

**November 18, 2020**  
**Greater Lafayette Safety Council**

# **Basic Compliance Tips for Hazardous Waste Handlers**

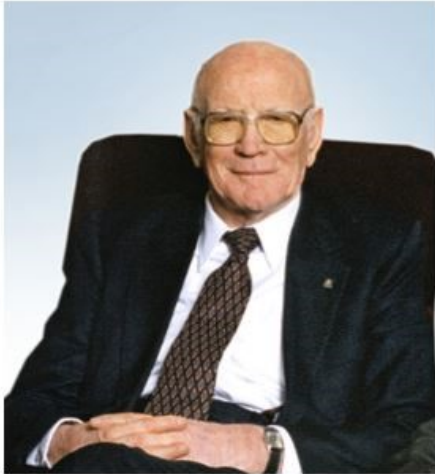
**Joe Menkhaus**  
**Project Manager**  
**EnviroServe, A SAVAGE COMPANY**

# Overview

- **Introduction to EnviroServe – A Savage Company**
- **EPA Civil & Criminal Enforcement**
  - **The Inspection Process**
- **Area of Concern #1 – Air**
- **Area of Concern #2 – Water**
- **Area of Concern #3 – Hazardous Waste**
  - **Generator Status**
  - **Waste Evaluation**
    - **Hazardous and Solid Wastes**
    - **Special Categories**
  - **Basic Recordkeeping (Preparing for an Audit)**
  - **Examples**
- **Q & A**

## Savage Founders

**Kenneth Savage**



***“Do the Right Thing”***

**Neal Savage**



***“Find a Better Way”***

**Luke Savage**



***“Make a Difference”***

## WHY WE DO WHAT WE DO

### Our Purpose

To **enable** our Customers and Partners to:



Feed the World



Power our Lives



Sustain the Planet

## WHAT MAKES US DISTINCTIVE IN THE MARKET

### Our Mission

To be **indispensable** to Customers and Partners in **moving and managing** their **essential** materials, relying on:



our **team**



our **solutions**



our **results**

## HOW WE'RE EXPECTED TO ACT

### Our Values

To achieve our Purpose and Mission, we **live and lead** according to the values in the **Vision and Legacy**:



