GENERATOR CLASSIFICATIONS and REQUIREMENTS

Kansas Department of Health and Environment
Bureau of Waste Management
FOUR CLASSES OF GENERATORS

• Conditionally Exempt Small Quantity Generator (CESQG) (less than 55 lbs/month)
• Kansas Small Quantity Generator (KSQG) (55 lbs or more but less than <220 lbs/month)
• Small Quantity Generator (SQG) (220 lbs/month or more but less than 2,200 lbs/month)
• Large Quantity Generator (LQG) (2,200 lbs/month or more)
ACUTELY HAZARDOUS WASTE (P-LISTED)

- Anyone who generates or accumulates 2.2 lbs (1 kg) or more of acutely hazardous waste in a calendar month is a LQG.
- Containers holding acutely hazardous wastes must be triple rinsed to be considered RCRA empty. The rinseate must be managed as acutely hazardous waste (or beneficially used).
ALL GENERATORS

• Must conduct hazardous waste determinations on all waste streams
• Must document all hazardous waste determinations (and keep for 3 years from the date the waste is last sent off-site)
• Must know how much of each hazardous waste stream is generated each month
• Must properly dispose of all wastes
NON-ACCUMULATING CESQG

• CESQG who accumulates less than 55 pounds on-site must:
  – Dispose of their hazardous waste in a manner that is protective of the environment (municipal solid waste landfill, household hazardous waste facility (HHW) permitted for CESQG waste, Treatment Storage Disposal Facility (TSDF)).
ACCUMULATING CESQG

• CESQG who accumulates 55 pounds or more on-site must:
  – Conduct monthly inspections of hazardous waste storage containers and document the inspections.
  – Dispose of hazardous waste at an approved site (HHW permitted for CESQG waste or a TSDF).
KSQG Only

- Must conduct monthly inspections of hazardous waste storage containers and document the inspections.
- Unless transporting their own hazardous waste to a HHW permitted for KSQG waste, must:
  - Use a registered hazardous waste transporter
  - Use a hazardous waste manifest when shipping off-site
  - Send an initial Land Disposal Restriction (LDR) notice for each waste stream to each disposal facility
- If exceed 2,200 pounds of hazardous waste on-site, then must meet SQG requirements.
KSQG and SQG and LQG

- Must obtain an EPA Identification Number from KDHE
- Must update Notification form within 60 days of information changing
- Must pay an annual monitoring fee to KDHE
- Must retain records (inspection logs, manifests, LDRs, analysis, etc.) for 3 years
- Must meet pre-transport requirements
• Preparedness and prevention requirements:
  – Equip the facility with:
    • Internal communications or alarm system
    • A device such as a telephone or hand-held two-way radio capable of summoning emergency assistance from local emergency responders
    • Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment
    • Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems
KSQG and SQG and LQG

• Preparedness and prevention requirements (Continued):
  – Maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste.
  – Test and maintain all emergency and communications equipment to assure proper operation in emergency.
  – Personnel must have immediate access to internal alarm or emergency communication device when handling hazardous waste.
KSQG and SQG and LQG

• Preparedness and prevention requirements (Continued):
  – Maintain aisle space to allow unobstructed movement in an emergency
  – Make arrangements with local emergency organizations including:
    • Familiarize police, fire departments, and hospitals with facility, hazardous waste handled, etc.
    • Where more than one department might respond, designate one as the primary emergency authority.
    • Maintain agreements with state emergency response teams, emergency response contractors, and equipment suppliers as necessary.
KSQG and SQG Only (Not LQG)

• Preparedness and prevention requirements (Continued):
  – Have an emergency coordinator on-site or on call at all times who can respond to any emergency that arises and meet the response requirements of 40 CFR 262.34(d)(5)(iv).
KSQG and SQG Only (Not LQG)

• Preparedness and prevention requirements (Continued):
  – Post the following information next to at least one telephone:
    • The name and telephone number of emergency coordinator
    • Location of fire extinguishers and spill control material and fire alarm (if present)
    • The telephone number of the fire department (unless direct alarm available) (911 is sufficient)
    • If the generator relies solely on cell phones, the information listed above must be posted on walls so that they can be readily seen by employees. Employees shall be trained on the locations of these postings. Management personnel shall have these numbers programmed into their cell phones.
KSQG and SQG Only (Not LQG)

• Ensure that all personnel are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies
  – Initial training within 6 months of hire
  – Annual training after initial training
  – Training documented and maintained for 3 years
SQG and LQG Only (Not KSQG)

- Must use a registered hazardous waste transporter
- Must use a hazardous waste manifest when shipping hazardous waste off-site
- Must send an initial Land Disposal Restriction (LDR) notice for each waste stream to each disposal facility
- Must conduct weekly inspections of hazardous waste storage containers and document the inspections
SQG ONLY

• Store hazardous waste on-site for 180 days or less or 270 days or less if the generator must transport hazardous waste 200 miles or more for off-site treatment, storage or disposal.

• If exceed 13,200 lbs (6,000 kg) of hazardous waste on-site, then must meet TSDF requirements (obtain a permit).
LQG ONLY

• Store hazardous waste on-site for 90 days or less.
• File biennial reports as required by 40 CFR 262.41.
• Prepare and maintain a contingency plan:
  – Describe emergency response actions
  – Describe arrangements with emergency response agencies
  – List names, addresses, and phone numbers of all emergency coordinators
  – List emergency equipment and describe equipment capabilities
  – Describe evacuation plan
  – Submit copies of the plan and any revisions to outside agencies
LQG ONLY

• Provide and document personnel training. Required documentation includes:
  – Job titles and job descriptions, which must include hazardous waste duties
  – Name of the person filling each position
  – Description of the type and amount of training, both introductory (within 6 months) and continuing (annual), to be given
  – Records of training given
QUESTIONS???