Paul Franson
Environmental Analyst 3
Enforcement Case Manager
Waste Engineering & Enforcement Division

Paul.Franson@ct.gov
(860) 424-3565
Hazardous Waste Determination?
Topics

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

- If you periodically exceed your normal generation rate
  - infrequent cleanouts, unforeseeable spills, etc.
- What requirements apply?
  * Re-evaluate your generator classification often!! *

<table>
<thead>
<tr>
<th>Episodic Generator</th>
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<tbody>
<tr>
<td>If Monthly Generation Rate Exceedance is an Unforeseeable/Infrequent Event</td>
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  1. Manage generated waste in compliance with applicable generator classification (at least for that month)
  2. Document monthly generation rates
  3. Document accumulation rates
  4. Minimize potential for reoccurrence of episodic generation

<table>
<thead>
<tr>
<th>Change Generator Status</th>
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<tr>
<td>If Monthly Generation Rate Exceedance is a Common Occurrence</td>
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  1. Notify DEEP in writing
  2. Complete Form 8700-12 which can be found at www.epa.gov and submit to DEEP.
  3. Comply with new generator classification requirements
We’re an SQG…So Now What?

• Containers, Tanks, Buildings

• Container Management Options
  – Satellite Accumulation Area (SAA)
    • a.k.a. POG, satellites
  – Hazardous Waste Container Storage Areas
    • a.k.a. CSAs, LT-180 areas

• Requirements for all containers:
  – Labeled
  – Sound condition
  – Compatible with materials
  – Closed
Container Rules

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

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

AND

Non-Acutely HW

Emptyed using common methods

AND

Compressed gas (e.g., aerosols*)

AND

Pressure $\approx$ atm.

OR

< 1” remains

OR

Container is $\leq 110$ gal and $< 3\%$ by wt. remains

OR

Container is $>110$ gal and $< 0.3\%$ by wt. remains
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
Storage Violations
Storage Violations
Storage Violations
The Manifest

- **Purpose:** Shipping Paper - Track Waste “Cradle to Grave”
- **How to Complete the Manifest**
  (Complete instructions located in Appendix to 40 CFR Part 262)
- **Distribution**
  - **Page 1:** Destination facility to destination state (if required)
  - **Page 2:** Destination facility to generator state (if required)
  - **Page 3:** Destination facility to generator
  - **Page 4:** Destination facility copy
  - **Page 5:** Transporter copy
  - **Page 6:** Generator’s initial copy
  - **Legible Photocopy:** Submit to State

*Do not let the transporter leave before making a photocopy!*
The Manifest

• Completing the hazardous waste manifest:
  – Site address, contact info, and EPA ID #
  – Volume of waste
  – Description of waste (and waste codes)
  – Transporter name and EPA Id. No.
  – Receiving facilities (TSDF) name and EPA Id. No.
  – Generator signs and dates
  – Transporter signs and dates
  – Generator retains page 6 (photo copy page 1 if illegible)
  – Send a legible copy to DEEP (photo copy of page 6 or page 1)
  – Receiving facility sends you a signed dated copy after receiving the waste (page 3) – keep a copy!
The Manifest

- **CT DEEP Specific**
  - *Generator shall mail a legible copy of the manifest to CT DEEP within 7 days of the date of shipment*

- **Manifest Discrepancies**
  - *Quantity and/or Waste Description*

- **Rejections – Full/Partial/Residue**

- **Recordkeeping & Reporting**
  - *File copy 3 & 6 for at least 3 years*
  - *Exception Reporting*
    - *Contact transporter and facility*
    - *File report to DEEP within 60 days*
The Manifest

ALERT! ALERT! ALERT!

- **Legibility** - 15% of manifests are illegible!
  - Font is too light/faded/small (use 12 pt)
  - Data overwrites form text/lines
- **Completeness**
  - Quantity, DOT description, waste codes not entered
  - Incorrect generator ID (i.e., EPA ID #)

Responsibility of the Generator – you are signing a legal document!
**Correctly prepared Manifest**

- Font size: Appropriate size & clarity throughout
- Alignment: Completely inside appropriate boxes throughout
- Generator EPA ID Number: Correct & legible
- Emergency Response Phone: Proper & legible
- Generator Name & Mailing Address: Correct & complete.
- Generator’s Phone: Legible
- Generator Site Address: Proper format for same as mailing address.
- Transporter & TSDF: Complete & legible
- Waste info: Complete & legible
Quiz!

The Manifest
Incorrectly prepared Manifest

Font size: too small throughout

Alignment: misaligned and illegible throughout

Generator EPA ID Number: font too small & misaligned – illegible

1. Emergency Response Phone: font too small & misaligned – illegible

2. Generator Name & Mailing Address: font too small & misaligned, incomplete, no town, state or zip.

3. Generator’s Phone: font too small & misaligned – illegible

4. Generator Site Address: Missing

5. Transporter & TSDF: font too small & misaligned – illegible

Land Disposal Restriction

- Prepare Land Disposal Restriction Notices
  - Waste *does not meet the treatment standard(s)*
  - Waste *meets the treatment standard(s)*

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

- Recordkeeping (keep for 3 years from date of last shipment)

- One time notification to facility

- Update notification
  - *(if change in facility or waste)*
Emergency Planning

- Designate Emergency Coordinator(s) (EC)

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

- Respond to emergencies
  
  EC or designee must respond to emergencies to the extent possible
Emergency Information

Post this information by the phone!

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

– Train designated emergency response employees

– Keep adequate response equipment on-site

• absorbents (clay litter, pads, pigs, saw dust, sand, rags, etc)
• shovels
• booms (contain spills to water)
• fire extinguishers
• protective gloves
• containers for waste collection
Emergency Reporting

- **Notify DEEP (860-424-3338)**
  - required for all spills

- **Notify national response center (800-424-8802)**
  - impacts water body
  - impacts adjacent properties
Employee Training

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

- **Refresher training** *(as needed)*
Any Questions?