**Do the Right Thing**



**Find a Better Way**



**Make a Difference**

# SECTORS

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Feed the World

**AGRICULTURE**



Power our Lives

**ENERGY &  
CHEMICAL**



Sustain the Planet

**ENVIRONMENTAL**

## Savage's Approach to Dealing with Uncertain Times

We'll be **thoughtful** and **deliberate**, but **aggressive**



Keep our people safe



Protect and enhance our culture



Strengthen our organization, strategy, structure, and team



Deepen Customer relationships



Reduce costs/ preserve precious capital

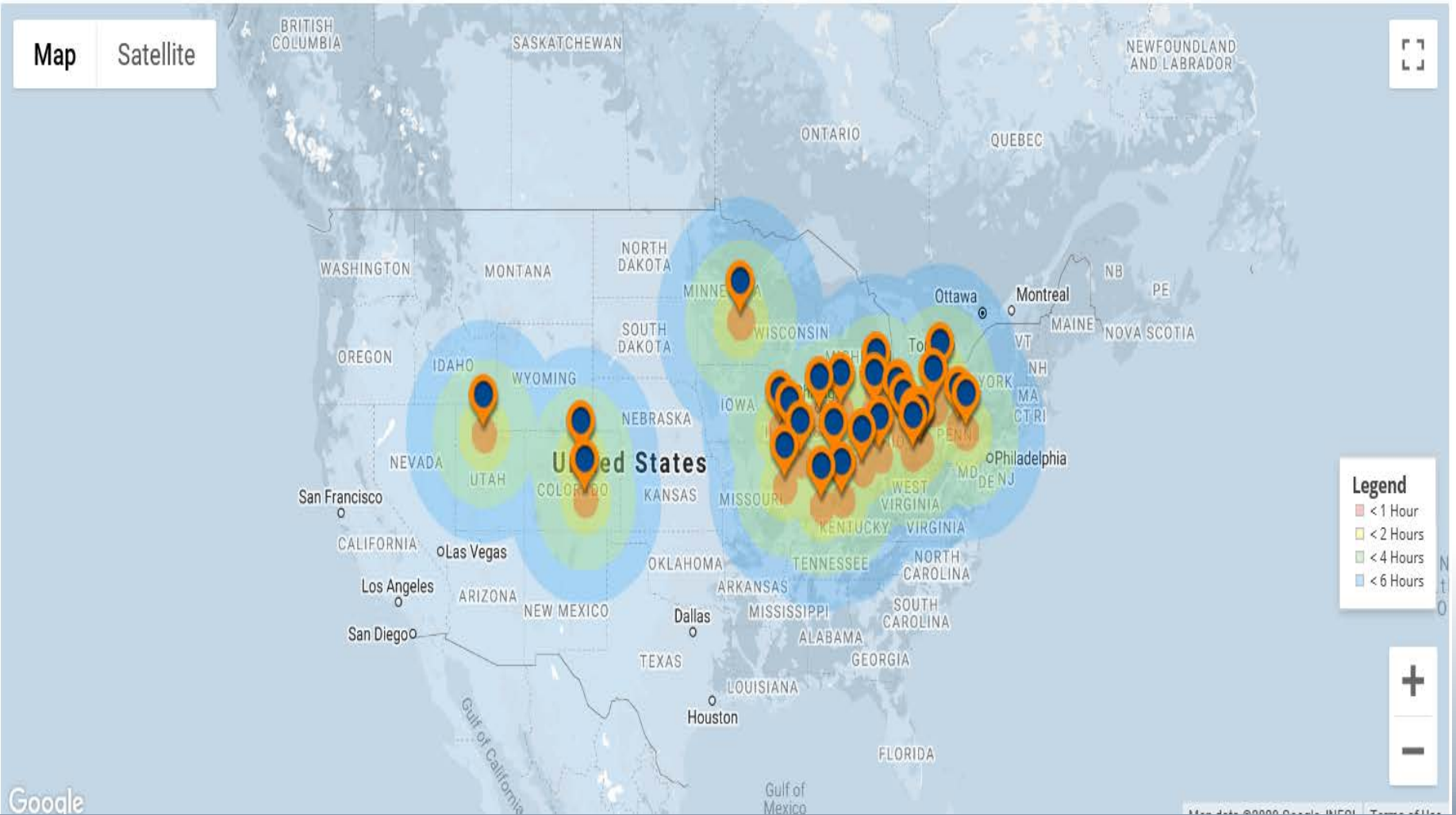


Maintain a long-term perspective

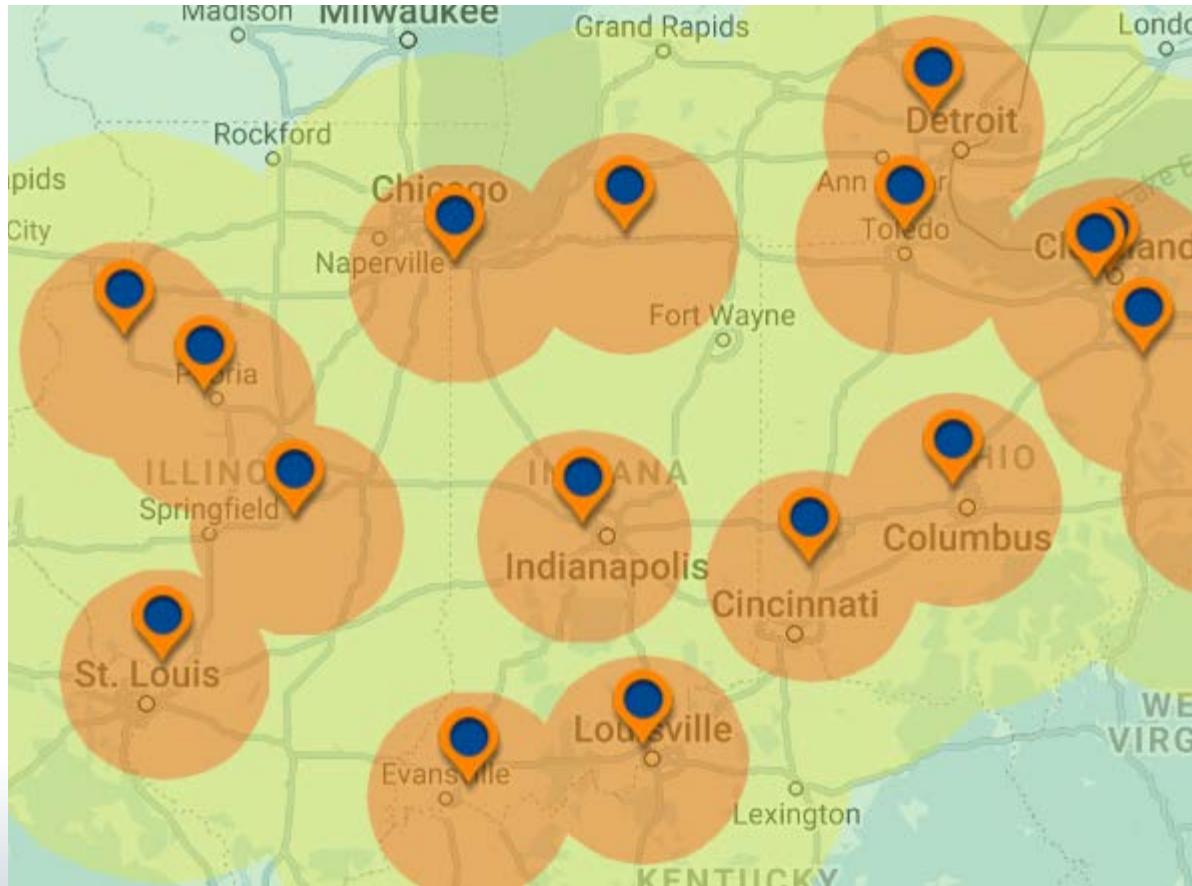


Apply lessons from crisis (to be better)

# EnviroServe in U.S.



# EnviroServe in Indiana-Region



Most of Indiana < 1 hour

All of Indiana < 2 hours



# EPA Civil and Criminal Enforcement

# EPA Civil Penalty Authority

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- EPA has standard penalty authority for violation of hazardous waste, water pollution and air pollution of \$37,500 per day of violation.
- At a minimum, EPA penalty policy calls for recapture of the economic benefit realized due to non-compliance.
- Penalties of \$10,000 to \$100,000 not uncommon for “paperwork” violations.

# Statutes - Critical

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- Critical Importance - To accurately report information on environmental records.
- Cite to 33 U.S. 1319(c)(4) which provides:
- “Any person who knowingly makes any false material statement, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained under this chapter (Clean Water Act) or who knowingly falsifies, tampers with, or renders inaccurate any monitoring device or method required to be maintained under this chapter, shall upon conviction, be punished by a fine of not more than \$10,000, or by imprisonment for not more than 2 years, or both...”
- Cite to general statute on obstruction of justice, 18 U.S.C. 1519
- “Whoever knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation...”

# U.S. EPA Criminal Convictions

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- **United States v (Deleted)** - former environmental manager for a refinery was charged with conspiring to violation the Clean Water Act by failing to report all wastewater test results to the regulator. In this case, even a clerical worker responsible for preparing the reports could be charged if they knew that the test results were not reported even if they had no knowledge of the reporting requirements and merely was following orders.”
- **(Deleted) Company-** Plead guilty to two counts of Clean Air Act false statements. Two year probation and \$325,000 in fines. Continued to record air pollution control equipment readings when the equipment was broken.
- **(Deleted Individual & Company)-** Plead guilty to illegal storage of hazardous waste. Stored 40 drums and 16 totes of flammable hazardous waste at a self-storage facility. Will serve 10 months in prison.
- **(Deleted Individual & Company)-** Plead guilty to negligent disposal of water mixed with crude oil to the river over a three day period. Faces up to one year in prison and a \$100,000 fine.
- **(Deleted Individual & Company) -** Stored 450 gallons of hazardous waste over three year period. Discharged waste through pre-treatment process without a proper permit. Plead guilty to illegal storage of hazardous waste. One year probation and \$50,000 fine.

# Common Environmental Violations

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- **Air Quality Violations**
  - Installing equipment without permits
  - Not keeping records required by permits
  - Emissions in excess of regulations or permits
  - Failure to maintain or monitor pollution control equipment
- **Hazardous Waste Violations**
  - Not evaluating wastes to determine if hazardous
  - Containers open or in poor condition
  - Failure to test and maintain emergency equipment
  - Not labeling used oil containers and fill pipes
  - Failure to inspect hazardous waste storage areas at least weekly
- **Wastewater/Storm Water Violations**
  - Failing to obtain an industrial storm water permit
  - Discharge wastewater without a permit or without permit of the local wastewater plant
  - Unpermitted discharges into drains, storm sewers or on-site septic systems

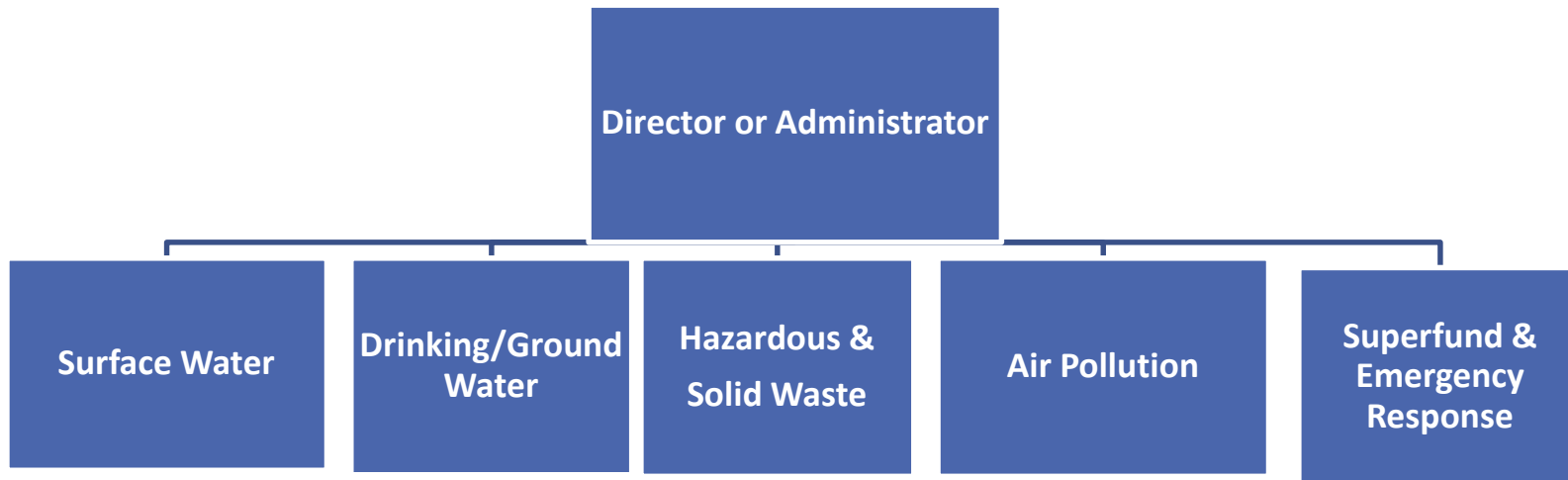
# The Enforcement Process- Begins with an Inspection

# EPA Inspection Authority

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- **Clean Air Act §114-** sample air emissions, review and copy records required to be maintained and inspect equipment.
- **Clean Water Act §308-** copy records regarding discharges, can obtain samples and inspect for required permits.
- **Hazardous Waste (RCRA) §3007-** monitor and sample waste streams, review waste analysis records, manifests, inspect, etc.
- **Other Statutes:** CERCLA §104(e), FIFRA §§ 136f & 136g; SDWA §1445; and TSCA §11

