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Bureau of Waste Management

Hazardous Waste Management Guidance Document for Municipal Public Works Garages

This guidance document does not and is not intended to replace or supersede either Regulations of Connecticut State Agencies (RCSA), Sections 22a-449(c)-100 through 110 and 22a-449(c)-11 ("Hazardous Waste Management Regulations") or the Code of Federal Regulations Title 40 ("40 CFR"), Parts 260 through 271. The State of Connecticut Department of Environmental Protection ("DEP") advises the regulated community not to rely solely upon the information presented in this guidance document, but to read all applicable regulations set forth in both the Hazardous Waste Management Regulations and Title 40 CFR, Parts 260 through 271, and to keep informed of all subsequent revisions or amendments to these regulations.

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PREFACE

This handbook does not and is not intended to replace or supersede either Regulations of Connecticut State Agencies "RCSA", Sections 22a-449(c)-100 through 110 and 22a-449(c)-11 (Hazardous Waste Management Regulations) or the Code of Federal Regulations Title 40 ("40 CFR), Parts 260 through 279.

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DEP encourages generators to contact the Waste Engineering and Enforcement Division with any questions regarding this handbook or regarding the requirements for conditionally exempt small quantity generators of hazardous waste. If, after reading these guidelines, you have questions or would like to obtain a copy of the Hazardous Waste Management Regulations or copies of other publications, please do not hesitate to contact the Bureau of Waste Management at the telephone numbers provided below.

**State of Connecticut Department of Environmental Protection
Bureau of Waste Management, Richard J. Barlow, Bureau Chief
Waste Engineering and Enforcement Division, David A. Nash, Director**

- | | |
|---|----------------|
| 1) Toll Free Compliance Assistance Help Line | 1-888-424-4193 |
| 2) Enforcement and General Information | (860) 424-3023 |
| 3) Permitting and General Information | (860) 424-3372 |
| 4) Transporter Permitting and General Information | (860) 424-3372 |
| 5) Manifest Information | (860) 424-3375 |
| 6) Special Waste Disposal Authorization | (860) 424-3372 |
| 7) Office of Pollution Prevention | (860) 424-3297 |
| 8) DEP Spill Response Unit (to report a spill) | (860) 424-3338 |

Parts of this handbook are taken from EPA Guidance document EPA 305-B-96-001 and are edited for State specific use.

INTRODUCTION

Purpose

The Department of Environmental Protection (DEP), Bureau of Waste Management, Waste Engineering and Enforcement Division (WEED) was developed with the goal of protecting human health and the environment. WEED is conducting a special initiative to encourage the proper management of hazardous wastes generated at the **Connecticut Municipal Public Works Garages**.

The Resource Conservation and Recovery Act (RCRA) Program

RCRA, an amendment to the Solid Waste Disposal Act, was enacted in 1976 to ensure the safe disposal of the huge volumes of municipal and industrial solid waste generated nationwide. RCRA has been amended by Congress several times, most significantly in November 1984, by the Hazardous and Solid Waste Amendments (HSWA). These amendments significantly expanded the scope and requirements of RCRA, resulting in regulation of much of the waste generated in this country, both hazardous and non-hazardous.

Although municipal public work garages were in operation before the inception of the RCRA program, municipalities must still follow the RCRA framework for the proper management of hazardous and non-hazardous waste.

The RCRA program is based upon three distinct goals aimed at creating a safe and effective hazardous waste management system. They are:

- 1) Protection of human health and the environment
- 2) Reduction of waste and conservation of energy and natural resource
- 3) Reduction or elimination of the generation of hazardous waste.

Subtitle C of RCRA establishes a "cradle-to-grave" management system for controlling hazardous waste from its point of generation to final disposal. The objective of Subtitle C is to ensure that hazardous waste is handled in a manner protective of human health and the environment. Pursuant to Subtitle C, regulations regarding the generation, transportation, treatment, storage and disposal of hazardous waste have been issued. Facilities affected by these regulations must be maintained and operated in a manner that will minimize danger to human health and the environment.

Connecticut Regulated Waste is industrial waste that is considered to be Non-RCRA hazardous waste. However, this waste must still be managed and disposed under more stringent requirements than solid waste. These wastes include, but are not limited to waste PCBs, waste oil (non-hazardous), waste water soluble oil, waste chemical liquids and waste chemical solids. These are broad definitions, and specific questions regarding these types of wastes should be brought to DEP.

IDENTIFICATION OF HAZARDOUS WASTE

The regulatory framework established under Subtitle C of RCRA was designed to protect human health and the environment from the effects of improper management of hazardous waste. As a result, identifying whether a waste is hazardous is crucial in determining the applicability of the Subtitle C regulations.

Wastes are considered hazardous for different reasons, and the responsibility for determining if a particular waste is hazardous **falls on the generator of that waste.**

In general, RCRA defines hazardous waste as a solid waste, which because of its quantity, concentration, or physical or chemical characteristics may:

- Cause or contribute to significant injury or death, or
- Damage or pollute the land, air, or water.

Hazardous Waste Under RCRA

A solid waste, defined by RCRA as any material including liquids, sludges, and contained gases that is disposed, burned, or recycled in a certain manner, is considered hazardous if it:

- Exhibits any one of the **characteristics** of a hazardous waste
- Has been specifically **listed** as a hazardous waste in the regulations
- Is a **mixture** containing a listed hazardous waste and a non-hazardous waste
- Is a waste **derived** from the treatment, storage, or disposal of a listed hazardous waste.

Each of these four categories is discussed in greater detail below.

Characteristic Wastes

Characteristic wastes, as defined under RCRA, are identified by a specific number, or **waste code**, that begins with the letter "D." A waste is hazardous if it exhibits one or more of the following characteristics:

- **Toxicity (D004-D043)**—The toxicity characteristic identifies a list of constituents that, if present in concentrations greater than specified levels, are considered a threat to human health and the environment. A test called the Toxicity Characteristic Leaching Procedure (TCLP) demonstrates whether a waste contains levels of hazardous constituents above regulatory thresholds. Wastes exhibiting the toxicity characteristic are given specific waste codes depending on the hazardous constituent of concern. For example, TCLP results indicating levels of arsenic or chromium greater than 5.0 parts per million (ppm) in a waste stream are toxic for arsenic and chromium, and are given the waste codes "D004" and "D007," respectively.

- **Ignitability (D001)**—These wastes are easily combustible or flammable. Examples of ignitable wastes include spent solvents and discarded fuels.
- **Corrosivity (D002)**—These wastes dissolve metals or other materials, or burn the skin. Common corrosive wastes include caustic soda and nitric acids.
- **Reactivity (D003)**—These wastes are unstable or undergo rapid or violent chemical reaction with water or other materials. Cyanide- or sulfide-bearing wastes typically exhibit the characteristic of reactivity.

