2017 Hazardous Waste Generator Workshop Basic Course

Our Mission: To protect and improve the health and environment of all Kansans.
Disclaimer

This will not be a substitute for your training requirements.

Job specific training is required to meet the requirements under RCRA.
Topics For This Morning

Introduction to RCRA
Waste determinations
  • What is a waste
  • What defines a solid waste
  • Exemptions
  • Hazardous Waste Generator Classifications

On-site Management
  • Containers
  • Training
  • Emergency Preparedness

Navigating KDHE Website
  • Resources
  • CAVs

Our Mission: To protect and improve the health and environment of all Kansans.
INTRODUCTION TO RCRA

RCRA – Resource Conservation and Recovery Act

• “Cradle to Grave” Law (Point of generation until final disposal)
  • All wastes must be evaluated and properly managed.
  • Responsibility falls to everyone handling, managing, and otherwise in possession.
  • Ignorance of the law is not an excuse.
Why?

To protect human health and the environment by ensuring responsible management of hazardous and nonhazardous waste.
INTRODUCTION TO RCRA

• Purpose was to create responsible disposal options and encourage recycling/reuse.

1980 – EPA implements regulations.
• Created a set of rules to ensure the proper handling and disposal of “solid waste.”
INTRODUCTION TO RCRA

1982 – Kansas Hazardous Waste Program begins

April 29, 2011 – Major revisions to the Kansas Hazardous Waste Program.

2013 – Technical revisions and adoption of RCRA Corrective Action.

Additional adoptions and revisions are coming (will be discussed this afternoon).

Our Mission: To protect and improve the health and environment of all Kansans.
How does RCRA work?

- Hazardous Waste
- Universal Waste
- Solid Waste

Our Mission: To protect and improve the health and environment of all Kansans.
Waste Management

Mission - To minimize the health and environmental impact associated with the generation, storage, transportation, treatment, and disposal of all solid and hazardous wastes in Kansas.

Upcoming Events
- WORKS! 2017, June 19-21, Lawrence, KS
- Household Hazardous Waste 6-Hour On-Line Refresher Course
- 2017 Hazardous Waste Generator Workshops

Forms
- All Solid Waste & Hazardous Waste Forms
- Solid Waste Facility - Planning - Activities Not Requiring a Permit - Disaster - Financial Assurance - Grants - Hazardous Waste

Announcements and News

Compliance, Assistance, & Enforcement

Waste Mgmt Links
- Contact Us
- BWM Staff Listing
- What's New
- Keep It Clean Kansas Calendar
- June Revision
- Events
- Workshops, Training, Special Events
- Frequently Used Forms
- All Forms
- Disaster Response Forms and Information
- Disposal Without a Permit
- Generator Liquid Waste Profile Sheet
- Kansas Open Records Request (KORA)
- Request a Compliance Assistance Visit
- Mausoleum Permitting
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<td>- Solid &amp; Hazardous Waste Compliance Documents</td>
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<td>- Medication Disposal Participant Survey</td>
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<td>- Medication Disposal Reporting form</td>
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<td>- Pharmacy Participation Application</td>
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<td>- Statutes and Regulations</td>
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| Request a Compliance  |
| Assistance Visit  |
| Mausoleum Permitting  |
| Solid & Hazardous Waste Compliance Documents  |
| Special Waste Disposal Request  |

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<td>Debris Management Plan</td>
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<td>Ebola Waste is &quot;Hazardous&quot; - Secretary's Policy</td>
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<td>Land-Spreading Oil and Gas</td>
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<td>Drilling Waste</td>
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<td>Medication Disposal Options</td>
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<td>Safe Disposal of Medical Sharps</td>
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<td>Solid Waste Tonnage Reporting</td>
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<td>Stormwater Rules at SW Facilities</td>
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<th>Websites</th>
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<td>Get Caught Recycling</td>
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<td>Kansas E-Waste</td>
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<td>Kansas Recycles</td>
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<tr>
<td>Kansas Organization of Recyclers</td>
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<td>Video Showcase</td>
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Where to start?

Hazardous Waste Generator Handbook
• Available on our website
• Contains
  • Guide to complying with the regulations
  • Technical Guidance Documents
  • Example forms
  • Training Guide/Manual
Where to start?

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<tr>
<th>Waste Determinations</th>
<th>On-Site Management</th>
<th>Disposal</th>
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<td>• Notification</td>
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<td>• Is it a solid waste?</td>
<td>• Container Management</td>
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<td>• Is it hazardous?</td>
<td>• Record Keeping</td>
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<td>• How much are you generating?</td>
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<td>• Generator Classification?</td>
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<td>• Emergency Preparedness</td>
<td>• Land Disposal Restrictions (LDRs)</td>
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Our Mission: To protect and improve the health and environment of all Kansans.
Waste Determinations

Required at the point of generation, prior to any dilution, mixing, or other alteration of the waste occurs, and any point thereafter where exposure or other factors may have changed the properties of the waste.

This includes any process changes that occur after a determination has been made.
Waste Determinations

Step 1: Identify your wastes

What are your waste streams?

What do you discard?

What gets recycled?

What off-spec products/by-products?