# Understanding EPA Organization





# How EPA Decides Who to Inspect

## Annual Inspection

- State federal grant commitments
- Large quantity generators
- Major facilities

## Complaint Inspection

- Anonymous or formal complaints

## Sector or Special Inspections

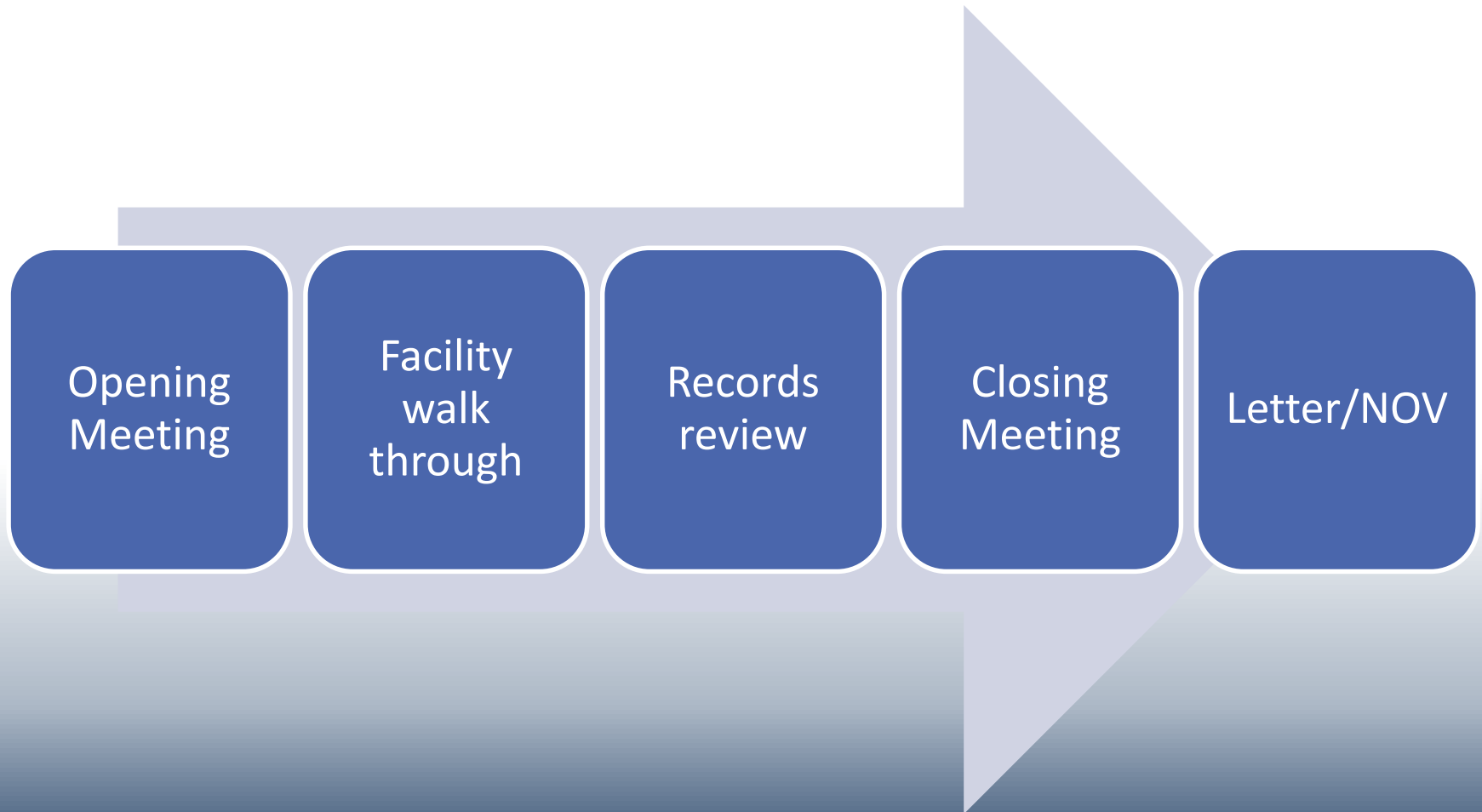
- Target by sector (scrap yards, foundries, vehicle maintenance yards)
- Enforcement priorities



*Inspections can be announced or unannounced (“surprise) inspections. Complaint inspections are typically unannounced.*

# EPA Inspection Process

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# How to Prepare for Inspection



## Who will talk

- Identify key contact at the facility
- Person should be familiar with environmental regulatory requirements
- Do's and don't's of responding to an inspection



## Be familiar with operations

- Which process, tanks or systems are regulated or have permits
- Understanding what reporting obligations may apply



## Organize records

- Permits or required record keeping
- Respond to requests post-inspection
- Segregate confidential records (i.e. Attorney-Client Privileged)

# 3 MAJOR AREAS

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1. AIR

2. WATER

3. HAZARDOUS WASTE

# #1 - Air Issues

- Paint Booths/Painting Operations
  - Typically require permits
  - Permit-to-Install
  - Limits on types or amounts of paints used
  - Hours of operation
- Inspection
  - Permits and records
  - Off-property odors emissions



# Other Air Issues

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- Dust Control
  - Unpaved Surfaces
- Plasma Cutting Tables
- Others

## #2 - Water

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A. Sanitary Waste

B. Stormwater Waste

C. Process Water Waste

# # A – Sanitary “Sewage” Waste

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- Local POTW – Publicly Owned Treatment Works
- On-site Management – Discharge or Other
- 3<sup>rd</sup> Party Hauling



# # B - Stormwater

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## What is stormwater?

Stormwater is water from rain or melting snow that does not soak into the ground. It flows from rooftops, over paved areas, bare soil, and sloped lawns. As it flows, stormwater runoff collects and transports animal waste, litter, salt, pesticides, fertilizers, oil & grease, soil and other potential pollutants.



# Stormwater

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The Clean Water Act authorizes EPA and states, which are delegated the authority by EPA, to regulate point sources that discharge pollutants into waters of the United States through the National Pollutant Discharge Elimination System (NPDES) permit program. So-called "point sources" are generated from a variety of municipal and industrial operations, including treated wastewater, process water, cooling water, and stormwater runoff from drainage systems. The [NPDES Storm Water Program](#), in place since 1990, regulates discharges from municipal separate storm sewer systems (MS4s), construction activities, industrial activities, and those designated by EPA due to water quality impacts.



# Stormwater Issue

Rainfall

# # C – Process Waste Waters

Truck Wash Waste  
Waters/Interior Trench  
Waste

**Where does your dirty  
truck wash water go?**



# Process Water – Cleaning & Trench Waste

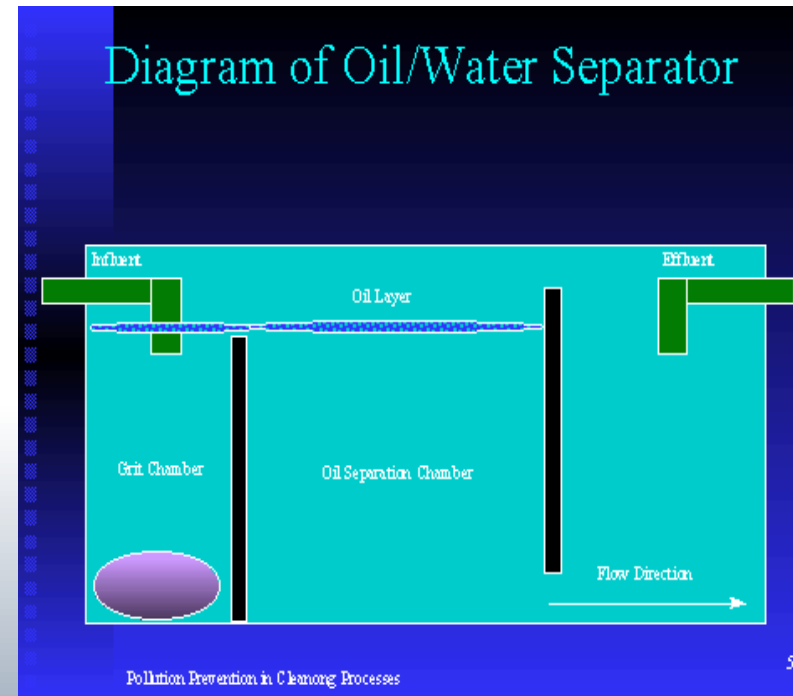
- **Where do I rinse off my power units?**
- **Am I certain that no oils or greases (petroleum) are captured and do not reach the environment?**
- **The penalties for knowingly releasing petroleum to the environment are severe...**