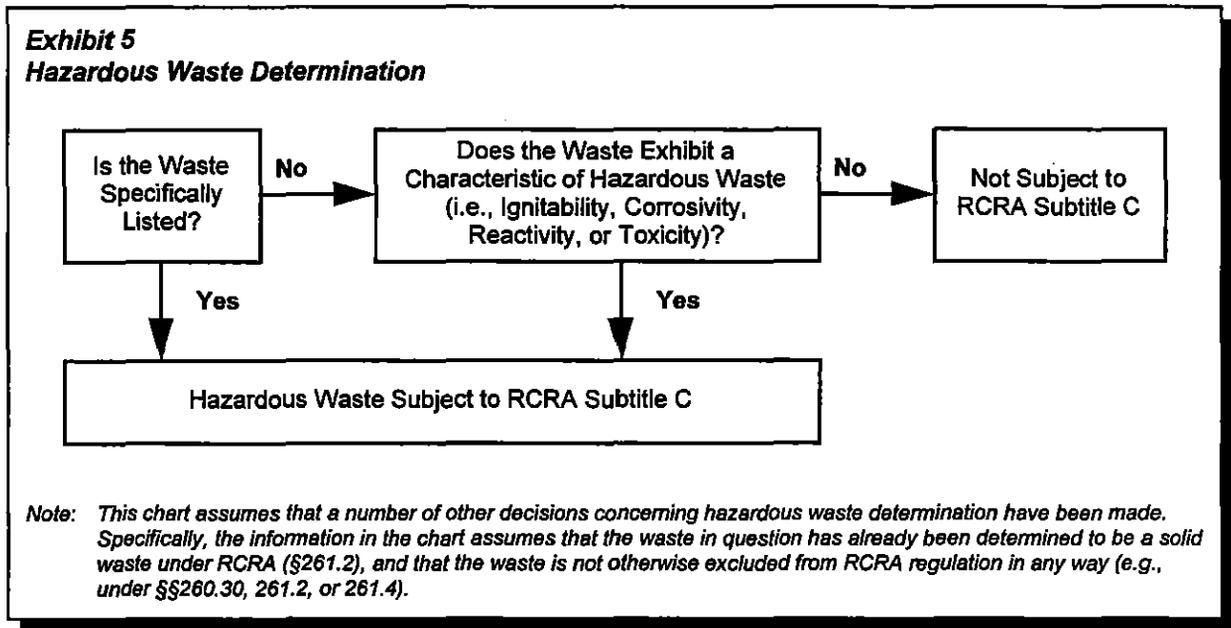
Listed Wastes

In addition to the four characteristic wastes, a waste is also hazardous if it is specifically identified on one of four lists developed by EPA. A hazardous waste listing is a narrative description of a specific type of waste that EPA considers dangerous enough to warrant regulation. Hazardous waste listings describe wastes from specific sectors of industry or specific chemical formulations.

Before developing a listing, EPA thoroughly studies a particular waste stream and the threat it can pose to human health and the environment. If the waste poses a great enough threat to warrant regulation, EPA includes a precise description of that waste on one of the hazardous waste lists. Any waste that meets the narrative listing description is considered hazardous, regardless of its chemical composition or any other potential variable. The four types of listed wastes are:

- **F-listed wastes**—Wastes from **nonspecific sources** that are produced by a number of manufacturing and industrial processes. These wastes include, but are not limited to brake cleaners, paint wastes, degreasing solvents, contaminated rags and contaminated speedi dry.
- **K-listed wastes**—**Specific source wastes** generated by particular industries identified by EPA. Most garages will not generate this type of waste. If personnel has questions regarding types of wastes generated, contact DEP at (888) 424-4193.
- **P-listed wastes**—Specific unused or off-specification **commercial chemical products** that are being discarded. EPA has specifically identified wastes on the P-list as being **acutely hazardous**. Most garages will not generate this type of wastes. If personnel has questions regarding types of wastes generated, contact DEP at (888) 424-4193.
- **U-listed wastes**—Specific unused or off-specification commercial chemical products that are being discarded. Garages should be aware of these types of wastes when conducted inventories and disposing unused or off-spec (including out-of-date) materials.

Exhibit 5 outlines some of the questions that should be asked to determine whether a waste is hazardous under RCRA Subtitle C.



Hazardous Waste Mixtures

RCRA also regulates the waste resulting from the mixture of hazardous and nonhazardous wastes. A mixture involving characteristic wastes is hazardous only if the mixture itself exhibits a characteristic. Under the "mixture rule" for listed wastes, however, a mixture made up of non-hazardous solid waste and any amount of a listed hazardous waste is, itself, a listed hazardous waste. The mixture will bear the same waste code and regulatory status as the original listed component of the mixture. This principle applies regardless of the percentage of listed waste in the waste mixture, the actual threat posed by the waste mixture, or the mixture's chemical composition. The mixture rule was originally created to prevent the dilution of listed wastes as a substitute for treatment activities.

CONTAMINATED MEDIA

EPA's **contained-in policy** addresses environmental media (e.g., soil, sediment, and groundwater) contaminated with hazardous waste. According to this policy, any media that is contaminated with a listed waste must be managed as as if it was that listed hazardous waste.

However, since media are not solid waste under federal law, states can set contaminant concentrations thresholds below which media would be considered non-hazardous under RCRA without treatment. DEP has set such thresholds in a draft "Contained-In Policy".

To determine whether a media contains a hazardous waste, owners/operators must have complete, accurate, and historical information pertaining to past and present waste management

operations at the facility. If constituents of concern in the soil cannot be linked to a process that generated a listed hazardous waste, then the contained-in policy will not apply.

Media that contain listed waste at concentrations considered hazardous under RCRA may be treated to lower the concentrations but a RCRA permit is necessary and more stringent "exit criteria" apply (RCRA LDR).

Similarly, any contaminated media that exhibits a characteristic of hazardous waste is also considered hazardous waste and subject to regulation. Media that exhibit a characteristic of hazardous waste can be treated to remove the characteristic.

Derived-from Hazardous Waste

Any residue resulting from the treatment, storage, or disposal of a listed waste is considered a hazardous waste. Examples of derived-from wastes include: ash resulting from the combustion of hazardous waste, and sludges generated from the treatment of hazardous wastewaters.

Acutely Hazardous Waste

Some hazardous wastes are considered to be "acutely hazardous." These are wastes that EPA has determined to be so dangerous in small amounts that they are regulated in the same manner as large amounts of other hazardous wastes. Acutely hazardous wastes include certain dioxin-containing wastes and those unused commercial chemical products identified as P-listed wastes.

GENERATORS OF HAZARDOUS WASTE

As stated previously, RCRA regulates hazardous waste from the point of generation through final disposal. Hazardous waste generators are the first link in RCRA cradle-to-grave hazardous waste management system. EPA has established comprehensive standards for generators managing hazardous waste, including standards for on-site accumulation, waste tracking, labeling, recordkeeping, and reporting requirements.

