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# Topics:

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





### **Episodic Generation**

- Periodically (once or twice) exceed given classification
- What requirements apply?
  - \* Re-evaluate your generator classification often!! \*

#### Episodic Generator Change Generator Status If Monthly Generation Rate Exceedance is If Monthly Generation Rate Exceedance is a Common an Unforeseeable/Infrequent Event **Occurrence** Manage generated waste in Notify DEEP in writing compliance with applicable generator Complete Form 8700-12 which can classification be found at www.epa.gov and submit to DEEP. Document monthly generation rates Document accumulation rates 3. Comply with new generator 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 Storage Areas (HWSA)
    - a.k.a. MAAs, LT-180 areas
- Requirements for <u>all</u> containers:
  - Labeled
  - Sound condition
  - Compatible with materials
  - Closed



#### **Container Rules**

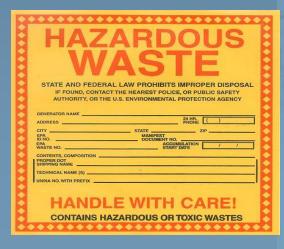
- What is a Satellite Accumulation Area?
  - Located at or near point of generation
  - Under control of an operator
  - Quantity limits: do not exceed 55-gal per waste type
  - Labeling: "Hazardous Waste" and description of waste
  - Containers must be in good condition





### **Container Rules**

- What happens when the SAA limit is met?
  - Date the waste container
  - Bring waste container to a <u>controlled</u> storage/accumulation area <u>within 3 days</u>
  - Affix pre-transport labels if not already on container
    - "Hazardous Waste" and description of contents
    - Generator's name & address
    - Generator's EPA ID #
    - Manifest number
    - DOT shipping name and ID number
  - Inspect weekly
  - Ship off-site within 180-days



### **Container Storage**

- A controlled storage/accumulation area has:
  - Secondary containment
    - 10% of all containers or 100% of largest
  - Impervious base
    - Poly spill pallets
    - Epoxy coated concrete
    - Sheet metal



- Warning signs
  - No smoking signs (flammable or reactive)





### **Container Storage**

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



### When is a container RCRA Empty?

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





### A container is RCRA Empty If...

Acutely Hazardous Waste

AND

Triple Rinsed

OR

Liner removed

Non-Acutely HW Non-compressed gas

**AND** 

Emptied using common methods

**AND** 

< 1" remains

OR

Container is ≤ 110 gal and < 3% by wt. remains

OR

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

Compressed gas (e.g., aerosols\*)

AND

Pressure ≈ atm.

### **Tank Talk**

- Tank Systems
  - Tank
  - Ancillary equipment (i.e. piping, valving)
  - Containment system

#### Management Requirements

- Avoid leaks/ruptures
- Cover
- Feed cut-off system
- Inspect level daily
- Inspect tank system weekly
- Storage < 180-days (date! Or keep accumulation log)</li>
- Label "Hazardous Waste" with description of contents
- Compatibility with contents
- Ignitable/reactive wastes → see NFPA code



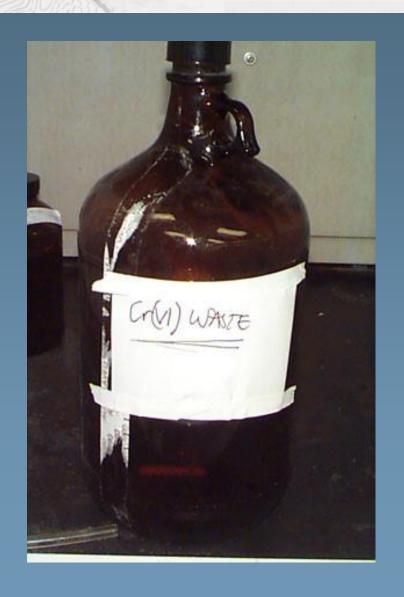
# Quiz!

