
 Transporter 1 Printed/Typed Name Signature Month Day Year  
 Transporter 2 Printed/Typed Name Signature Month Day Year

18. Discrepancy  
 18a. Discrepancy Indication Space  Quantity  Type  Residue  Partial Rejection  Full Rejection

18b. Alternate Facility (or Generator) Manifest Reference Number U.S. EPA ID Number

Facility's Phone  
 18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1	2	3	4
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20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a.  
 Printed/Typed Name Signature Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)



# The Manifest

- Purpose: Shipping Paper - Track Waste “Cradle to Grave”
- How to Complete the Manifest  
(Complete instructions located in Appendix to 40 CFR Part 262)
- Distribution
  - *Page 1: Destination facility to destination state (if required)*
  - *Page 2: Destination facility to generator state (if required)*
  - *Page 3: Destination facility to generator*
  - *Page 4: Destination facility copy*
  - *Page 5: Transporter copy*
  - *Page 6: Generator’s initial copy*
  - *Legible Photocopy: Submit to State*

**Do not let the transporter leave before making a photocopy!**

# The Manifest

- Completing the hazardous waste manifest:
  - *Site address, contact info, and EPA ID #*
  - *Volume of waste*
  - *Description of waste (and waste codes)*
  - *Transporter name and EPA Id. No.*
  - *Receiving facilities (TSDf) name and EPA Id. No.*
  - *Generator signs and dates*
  - *Transporter signs and dates*
  - *Generator retains page 6 (photo copy page 1 if illegible)*
  - *Send a legible copy to DEEP (photo copy of page 6 or page 1)*
  - *Receiving facility sends you a signed dated copy after receiving the waste (page 3) – keep a copy!*

# The Manifest

- CT DEEP Specific
  - *Generator shall mail a legible copy of the manifest to CT DEEP within 7 days of the date of shipment*
- Manifest Discrepancies
  - *Quantity and /or Waste Description*
- Rejections – Full/Partial/Residue
- Recordkeeping & Reporting
  - *File copy 3 & 6 for at least 3 years*
  - *Exception Reporting*
    - *Contact transporter and facility*
    - *File report to DEEP within 60 days*





# The Manifest

**ALERT! ALERT! ALERT!**

- **Legibility** - 15% of manifests are illegible!
  - Font is too light/faded/small (use 12 pt)
  - Data overwrites form text/lines
- **Completeness**
  - Quantity, DOT description, waste codes not entered
  - Incorrect generator ID (i.e., EPA ID #)

***Responsibility of the Generator ; You are signing a legal document !***

# Importance of Correct Manifests

- Generators are responsible for completing manifests
  - *Transporters share responsibility IF the transporter prepared the manifest*
- Generators cannot change or correct a manifest after shipment
  - *Check the manifest before signing!*
  - Only the receiving facility can make certain corrections
    - “discrepancies” involving quantity or waste description
    - Receiving facility notifies generator and DEEP

# Some Consequences of Errors

- Potentially creating a record that more waste was shipped or generated than actually occurred
  - *RCRA generator status*
  - *Property Transfer Program “establishment”*
- Increased risk of DEEP inspection or enforcement
- Time spent responding to DEEP requests for information, corrective measures
- Inability to accurately document past waste shipments associated with the site



<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number CTP000025628	2. Page 1 of 1	3. Emergency Response Phone (860) 424-3000	4. Manifest Tracking Number <b>123456789XYZ</b>	
5. Generator's Name and Mailing Address CT Dept. of Energy & Env. Protection 79 Elm St Hartford, CT 06106 Generator's Phone: (860) 424-3000				Generator's Site Address (if different than mailing address) Same		
6. Transporter 1 Company Name You Call We Haul, Inc.				U.S. EPA ID Number CT0987654321		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address World Wide Haz Waste Mgt Services 9 Service Lane Beautius, CT 06111 Facility's Phone: (203) 777-7777				U.S. EPA ID Number CT0999888777		
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	11. Total Quantity Type	12. Unit Wt./Vol.	13. Waste Codes
	X	1 WASTE GOVERNMENTIUM, 8, PGII, UN1832	1	DM	79 P	D002
	2					
	3					
	4					
	14. Special Handling Instructions and Add					
	15. GENERATOR'S/OFFEROR'S CERT marked and labeled/placarded, and a Exporter, I certify that the contents of I certify that the waste minimization s Generator's/Offeior's Printed/Typed Name					he, and are classified, packaged, shipment and I am the Primary
						Month Day Year
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____					
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name _____ Signature _____ Month Day Year _____ Transporter 2 Printed/Typed Name _____ Signature _____ Month Day Year _____					
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____					
	18b. Alternate Facility (or Generator)				U.S. EPA ID Number	
	Facility's Phone: _____				Month Day Year	
	18c. Signature of Alternate Facility (or Generator) _____					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. _____		2. _____		3. _____		4. _____
20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name _____ Signature _____ Month Day Year _____						