Because generators produce waste in different quantities, EPA has established three categories of waste generators:

- **Large quantity generators (LQG)** generate 1000 kilograms (kg) (approximately 2200 pounds, 300 gallons or 5, 55-gallon drums) or more of hazardous waste per calendar month or more than 1 kg (2.2 pounds) of acutely hazardous waste. Any generator that produces greater than 1 kg of acutely hazardous waste in a calendar month must comply with all of the large quantity generator requirements. Of the three classifications of hazardous waste generators, large quantity generators are subject to the most comprehensive standards.
- **Small quantity generators (SQG)** generate between 100 and 1000 kg of hazardous waste (between approximately 220 and 2200 pounds, 25 and 300 gallons or 3-5, 55-gallon drums) per calendar month. Small quantity generators are subject to a limited

portion of the regulations that apply to large quantity generators. Small quantity generators in Connecticut may not accumulate more than 1000 kg of hazardous waste or 1 kg (2.2 pounds) of acutely hazardous waste in a month on-site at any one time. Small quantity generators who exceed this accumulation limit must comply with the regulations for large quantity generators.

- **Conditionally exempt small quantity generators (CESQG)** generate 100 kg or less of hazardous waste (approximately 220 pounds, 25 gallons or ½ 55-gallon drum) per calendar month. These generators are conditionally exempt from many of the regulations governing hazardous waste generators, provided they do not accumulate more than 1000 kg on-site at any one time and that any hazardous waste generated is sent to a State- or Federally-approved facility.

Owners/operators of facilities that generate hazardous waste are responsible for making the correct generator status determination.

Episodic Generation

Facilities that generate hazardous waste may be regulated under different rules at different times, depending on the amount of waste generated in any given month. For example, a small quantity generator that generates over 1000 kg of waste in a particular month must comply with the more extensive large quantity generator requirements for the amount of time that the waste remains on site. This fluctuating hazardous waste generation pattern is known as **episodic generation**. Because of this regulations, a generator should maintain the same status whenever possible to avoid not complying with regulations.

Hazardous Waste Counting

In order to determine the extent to which a facility is subject to the RCRA generator regulations, each generator must "**count**" the amount of hazardous waste produced at the facility in a calendar month and determine generator status (i.e., large quantity, small quantity, or conditionally exempt). Counting involves adding up the **weight** of all quantities of characteristic and listed hazardous wastes generated at a particular facility. Wastes should only be counted once toward a generator's monthly status calculation.

Exhibit 6 may assist in deciding when a hazardous waste is to be counted when making a generator's quantity determination. EPA requires that only those wastes that are subject to "substantive regulation" be counted. Substantive regulation includes any regulation directly related to the storage, transportation, treatment, or disposal of hazardous wastes. Regulations which would not be considered substantive include requirements to notify and obtain an EPA identification number or to file a Biennial Report.

**Exhibit 6
Hazardous Waste Counting**

COUNTED	NOT COUNTED
<ul style="list-style-type: none"> • Wastes accumulated on-site for any period of time prior to their subsequent management. • Wastes packaged and transported off site. • Wastes placed directly into a regulated on-site treatment, storage, or disposal unit. • Wastes meeting the definition of F, K, P or U listing. • Wastes removed from exempt units (e.g., wastewater treatment units). • Wastes generated as sludges and removed from product storage tanks. • Wastes generated at satellite accumulation areas. • Examples: <ul style="list-style-type: none"> - Process residuals, sludges. - Wastewater that accumulates on the drip pad and in the collection system, e.g., drip pad sump. - When discarded: metal banding (unless recycled), wood stickers, personal protective equipment. 	<ul style="list-style-type: none"> • Hazardous waste removed from on-site storage.* • Hazardous waste produced by on-site treatment (including reclamation) so long as the treated waste has already been counted once. • Spent materials that are generated, reclaimed, and subsequently reused on site, so long as the spent material has already been counted once. • Wastes excluded from the definition of solid waste under §261.2, i.e., wastewater discharged to a POTW or NPDES point source discharge. • Wastes excluded from regulation under §261.4(a)-(f) (e.g., industrial wastewater discharges that are point source discharges (261.4(a)(2)). • Recyclable materials under §261.6(a)(3). • Wastes reclaimed on-site without prior storage or accumulation. • Wastes managed in exempt units (e.g., wastewater treatment units). • Residues left in empty containers (empty as per §261.7). • Universal wastes managed under Part 273 once adopted by DEP.

* EPA's counting Guidelines are designed to account for those wastes that are subject to "substantive regulation." These wastes should only be counted once, and not double counted. Therefore, in this example, because hazardous wastes removed from hazardous waste storage have already been counted once, they need not be counted again (§261.5(d)).

GENERAL RCRA REQUIREMENTS FOR GENERATORS OF HAZARDOUS WASTE

Large and small quantity generators are subject to several specific requirements under RCRA. Regulations require generators to:

- Obtain an EPA identification number
- Properly prepare hazardous waste for transportation
- Follow accumulation and storage requirements
- Manifest hazardous waste
- Satisfy recordkeeping and reporting requirements
- Provide personnel training
- Develop contingency plans (Although Emergency Planning is required for SQGs, no formal written contingency plan is required for SQGs.)

The specifics of the above requirements will differ depending upon a facility's generator status. Each of the requirements mentioned above is discussed in more detail below.

EPA Identification Number

Each EPA identification number consists of a series of letters and digits which uniquely identified a facility. The digits represent the specific facility, and the letters indicate in which State the facility is located. EPA identification numbers are obtained by filing Form 8700-12, "Notification of Regulated Waste Activity," with the appropriate EPA Regional or State RCRA office.

Without an EPA identification number, a generator cannot treat, store, dispose of, transport, or offer for transport any hazardous waste. A generator is also forbidden from offering hazardous waste to a transporter or treatment, storage, or disposal facility (TSDF) that does not have an EPA identification number. On the Federal level, conditionally exempt small quantity generators (CESQG) are not required to obtain EPA identification numbers; however, State policy may require conditionally exempt generators to obtain EPA identification numbers. In Connecticut, CESQGs are not required to obtain EPA identification numbers. However, they must ensure any transporter they use does have an EPA identification number.

Pre-Transport Requirements

EPA has adopted the pre-transport regulations used by the U.S. Department of Transportation (DOT). DOT regulations require proper packaging to prevent leakage of hazardous materials, and labeling, marking, and placarding of these wastes to identify characteristics and potential dangers. For more information on DOT prepackaging requirements, consult the regulations in 49 CFR.

Accumulation Requirements

Although storage of hazardous waste generally requires a RCRA permit, RCRA allows generators to "accumulate" hazardous waste on-site without a permit as long as they comply with specific limits and standards set out for each generator category.

Large Quantity Generators

If your municipality falls under LQG requirements, the following will apply to you. Large quantity generators may accumulate waste on-site for up to 90 days without a RCRA permit as long as:

- The waste is properly stored
- The facility has a contingency plan in place
- Facility personnel are trained in proper waste handling procedures.

Large quantity generators may only accumulate hazardous waste in containers, tanks, containment buildings, or on drip pads. Each container and tank must be labeled with the words "hazardous waste," and generators must mark the accumulation start date on each container. Tanks need not have the start date marked on them because they are continually reused. Large quantity generators must, however, be able to demonstrate through manifests and other records that the tank has been emptied within the specified 90-day time frame. In Connecticut each hazardous waste label must also specify the chemical names of the contents.