Container and tank management

## **Satellite Violations**



## **Satellite Violations**



## **Satellite Violations**



# **Storage Violations**



# **Storage Violations**



# **Storage Violations**



# **Waste Manifest Form**

	FORM HAZARDOUS	1. Generator ID Number	er		2. Page 1 of	Emergency Res	ponse Phone	4. Manifest	Tracking Num	nber	
W	VASTE MANIFEST										
5. Gr	enerator's Name and Mailir	ng Address			G	enerator's Site Ac	ldress (if different l	han mailing addre	ess)		
ı											
l											
Geni	erator's Phone:				1						
6. Tr	ansporter 1 Company Nam	ne						U.S. EPAID	Number		
								1			
7. To	ansporter 2 Company Nam	10						U.S. EPAID	Number		
								1			
8. De	esignated Facility Name an	id Site Address						U.S. EPA ID	Number		
l											
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Facil	lity's Phone:							1			
9a	9b. U.S. DOT Descripti	on (including Proper Shi	ipping Name, Hazard	Class, ID Numbe	er	10.4	Containers	T1 Total	12. Unit	10	
HM	and Packing Group (if a	any))				No.	Type	Quantity	Wt./Vol.	13 Waste Coo	les:
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- General Purpose: paper trail
- How to Complete the Manifest
- Distribution
  - Page 1: Destination facility to destination state
  - Page 2: Destination facility to generator state
  - Page 3: Destination facility to generator
  - Page 4: Destination facility copy
  - Page 5: Transporter copy
  - Page 6: Generator's initial copy
  - Legible Photocopy: Submit to State

Do not let the transporter leave before making a photocopy!

- Completing the hazardous waste manifest:
  - Site address, contact info, and EPA ID #
  - Volume of waste
  - Description of waste (and waste codes)
  - Transporter name and EPA Id. No.
  - Receiving facilities (TSDF) name and EPA Id. No.
  - Generator signs and dates keep a copy!
  - Transporter signs and dates
  - Send a copy to the generator state's DEEP
  - Send a copy to the receiving facility's state DEEP
  - Receiving facility sends you a signed dated copy after receiving the waste – keep a copy!

- CT DEEP Specific
  - Postmark (and mail) photocopy of page 1 (top copy) to CT
     DEEP within 7 days of the date of shipment
- Manifest Discrepancies
  - Quantity
  - DOT Description
  - Non-acceptable waste
  - Residue > RCRA empty
- Recordkeeping & Reporting
  - File copy 3 & 6 for at least 3 years
  - Exception Reporting
    - Contact transporter and facility
    - File report to DEEP within 60 days



#### **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!

Ple	ase pri		d for use on elite (12-pitch) typewriter.)					n Approved. OMB No. 20	50-0039			
1		FORM HAZARDOUS ASTE MANIFEST	Generator ID Number CTP000025628	CTP000025628 1 (860) 424-3000				4. Manifest Tracking Number 123456789XYZ				
	5. Generator's Name and Mailing Address CT Dept. of Energy & Env. Protection Protection (different than mailing address) 79 Elm St Hartford, CT 06106 Generator's Phone:  (860) 424-3000											
	6. Tra	6. Transporter T Company Name You Call We Haul, Inc.						U.S. EPAID Number CT0987654321				
	7. Transporter 2 Company Name						U.S. EPA ID Number					
	8. Des	signated Facility Name and Si World	Wide Haz Waste Mgt Services			U.S. EPAID N	Number					
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	9a. HM	9b. U.S. DOT Description ( and Packing Group (if any)	including Proper Shipping Name, Hazard Class, ID Numbr )	er,	10. Containers No. Type	11 Total Quantity	12. Unit Wt. /Vol.	13. Waste Codes				
GENERATOR -	х	WASTE GOVE	RNMENTIUM, 8, PGII, UN1832	3, PGII, UN1832		79	P	D002				
- GENE		2	Correct	ly prepare	ed Manifest							
		3.		Font size: Appropriate size & clarity throughout Alignment: Completely inside appropriate boxes throu								
		4.	Generator EPA ID	Generator EPA ID Number: Correct & legible								
l	14 Sr	pecial Handling Instructions ar	Emergency Response									
			<ul> <li>Generator Name &amp; Mailing Address: Correct &amp; complete.</li> <li>Generator's Phone: Legible</li> <li>Generator Site Address: Proper format for same as mailing</li> </ul>									
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<u></u>	16 Int	ternational Shipments	Item 19: Comple									
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* P/	Form	8700-22 (Rev. 3-05) Prev	vious editions are obsolete.									

# Quiz!

The Manifest

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# **Land Disposal Restriction**

- Prepare Land Disposal Restriction Form (land ban form)
  - Done for all wastes that do not meet the land disposal treatment standards (i.e., wastes that must be treated before being disposed)
  - Generator must identify each hazardous constituent and underlying constituent (ex. "lead" and "nickel") requiring treatment/that have been treated
- Recordkeeping (3 years)
- One time notification to facility
- Update notification
  - (if change in facility or waste)

# **Emergency Planning**

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



# **Emergency Information**

#### Post this information by all phones!

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

# **Emergency Responding**

#### You are required to contain releases

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



# **Emergency Reporting**

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



# **Employee Training**

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



# Questions?