

Michelle Gore

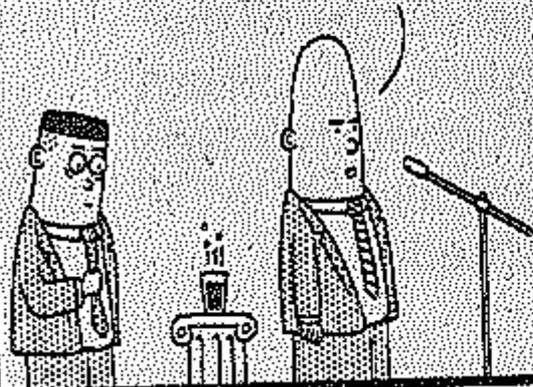
Sanitary Engineer, Enforcement Staff
Waste Engineering & Enforcement Division

michelle.gore@ct.gov

(860) 424-4160

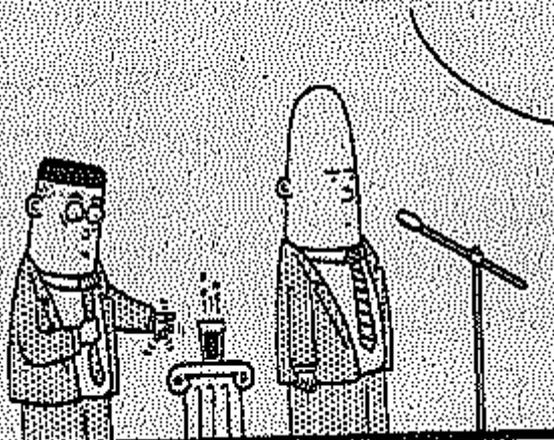
DILBERT By Scott Adams

I WILL PROVE OUR INDUSTRIAL SLUDGE IS SAFE BY FORCING AN INTERN TO DRINK A GLASS OF IT.



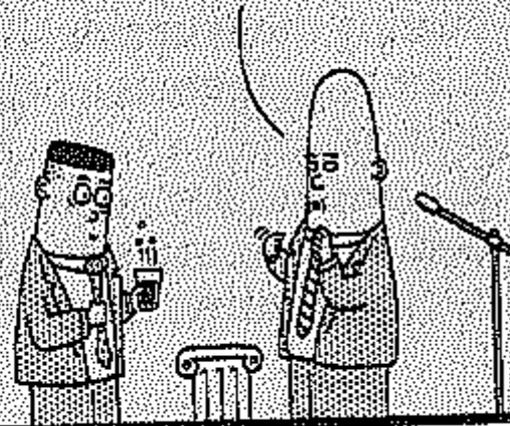
Dilbert.com DilbertCartoonist@gmail.com

THAT'S STUPID. WE WANT TO SEE YOU DRINK IT YOURSELF.



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SEE IF YOU CAN REACH THAT GUY IN THE SECOND ROW WITH A SPIT TAKE.



Hazardous Waste Determination?

Topics:

- Generator Status
- Containers & Tanks
- The Manifest
- Land Disposal Restriction
- Emergency Planning & Preparedness
- Employee Training

Episodic Generation

- Periodically (once or twice) exceed given classification
- 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">1. <i>Manage generated waste in compliance with applicable generator classification</i>2. <i>Document monthly generation rates</i>3. <i>Document accumulation rates</i>4. <i>Minimize potential for reoccurrence of episodic generation</i>	<ol style="list-style-type: none">1. <i>Notify DEEP in writing</i>2. <i>Complete Form 8700-12 which can be found at www.epa.gov and submit to DEEP.</i>3. <i>Comply with new generator classification requirements</i>

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 Storage Areas (HWSA)*
 - *a.k.a. MAAs, LT-180 areas*
- Requirements for all 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*
 - *Labeling: “Hazardous Waste” and description of waste*
 - *Containers must be in good condition*



Container Rules

- What happens when the SAA limit is met?
 - *Date the waste container*
 - *Bring waste container to a controlled storage/accumulation area within 3 days*
 - *Affix pre-transport labels 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 ACCUMULATION START DATE _____ / ____ / ____
WASTE NO. _____

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

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

Container Storage

- A controlled storage/accumulation area has:
 - *Secondary containment*
 - *10% of all containers or 100% of largest*
 - *Impervious base*
 - *Poly spill pallets*
 - *Epoxy coated concrete*
 - *Sheet metal*
 - *Warning signs*
 - *No smoking signs (flammable or reactive)*



Container Storage

- A controlled storage/accumulation area has:
 - *Aisle space*
 - *30 inches between rows of drums*
 - *Security & 50 feet from property line*
 - *Flammable or reactive*
 - *Separated incompatibles*
 - *Acid from alkali*
 - *Flammable from corrosives*



When is a container RCRA Empty?