Treatment in Generator Accumulation Units

If a generator continues to store hazardous waste for longer than 90 days, the facility will be considered a hazardous waste storage facility and must obtain a RCRA permit (see discussion of RCRA permits below). Under Federal regulations, generators may perform treatment (except for thermal treatment such as combustion and incineration) of hazardous waste in accumulation units under the condition that they continue to comply with the general management standards discussed above and do not exceed the 90-day accumulation time limit.

RCRA Air Emission Standards

On December 6, 1994, EPA finalized its air emission standards under RCRA to reduce volatile organic air emissions from waste management operations. These standards, known as Subpart CC, affect owners/operators managing hazardous waste with a certain volatile organic concentration in tanks, surface impoundments, and containers. Large quantity generators must comply with these regulations in order to maintain their permit-exempt status. If your municipality is a LQG, you must comply with all Subpart CC requirements. The Subpart CC standards became effective on December 6, 1996 (see 59 FR 62896 & 61 FR 59932). Oil-borne facilities using large tanks to store hazardous waste need to carefully consider the applicability of Subpart CC.

Small Quantity Generators

Small quantity generators may accumulate waste on-site for up to 180 days as long as:

- The on-site quantity does not exceed 1000 kg at any time
- At least one employee who is responsible for coordinating emergency responses is either at the facility or on-call at all times
- The facility has basic safety information, including the name and telephone number of the designated emergency coordinator, location of fire extinguishers, spill control materials, and the fire department phone number posted next to the telephone
- Personnel are familiar with the emergency procedures to be followed in the event of a spill or accident.

If waste is stored in drums for longer than 180 days, the facility will be considered a storage facility and must obtain a RCRA permit (see discussion of RCRA permits below). Small quantity generators may also treat hazardous waste in accumulation units provided they comply with the general management and time limit restrictions discussed above.

Conditionally Exempt Small Quantity Generators

Conditionally exempt small quantity generators may accumulate hazardous waste on-site as long as they do not have on-site, at any one time, more than 1000 kg of hazardous waste, or 1 kg of acutely hazardous waste. There are no accumulation time limits for conditionally exempt small quantity generators. CESQGs must keep all hazardous waste determinations including any analytical results on-site for *at least three years*. CESQGs should inform employees of hazardous wastes at the site, how to safely and properly manage the wastes, and what to do in the case of an emergency. DEP recommends that CESQGs follow best management practices when conducting any recordkeeping, personnel training, or emergency planning.

Satellite Accumulation

Many municipal public works garages may temporarily store their hazardous waste in locations at or near the point of generation before taking the waste to a central accumulation area at the facility (i.e., the "90-day area"). This **satellite accumulation** is permissible under Federal RCRA regulation, provided certain criteria are met. Generators may accumulate up to 55 gallons of hazardous waste, or one quart of acutely hazardous waste, at or near the point of generation in satellite accumulation areas without triggering the generator's "90-day clock." The following requirements apply to satellite accumulation:

- Containers must be labeled as "HAZARDOUS WASTE" and with other words that identify the contents of the container.
- Once the 55-gallon limit is reached in the satellite accumulation area, the containers must be removed within 72 hours and taken to a central accumulation area.
- The 90- or 180-day facility accumulation limit begins with respect to satellite accumulation waste as soon as the waste is removed from the satellite accumulation area.
- When the 55-gallon limit is reached, generators must mark the container with the start date that excess waste started to accumulate. Generators then have three days to remove the hazardous waste to a central accumulation area where the 90- or 180- day accumulation time will begin, depending on their generator status.

EPA does not limit the number of satellite accumulation areas allowed at a particular facility, nor does it specify the type or size of containers that may be used. As long as the 55-gallon limit is not exceeded, owners/operators may use a variety of containers to accumulate wastes in a satellite area. A municipal public works garage should call DEP with any questions regarding proper satellite areas.

Storage Requirements

Hazardous waste may be stored in 55-gallon drums, tanks, or other units suitable for the type of waste generated.

If hazardous waste is stored in **containers**:

- The container must be clearly marked with the words "HAZARDOUS WASTE", identify the chemical contents and the date the accumulation starts.
- Containers must be compatible with the waste and kept in good condition. Containers must be replaced if they begin to leak.
- Containers must be kept closed and sealed except when being emptied or filled.
- Containers must be inspected each week for leaks or corrosion.
- If a container is used to store ignitable or reactive waste, it must be placed at least 50 feet (15 meters) from the facility property line to create a buffer zone.
- Wastes that can react together must never be stored together to prevent dangerous reactions upon contact.

Generators may also store hazardous waste in tanks, provided they meet certain standards.

If **small quantity generators** are accumulating hazardous waste in tanks:

- The tank must be kept covered or, if uncovered, there must be at least two feet of space between the top of the tank and the waste being stored (unless the tank is equipped with secondary containment).
- If the tanks have equipment that allows waste to flow into them continuously, waste feed cut-off or bypass systems must be provided to stop the flow in case of problems.
- Monitoring or gauging systems must be inspected each operating day and the tanks themselves must be inspected each week for leaks or corrosion.
- For tanks containing ignitable or reactive wastes, a buffer zone must be established between the tank and the facility property line. At a minimum, buffer zones must meet appropriate National Fire Protection Association (NFPA) requirements. Owners/operators can obtain this information from the local fire department.

Manifest Requirements

A generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a Uniform Hazardous Waste Manifest (Form 8700-22A). Manifests allow generators, as well as regulators, to track the movement of hazardous waste from its point of generation to the point of ultimate treatment, storage, or disposal. Each party that handles the waste must sign the manifest and retain a copy. Once the transport is complete, the receiving facility must return a signed copy of the manifest to the generator (within 60 days for small quantity generators, and within 45 days for large quantity generators). If no copy of the signed manifest is received by the generator, an exception report must be filed.

RCRA manifests contain the following information:

- Name and EPA identification number of the generator, transporter, and the designated TSDF
- DOT description of the waste
- Quantity of waste
- Address of the designated TSDF to which the waste is being transported
- Certification that the generator has in place a program to reduce the volume or toxicity of waste and that the treatment, storage, and disposal method chosen by the generator is the most practical method currently available.

Personnel Training

Large and Small quantity generators must satisfy certain personnel training requirements. These requirements help to ensure that all employees in contact with hazardous waste are knowledgeable of the dangers involved and educated on proper waste handling procedures and precautions. If your municipal garage is a Large quantity generator, you are subject to the same personnel training requirements as permitted RCRA facilities. To fulfill these requirements, facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a safe and effective manner. Employees must complete the program within six months after beginning their employment and must take part in an annual review of the initial training.

Municipal garages that are Small quantity generators are not required to satisfy these requirements, but are responsible for ensuring that facility personnel are instructed in proper waste handling procedures. Municipal garages that fall under Conditionally exempt small quantity generator requirements are not subject to personnel training requirements.

Contingency Plans

Generators are required to have a contingency plan in place at the facility that outlines the proper response procedures necessary to minimize hazards posed by fires, explosions, or unplanned releases of hazardous waste from the facility. Similar to personnel training requirements, large quantity generators are subject to the same contingency plan requirements as permitted facilities. Details of the precautionary measures that must be taken are found in the regulations.

