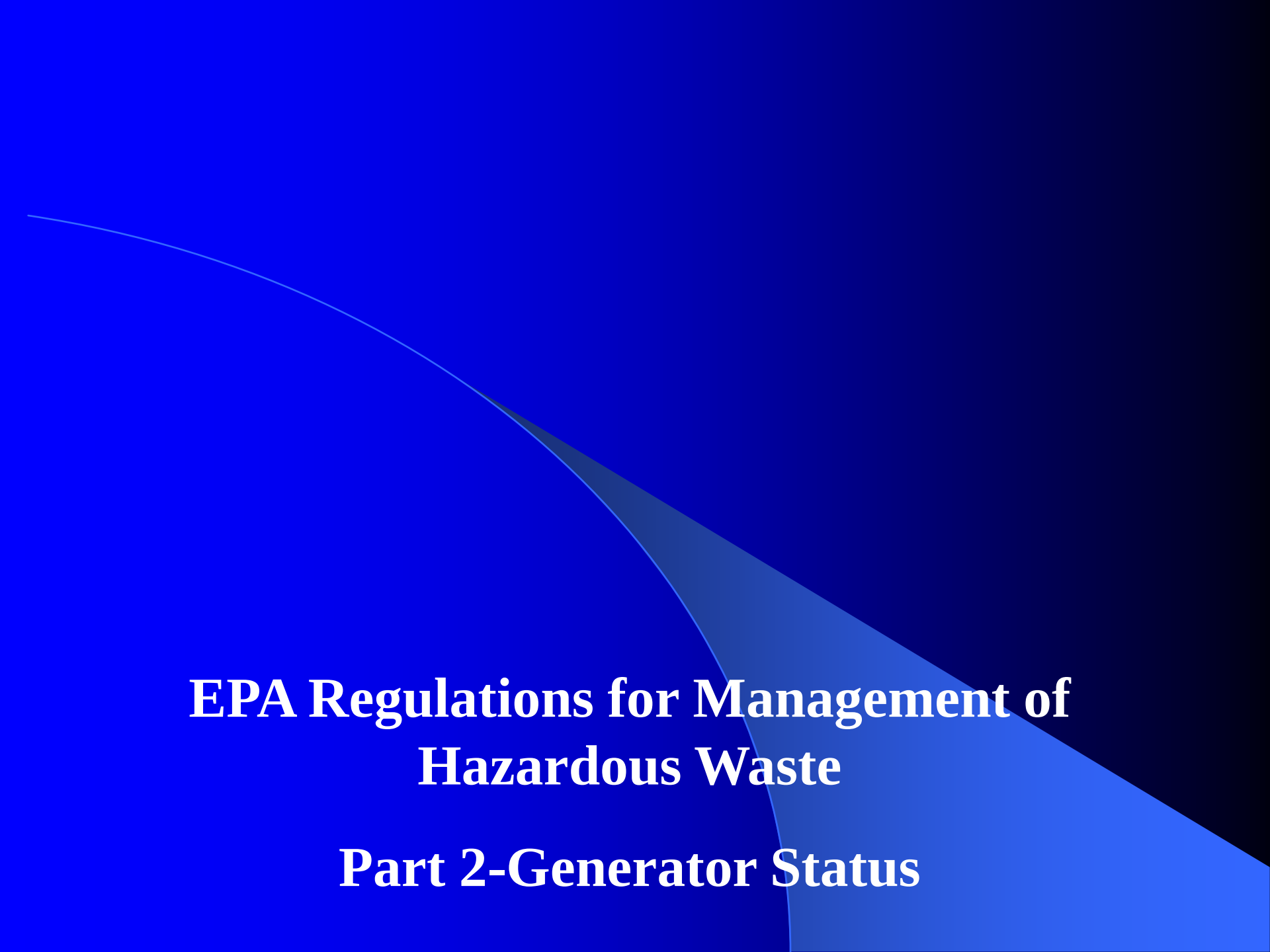




EPA Regulations for Management of Hazardous Waste

Part 2-Generator Status

Generator Status

- **Conditionally Exempt SQG**

- Generates < 100 kg/mo ($\sim 1/2$ drum), < 1 kg P waste
- may not accumulate more than 1,000 kg (~ 5 drums) at one time

- **Small Quantity Generator**

- Generates 100 kg/mo to 1000 kg/mo ($\sim 1/2$ drum - 5 drums)
- may not accumulate more than 6,000 kg (~ 30 drums)

- **Large Quantity Generator**

- Generates > 1000 kg/mo (~ 5 drums), > 1 kg P waste

CESQG failing to ensure proper disposal of D001 paint



Small Quantity Generator Requirements

- Obtain EPA identification number
- Ensure delivery to permitted TSDF
- May use tolling agreement instead of manifest
- 180 day storage limit without permit
- Never accumulate >6000kg on-site (~30 drums)

