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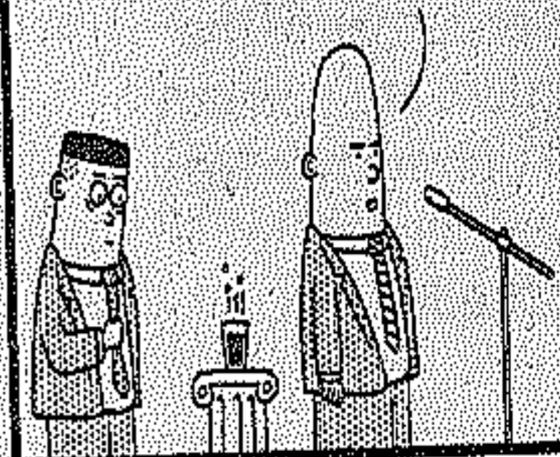
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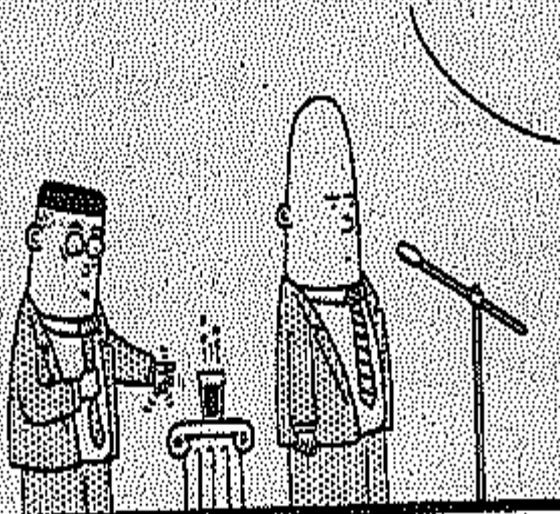
# DILBERT By Scott Adams

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

- 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>	<b><i>Change Generator Status If Monthly Generation Rate Exceedance is a Common Occurrence</i></b>
<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 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*
    - *10% of all containers or 100% of largest*
  - *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) 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 LITRE OF RESIDUE REMAINS ON THE SURFACE OF THE DRUM. ALL TAPES 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!

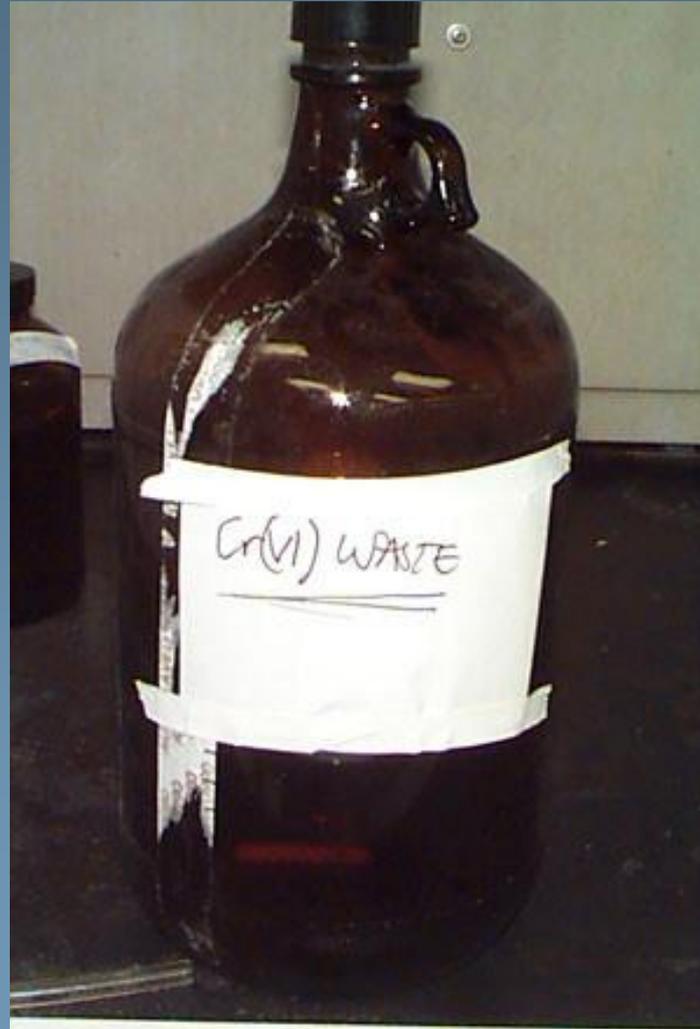
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Container and tank management

# 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. 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: \_\_\_\_\_  
Date leaving U.S.: \_\_\_\_\_

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

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!**

<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 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:								
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 Additions:								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I certify that the contents of this manifest are true, and are classified, packaged, labeled, and are classified, packaged, shipped and I am the Primary Responder. I certify that the waste minimization is as follows: Generator's/Officer's Printed/Typed Name: _____								
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 signature (for exports only): _____ Date leaving U.S.: _____								
TRANSPORTER	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: _____							
	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. CT000025628	2. Page 1 of 1	3. Emergency Response Phone (860) 424-3000	4. Manifest Tracking Number <b>123456789XYZ</b>
5. Generator's Name: Dept. of Environmental 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: CT099888777			
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, PGI1, UN1832		No.	Type	12. Unit Wt./Vol.
X		1		UWI	79 P
13. Waste Codes		D002			
<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 and Address					
16. Intended Recipient					
17. Transporter's Name and Address					
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.		3.	
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
  - Waste does not meet the treatment standard(s)
  - Waste meets the treatment standard(s)

*“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) (EC)
- 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 extent possible*



# Emergency Information

**Post this information by the phone!**

- Name and phone # of emergency coordinators
- Location of fire extinguishers
- Location of spill response equipment
- Location of fire alarms (*if present*)
- Phone number for fire department



# Emergency Response Training

- *Train designated emergency response 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

- *Relevant* training - Facility personnel who have been assigned waste management and/or emergency response duties must receive training relevant to their assigned responsibilities:
  - *Place waste in containers*
  - *Inspect storage areas/tanks*
  - *Perform waste determinations*
  - *Prepare or sign manifests*
  - *Respond to emergencies*
- Refresher training (as needed)



# Any Questions?