Extensive plans are not required for municipal garages that fall under the requirements of small quantity generators; rather, small quantity generators must construct a modified version of the plan. Conditionally exempt small quantity generators are not required to have contingency plans.

Recordkeeping and Reporting Requirements

Hazardous waste generators must satisfy several recordkeeping and reporting requirements. Large quantity generators who transport hazardous waste off-site must submit a **biennial report** by March 1 of each even-numbered year. This report details the generator's activities during the previous calendar year, including the quantity and nature of the hazardous waste generated; and the name, address, and EPA identification number of each TSD facility to which waste was sent and each transporter who handled the waste for the facility. The report must also describe the facility's efforts to reduce the volume and toxicity of the wastes generated and the changes in volume and toxicity actually achieved compared to previous years (**waste minimization report**). Small Quantity Generators are required to submit an abbreviated biennial report. Conditionally Exempt Small Quantity Generators are not required to submit a biennial report.

To ensure the safe and efficient transport of hazardous waste to off-site facilities, RCRA requires facilities to return a signed copy of the manifest to the generator within a certain time frame. Small quantity generators must receive a copy within 60 days, large quantity generators within 45 days. Owners/operators who do not receive a copy of the manifest signed and dated by the TSD facility within the appropriate time period must submit an **exception report**. Although there is no specific form, the contents of the exception report are specified in the regulations. Conditionally exempt small quantity generators are not required to prepare a manifest, and thus are not subject to the exception reporting requirements.

All generators including municipal garages must keep signed copies of manifests for at least three years from the date waste was accepted by the initial transporter. The generator must also retain a copy of each biennial report for three years from the due date of the report. In addition, a generator must keep records of any test results or waste analyses for at least three years. The three-year period for retention of records is automatically extended during an enforcement action.

Exhibit 7 on the following page summarizes the different regulatory requirements for LQGs, SQGs and CESQGs.

Exhibit 7
Requirements for Facilities that are Generators of RCRA Hazardous Waste

	Large Quantity	Small quantity	Conditionally Exempt
Hazardous Waste Quantity Limits (per calendar month)	1000 Kg hazardous waste or 1 Kg acute hazardous waste	Greater than 100 Kg but less than 1000 Kg hazardous waste <1 Kg acute hazardous waste	< 100 Kg or < 1 Kg acute hazardous waste
Waste Determination	Yes	Yes	Yes
EPA ID Number	Yes	Yes	No
On-Site Accumulation Quantity Limits	None	<1000 Kg < 1 kg acute hazardous waste	1000 Kg 1 Kg acute hazardous < 100 Kg spill residue from acute HW
Maximum Accumulation Time	90 days	180 days	No Limit*
Storage Requirements	Comply with all 40 CFR Part 265 management standards for tanks, containers, containment buildings and secondary containment	Comply with all 40 CFR part 265 management standards for tanks, containers, and containment buildings and secondary containment.	None*
Off-Site Waste Management	RCRA permitted or interim status HW facility	RCRA permitted or interim status HW facility	RCRA permitted or interim status facility or state approved facility
Contingency Plan	Full plan to minimize hazards from fires, spills, explosion	Posting emergency information by telephones	None*
Permitted Transporter Required	Yes	Yes	Yes
Treatment on Site without a RCRA Permit	No (With exceptions including treatment in containers and tanks)	No (With exceptions including treatment in containers and tanks)	No (Except for treatment in containers and tanks or on-site recycling)
Manifest	Yes	Yes	No
Biennial Report	Yes	Yes (abbreviated form)	No
Recordkeeping	<ul style="list-style-type: none"> • Manifests • Biennial reports • Exception reports • Test results • Records of past management practices • Documentation if any past decontamination of equipment to eliminate waste codes • Waste Determinations 	<ul style="list-style-type: none"> • Manifests • SQG Biennial reports • Exception reports • Test results • Records of past management practices • Documentation if any past decontamination of equipment to eliminate waste codes • Waste Determinations 	<ul style="list-style-type: none"> • Waste Determinations
Personnel Training	Formal classroom training with annual updates	Employees must be familiar with waste handling and emergency procedures relevant to their position	None*

* Best Management Practices, including responsible handling and storage of wastes is recommended.

LAND DISPOSAL RESTRICTIONS

The RCRA Land Disposal Restrictions (LDR) require that hazardous waste must meet specified treatment levels in order to be disposed of on the land. An example of land disposal is the placement of wastes into a landfill or lagoon. EPA has assigned each waste code identified under RCRA a specific **treatment standard** that must be met before land disposal can occur. Treatment standards can be expressed in two ways: (1) as a specific technology (e.g., combustion, vitrification) that must be applied to the waste in order to meet the standard, or (2) as specific concentration levels. Facilities managing wastes with treatment standards expressed as concentration levels may perform any type of treatment on the waste stream to achieve the standard (keep in mind however, that a generator cannot perform thermal treatment, such as incineration or combustion, unless they obtain a RCRA permit). EPA does not allow the dilution of hazardous waste to meet LDR treatment standards.

Wastes which do not meet treatment standards cannot be land disposed unless EPA has granted a variance, extension, or exclusion for a particular waste stream. Also, certain newly identified wastes (those identified on or after November 8, 1984) have not yet been assigned treatment standards. This is because EPA needs time to determine the best methods available to treat these wastes in order to establish treatment standards. Until a treatment standard has been developed, these wastes will not be subject to LDR.

Generators and TSDFs managing hazardous wastes that are subject to LDR have specific notification, certification, waste analysis, and recordkeeping requirements. Similar to a hazardous waste manifest, LDR notification and certification paperwork helps hazardous waste handlers and EPA ensure that wastes are being properly treated before land disposal.

Waste Subject to LDR Requirements

Generators are responsible for determining whether their waste is subject to LDR. This is accomplished by either testing the waste or by applying generator process knowledge. If a waste is subject to LDR but does not meet the applicable treatment standards, generators must provide written notification to the TSDF to which the waste is being sent. Although there is no specific LDR notification form, EPA does require specific information to be included in the notice, including:

- EPA hazardous waste code
- Identification of the waste as a wastewater or non-wastewater
- Manifest number of the shipment
- Waste analysis information (if available)
- For certain specified wastes, any additional hazardous constituents present in the waste.

If an LDR waste does meet applicable treatment standards, the generator must certify to the receiving TSDF that the waste meets the required treatment standards. Generators must keep a copy of all notifications and certifications for at least five years.

Generators may treat their waste on-site to meet LDR treatment standards. To do so, they must first

develop a written waste analysis plan (WAP). The WAP must justify the frequency of testing based on a detailed analysis of a representative sampling of the waste, and contain information necessary for proper treatment of the waste. Generators who perform on-site treatment of hazardous waste that is unrelated to LDR treatment standards are not required to develop a WAP.

RCRA PERMITTING

Permits are an essential part of the RCRA Subtitle C program. RCRA requires facilities that treat, store, or dispose of hazardous waste to obtain an operating permit. A permit establishes rigorous site-specific administrative and technical hazardous waste management standards to which a TSDF must adhere.