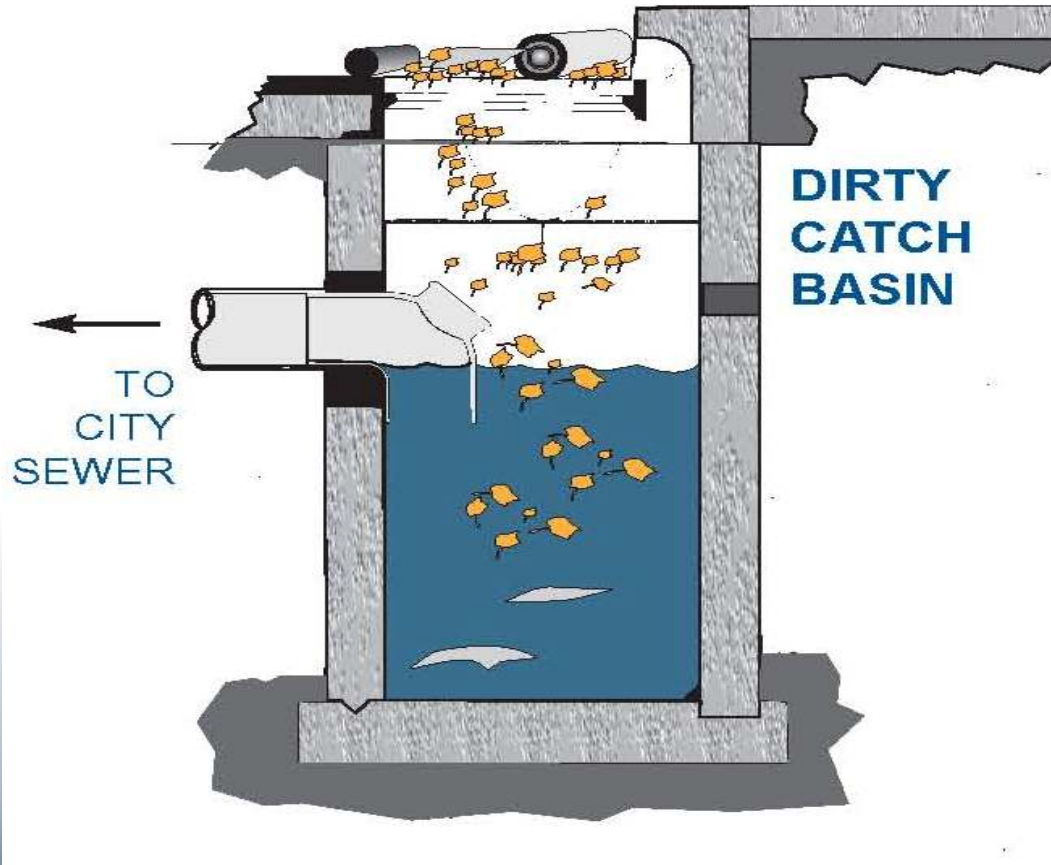
# WATER POLLUTION

## Oil-Water Separators

- **Do you have an Oil-Water Separator?**
- **Why do I have to maintain my Oil-Water Separator?**
- **Are you certain that it is not simply a catch basin?**
- **Where does it discharge?**



# Not an Oil-Water Separator



# General Water Thoughts

- **Do you have a site map that shows all of your drains, conveyances and discharges?**
- **Where is your sanitary sewer discharge?**
- **Where is your stormwater going?**





## WATER POLLUTION Local POTW Agreement

- Discharge Permit needed?
- If you don't know what you are allowed to discharge, then you don't know what is allowed in the sewer.



# Water Plans

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- SPCC Plan
  - Oil related
  - Spill Prevention, Containment & Countermeasure Plan
- SWPPP
  - Stormwater Related
  - Storm Water Pollution Prevention Plan

**Routine Training**

**Routine Inspections**

**Container Storage / Secondary Containment**

# Area #3 – Hazardous Waste

## Generator Status

Hazardous Waste Generator Categories			
	CESQG	SQG	LQG
<b>Generation per Month</b>	≤ 1 kg Acute Hazardous Waste		> 1 kg Acute Hazardous Waste
	≤ 100 kg Hazardous Waste	> 100 kg and < 1,000 kg Hazardous Waste	≥ 1,000 kg Hazardous Waste
<b>Total Accumulation On-site</b>	≤ 1 kg Acute Hazardous Waste		> 1 kg Acute Hazardous Waste
	≤ 1,000 kg Hazardous Waste	> 1,000 kg and < 6,000 kg Hazardous Waste	≥ 6,000 kg Hazardous Waste

The following estimates will vary according to the density of the waste.  
 1 kg ≈ 1 qt  
 100 kg ≈ 27 gal (about ½ of a 55-gallon drum) or 220 lbs  
 1,000 kg ≈ 270 gal (about five 55-gallon drums) or 2,200 lbs  
 6,000 kg ≈ 1,620 gallons (about thirty 55-gallon drums) or 13,200 lbs

## WASTE – CESQG or VSQG

- **Conditionally Exempt Small Quantity Generator**
  - **New: Very Small Quantity Generators**
- **Less than 220 # Hazardous Waste for any given month**
  - **Also: Less than 2,200 pounds on site any given time**
  - **Also: Less than 1 KG (2.2 pounds) Acutely Toxic**
- **CESQG's are much less scrutinized than SQG or LQG's.**

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.  
**NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.**

Safety Equipment Used:

**WASTE EVALUATION**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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**GENERATOR CLASSIFICATION**

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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*NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.*

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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**TREATMENT OF HAZARDOUS WASTE**

4.	Does the generator treat hazardous waste in a:				
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

*NOTE: Complete appropriate checklist for each unit.*

*NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.*

*NOTE: If waste is treated to meet LDRs, use LDR checklist.*

**MIX HAZARDOUS WASTE WITH USED OIL**

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

CONDITIONALLY  
EXEMPT SMALL  
QUANTITY  
GENERATOR – TYPICAL  
INSPECTIONS

## WASTE - SMALL QUANTITY GENERATOR

- BETWEEN 220 # AND 2200 # IN A MONTH
  - Also, Less than 13,227 pounds onsite any given time
- MORE Requirements
- Must get an EPA ID#
- Must ship hazardous waste <180 days

# SQG - TYPICAL INSPECTIONS (220# - 2200# IN A MONTH)

SMALL QUANTITY GENERATOR REQUIREMENTS COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET			
CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste. SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month. LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month. NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.			
Safety Equipment Used:			
<b>GENERAL REQUIREMENTS</b>			
1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes	No
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes	No
3.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]	Yes	No
4.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	Yes	No
5.	Does the generator accumulate hazardous waste?	Yes	No
NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.			
6.	Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	Yes	No
NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]			
7.	Is the generator accumulating more than 8,000 kg on site? [3745-52-34(D)]	Yes	No
NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.			
8.	Does the generator treat hazardous waste in a:		
a.	Container that meets 3745-86-70 to 3745-86-77?	Yes	No
b.	Tank that meets 3745-86-101?	Yes	No
c.	Drip pads that meet 3745-89-40 to 3745-89-45?	Yes	No
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes	No
NOTE: Complete appropriate checklist for each unit.			
NOTE: If waste is treated to meet LDRs, use LDR checklist.			
<b>MANIFEST REQUIREMENTS</b>			
9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)]	Yes	No
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)]	Yes	No
a.	Does the contractual agreement specify the type of waste and frequency of shipment?	Yes	No
b.	Is the transport vehicle owned and operated by the reclaimer?	Yes	No

[Facility Name/Inspection Date]  
[ID number]  
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c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes	No	N/A
NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.				
11.	Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes	No	N/A
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20(A)(1)]				
12.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes	No	N/A
NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]				
13.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes	No	N/A
14.	Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes	No	N/A
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.				
15.	If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)]	Yes	No	N/A
16.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes	No	N/A
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.				
<b>PREPAREDNESS AND PREVENTION</b>				
17.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes	No	N/A
18.	Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]			
a.	Name and telephone number of emergency coordinator?	Yes	No	N/A
b.	Location of fire and spill control equipment, and, if present, fire alarm(s)?	Yes	No	N/A
c.	Telephone number of local fire department?	Yes	No	N/A
19.	Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]	Yes	No	N/A
20.	Has the facility property responded to all fires and spills? [3745-52-34(D)(5)(d)]	Yes	No	N/A
21.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste? [3745-65-31]	Yes	No	N/A
22.	Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:			
a.	Internal Alarm system? [3745-65-32(A)]	Yes	No	N/A

