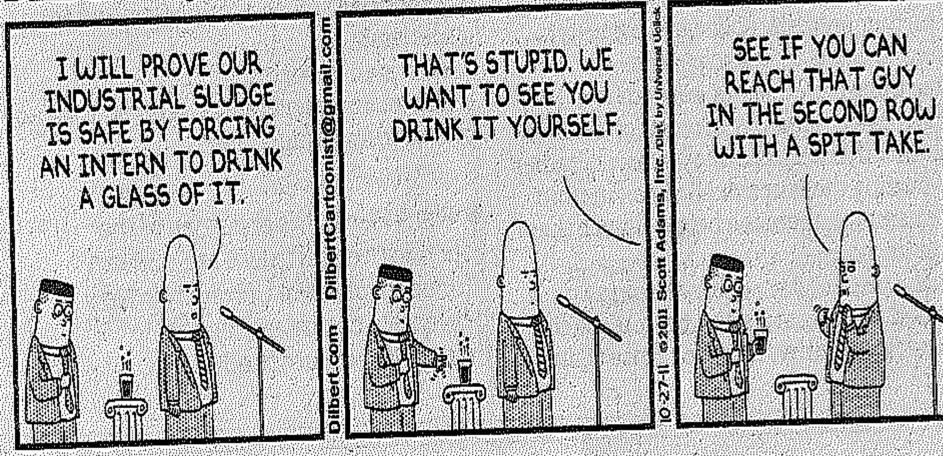
## Paul Franson

Environmental Analyst 3
Enforcement Case Manager
Waste Engineering & Enforcement Division

### Paul.Franson@ct.gov

(860) 424-3565

### **DILBERT** By Scott Adams



Hazardous Waste Determination?

## Topics

- Episodic Generation
- Containers & Tanks
- The Manifest
- Land Disposal Restriction
- Emergency Planning & Preparedness
- Employee Training

### **Episodic Generation**

- If you periodically exceed your <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 Notify DEEP in writing 1. compliance with applicable generator 2. Complete Form 8700-12 which can 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, Buillings
- 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> containers:
  - Labeled
  - Sound condition
  - Compatible with materials
  - Closed



#### **Container Rules**

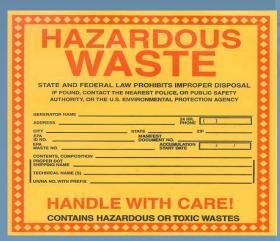
- What is a Satellite Accumulation Area?
  - Located at or near point of generation
  - Under control of an operator
  - Quantity limits: do not exceed 55-gal per waste type or one quart of acutely hazardous waste
  - Marked: "Hazardous Waste" and description of waste
  - Containers in good condition, closed, compatible





#### **Container Rules**

- What happens when the SAA quantity limit is met?
  - Mark the container with date when quantity limit was met
  - Bring waste container to a fully regulated storage/accumulation area within 3 days
  - Consider pre-transport marking and labeling if not already on container
    - "Hazardous Waste" and description of contents
    - Generator's name & address
    - Generator's EPA ID #
    - Manifest number
    - DOT shipping name and ID number
  - Inspect weekly
  - Ship off-site within 180-days



### **Container Storage**

- HW container storage areas are required to have:
  - Secondary containment
    - 10% of all containers or 100% of largest
  - Impervious base
    - Poly spill pallets
    - Epoxy coated concrete
    - Sheet metal



- Warning signs (Consider not RCRA required for SQG's)
  - No smoking signs (flammable or reactive)





### **Container Storage**

- HW storage areas are required to have:
  - Aisle space
    - Suggest 30 inches between rows of drums and/or case by case
  - Separate incompatibles (waste/waste and/or waste/materials)
    - Acid from alkali
    - Flammable from corrosives

(Consider - Not RCRA required for SQG's)

- 50 foot buffer from property line
  - Ignitable and reactive waste



### When is a container RCRA Empty?

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





## 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)</li>
- Label "Hazardous Waste" with description of contents
- Ignitable/reactive wastes → see NFPA code
- Compatibility (waste/waste, waste /material, tank)