Permit Exemptions

There are limited circumstances under which a facility can treat, store, or dispose of hazardous waste without a permit:

- Large quantity generators storing hazardous waste on site for less than 90 days, and small quantity generators storing hazardous waste on site for less than 180 days
- Owners/operators of totally enclosed treatment facilities, wastewater treatment units, and elementary neutralization units
- Persons engaged in containment activities during an emergency response (e.g., spills, accidents)
- Owners/operators of solid waste disposal facilities handling only conditionally exempt small quantity generator wastes.

Any facility that does not qualify for a permit exemption and that treats, stores, or disposes of hazardous waste must obtain a RCRA permit. Because treatment, storage, and disposal generally involve several different types of units and multiple activities, the permitting regulations impose requirements far more extensive than those imposed upon a generator.

PERMITTING STANDARDS

RCRA permitting standards consist of both general TSDF standards as well as unit-specific standards. **Under most circumstances, Municipal Public Works Garages will not be TSDFs, and will not be required to apply for a RCRA permit.** The general RCRA TSDF standards require facilities to:

- Conduct detailed chemical and physical analyses of waste managed at the facility
- Install security measures to protect human health, safety, and the environment
- Develop and conduct a written facility inspection plan
- Ensure that facility personnel are trained to handle any hazardous waste with which they may come into contact
- Properly manage all wastes to minimize the chance of ignition, reaction, or explosion
- Comply with standards prohibiting the siting of a facility in areas prone to flooding or seismic activity
- Develop emergency preparedness and contingency plans
- Comply with general manifesting, recordkeeping, and reporting requirements.

All new facilities requiring a RCRA permit must apply for, and receive, a permit before construction of the facility can begin. Owners/operators of existing facilities must operate under RCRA's **interim status** standards while seeking a permit or awaiting permit approval by EPA. With few exceptions, RCRA's interim status standards are very similar to the permitting standards.

Permit Applications

RCRA permit applications are lengthy and comprehensive, consisting of two parts: Part A and Part B. Both parts of the application provide EPA with the information necessary to establish site-specific requirements. The Part A application is submitted on Form 8700-23, and consists of basic facility information such as the name, mailing address, and location of the facility. The Part B application is the more complex, narrative part of the permit application in which the applicant describes, in great detail, the types of wastes that will be managed at the facility, precautionary measures that will be taken to protect human health and the environment, and all waste analysis, facility inspection, and contingency plans that will be part of everyday activities of the facility.

Once EPA receives this information, the application is reviewed, presented for public comment, then approved or denied. All RCRA permits are effective for a fixed term, not to exceed ten years. At that time, the permit may be modified, reissued, or terminated.

Facilities and Permits

The process of obtaining a RCRA treatment, storage, and disposal permit is difficult and lengthy, sometimes taking two years or more to complete. Facilities can, and often do, avoid the need to obtain a RCRA permit by maintaining their permit-exempt status as a hazardous waste generator. To do this, a facility must ensure that any waste generated at the facility is removed and sent to a permitted or interim status TSDF within the appropriate time frame (within 90 days for large quantity generators and within 180 days for small quantity generators). Because most municipal garages do not generate large volumes of waste, the majority of garages should not find it difficult to remain exempt from permitting requirements.

CLOSURE REQUIREMENTS AT PERMITTED FACILITIES

All hazardous waste management facilities eventually cease their treatment, storage, or disposal activities. When ceasing operation, these facilities must be closed and maintained in a way that ensures that they do not pose a future threat to human health and the environment.

Closure regulations can be divided into two parts: general closure standards and unit-specific standards. General closure standards apply to all TSDFs entering into closure. Unit-specific standards address the specific types of waste management units regulated under RCRA. Both general and unit-specific standards must be satisfied to complete closure activities. The maximum time allowed to complete closure after the unit has received its final volume of waste is 180 days. Extensions to this 180-day time period may be granted under certain circumstances by the EPA Regional Administrator. All TSDFs must submit closure plans explaining, in detail, how the facility will achieve the closure standards. Permitted facilities must submit this plan with their Part B permit application. Interim status facilities must have written closure plans on-site six months after they become subject to the RCRA TSDF standards.

Each closure plan must:

- Describe how each hazardous waste management unit at the facility will be closed
- Estimate the maximum inventory of hazardous waste that will be on-site during the facility's operating life
- Describe closure methods necessary to remove and manage waste present at the facility
- Describe any other steps necessary to achieve complete closure
- Contain a schedule of closure dates, including the amount of time each closure activity will take
- Contain an expected date of final closure.

Post-Closure Requirements

Owners/operators who cannot "clean close" their facility by removing or decontaminating all equipment, structures, and soils must also enter into a period of post-closure care to prevent or control any future releases into the environment. Post-closure is normally a 30-year period after closure during which owners/operators must conduct groundwater monitoring and maintenance activities to prevent releases. Facilities entering into post-closure must obtain a post-closure permit, and must also submit a post-closure plan to the EPA Regional Administrator describing how these activities will be conducted.

Closure of Facilities

Facilities that maintain generator status under RCRA are subject to limited closure requirements. Large quantity generators must close their accumulation units in a manner that minimizes or eliminates post-closure release of hazardous waste into the environment, and must dispose of or decontaminate equipment, structures, and soils at the facility.

Small quantity generators are not subject to generic closure requirements; instead, small quantity generators must comply with applicable unit-specific closure requirements contained in the regulations. For example, at closure, all accumulated hazardous waste and residues must be removed from any materials, equipment or structures within the building. Small quantity generators accumulating hazardous waste in tanks must also comply with the appropriate tank closure requirements.

Hazardous wastes generated from closure activities must be handled according to applicable RCRA regulations. EPA has not established specific Federal cleanup levels to verify "clean closure." Many States including CT, however, have established risk-based cleanup levels depending upon projected land use at the facility. Thus, facilities must work closely with their implementing agency to determine specific levels of decontamination that will ensure the protection of human health and the environment.

Underground Storage Tanks

RCRA's Underground Storage Tank (UST) program establishes a comprehensive regulatory scheme for the management of USTs storing petroleum and hazardous substances as defined under CERCLA. The regulations establish minimum standards for new tanks and require owners/operators of existing tanks to either upgrade, replace, or close them according to the regulations.

The regulations are divided into two parts. The first part contains technical requirements designed to reduce the chances of releases from USTs, detect leaks and spills when they occur, and secure prompt cleanup in the event of a release. The second part of the UST regulations consists of financial responsibility requirements to ensure that, in the event of a spill or leak from an UST, a facility will have the financial resources to pay for cleanup and compensate any third parties involved. The financial responsibility requirements apply only to USTs containing petroleum.

Some facilities are subject to the UST regulations; although, the definition of "regulated substance" as it applies to the UST program specifically excludes RCRA hazardous wastes. This is because RCRA already has standards regulating the management of tanks containing hazardous waste, whether underground or above ground. As a result, tanks accumulating hazardous waste at a facility, even if underground, are not subject to the UST regulations. If a facility does have an underground storage tank (defined as a tank system whose volume is 10 percent or more below the surface of the ground) on-site that contains petroleum or hazardous substances as defined under CERCLA, it may be subject to the UST regulations.