[Facility Name/Inspection Date]  
[ID number]  
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## WASTE – LARGE QUANTITY GENERATOR

- **LARGE QUANTITY GENERATOR**

- **> 2,200 POUNDS IN ANY MONTH = LARGE QUANTITY GENERATOR**
- **Or >1 Kg (2.2 Pounds) any ACUTELY TOXIC WASTE**
- **MUST SHIP EVERY 90 DAYS**

**LARGE QUANTITY GENERATORS MUST HAVE WASTE CONTINGENCY PLANS, DO SPECIAL EMPLOYEE TRAINING AND WILL BE SUBJECT TO MORE FREQUENT INSPECTIONS.**



# LARGE QUANTITY GENERATOR – TYPICAL INSPECTION CHECKLIST

16	Job descriptions? [3745-66-1002]	Yes	No	N/A	
17	Type and amount of training given to each person? [3745-66-1003]	Yes	No	N/A	
18	Completed training or job experience required? [3745-66-1004]	Yes	No	N/A	
21	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-66-1005]	Yes	No	N/A	

**NOTE:** The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (initials and/or on the job) may include the following: environmental coordinator, drum handlers, emergency coordinator, personnel who conduct hazardous waste inspections, emergency response team, personnel who prepare manifests, etc.

Job performed	Name of employee	Date Trained

**CONTINGENCY PLAN**

19	Does the contingency plan have a contingency plan to minimize hazards to human health or the environment from fire, explosion or any unplanned release of hazardous waste? [3745-65-5114]	Yes	No	N/A	
20	Does the plan describe the following:				
a.	Actions to be taken in response to fire, explosion or any unplanned release of hazardous waste? [3745-65-5216]	Yes	No	N/A	
b.	Arrangements with emergency authorities? [3745-65-5217]	Yes	No	N/A	
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-5218]	Yes	No	N/A	
d.	A list of all emergency equipment, including location, a physical description and brief outline of capabilities? [3745-65-5219]	Yes	No	N/A	
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-5220]	Yes	No	N/A	

**NOTE:** If the facility already has a "Spill Prevention, Control and Countermeasure Plan" under CERP Part 112 or 43 CERP Part 1310, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management emergency procedures. Complete with CAC requirements.

22	Is a copy of the plan (and revisions) kept on-site and being given to all emergency authorities that may be requested to provide emergency services? [3745-65-5221]	Yes	No	N/A	
23	Has the generator revised the plan in response to rule changes, facility equipment and personnel changes, or failure of the plan? [3745-65-5222]	Yes	No	N/A	
24	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-5223]	Yes	No	N/A	

**NOTE:** The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan (b) all operations and activities of the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to control the resources needed to implement provisions of the contingency plan.

**EMERGENCY PROCEDURES**

25	Does the facility have a procedure or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes	No	N/A	
a.	Was the contingency plan implemented? [3745-65-5116]	Yes	No	N/A	
b.	Did the facility follow the emergency procedures in 3745-65-500A through 500I?	Yes	No	N/A	

(Facility Name/Inspection Date)  
(ID number)  
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**LARGE QUANTITY GENERATOR REQUIREMENTS COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

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SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
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**NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.**

**Safety Equipment Used:**

**GENERAL REQUIREMENTS**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes	No	N/A	
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes	No	N/A	
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes	No	N/A	
4.	Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]	Yes	No	N/A	
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes	No	N/A	
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes	No	N/A	
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes	No	N/A	
8.	Does the generator accumulate hazardous waste?	Yes	No	N/A	

**NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.**

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes	No	N/A	
10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]				
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes	No	N/A	
b.	Tank that meets 3745-66-80 to 3745-66-101 except 3745-66-97(C)?	Yes	No	N/A	
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes	No	N/A	
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes	No	N/A	

**NOTE: Complete appropriate checklist for each unit.**  
**NOTE: If waste is treated to meet LDRs, use LDR checklist.**

11.	Does the generator export hazardous waste? If so:	Yes	No	N/A	
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes	No	N/A	
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes	No	N/A	
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes	No	N/A	
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes	No	N/A	

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A.	Did the generator comply with 3745-52-34(A) through 46 or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes	No	N/A	
B.	Did the generator mark the container's holding access with the correct name and the date the container was last inspected? [3745-52-34(C)(3)]	Yes	No	N/A	

**NOTE:** The visible accumulation area is limited to 60 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (see line 2 - spill for acute hazardous waste). There could be additional waste streams accumulated in one hour from different points of generation.

**LITE AND MANAGEMENT OF CONTAINERS IN 90-DAY ACCUMULATION AREAS**

42.	Are hazardous waste marked containers with the words "Hazardous Waste"? [3745-52-34(C)(3)]	Yes	No	N/A	
43.	Is the accumulation area on each container? [3745-52-34(C)(2)]	Yes	No	N/A	
44.	Are containers waste stored in containers which are:				
a.	Constructed under applicable engineering standard? [3745-52-34(C)]	Yes	No	N/A	
b.	In good condition? [3745-52-17]	Yes	No	N/A	
c.	Compatible with wastes stored in them? [3745-52-17]	Yes	No	N/A	
d.	Handled in a manner which prevents rupture/leakage? [3745-52-17(B)] [3745-52-17(C)]	Yes	No	N/A	

**NOTE:** Revised location of process summary sheets throughout the area, document on facility sign.

45.	Is the container identification process summary sheet (ID number) [3745-52-34(C)(2)] for:				
a.	Any containers contained in a log or summary? [3745-52-34(C)(2)]	Yes	No	N/A	
b.	Containers of ignitable or reactive waste stored in tank 55 (see 55 - tanks) from the facility's primary tank? [3745-52-34(C)(2)]	Yes	No	N/A	
c.	The container of ignitable waste stored in tank 55 (see 55 - tanks) from the facility's primary tank with other types of waste in a like tank, shell or other device? [3745-52-34(C)(2)]	Yes	No	N/A	
46.	Are the generator's emergency materials, if combustible wastes and materials in the same container, is done in accordance with 3745-55-17(B)? [3745-55-17(C)]	Yes	No	N/A	
47.	Is the generator's process hazardous waste an uncontrolled container that is not used to accumulate waste, but done in accordance with 3745-55-17(B)? [3745-55-17(C)]	Yes	No	N/A	

**NOTE:** ORC 3745-65-51(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the nature or concentration of ignitable waste, or incompatible waste and materials so that it does not create a significant condition that could create a hazard to the community. The generator must ensure that the waste is stored in a container that meets the design performance standard of 3745-55-11.

50.	Does the generator have a 90-day accumulation area that meets the design performance standard of 3745-55-11?	Yes	No	N/A	
-----	--	-----	----	-----	--

**NOTE:** Please provide a description of the unit and documentation provided by the generator for the file to demonstrate compliance with 3745-55-11. A description of the unit and documentation provided by the generator for the file to demonstrate compliance with 3745-55-11. A description of the unit and documentation provided by the generator for the file to demonstrate compliance with 3745-55-11.