Haz Waste in the Trash



Haz Waste in the Trash



Small Quantity Generator Requirements

- Training (not documented)
- Emergency Planning
- Posting information near phones
- No biennial report
- 60 day exception reports
- Maintain facility properly

Large Quantity Generator Requirements

- Obtain EPA identification number
- 90 day storage limit without permit
- Manifests required
 - No tolling agreements
- Contingency plan
- Training (documented)
- Biennial report (March 1 of even years)
- 45 day exception reports

LQG Accumulation Area



LQG 50' Setback

- 50 foot setback from property boundary for ignitable or reactive waste for LQGs



On-Site Management

- Accumulation Units
 - CESQGs - tanks and containers
 - SQGs - tanks and containers
 - LQGs - tanks, containers, containment buildings and drip pads
- On-site treatment allowed in above accumulation units provided certain requirements are achieved.

Containers - Labels

- Labeled “Hazardous Waste”

HAZARDOUS WASTE

FEDERAL AND/OR STATE LAWS PROHIBIT IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

GENERATOR INFORMATION:

NAME _____

ADDRESS _____ PHONE _____

CITY _____ STATE _____ ZIP _____

EPA ID NO. _____ STATE MANIFEST DOCUMENT NO. _____

ACCUMULATION START DATE _____ EPA WASTE NO. _____

[_____]

DO NOT PROVIDE SHIPPING NAME AND HAZARD CODE WITH THIS LABEL

HANDLE WITH CARE!

Containers - Dates

- Marked with Date of Accumulation



Containers - Condition

- Comply with 40 CFR 265, Subpart I
 - Containers in good condition, closed, compatible with contents, inspected weekly



Open, Unlabeled Containers of Haz. Waste



Open Containers



Open Container



Open Container



Open container, waste on
drum, no label, no date



Satellite Accumulation

- 55-gallons Maximum
- At or near the Point of Generation
- Labeled “Hazardous Waste” or other Words that Describe Contents
- Mark waste accumulated in excess of 55-gallons with the date of accumulation
- 72 hours to move to storage area
- Please, no mobile satellite drums

Satellite Container



Satellite Container ?



Satellite Container ?



Tanks

- Label “Hazardous Waste”
- Document 90/180 day storage limit compliance
- Comply with 40 CFR 265.201 (SQG)
- Comply with 40 CFR 265, Subpart J (LQG)
 - P. E. Certification
 - Secondary containment
 - Daily inspections

Training

- Employees must be trained with respect to their duties
- Must not work unsupervised until training is complete
- Must complete initial training within 6 months of hiring or assignment of HW management responsibility
- Annual Update

Proper Training?



Proper Training?



Training Records LQGs

- Job titles
- Position Description
- Requisite Qualifications
- Description of Training
- Documentation that Training has been Completed

Preparedness and Prevention - SQGs and LQGs

- Housekeeping -- No Discharges of Hazardous Constituents
- Required Equipment -- alarm, phone, fire & spill control equipment
- Aisle Space
- Emergency Response Arrangements with Police, Fire Department and Hospital

Maintenance and Operation

- Facility must be properly maintained and operated.



Proper Maintenance and Operation



Proper Maintenance and Operation ?



Do you know where your
drains go?



Containers - Aisle Space

- Adequate aisle space must be maintained around containers



Containers - Aisle Space



Containers - Aisle Space



Contingency Plan Contents

LQGs

- Fire, Spill, Explosion Response Procedures
- A description of arrangements with local authorities
- Emergency Coordinators Name, Addresses and Telephone Numbers
- Emergency equipment list
- Specifications and capabilities of emergency
- Locations of emergency equipment
- An evacuation plan and routes
- Evacuation/alarm signals

Recordkeeping and Reporting

- Copies of Hazardous Waste Determinations and Analyses
- Manifests
- Exception Reports
- Biennial Reports for LQGs
- Incident Reports re: Spills or Emergencies Requiring Implementation of the Contingency Plan
- Maintain Documents for 3 years (forever?)

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Requirement - Inspections

- Effective 1/5/95
- Container Inspection Records
 - Date
 - Time
 - Legibly written name of the inspector
 - Number of containers
 - Condition of containers
 - Notes of observations made, date and nature of repairs or corrective actions

Land Ban

- LDR Notification
- LDR Certification
- Retain Documentation for 3 years (forever?)
- Waste Analysis Plan

LDR Notice Contents

- All Applicable Waste Codes
- Treatability Group
- Constituents subject to regulation, if not all regulated constituents
- Manifest Document Number of Shipment
- Waste analysis data where available
- One time notice pursuant to Phase IV LDR dated 5/12/97 (62 FR 25998-26040)