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



EMPTY

PREVIOUS CONTENTS _____

DATE _____

REMARKS _____

SUPERVISOR'S SIGNATURE _____

THIS DRUM IS EMPTY FOR EPA STANDARDS, NO MORE THAN ONE YEAR OF STORAGE PERMITTED ON THE BASIS OF THE DUNS, ALL FEES AND BONDS ARE PAID.

A container is RCRA Empty If...

Acutely Hazardous Waste

AND

Triple Rinsed

OR

Liner removed

Non-Acutely HW
Non-compressed gas

AND

Emptied using common methods

AND

< 1" remains

OR

Container is ≤ 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. piping, valving)
 - 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
 - Compatibility with contents
 - Ignitable/reactive wastes → see NFPA code



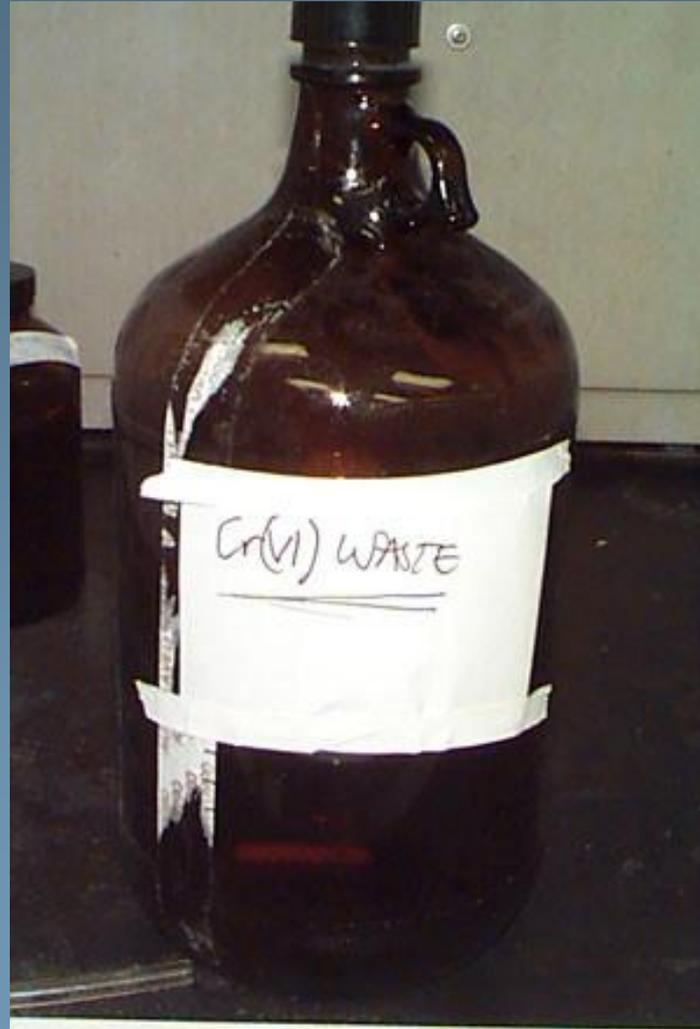
Quiz!

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. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
1						
2						
3						
4						

14. Special Handling Instructions and Additional Information

15. **GENERATOR/SIGNER'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/manifested, 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/Signer'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 reports 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

Manifest Reference Number _____ U.S. EPA ID 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	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 _____

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

The Manifest

- General Purpose: paper trail
- How to Complete the Manifest
- Distribution
 - *Page 1: Destination facility to destination state*
 - *Page 2: Destination facility to generator state*
 - *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 – keep a copy!*
 - *Transporter signs and dates*
 - *Send a copy to the generator state's DEEP*
 - *Send a copy to the receiving facility's state DEEP*
 - *Receiving facility sends you a signed dated copy after receiving the waste – keep a copy!*

The Manifest

- CT DEEP Specific
 - Postmark (and mail) photocopy of page 1 (top copy) to CT DEEP within 7 days of the date of shipment
- Manifest Discrepancies
 - Quantity
 - DOT Description
 - Non-acceptable waste
 - Residue > RCRA empty
- 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!**