**PRE-TRANSPORT REQUIREMENTS**

51.	Does the generator participate in hazardous waste in accordance with the requirements of 3745-52-34, 3745-52-35, 3745-52-36 and 3745-52-37?	Yes	No	N/A	
52.	Does each container (118 gallons or less) of hazardous waste meet:				
a.	ORC 3745-52-34, 3745-52-35, 3745-52-36 and 3745-52-37?	Yes	No	N/A	

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53.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-50(1)?	Yes	No	N/A	
-----	---	-----	----	-----	--

**NOTE:** ORC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

**PREPAREDNESS AND PREVENTION**

34.	Is the facility operator to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-51]	Yes	No	N/A	
35.	Does the generator have the following equipment of the facility, if it is required by the applicable standard associated with the waste?				
a.	Internal communication or alarm system? [3745-65-52(A)]	Yes	No	N/A	
b.	Emergency communication device? [3745-65-52(B)]	Yes	No	N/A	
c.	Portable fire control, spill control and decontamination? [3745-65-52(C)]	Yes	No	N/A	
d.	Water of adequate volume-pressure per documentation or facility map? [3745-65-52(D)]	Yes	No	N/A	

**NOTE:** Verify that the equipment is listed in the contingency plan.

37.	Does the generator have a procedure in place to ensure the proper operation in time of emergency? [3745-65-53]	Yes	No	N/A	
38.	Are the emergency equipment materials (inventories) recorded in a log or summary? [3745-52-34(C)(2)]	Yes	No	N/A	
39.	Are personnel having immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-52(C) [3745-65-52(A)])	Yes	No	N/A	
40.	Are there only one employee on the premises, is there immediate access to a phone (e.g., phone, land line, but not pay public) capable of summoning external services? [3745-65-52(C)]	Yes	No	N/A	

**NOTE:** The generator must ensure that the generator has immediate access to emergency or spill control equipment? [3745-52-35]

41.	Are the generator's emergency materials, if combustible wastes and materials in the same container, is done in accordance with 3745-55-17(B)? [3745-55-17(C)]	Yes	No	N/A	
42.	Are the generator's emergency materials, if combustible wastes and materials in the same container, is done in accordance with 3745-55-17(B)? [3745-55-17(C)]	Yes	No	N/A	

**SATELLITE ACCUMULATION AREA REQUIREMENTS**

43.	Does the generator ensure that visible accumulation areas:				
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes	No	N/A	
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(2)]	Yes	No	N/A	
c.	Do not exceed a total of 60 gallons of hazardous waste at any one time? [3745-52-34(C)(3)]	Yes	No	N/A	
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(4)]	Yes	No	N/A	
e.	Containers are closed, in good condition and compatible with wastes stored in the container? [3745-52-34(C)(5)]	Yes	No	N/A	
f.	Containers are marked with the words "Hazardous Waste" or other words that identify the contents? [3745-52-34(C)(6)]	Yes	No	N/A	

| 44. | Is the generator accumulating hazardous waste(s) in excess of the amount listed in the preceding question? If so: | Yes | No | N/A |  |

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(ID number)  
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## MONTHLY HAZARDOUS WASTE GENERATION LOG

(Please Copy - one for each month of the year. Save one copy as the master)

**Keep Each Month on File**

MONTH: \_\_\_\_\_

YEAR: \_\_\_\_\_

(1) Hazardous Wastes	(2) Quantity (lbs)	
Hazardous Waste Monthly Generation Total:		LBS
(3) Total Amount of Hazardous Waste Stored On Site:		LBS

(1) Include all known hazardous wastes (i.e., waste paint, spent solvent, wastes determined to be hazardous based on process knowledge or TCLP testing).

(2) You need to track the quantity of hazardous waste that you generate each month to document your hazardous waste generator category.

(3) Report the total quantity of hazardous waste stored on site. If you are nearing your storage limits (CEQSG = 2,200 lbs; SQG = 13,200 lbs) it may be time to contact your hazardous waste management service provider to arrange for off-site disposal.

Large Quantity Generator (LQG)	More than 2,200	More than 13,200
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# Comparison Table

## Generator Requirments

**Generator Requirement Summary Table**

Generator Requirements and OAC reference	Generator Category		
	CESQG	SQG	LQG
<b>Monthly Generation</b> 3745-52-34  <b>Total Accumulation On-site</b> 3745-52-34	≤ 1 kg acute hazardous waste ≤ 100 kg hazardous waste	> 100 kg and < 1,000 kg hazardous waste	> 1 kg acute hazardous waste ≥ 1,000 kg hazardous waste
<b>Hazardous Waste Determination</b> 3745-52-11	≤ 1 kg acute hazardous waste ≤ 1,000 kg hazardous waste	> 100 kg and < 6,000 kg hazardous waste	> 1 kg acute hazardous waste ≥ 6,000 kg hazardous waste
<b>EPA ID Number</b> 3745-52-12	Required through process knowledge or analysis (documentation required)	Required through process knowledge or analysis (documentation required)	Required through process knowledge or analysis (documentation required)
<b>Accumulation Time</b> 3745-51-05 3745-52-34	No applicable requirement	Required	Required
<b>Generator Treatment</b> 3745-52-34	None 3745-51-05	180 days or 270 if the TSDF is > 200 miles away (30 day extension also available) 3745-52-34(D) to (F)	90 days (30 day extension also available) 3745-52-34(A)
<b>Satellite Accumulation</b> 3745-52-34  <b>Container Management</b> 3745-66-70 to 77	Permissible on-site but must follow LQG requirements  No applicable requirement	Can treat hazardous waste on-site for up to 180 days  Up to 55 gallons of non-acute or 1 quart of acutely hazardous waste at or near the point of generation  Good condition compatible with waste labeled as hazardous waste maintain aisle space and lids conduct weekly inspections label accumulation start date (unless a satellite accumulation area)	Can treat hazardous waste on-site for up to 90 days  Up to 55 gallons of non-acute or 1 quart of acutely hazardous waste at or near the point of generation  Good condition compatible with waste labeled as hazardous waste maintain aisle space and lids subparts AA, BB and CC apply conduct weekly inspections label accumulation start date (unless a satellite accumulation area)
<b>Tank Management</b> 3745-66-90 to 99 and 3745-66-101	No applicable requirement	Good condition compatible with waste labeled as hazardous waste accumulation start date tracked daily inspections 3745-66-101	Good condition compatible with waste labeled as hazardous waste accumulation start date tracked daily inspections subparts AA, BB and CC apply secondary containment is required

**Generator Requirement Summary Table**

Generator Requirements and OAC reference	Generator Category		
	CESQG	SQG	LQG
<b>Pre-Transport Requirements</b> 3745-52-30 to 33	No applicable requirement	Packaging Labeling Marking Placarding	Packaging Labeling Marking Placarding
<b>Personnel Training</b> 3745-65-16	No applicable requirement	All employees must be thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities 3745-52-34(D)(5)(c)	Required with annual refresher
<b>Emergency Equipment</b> 3745-65-30 to 37	No applicable requirement	Internal communication or alarm system Telephone or two-way radio Fire, spill control and decontamination equipment	Internal communication or alarm system Telephone or two-way radio Fire, spill control and decontamination equipment
<b>Emergency Procedures &amp; Contingency Plan</b> 3745-65-51 to 56	No applicable requirement	Written plans are not required. Emergency procedures required 3745-52-34(D)(5)(d)	Written contingency plan and emergency procedures required
<b>Recordkeeping</b> 3745-52-40	Records of waste evaluation	Manifests LDR notification Exception reports Waste evaluation (kept on-site for at least 3 years)	Manifests LDR notification Exception reports Training records Annual reports Waste evaluation (kept on-site for at least 3 years)
<b>Manifesting</b> 3745-52-20 to 23	No applicable requirement	Required	Required
<b>Exception Reports</b> 3745-52-42	No applicable requirement	Notify and send a copy to Ohio EPA within 60 days	Contact the transporter and/or destination facility within 35 days and send report to Ohio EPA within 45 days
<b>Land Disposal Restriction Determination</b> 3745-270-07	No applicable requirement	Determine if waste must be treated before it can be land disposed (or write on manifest that a determination has not been made)	Determine if waste must be treated before it can be land disposed (or write on manifest that a determination has not been made)
<b>Land Disposal Restriction Notification</b> 3745-270-07	No applicable requirement	One-time written notice to each TSDF receiving your hazardous waste	One-time written notice to each TSDF receiving your hazardous waste
<b>Annual Reports</b> 3745-52-41	No applicable requirement	No applicable requirement	Required by March 1st

## Hazardous Waste Codes

- Characteristic Waste Codes (Laboratory)
  - D001 – D043
  - All have a physical/measurable characteristic
- Listed Waste Codes
  - Hazardous because associated with a process or a pre-defined commercial chemical product
  - F-Listed Codes (Processes)
  - K-Listed Codes (Processes)
  - U-Listed Codes (Toxic Commercial Chemicals)
  - P-Listed Codes (Acutely Toxic Commercial Chemicals)

