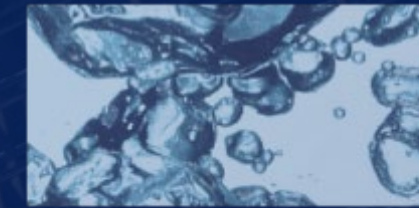


SIMPLIFYING



THE



COMPLEX



Paul D. Hansen, P.E.
SWLA AWMA March 7, 2024

Hazardous Waste Management Practices

Maintaining Compliance

Paul D. Hansen, P.E.
SWLA AWMA March 7, 2024



Common Issues Affecting Compliance

- ▣ Generator Status
- ▣ Becoming “Nose-Blind”
- ▣ Improper point of generation determination
- ▣ Paperwork
- ▣ Where is my waste going?
- ▣ Storage Practices
- ▣ Perception becoming Reality

Generator Status

Very Small Quantity Generator (VSQG)

- Generate ≤ 220 lbs/month and
- Generate ≤ 2.2 lbs/month of acute hazardous waste

Small Quantity Generator (SQG)

- Generate 220-2200 lbs/month and
- Generate ≤ 2.2 lbs/month of acute hazardous waste

Large Quantity Generator (LQG)

- Generate ≥ 2200 lbs/month or
- Generate > 2.2 lbs/month of acute hazardous waste

Accumulation Time

Generator status based
on amount generated
per month

Time frame for disposal
based on amount
generated (90 to 180
days)

Satellite Accumulation

- Near point of generation
- No more than 55-gallons at one time
- Indefinite time period
- Must be labeled with type of waste
- Date when container is full (3 days to move to Haz Storage)

Breaking out of the Everyday Task Mindset

- Choose a specific area to focus on during compliance checks
- Take a training or refresher course
- 3rd Party audit/evaluation
- Have a coworker familiar with the task perform a walkthrough

Where Do I Generate Waste?

- At what point in your process does a waste product have no further value?
- Does a product no longer have commercial value?
- Carefully evaluate your waste streams before a regulatory audit!



No Job is Finished Until the Paperwork is Done

- Keep profiles current
 - Most waste disposal companies will help
 - Remember you can use “Generator Knowledge”
- Ensure you receive the completed manifest
- Have a tracking system of quantities, form codes, and designations




I DON'T WANT TO BE A GROWNUP ANYMORE

There is too much paperwork

No Job is Finished Until the Paperwork is Done

- Inspection Logs – Are they adequate?
 - Sometimes simply stating “Observed” is not enough!
 - Leaves room to question inspection records
 - Does not have to be a burden

- Reports
 - Industrial Waste
 - 8700-12
 - Biennial
 - More for TSDF

United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM	
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1. Reason for Submittal (Select only one.)

<input type="checkbox"/>	Obtaining or updating an EPA ID number for on-going regulated activities (Items 10-17 below) that will continue for a period of time.
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<input type="checkbox"/>	Site was a TSD facility, a reverse distributor, and/or generator of $\geq 1,000$ kg of non-acute hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent LQG regulations)
<input type="checkbox"/>	Notifying that regulated activity is no longer occurring at this Site
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
<input type="checkbox"/>	Submitting a new or revised Part A (permit) Form

2. Site EPA ID Number

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3. Site Name

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4. Site Location Address

Street Address			
City, Town, or Village			County
State	Country	Zip Code	
Latitude	Longitude	<input type="checkbox"/> Use Lat/Long as Primary Address	

Where is it Going?

- Very important to know where your waste is going!
- You are responsible to the “grave”
- Use reputable vendors
 - Sometimes your buddy is not your best friend!



