

HAZARDOUS WASTE MANAGEMENT

**hazardous
waste**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

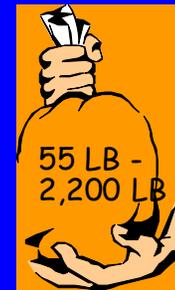
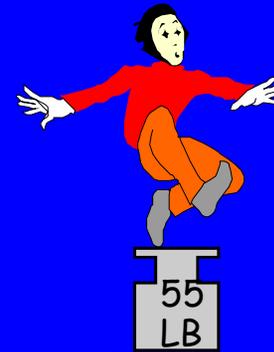
GENERATOR INFORMATION:
NAME _____
ADDRESS _____
CITY _____ STATE _____ ZIP _____
EPA / MANIFEST
ID NO. / DOCUMENT NO. _____ / _____
ACCUMULATION START DATE _____ EPA WASTE NO. _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX
handle with care!

Kansas Department of Health and Environment
Bureau of Waste Management

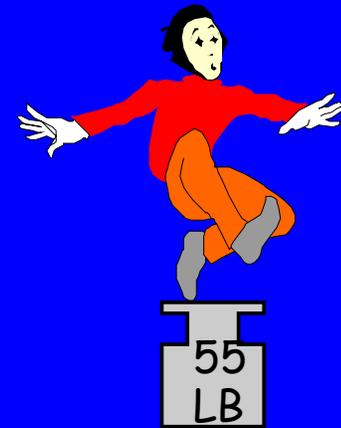
THREE TYPES OF GENERATORS

- Small Quantity Generator
(less than 55 lbs/month)
- Kansas Generator
(55 lbs to <2,200 lbs/month)
- EPA Generator
(2,200 lbs/month or more)



SMALL QUANTITY GENERATOR

- Must determine what wastes are hazardous and the total quantity generated in a month
- Must properly dispose of all waste
- SQGs that accumulate 55 lbs or more HW are subject to the following:
 - Pretransport requirements
 - Dating and labeling requirements
 - Weekly inspection requirements



KANSAS GENERATOR

- Must determine what wastes are hazardous and the total quantity generated in a calendar month (no averaging)
- Must obtain an EPA Identification Number from KDHE
- Must pay an annual monitoring fee to KDHE
- Must use a registered hazardous waste transporter
- Must meet pre-transport requirements

KANSAS GENERATOR

- Must manifest HW when shipping off-site
- Must send an initial Land Disposal Restriction (LDR) notice for each waste stream to each disposal facility.
- Must retain records (manifests, inspection logs, LDRs, analysis, etc.) for 3 years



KANSAS GENERATOR

- Must meet storage requirements for containers and tanks (labeled “Hazardous Waste”, dated, closed, in good condition)
- Provide for preparedness and prevention by taking certain precautions (notify hospitals, emergency personnel about types of waste handled or potential injuries)
- Meet emergency preparedness requirements (contact person, post emergency numbers, etc.)
- Must train personnel so they are familiar with HW management requirements

ACCUMULATION LIMITS

Any Small Quantity or Kansas Generator who accumulates 2,200 pounds or more of hazardous waste or 2.2 pounds or more of acutely hazardous waste on site is immediately subject to all EPA generator requirements.

ACCUMULATION TIME

- Accumulation time is also called storage time in Kansas. This is the amount of time that hazardous waste can be in storage at your facility without a permit.

ACCUMULATION TIMES

- Small Quantity and Kansas Generators: No accumulation time as long as you do not accumulate 2,200 lbs or more on-site. (This will be changing for some of these generators under the impending regulation changes).
- EPA Generators: Cannot accumulate/store waste for more than 90 days without a permit.

ACCUMULATION TIMES

- Accumulation times do not apply to waste that is in a satellite accumulation area (Kansas and EPA Generators)
- Satellite accumulation is defined:
As many as 55 gallons of each type of hazardous waste or one quart of acutely hazardous waste in no more than one container at or near any point of generation and that is under the control of the operator.

