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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 <u>normal</u> generation rate:
 - infrequent cleanouts, unforeseeable spills, etc.
- What requirements apply ??
 - * Re-evaluate your generator classification often!! *

Episodic Generator Change Generator Status If Monthly Generation Rate Exceedance is If Monthly Generation Rate an Unforeseeable/Infrequent Event Exceedance is a Common Occurrence Manage generated waste in 1. Notify DEEP in writing compliance with applicable generator Complete Form 8700-12 which can 2. classification (at least for that month) be found at www.epa.gov and submit to DEEP. Document monthly generation rates Document accumulation rates Comply with new generator 3. classification requirements Minimize potential for reoccurrence of episodic generation

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

- Containers, Tanks, Builtings
- 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 <u>all</u> RCRA containers:
 - Labeled
 - Sound condition
 - Compatible with materials
 - Closed





- 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

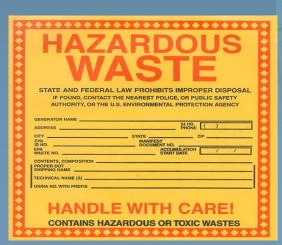






Container Rules

- 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





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





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 ≤ 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 ≈ 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!

Container and tank management



Satellite Violations





Satellite Violations





Satellite Violations





Storage Violations





Storage Violations





Storage Violations





Waste Manifest Form

	IFORM HAZARI		nerator ID Numbe	r		2. P	Page 1 of 3. Emer	gency Responsi	Phone	4. Manifest	t Tracking Nu	ımber		
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- 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 <u>3</u> & 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 I

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

Ple		ned for use on elite (12-pitch) typewriter.)	10 0 mar 4 of 10	F	Dhana	A Manifest	Form Approved. OMB No. 2050-0039
1	UNIFORM HAZARDOUS WASTE MANIFEST	CTP000025628	1 1	8 Emergency Response (860) 424-3	000	4. Manifest	Tracking Number P3456789XYZ
	Generator's Name and Mailing Generator's Phone:	ng Address CT Dept. of Energy & Env. Protection of Env. Protection					
	Transporter 1 Company Name	You Call We Haul, Inc.				U.S. EPAID 1	Number CT0987654321
	7. Transporter 2 Company Name	ie				U.S. EPA ID N	Number
	9 Sen Beaut	d Wide Haz Waste Mgt Services vice Lane Itius, CT 06111) 777-7777				U.S. EPAID N	Number T0999888777
100	- comp c c c c c c c c c c c c c c c c c c c	on (including Proper Shipping Name, Hazard Class, ID Numb	C.	10. Contain	Type	11 Total Quantity	12. Unit Wt. Not. 13. Waste Codes
AATOR —	X NASTE GOV	/ERNMENTIUM, 8, PGII, UN183	2	1	DM	79	P D002
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	Transporter eignature frei erpen	t of Receipt of Materials		Date leavin	ng U.S.:		
TR ANSPORTER	Transporter 1 Printed/Typed Nam Transporter 2 Printed/Typed Nam 18. Discrepancy		Signal Signa				Month Day Year
	18a. Discrepancy Indication Spar	ace Quantity Type		Residue Manifest Reference	Number	Partial Rej	ection Full Rejection
FACILITY	18b. Alternate Facility (or General	rator)			W	U.S. EPAID N	Number
DESIGNATED F	Facility's Phone: 18c. Signature of Alternate Facilit 19. Hygandows Waste Report Ma.		colmont denser	and requesting analogues			Month Day Year
	13. nazardous waste keport Ma 1.	anagement Method Codes (j.e., codes for hazardous waste t 2.	earment, disposal, a	ina recycling systems)		4.	
	20. Designated Facility Owner or Printed/Typed Name A Form 8700-22 (Rev. 3-05) P	or Operator. Certification of receipt of hazardous materials co	ered by the manifes Signa		18a		Month Day Year

Quiz!

The Manifest

Please print or type. (Form des	signed for use on elite (12-pitch) typewriter.)			Form Ap	proved. OMB No. 2050-0039
UNIFORM HAZARDOUS WASTE MANIFEST	1. Generato CIPP 000025628	2 Page 1 of 3(8	66)9424-3606se Phone	4. Manifest Tracking Numb	789XYZ
5. Generator's N@Te Decide		Ger	erator's Site Address (if different ti	nan mailing address)	
	hn Jacob Jingleheimer Schmidt				
Generator's Phone 6. Transporter 1 Company N	You Call We Haul, Inc.			U.S. EP0987654321	
7. Transporter 2 Company No	ame			U.S. EPA ID Number	
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	ice zane				
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	777-7777 ption (including Proper Shipping Name, Hazard Class	o ID Number	10 Containers	11 Total 12 Unit	
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18. Discrepancy					
18a. Discrepancy Indication S	Space Quantity [Туре	Residue	Partial Rejection	Full Rejection
		50	Manifest Reference Number.		
18b. Alternate Facility (or Ger	nerator)		mortical receivable number.	U.S. EPAID Number	
18b. Alternate Facility (or Ger Facility's Phone:				I	
	acility (or Generator)				Month Day Year
19. Hazardous Waste Report 1. Hazardous Waste Report	Management Method Codes (i.e., codes for hazardo	ous waste treatment, disposal, and	recycling systems)		
1. 11141	2	3.	# # PERSON TE	4.	
20. Designated Facility Owne	r or Operator. Certification of receipt of hazardous m	naterials covered by the manifest e	xcept as noted in Item 18a		
Printed/Typed Name		Signatu	е		Month Day Year
♥ Form 8700-22 (Rev. 3-05)	Previous editions are obsolete				



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 (1st and 2nd)





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?