Although there are no Federal RCRA standards for the management of products in aboveground tanks, States may have established such requirements. (Refer to CT-DEP - Underground Storage Tank Unit 860-424-3298)

Municipal Public Works Garage Information

As a municipal public works garage, you are most likely either a small quantity generator ("SQG") or a conditionally exempt small quantity generator ("CESQG"). This document is intended to help municipal public works garages begin to address hazardous waste and Connecticut Regulated Waste management. If there are any questions regarding this guidance document or hazardous waste management at the garage, the garage should contact the DEP COMPASS line at (888) 424-4193.

The wastes listed here are only some wastes that may be generated at the Public Works Garage, and may not include all of the wastes generated at every garage. All Garage employees should evaluate the wastes generated at the garage and determine whether the waste is RCRA hazardous waste, non-RCRA, Connecticut regulated waste or special waste, or a municipal solid waste.

If the garage is a conditionally exempt small quantity generator, some of the following information would fall under Best Management Practices instead of Regulation. However, in order for the garage to maintain in compliance, it would be beneficial to follow these guidelines. Hazardous waste determination are required under both federal and state regulation, regardless of the generator status of the garage. **ALWAYS maintain your hazardous waste determinations for all of your wastes, whether through knowledge of process or analytical testing on-site.**

COMMON TYPES OF WASTES

Hazardous wastes generated at your garage may include any of the following wastes:

- 1) Aerosol Cans** - The aerosol can waste stream includes "all" types of aerosol cans, including spray cleaners, paints, lubricants, disinfectants, etc.
- 2) Antifreeze** - This waste stream is dedicated strictly to antifreeze and antifreeze water mixtures.
- 3) Batteries** - All batteries except alkaline batteries (examples include nickel/cadmium and lead acid) must be recycled or disposed as regulated wastes. DEP strongly encourages the recycling of this waste stream.
- 4) Contaminated Absorbents** - This waste stream is for absorbent materials (speedi-dry, spill pads, spill socks, wipes, etc.) Used for cleaning up spills and drips of oil, antifreeze, gas, paint, mineral spirits, degreasing and cleaning solvents, diesel fuel, etc. The waste stream is also for paint solids, such as paint sludge and chips, used brushes and rollers, and paint contaminated wipes, masking paper, mixers, cups, strainers, etc. Spent carbon filters from the aerosol can puncturing system, if not recycled, should also go into this waste stream.
- 5) Degreasing Solvents and Parts Washer Mineral Spirits** - This waste stream is dedicated for parts washers that use only mineral spirits. Mineral spirits includes petroleum distillate, stoddard solvent and naphtha.

6) **Gasoline** - The gasoline waste stream is for any liquid waste gasoline, gas and oil mixtures, and gas with water contamination.

7) **Mercury-containing fluorescent lamps** - This waste stream includes all mercury containing lamps generated at the municipal garage. If the garage uses low-mercury containing lamps, this waste stream must be managed as a Connecticut Regulated Waste.

8) **Waste Oil** - This waste stream includes oils that are contaminated with solvents or other wastes generated at the municipal garage rendering the oil non-recyclable.

9) **Waste Paint and Thinner** - This waste stream includes all liquid and semi-liquid oil based paints, primers, stains, polyurethane and epoxy coatings, and thinners used with these coatings. This waste stream does NOT include latex paints, or cured, dried paints.

10) **Pesticides / Herbicides** - This waste stream includes any old, banned or unused pesticides generated at the municipality.

Connecticut regulated waste generated at your garage may include any of the following wastes:

1) **Used Oil** - Used oil is tested and found to be a recyclable waste stream.

2) **Latex Paint** - This waste stream includes any old or unusable latex paints.

Many other wastes may fall under this category at specific municipal garages, and each facility should evaluate their waste generated on-site. This evaluation will always include a hazardous waste determination, whether by knowledge of process or analytical testing.

As a CESQG, your municipal garage has the following responsibilities:

1) Perform a hazardous waste determination on any new waste stream that your municipality generates. Ensure previously performed hazardous waste determinations performed are current with the process and operations conducted and materials used at your garage.

2) Maintain proper records at your garage including your logs, hazardous waste determinations and manifests for at least three years.

3) Ensure the safe and proper off-site transport and disposal of your hazardous waste by:
a) Using only permitted transporters and permitted waste receiving facilities which have EPA identification numbers
b) Transporting your own hazardous waste, in quantities less than 1000 kg/month and in your own vehicle, to a permitted waste receiving facility which has an EPA Identification Number,
c) Not disposing of your hazardous waste in a municipal or private solid waste landfills located in the State of Connecticut.

4) Properly managing your hazardous waste by not accumulating greater than 1000 kg of hazardous waste on-site at any one time.

NOTE: If your municipal garage is an SQG or LQG, your garage will be required to perform additional duties as outlined in this document and as specified in state and federal regulations.

CONTAINER MANAGEMENT

As a municipality, ensure that the following requirements are met for each hazardous waste stream generated:

- 1) Store the hazardous waste in a container that is in good condition.
- 2) Ensure the container is compatible with the hazardous waste, and ensure incompatible waste/materials are separated by means of a dike, wall or berm.
- 3) Keep the container closed and marked except when adding or removing hazardous waste.
- 4) Handle the container carefully and ensure adequate aisle space is maintained between containers.
- 5) Separate incompatible wastes and materials from the other incompatible container of hazardous wastes.
- 6) Store the hazardous waste in a contained area - impervious base and secondary containment.
- 7) Label and mark the container "Hazardous Waste" and the chemical name ("specific to the hazardous waste generated") to identify the contents and the date the container is filled.
- 8) Inspect containers on a routine basis - weekly - to verify proper management. **KEEP A LOG.**

Container Storage Area - Store all hazardous wastes in a container in good condition and compatible with the waste being stored. Keep the container closed except when adding or removing the waste. Label each container with the words "Hazardous Waste" and a list of each type of waste that is placed in the container. The labeling can be hand written on the container, a plaque or a sign attached to the container. **Preprinted labels may even be obtained from your off-site transporter company.** Store the hazardous wastes in a contained area with a berm on an impervious base - a base or floor which does not absorb spilled liquids. Some types of impervious bases include epoxy coated concrete, plastic liners, prefabricated plastic or poly trays, and metal trays. It is strongly encouraged by DEP that the containers of hazardous wastes be stored indoors or under cover, and surrounded with a berm or other structure to contain any accidental spills or releases. Try to keep the container storage area close to the area where the waste oil is being generated. **DO NOT STORE THESE CONTAINERS OUTDOORS ON THE GROUND.** This may lead to soil and groundwater contamination if any of the containers leak.

Complete weekly inspections on these containers and their storage areas in order to ensure that you are properly managing your wastes at your facility. Conducting the inspections weekly reduces potential for any problems to continue undetected and uncorrected posing a threat to human health and the environment. Any problems that may be discovered during an inspection should be noted on the inspection form and fixed immediately. If you have questions regarding proper management of hazardous waste streams generated at your municipal garage, you should contact the Compliance Assistance Help Line at (888) 424-4193.