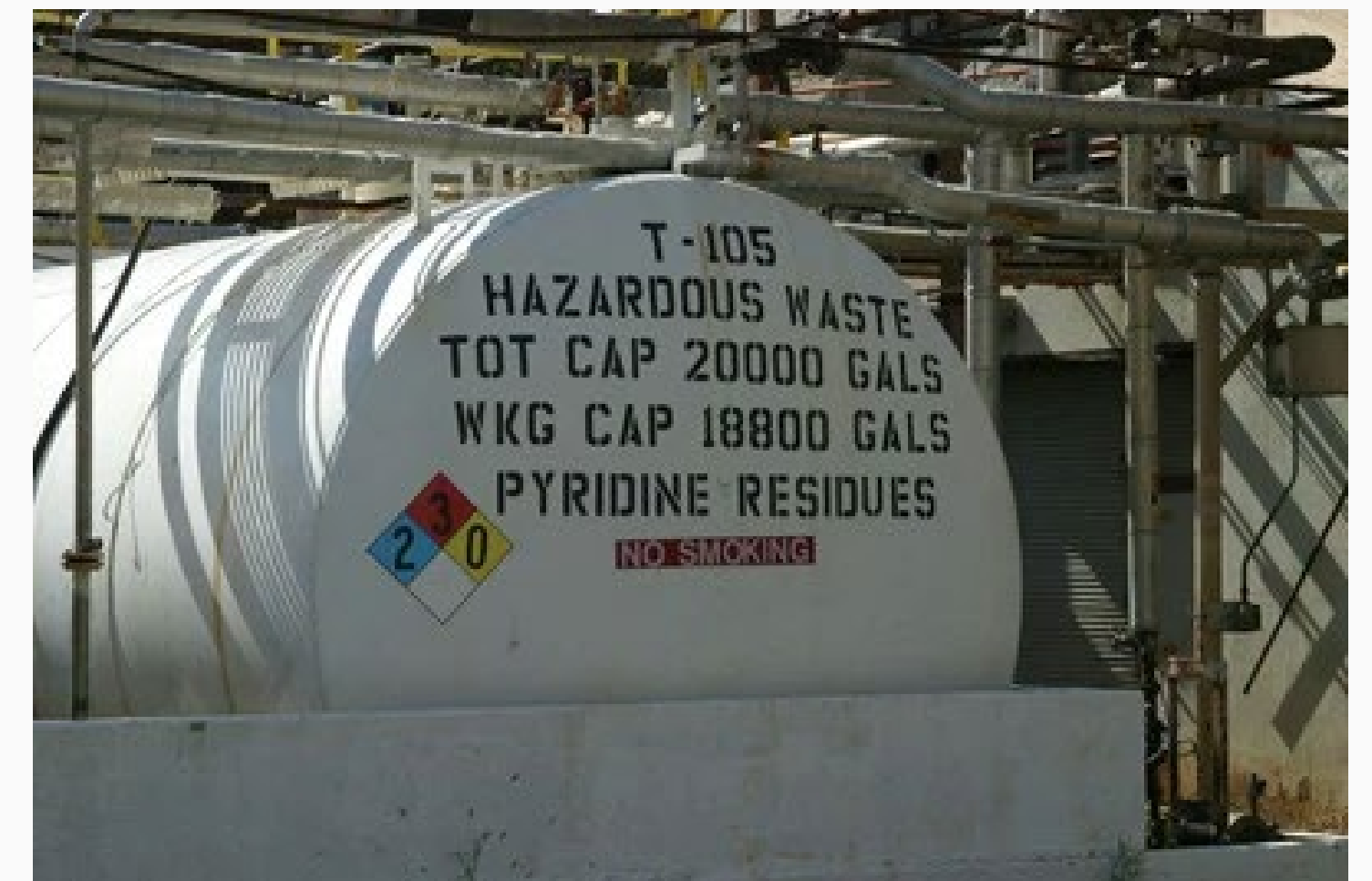
Storage Practices

- Proper signage on the storage area is most often overlooked.
 - Hazardous Waste
 - No Smoking
 - Danger – Unauthorized Personnel Keep Out
- Must be secured
- Liquid waste must be in a containment area with impervious coating



Storage Practices – Cont.

- Proper grounding of flammables
 - Evaluate if a proper ground exists
- If using tanks, have a written tank assessment by an engineer on file
 - Must be labeled “Hazardous Waste”
 - Must have contents identified



Perception is Reality

- Timely Reporting
- Well kept inspection logs
- Knowledgeable staff
- CLEAN!
- Greet inspectors quickly and provide general courtesy



What Will Get you Fined?



Recent issues identified that led to administrative orders with penalty

- Failure to submit 8700-12
- Failure to provide waste manifests
- Failure to post “No Smoking”
- Failure to provide contingency plan for review
- Failure to document analysis/information used to determine if used oil contains hazardous waste
- Failure to maintain adequate aisle space
- Failure to mark hazardous waste with the words “Hazardous Waste”
- Failure to mark identification of hazards, accumulation start date
- Failure to maintain impervious coating
- Failure to mark satellite accumulation containers
- Failure to keep containers closed
- Failure to provide training

Questions?

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