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CTP000025628	2. Page 1 of 1	3. Emergency Response Phone (860) 424-3000	4. Manifest Tracking Number 123456789XYZ		
5. Generator's Name and Mailing Address CT Dept. of Energy & Env. Protection 79 Elm St Hartford, CT 06106 (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 (203) 777-7777				U.S. EPA ID Number CT0999888777			
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. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
X	1. WASTE GOVERNMENTIUM, 8, PGII, UN1832	1	DM	79	P	D002	
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additions							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I certify that the contents of this manifest are accurate, and are classified, packaged, shipped, and I am the Primary							
Generator's/Offoror's Printed/Typed Name							Month Day Year
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ 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 <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: _____ U.S. EPA ID Number: _____							
18b. Alternate Facility (or Generator)							
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. H141		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	

GENERATOR

TRANSPORTER/INTL

DESIGNATED FACILITY

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
- Item 19: Complete & legible

Quiz!

The Manifest

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID No. CT000025628	2. Page 1 of 1	3. Emergency Response Phone (860) 424-3000	4. Manifest Tracking Number 123456789XYZ
5. Generator's Name, Department, and Protection 79 Elm St Atten: John Jacob Jingleheimer Schmidt		Generator's Site Address (if different than mailing address)			
Generator's Phone: (860) 424-3000		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 World Wide Hazardous Waste Mgt Services 9 Service Lane		U.S. EPA ID Number CT0998888777			
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		11. Total Quantity
	WASTE GOVERNMENTUM, 8, PGI, UN1832		No.	Type	79 P
				12. Unit Wt./Vol.	13. Waste Codes
					DUJZ
<div style="background-color: red; color: black; padding: 10px; border: 2px solid black;"> <h2 style="margin: 0;">Incorrectly prepared Manifest</h2> <p style="margin: 5px 0;">Font size: too small throughout</p> <p style="margin: 5px 0;">Alignment: misaligned and illegible throughout</p> <p style="margin: 5px 0;">Generator EPA ID Number: font too small & misaligned – illegible</p> <ol style="list-style-type: none"> 1. Emergency Response Phone: font too small & misaligned – illegible 2. Generator Name & Mailing Address: font too small & misaligned, incomplete, no town, state or zip. Includes extraneous info intended for route driver that should NOT be on manifest. 3. Generator's Phone: font too small & misaligned – illegible 4. Generator Site Address: Missing 5. Transporter & TSDF: font too small & misaligned – illegible 6. Waste info: font too small & misaligned – illegible 7. Item 19: font too small & misaligned – illegible </div>					
14. Spill or Leak					
15. Generator's Name, Department, and Protection					
16. Intentional Release					
17. Transporter's Name					
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. H141		2.		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 Form (land ban form)
 - *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*
- Recordkeeping (3 years)
- One time notification to facility
- Update notification
 - *(if change in facility or waste)*



Emergency Planning

- Identify key employees
 - *Emergency coordinator*
 - *Alternate coordinator*
- Plan for site specific emergencies
 - *Spills, fires, flooding*
 - *at minimum – must contain releases/spills*
 - *Hazards of your chemicals*
 - *Volume of chemicals (container/tank size)*
 - *Site characteristics (Floor drains?, Outdoor storage?, Incompatibles?, Ignition sources?)*



Emergency Information

Post this information by all phones!

- Name and phone # of emergency coordinators
- Location of spill response equipment
- Location of fire extinguishers and/or pull boxes
- Phone number for off-site responders (Fire Dept, spill contractors, DEEP)
- Evacuation routes



Emergency Responding

You are required to contain releases

- *Train key employees*
- *Keep adequate response equipment on-site*
 - *absorbents (clay litter, pads, pigs, saw dust, sand, rags, etc)*
 - *shovels*
 - *booms (contain spills to water)*
 - *fire extinguishers*
 - *protective gloves*
 - *containers for waste collection*



Emergency Reporting

- *Notify DEEP (860-424-3338)*
 - *required for all spills*
- *Notify national response center (800-424-8802)*
 - *impacts water body*
 - *impacts adjacent properties*



Employee Training

- All personnel who have hazardous waste management duties:
 - *Coordinate site operations*
 - *Place waste in containers*
 - *Inspect storage areas/tanks*
 - *Respond to emergencies*
 - *Perform waste determinations*
 - *Prepare or sign manifests*
- Annual refresher - why we're here today!



Questions?