**Correctly prepared Manifest**

Font size: Appropriate size & clarity throughout  
Alignment: Completely inside appropriate boxes throughout

- Generator EPA ID Number: Correct & legible
- Emergency Response Phone: Proper & legible
- Generator Name & Mailing Address: Correct & complete.
- Generator's Phone: Legible
- Generator Site Address: Proper format for same as mailing address.
- Transporter & TSDF: Complete & legible
- Waste info: Complete & legible

# Quiz!

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The Manifest

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID No. 000025628	2. Page 1 of 1	3. Emergency Response Phone (866) 424-3000	4. Manifest Tracking Number <b>123456789XYZ</b>	
5. Generator's Name: Dept. of Protection 79 Elm St Atten: John Jacob Jingleheimer Schmidt		Generator's Site Address (if different than mailing address)				
Generator's Phone: (203) 777-7777		6. Transporter 1 Company Name: You Call We Haul, Inc.		U.S. EPA ID Number: CT0987654321		
		7. Transporter 2 Company Name		U.S. EPA ID Number		
8. Designated Facility Name: Waste Mgt Services 9. Service Lane		U.S. EPA ID Number: CT0987654321				
Facility's Phone: (203) 777-7777						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	WASTE GOVERNMENTUM, 8, PGII, UN1832	1	DIWI	79	P	DUJZ
<p><b>Incorrectly prepared Manifest</b></p> <p>Font size: too small throughout</p> <p>Alignment: misaligned and illegible throughout</p> <p>Generator EPA ID Number: font too small &amp; misaligned – illegible</p> <ol style="list-style-type: none"> <li>Emergency Response Phone: font too small &amp; misaligned – illegible</li> <li>Generator Name &amp; Mailing Address: font too small &amp; misaligned, incomplete, no town, state or zip.</li> <li>Generator's Phone: font too small &amp; misaligned – illegible</li> <li>Generator Site Address: Missing</li> <li>Transporter &amp; TSDF: font too small &amp; misaligned – illegible</li> <li>Waste info: font too small &amp; misaligned – illegible</li> </ol>						
14. Spill or Leak						
15. Generator's Name, Address, and Phone						
16. Initials of Transporter						
17. Treatment, Storage, and Disposal Facility						
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number						
18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. 11111 2. 3. 4.						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name Signature Month Day Year						

# Land Disposal Restriction

- Prepare Land Disposal Restriction Notices
  - *Done for all wastes that do not meet the land disposal treatment standards (i.e., wastes that must be treated before being disposed)*
  - *Generator must identify each hazardous constituent and underlying constituent (ex. “lead” and “nickel”) requiring treatment/that have been treated*

*“Generator Paperwork Requirements Table” - 40 CFR 268.7(a)(4)*

- Recordkeeping (keep for 3 years from date of last shipment)
- One time notification to facility
- Update notification
  - *(if change in facility or waste)*



# Emergency Planning

- Designate Emergency Coordinator(s)
- Plan for site-specific emergencies  
(Spills, fires, explosions, flooding, etc.)
  - *Identify emergency response duties*
  - *Hazards of your chemicals*
  - *Volume of chemicals* (container / tank size)
  - *Site characteristics* (Floor drains?, Outdoor storage?, Incompatibles?, Ignition sources?)
- Respond to emergencies  
EC or designee must respond to emergencies to the safest extent possible



# Emergency Information

## *Post this information by the phone!*

- Name and phone # of emergency coordinators
- Location of fire extinguishers, fire alarms (if present)
- Location of spill response equipment, first aid
- Phone numbers for emergency responders
- Evacuation routes (1<sup>st</sup> and 2<sup>nd</sup>)





# Emergency Response Training

- *Train designated emergency response employees*
  - *refresher training, change in process / chemicals / site*
- *Keep adequate emergency response equipment on-site*
  - *absorbents (clay litter, pads, pigs, saw dust, sand, rags, etc.)*
  - *shovels, First Aid kit*
  - *booms (contain spills in water)*
  - *fire extinguishers, gas mask*
  - *protective gloves, suit*
  - *containers for waste collection*



# Emergency Reporting

- Notify DEEP  
(860-424-3338)
  - *required for all spills*



- Notify National Response Center  
(800-424-8802)
  - *If spill impacts water body*
  - *If spill impacts adjacent properties*

# Employee Training

- *Relevant training* - Facility personnel who have been assigned waste management and/or emergency response duties must receive training relevant to their assigned responsibilities:
  - Coordinate site operations
  - Place waste in containers
  - Inspect storage areas/tanks
  - Perform waste determinations
  - Prepare or sign manifests
  - Respond to emergencies
- *Refresher training* (at least annually, or a process change)



# Any Questions?