# Waste Evaluation

## Land Disposal Restriction / Underlying Hazardous Constituents

- Once you have determined the Hazardous Waste Cods, then additional restrictions apply.
- Non-Wastewater or Wastewater
- Subcategories
- What Treatment Method must be utilized?
- Does the waste contain UHCs that exceed restricted levels?  
Example: Vanadium



4600 Brookpark Road  
Cleveland, OH 44134  
216-642-1311, fax 216-642-1474

### Land Disposal Restriction & Certification Form

Generator Name: \_\_\_\_\_ U.S. EPA ID No.: \_\_\_\_\_  
Generator Address: \_\_\_\_\_ Disposal Facility: \_\_\_\_\_  
Manifest Doc. No.: \_\_\_\_\_

#### Instructions

Column 1: Identify all U.S. EPA hazardous waste codes that apply to this waste shipment.  
Column 2: Choose the appropriate treatability group: Non-Wastewater (NWW) or Wastewater (WW). **If no choice is made, NWW will be assumed.**  
Column 3: Enter the appropriate Subcategory, if applicable, and also enter "Contaminated Soil" or "Debris" if the waste will be treated using one of the alternative treatment technologies provided by 268.49 (c) - soil, or 268.45 - debris.  
Column 4: Enter the letter of the appropriate paragraph from pages 1-2 of this form.  
Column 5: For F001 - F005, F009, D001 - D003, Debris and Contaminated Soil, please enter the same any constituents in your waste stream subject to treatment.  
**If applicable and no constituents are listed, the waste will be presumed to contain all UHC/LDR constituents.**

Manifest Line Item	U.S. EPA Hazardous Waste Code (s)	NWW or WW	Subcategory	How Must the Waste be Managed	Name of Hazardous Constituents contained in the waste. Complete for F001-F005, F039, D001-D043, Soil and Debris wastes.
9b-1	D001	NWW	D001 - IGNITABLE - HIGH TOC	A	(01) BENZ(a)PYRENE (03) URANIUM HEXAFLUORIDE (04) BENZ(b)FLUORANTHENE (12) FLUORANTHENE (16) PHENANTHRENE (20) CHRYSENE (23) INDIANO (1,2,3-CU)PYRENE
9b-2	D001	NWW	D001 - IGNITABLE - HIGH TOC	A	(01) BENZ(a)PYRENE (03) URANIUM HEXAFLUORIDE (04) BENZ(b)FLUORANTHENE (12) FLUORANTHENE (16) PHENANTHRENE (20) CHRYSENE (23) INDIANO (1,2,3-CU)PYRENE
9b-3					
9b-4					

I hereby certify that all information submitted on this and all associated documents is complete and accurate to the best of my knowledge and information.

Generator Signature: \_\_\_\_\_ Title: \_\_\_\_\_  
Printed Name: \_\_\_\_\_ Date: \_\_\_\_\_

#### How Must the Waste Be Managed?

- S. THIS CONTAMINATED SOIL DOES / DOES NOT CONTAIN LISTED HAZARDOUS WASTE AND DOES / DOES NOT EXHIBIT A CHARACTERISTIC OF HAZARDOUS WASTE AND IS SUBJECT TO / COMPLIES WITH THE SOIL TREATMENT STANDARDS AS PROVIDED BY 268.49(c) OR THE UNIVERSAL TREATMENT STANDARDS. I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited wastes. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
- A. THIS RESTRICTED WASTE REQUIRES TREATMENT TO THE APPLICABLE STANDARD. This waste must be treated to the applicable performance based treatment standard set forth in 40CFR Part 268 Subpart C, 268.32, Subpart D, 268.40 or RCRA Section 3004(d) prior to land disposal.
- B. THIS HAZARDOUS DEBRIS IS SUBJECT TO THE ALTERNATIVE TREATMENT STANDARDS OF 40 CFR 268.45.

## Land Disposal Restriction / Underlying Hazardous Constituents

- Example Land Disposal Restriction – UHC form.
- Several hundred UHC's are possible.

Manifest Line Item	U.S. EPA Hazardous Waste Code (s)	NWW or WW	Subcategory	How Must the Waste be Managed	Name of Hazardous Constituents contained in the waste. Complete for F001-F005, F039, D001-D043, Soil and Debris wastes.
9b-1	D001	NWW	D001 - IGNITABLE - HIGH TOC	A	(022) BENZO(A)PYRENE (063) DIBENZ(A,H)ANTHRACENE (023) BENZO(B)FLUORANTHENE (112) FLUORANTHENE (166) PHENANTHRENE (052) CHRYSENE (123) INDENO (1,2,3-C,D) PYRENE
9b-2	D001	NWW	D001 - IGNITABLE - HIGH TOC	A	(022) BENZO(A)PYRENE (063) DIBENZ(A,H)ANTHRACENE (023) BENZO(B)FLUORANTHENE (112) FLUORANTHENE (166) PHENANTHRENE (052) CHRYSENE (123) INDENO (1,2,3-C,D) PYRENE



# Special Categories

## (Does NOT Count toward Generator Status)

- Universal Waste
  - Batteries (Ni-Cad) – Many are straight Recycling
  - Agricultural Pesticides
  - Mercury-Containing Equipment
  - Bulbs (Lamps)
- Universal Waste Management Rules/Standards (40 CFR 261.5 (C) (6))
  - Small Quantity Handler (<11,000 lbs any one time)
  - Large Quantity Handler (>11,000 lbs any one time)
  - UW Transporter
  - Destination Facility
- Tires (Indiana Code 13-20-14-5.3)
  - Generators: Anyone who is source of >12 tires / year – Keep records at least 1 year
  - Processors: Required to have registration/financial assurance; records; contingency plan, etc.

## Special Categories

### (Do NOT Count toward Generator Status)

- Used Oil - Huge Waste Stream
  - Article 13 of the Indiana Administrative Code ([329 IAC 13\[PDF\]](#)), to encourage the recycling of used oil and promote its environmentally sound collection, storage, and management
  - Definition: Used oil is defined as any oil that has been refined from crude oil, or is a synthetic oil, and has been used and, as a result of such use, is contaminated by physical or chemical impurities. Used oils may include lubricants, hydraulic fluids, and heat transfer fluids, including commonly generated oils such as motor oil, hydraulic oils, metalworking oils, wire drawing solutions, refrigeration oil, or electrical insulating oil. Oil wastes originating from **unused oil**, oils used solely for their solvent properties, and animal and vegetable oils are not regulated as used oil. The facility must then determine if the waste is hazardous pursuant to [40 CFR 262.11](#), unless the oil is generated from a household, and manage the waste accordingly.

# Special Categories

## (Does NOT Count toward Generator Status)

- Used Oil
  - MUST be Recycled
  - Can't be mixed with Hazardous Waste
  - Must be Less Than 1,000 ppm Total Halogens\*
  - No Dust Suppression
  - Used oil that is NOT recycled is subject to applicable hazardous or solid waste rules.
  
- Used Oil Rule Categories
  - Used oil generators (minimal container management, on-site burning, spill cleanup, off-site shipments)
  - Used oil collection centers and aggregation points (same as for generators)
  - Used oil transporters and transfer facilities (includes additional recordkeeping, container and tank management, and storage time limits)\*
  - Used oil processors and re-refiners (additional recordkeeping, container and tank management, analysis plan, and emergency preparedness) \*
  - Used oil burners (off-specification used oil for energy recovery - additional recordkeeping)\*
  - Used oil fuel marketers (recordkeeping)\*
    - \*Notification to IDEM required.

# Special Categories

(Does NOT Count toward Generator Status)

- RCRA Empties
  - Container have been emptied through conventional means (pouring, pumping, draining)
  - < 1 inch, < 3% by weight (for <110 gal containers), < 0.3% by weight (>110 gal containers)
  
- Areas Not discussed today
  - Asbestos
  - Lead Based Paint
  - Radioactive
  - Covid/Biological
  - On site treatment



## Be Prepared: Waste Filing/Records

### File System #1 – **Shipping Documents**

- Manifests – Hazardous
- Bills of Lading-Non-hazardous
- Minimum 3 years
- Not good enough to leave them in the billing department
- These files restart each year

### File System #2 – **Waste Streams**

- Treat like Employee Files
- Profiles
- Analysis
- SDS
- Keep forever to defend how you ship as haz or non-haz

Oily Solids – AntiFreeze – Used Oil / Fuels – Aerosol Wastes – Universal Lamps & Batteries –  
Paint Liquids and Sludges – Sanding Waste – Brake Cleaner – O/W Separators – More

CHARGE: [REDACTED]

SHIP TO: [REDACTED] SALES #: [REDACTED]

CSI CUSTOMER NUMBER\*: [REDACTED]

\*IF CUSTOMER IS NEW PLEASE COMPLETE "NEW CUSTOMER INFORMATION FORM".