STORAGE vs ACCUMULATION



- A ≤ 90 day accumulation area and a ≤ 90 day storage area are the same.
- A hazardous waste storage area and a < 90 day storage area are the same.
- Storage over 90 days by an EPA generator in Kansas requires a permit.
- A satellite accumulation container is NOT the same as a storage container.
 - Satellite accumulation container is often referred to as a satellite container.

STORAGE vs SATELLITE

- Satellite containers must be:
 - marked “Hazardous Waste” when waste is first added to the container.
 - marked with the Accumulation Start Date when the container is full, when a second container of the same waste stream is started, or when 55 **GALLONS** (not pounds) is exceeded.
 - moved to the storage area within 3 days of becoming full (or no longer meeting the definition of satellite).
 - Alternatively, the container can be left in the satellite area and managed as a storage container.

STORAGE vs SATELLITE

- Storage Containers
 - Must be marked “Hazardous Waste” when waste is first added to the container.
 - Marked with the Accumulation Start Date (the date storage began).
 - Inspected weekly for condition, labeling, compatibility, etc.
 - Weekly inspections must be documented.

GOOD EXAMPLE



DEC 3 2003

OPEN CONTAINERS



OPEN CONTAINER

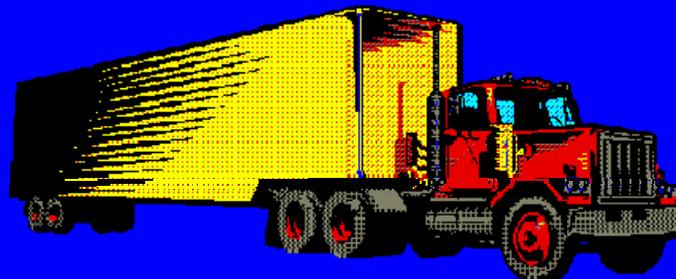


POOR CONDITION AND OPEN



Pre-Transport Requirements

- Have placards available for transporters
- Prior to shipping:
 - Package waste in proper DOT containers
 - Label each container per DOT regulations
 - Mark each container per DOT regulations



MAINTAIN RECORDS FOR THREE YEARS

- Signed copies of manifests
- Manifest exception reports
- Waste analysis
- Land Disposal Restrictions
- Inspection logs
- Training documents (EPA generators)
- Biennial reports (EPA generators)



PREPAREDNESS AND PREVENTION

- Provide proper maintenance
- Provide internal alarms and communications
- Provide personnel with access to communications
- Maintain sufficient aisle space
- Familiarize response agencies

KG EMERGENCY REPONSE REQUIREMENTS

- Name an emergency coordinator
- Duties of emergency coordinator:
 - Call fire department or extinguish fire
 - Contain and clean up spills
 - Notification to:
 - Response center 1-800-424-8802
 - KDHE 785-296-1679
 - Post Information by Telephone
- Employee Training



EPA GENERATORS

- Must meet the requirements for a Kansas Generator (except KG Emergency Response Requirements) plus:
- More extensive personnel training requirements
- Prepare and maintain a contingency plan (submit it to outside agencies)

EPA GENERATOR PERSONNEL TRAINING

- Job titles and job descriptions – must include hazardous waste duties
- Description of the training, including introductory and continuing (annual) training
- Records of training



EPA GENERATOR CONTINGENCY PLAN

- Describe emergency response actions
- Describe arrangements with emergency response agencies
- Name emergency coordinator
- List and description of emergency equipment
- Evacuation plan
- Copies of the plan submitted to outside agencies

UNIFORM HAZARDOUS WASTE MANIFEST SYSTEM

- Kansas is following the federal requirements for the new system (i.e. there are no special requirements in Kansas)
 - Kansas has no special waste codes
 - KDHE does not need to be copied on each manifest
- The new manifest system became effective on September 5, 2006
- Manifests have to be printed by registered companies
- A pre-printed 12-digit tracking ID will be on each manifest (3 letters, 9 numbers)

QUESTIONS???