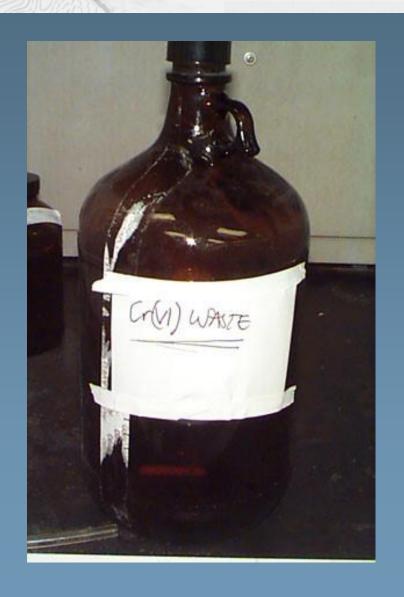
## Quiz!

Container and tank management

### **Satellite Violations**



### **Satellite Violations**



## **Satellite Violations**



## **Storage Violations**



## **Storage Violations**



## **Storage Violations**



## **Waste Manifest Form**

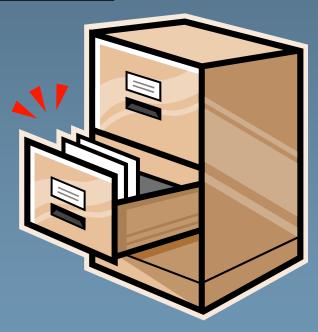
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1											
Gene	erator's Phone:				- 1						
6. Tra	ansporter 1 Company Nam	18						U.S. EPAID	Number		
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7. Tre	ansporter 2 Company Nam	e						U.S. EPAID I	Number		
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8. De	esignated Facility Name an	id Site Address						U.S. EPA ID I	Number		
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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!

- 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!

- 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



#### **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 prin		d for use on elite (12-pitch) typewrit								. OMB No. 2050-0039		
1	WA	ASTE MANIFEST	Generator ID Number CTP00002562		(8	4. Manifest Tracking Number 123456789XYZ							
	5. Generator's Name and Mailing Address CT Dept. of Energy & Env. Protection Generator's Site Address (if different than mailing address) 79. Elm St Hartford, CT 06106 Generator's Phone. (860) 424-3000												
Ш		ne set or 4. Come new Money	ou Call We Haul, Inc.					U.S. EPAID Number CT0987654321					
	7. Tran	nsporter 2 Company Name						U.S. EPA ID Number					
	8. Desi	ignated Facility Name and Si	Wide Haz Waste Mgt	Services				U.S. EPAID I	Number				
	Facility	9 Servi Beautii	ce Lane us, CT 06111 77-7777	CT0999888777									
	9a. HM	9b. U.S. DOT Description ( and Packing Group (if any)	including Proper Shipping Name, Hazaro )	Class, ID Number,		10. Contair No.	Type	11 Total Quantity	12. Unit Wt. Nol.	13.	Waste Codes		
GENERATOR -	x	WASTE GOVE	RNMENTIUM, 8, PGI	, UN1832		1	DM	79	Р	D002			
- GENE		2.	C	orrectly pre	pare	d Mani	fest						
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# Quiz!

The Manifest

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## **Land Disposal Restriction**

- Prepare Land Disposal Restriction Notices
  - Waste <u>does not</u> meet the treatment standard(s)
  - Waste <u>meets</u> the treatment standard(s)

"Generator Paperwork Requirements Table" - 40 CFR 268.7(a)(4)

- Recordkeeping (keep for 3 years from date of last shipment)
- One time notification to facility
- Update notification
  - (if change in facility or waste)



## **Emergency Planning**

- Designate Emergency Coordinator(s) (EC)
- Plan for site specific emergencies
   (Spills, fires, explosions, flooding, etc.)
  - Identify emergency response duties
  - Hazards of your chemicals
  - Volume of chemicals (container/tank size)
  - Site characteristics (Floor drains?, Outdoor storage?, Incompatibles?, Ignition sources?)
- Respond to emergencies

EC or designee must respond to emergencies to the extent possible

## **Emergency Information**

#### Post this information by the phone!

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



## **Emergency Response Training**

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



## **Emergency Reporting**

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



## **Employee Training**

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

# Any Questions?