**GENERATOR INFORMATION**

GENERATOR NAME: Weekend Update, LLC	CUSTOMER NAME:
12345 Improv. Street	
Pleasantville, Ohio 12345	
SITE: [REDACTED]	
PHONE: (614)123-4567	PHONE:
USEPA ID OHD123456789	E-MAIL: [REDACTED]
TECHNICAL CONTACT: Norm MacDonald	BILLING CONTACT:
TITLE [REDACTED]	PO # [REDACTED]

**GENERAL WASTE INFORMATION**

WASTE NAME: LP 107 ACID ORGANIC      KNOWN WASTE CODES: D002 [REDACTED] [REDACTED] [REDACTED]

UN3265, WASTE CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S., 8, PGII (BENZOIC ACID), ERG 153

PROCESS GENERATING WASTE: [REDACTED]

RCRA NON-HAZARDOUS EXEMPT?  Yes  No    If yes, please provide appropriate citation: [REDACTED]

USED OIL?  Yes  No    If yes, does oil contain chlorinated paraffins?  Yes  No

SPENT LAMPS?  Yes  No    If yes,  Lamps should be managed as Universal Waste  Lamps must be managed as Hazardous Waste

ANTICIPATED VOLUME: [REDACTED] GALLONS    [REDACTED] POUNDS    [REDACTED] CUBIC YARDS

PER:  ONE TIME     WEEK     MONTH     QUARTER     YEAR

METHOD OF SHIPMENT:  BULK LIQUID     BULK SOLID     BOX/TUBE     DRUM    TYPE & SIZE:

DISPOSITION OF WASTE     DISPOSAL     REUSE\*     TURNAROUND\*\*     INCINERATION ONLY

\*SIGNED REUSE AGREEMENT REQUIRED \*\*IF MATERIAL IS FOR TURN AROUND PLEASE SUBMIT T/A SPECS

**PHYSICAL PROPERTIES**

1. ODOR:  NONE     MILD     STRONG    DESCRIPTION: [REDACTED]

2. COLOR: Amber    3. pH:  NA     <2     2-4     4-10     10-12.5     >12.5

4. FLASHPOINT:  <73F     73-100F     100-140F     140-200F     >200F     NONE    5. OXIDIZER:  YES     NO

6. PHYSICAL STATE @ 70F:  LIQUID     SLUDGE     SEMI-SOLID     SOLID     POWDER

7. LAYERS:  SINGLE PHASE     BI-LAYERED     MULTI-LAYERED

8. DOES THE WASTE CONTAIN ANY OF THE FOLLOWING:    IF YES, ATTACH DOCUMENTATION

- PCB'S     YES     NO    - INSECTICIDES, PESTICIDES, HERBICIDES, OR RODENTICIDES     YES     NO

- INFECTIOUS OR BIOLOGICAL WASTE?     YES     NO    - NRC REGULATED ACTIVITY?     YES     NO

- IS MATERIAL SUBJECT TO NATIONAL EMISSION STANDARDS FOR BENZENE WASTE OPERATIONS (40 CFR 61 SUBPART FF)?     YES     NO

9. REACTIVITY

None     Water Reactive     Pyrophoric     Shock Sensitive     Cyanides     DOT Explosive     Sulfides    Other:

**SAMPLE AND MSDS INFORMATION**

TYPE OF SAMPLE:  NONE     GRAB     COMPOSITE    MSDS INCLUDED:  Yes     No

**CERTIFICATION:**

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability. The characterization of this waste stream has no willful omissions of composition or properties, and all known or suspected hazards have been disclosed. I also certify that any sample provided for testing used to substantiate the information on this form is representative of all materials described.

Signature: \_\_\_\_\_    Printed Name: [REDACTED]    Date: [REDACTED]

Title: [REDACTED]    Company: \_\_\_\_\_

# Example: Hazardous Waste Profile

# Example: Hazardous Waste Manifest

## Documents Each and Every Shipment

Please print or type Form Approved OMB No. 2050-0038

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number	2. Page 1 of 1	3. Emergency Response Phone	4. Manifest Tracking Number	
		<b>JJK</b>				
5. Generator's Name and Mailing Address <small>Generator's Site Address (if different than mailing address)</small>						
Generator's Phone						
6. Transporter 1 Company Name				U.S. EPA ID Number		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address				U.S. EPA ID Number		
Facility's Phone						
<b>GENERATOR</b>	9a. HAZ	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type	11. Total Quantity	12. Unit M. Abt.	13. Waste Codes
	1					
	2					
	3					
	4					
14. Special Handling Instructions and Additional Information						
15. <b>GENERATOR/SHIPPER'S CERTIFICATION:</b> I hereby declare that the contents of this assignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/segregated, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and/or on the Priority Exporter, I certify that the contents of this assignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste information statement identified in 40 CFR 263.23(a) (1) on a large quantity generator or (2) (2) on a small quantity generator is true.						
Generator/Shipper's Printed (Type) Name			Signature		Month Day Year	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. <input type="checkbox"/> Part of another Date being U.S.						
Transporter Signature (for exports only)						
<b>17. Transporter Acknowledgment of Receipt of Materials</b>						
Transporter 1 Printed (Type) Name			Signature		Month Day Year	
Transporter 2 Printed (Type) Name			Signature		Month Day Year	
<b>18. Emergency</b>						
Has Emergency Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Reaction <input type="checkbox"/> Full Reaction						
Manifest Reference Number						
19a. Alternate Facility (or Generator)				U.S. EPA ID Number		
Facility's Phone						
19b. Signature of Alternate Facility (or Generator)					Month Day Year	
<b>DESIGNATED FACILITY</b>						
20. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
21. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except provided in item 19a.						
Printed (Type) Name			Signature		Month Day Year	

# Two Quick Example Waste Streams



## Example: Metal Preparation – Sanding / Sandblast Waste

- Heavy Metals: Barium, Chromium, Lead in Paint
- Often Hazardous Waste Levels
- Crossover issue - Safety: Must wear respirators approved



## Example: Brake Cleaner

- Spent Solvents used in Cleaning – F003/F005
- Hazardous by Process
- Option: Use Absorbant Pads and collect solvent in a separate, Steel open top drum; or, Collect in a SEPARATE pail and manage with waste liquids
- Must manage as Hazardous waste; **DO NOT DISCHARGE**



## **Additional Complication – Vapor Intrusion by Chlorinated Solvents**

Tetrachloroethylene is found in brake cleaner. Tetra (which is mobile and vapor intrusion risk in its own right), breaks down to TCE, DCE and vinyl chloride. PCE, TCE and vinyl chloride contamination, is highly mobile and can cause significant vapor intrusion issues.

A new study showed TCE exposure to woman of child bearing years and pregnant women presents a short term acute risk.

As a result, States re-evaluated sites with TCE contamination.

- Ohio EPA issues letters to all **closed** cleanup sites with TCE contamination requesting, in many cases, to reopen those sites.
- Massachusetts Department of Environmental protection reviewed 1,000 closed cleanup sites with TCE contamination

Recent Case: TCE was used for testing in a lab and only small drips where ever released. Due to the mobility of the contaminant testing showed contamination that presented un unacceptable vapor intrusion risk.

**Bottom line, poor handling of these chemicals can result is significant liability risks to the company.**

# Conclusion

- #1 Responsibility of all Generators is to Evaluate your Waste
- Document each waste stream so you can answer the question “How do you know”
- Store each waste manifest by year (Save at least 3 years)
- Know your Generator Status and fulfill the necessary requirements at each stage

# Q & A

- Further Questions/Comments

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