EMERGENCY RESPONSE

As a municipality, ensure that the following proper emergency response and equipment requirements are met:

Your municipal public works garage should review this response, and tailor it specifically to your garage. After doing this, the designated Emergency Coordinator for the garage should let all employees know the proper response in the case of any emergencies.

In order to respond to any emergency situations that may arise at the municipality, emergency response equipment is necessary to have at the municipal garage in an area that is easy to access in the event of a spill or release. This equipment includes speedi-dry, absorbent pads or other absorbent material, shovels or other equipment to move the waste and gloves or other clothing of varying protection. The emergency response equipment should be contained in one area in a spill response kit, which should be checked at least monthly by an inspector to ensure all proper equipment is accounted for. Any missing or used equipment should be reported to the supervisor of the garage to be re-ordered.

1) You are required to have an **Emergency Coordinator** at your Municipal public works garage that is either on the premises at all times or on call (and can respond to the municipal garage site within a short period of time) who can respond to any emergency. The properly trained Emergency Coordinator must respond to any fires, spills or releases to the environment.

A) How the emergency coordinator or other properly trained personnel should respond to a **Hazardous Waste spill**

- 1) Using **gloves** or other appropriate clothing and equipment, absorb spill with **speedi-dry and absorbent pads** if small and controllable spill.
- 2) After conducting a hazardous waste determination on the waste, dispose the waste in a proper container through a licensed hazardous waste transporter if hazardous. Ensure the waste is transported in stable and compatible containers which are marked and labeled.
- 3) **BE CAUTIOUS** of the waste you have picked up. **NEVER mix wastes**. For example, do not mix waste liquid mineral spirits with waste liquid paint thinner.
- 4) **Report** this spill to the DEP Oil and Chemical Spill Response Division. A spill report form should be filled out.

B) How to respond to a **Fire**

- 1) Call the fire department. If the fire is small and in control, extinguish it using a fire extinguisher.

C) How to respond to a **Release to the Environment of hazardous waste**

- 1) If your spill reaches outside the facility and has the potential to threaten human health or the environment, immediately notify the National Response Center (800-424-8802) Your report will include:
 - Name, address and EPA ID number
 - Date, time, and type of incident (spill or fire)

- Quantity and type of hazardous waste involved in accident
- Extent of injuries
- Estimated quantity and disposition of recovered materials.

2) You must **post emergency information** including the following next to each telephone, especially near phones in the waste handling areas. The CESQG guidance outlines this information. Ensure that all of your information is included on this form at all telephones.

- A) name and telephone number of the emergency coordinator
- B) location of fire extinguishers and spill control material, and if present, fire alarm
- C) telephone number of the fire department, unless the facility has a direct alarm, and telephone numbers of other emergency response agencies.

3) Your municipal garage maintenance facility must have appropriate **safety and emergency equipment** including:

- A) Internal communications / Alarm system and Telephone for external communications
- B) Portable fire extinguishers / fire control equipment / spill control equipment / decontamination equipment
- C) Water, adequate volume and pressure / foam producing equipment / automatic sprinklers / water spray systems

In order to safely maintain and operate your facility, there is additional information that should be noted at your facility.

- Within your Hazardous Waste Storage Area and Used Oil Storage Area, you should maintain adequate aisle space to ensure movement within the area between the drums in case of an emergency. DEP recommends 30" minimum between containers. In order to minimize releases, do not stack drums of hazardous waste or used oil.
- Ensure that your ignitable and reactive wastes are separated from your sources of ignition or reaction. For example, do not allow smoking, or activities that could result in sparks or ignition near the ignitable or reactive wastes.
- Post and enforce "No Smoking" signs in all areas where ignitable and reactive wastes are stored - EVEN if your facility is non-smoking.
- Make arrangements with your local police and fire departments, State and local emergency response teams, emergency response contractors and local hospitals. These places and numbers will vary from garage to garage.

TRAINING REQUIREMENTS

As a municipality, ensure that the following training requirements are met:

Train personnel to reduce the potential for mistakes or mishandling of wastes which might threaten, and may possibly harm, human health and the environment. By reducing the potential for mistakes and mishandling of waste, you are, in turn, reducing any potential liabilities you might incur as a result of any harm done to the environment or to human health. If your municipality is a SQG, you must ensure that all of your employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal operations and emergencies.

Inform employees of hazards associated with your waste (categorized as hazardous waste unless hazardous waste determination conducted at the municipal garage denotes otherwise)

Inform ALL employees about proper procedures for responding to an emergency:

- Locations and proper use of fire control and spill control equipment
- How to operate alarm systems

Inform ALL employees about safe hazardous waste handling procedures:

- Storing waste in containers in good condition.
- Ensuring container is compatible with the waste.
- Keep the container closed except when adding or removing waste.
- Store the waste in a contained area.
- Handle the waste and container carefully.
- Separate incompatible wastes and materials from each other.
- Store the wastes in a contained area - impervious base and secondary containment.
- Label and mark the compatible container "Hazardous Waste" and the chemical name and the date the container is filled.
- Inspect containers on a routine basis - weekly- to verify proper management. KEEP A LOG

Inform ALL employees about Hazardous Waste Management Regulations applicable to your municipal garage:

All employees should be trained to understand the hazardous waste management regulations that apply to your municipal garage. This includes:

- Full-time employees
- New employees
- Part-time employees - including summer employees
- Temporary employees

RECORD KEEPING REQUIREMENTS

As a municipality, ensure that the following record keeping requirements are met:

Several different recordkeeping items must be kept by a small quantity generator - which many municipal public works garages are categorized under. They are listed and explained below.

Manifests or Bills of Lading - Used when transporting hazardous waste off-site. A completed manifest is located in the SQG guidance document sent with this municipal garage package. Must be kept on-site by the municipal garage for at least three years.

Exception Reports - A municipality identified as an SQG that does not receive a copy of the manifest with the hand-written signature of the owner or operator of the designated facility within 60 days of the date the waste was accepted by the initial transporter must submit a legible copy of the manifest. Some indication that the generator has not received confirmation of delivery must be submitted to the Commissioner.

Hazardous Waste Determination - This is the waste analysis or test results, or any other data used to determine that your waste is hazardous (or non-hazardous). In accordance with 40 CFR 262.11, keep this documentation for at least three years from the date the waste was last sent to on-site treatment storage or disposal. Retain any supporting information used to make your hazardous waste determination on-site in your files.

Inspection Logs - Inspection logs regarding the weekly container inspection record should be kept on file. In addition, any facility sending used oil off-site for burning should maintain a log of how much used oil was sent off-site, and the date it was sent off-site. This documentation should be signed by the employee making the statement. At the same time, those public works garages that are burning used oil should keep a log of the amount of used oil accepted to be burned at their facility and where it was accepted from. This information should also be signed to ensure accuracy if further questions arise.

Biennial Reports - A municipality identified as a Small Quantity Generator that ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must prepare and submit three copies of a Biennial Report to the Commissioner by March 1 of each even numbered year. The Biennial Report must be submitted on a form prescribed by the Commissioner.