What is no longer of value to your process?
Waste Determinations

Step 2: Identify your “solid wastes”

What is a solid waste?
• Anything (solid, liquid, or gas) that has been discarded
  • Abandoned (disposed, burned, accumulated, or stored)
  • Recycled (recovered, regenerated, etc.)
  • Inherently waste-like
• Is not excluded by §261.4(a)

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Disposed

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Burned
(Furnace, Energy Recovery, etc.)
Accumulated or Stored

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Recycled

Our Mission: To protect and improve the health and environment of all Kansans.
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<th>Use constituting disposal ($§261.2(c)(1))</th>
<th>Energy recovery/fuel ($§261.2(c)(2))</th>
<th>Reclamation ($§261.2(c)(3)) except as provided in §261.4(a)(17), 261.4(a)(23), 261.4(a)(24) or 261.4(a)(27)</th>
<th>Speculative accumulation ($§261.2(c)(4))</th>
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<tr>
<td>Spent Materials</td>
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<td>Sludges (listed in 40 CFR Part 261.31 or 261.32)</td>
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<td>Scrap metal that is not excluded under 40 CFR 261.4(a)(13)</td>
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Note: The terms “spent materials,” “sludges,” “by-products,” and “scrap metal” and “processed scrap metal” are defined in §261.1.
**RCRA Regulated Recycled Materials**

**Waste Materials**

- Spent Material
- Sludge
- By-Products
- Commercial Chemical Products
- Scrap Metal

**Processes**

- Use Constituting Disposal
- Energy Recovery/Fuel
- Reclamation
- Speculative Accumulation

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Note: The terms “spent materials,” “sludges,” “by-products,” and “scrap metal” and “processed scrap metal” are defined in §261.1.
RCRA Regulated Recycled Materials

How to use:

- Find the intersection for the waste and the process
- Asterisk – May be a solid waste
- Dash – May be excluded from the definition of a solid waste

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Note: The terms “spent materials,” “sludges,” “by-products,” and “scrap metal” and “processed scrap metal” are defined in §261.1.
Inherently Waste-Like

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40 CFR §261.2
What About These?

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Other Examples

• Floor Sweepings
• Sandblast Media
• PPE/Uniforms/Aprons/Rags
• Paint filters
• Masking Media (e.g., tape and paper)
Waste Determinations

Step 3: Exemptions
§261.4(a) – Solid Waste
§261.4(b) – Hazardous Waste

• Industrial Wastewater (Clean Water Act)
• Agricultural Wastes
• Excluded Scrap Metal (process, unprocessed home, and unprocessed prompt) being recycled
• Mining overburden when returned to the mine site
• Household Hazardous Waste
Waste Determinations

Step 4: Is it hazardous?

A solid waste which, if not excluded by §261.4(b), meets the definition of:

Characteristic Waste (D-List)

Listed Waste (F, K, P, U-Lists)

Refer to 40 CFR §261 Subpart B
Waste Determinations

Listed Wastes

- Spent Wastes
  - F-Listed (non specific sources)
  - K-Listed (specific sources)
- Unused Commercial Chemical Products
  - P-Listed (acutely hazardous, sole active ingredient)
  - U-Listed (sole active ingredient)
Characteristic Waste

Wastes that are hazardous because they exhibit a hazardous characteristic.

D001

D002

D003

D004-D043
Characteristic Waste

D001 – Ignitibility

- Flashpoint < 140°F (60°C)
- §261.21

D002 – Corrosivity

- pH ≤ 2 or ≥ 12.5
- §261.22
Characteristic Waste

D003 – Reactivity

• Unstable
• Reacts violently with water or other external substances
• Explosive
• §261.23
Characteristic Waste

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**D004-D043 – Toxicity**

- §261.24

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**Table 1 - §261.24**

<table>
<thead>
<tr>
<th>EPA HW No.</th>
<th>Contaminant</th>
<th>CAS No.</th>
<th>Regulatory Level (mg/L)</th>
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<tbody>
<tr>
<td>D018</td>
<td>Benzene</td>
<td>71-43-2</td>
<td>0.5</td>
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<tr>
<td>D008</td>
<td>Lead</td>
<td>7439-92-1</td>
<td>5.0</td>
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</table>
Characteristic Waste

Toxicity Characteristic Leaching Procedure (TCLP)
- Volatile Compounds
- Heavy Metals
- Pesticides/Herbicides
- Base Neutral Acids
How Do You Make This Determination?

Process Knowledge

• SDS – Flashpoint, pH, Reactivity, Ingredients
• What chemicals are involved?
• What is the process/chemical interaction?
• EPA clarified what constitutes process knowledge in the 2017 CFRs.

Laboratory Analysis from a KDHE-Certified Laboratory

• TCLP analysis by Method 1311 (SW-846)
• http://www.kdheks.gov/envlab/disclaimer.html
Document the Determination

Document how each waste determination was made.

Include copies of all supporting documentation (analytical reports, design plans, SDSs, etc.)

Waste profiles by themselves are not generally sufficient determinations or documentation.

Do not rely on your contractor/waste disposal company.

Retain all documentation until three years after waste was last shipped off site.
Waste Determination

“Kansas Waste Determination” App

Developed through a partnership between KDHE-BWM and SBEAP

Available on both Android and Apple app stores.

Will generate a sufficient waste determination document; however,

• Only as accurate as the information you provide.
• Will need to attach all supporting documentation.
Things That Are Not Hazardous Wastes

Used Oil – Used oil that is recycled for energy or material recovery is not subject to the hazardous waste regulations.

Medical Waste – waste generated in connection with human or animal care, which is potentially capable of causing disease or injury. Not necessarily a hazardous waste, but probably a “special waste.”

“Special Waste” – any solid waste that, because of physical, chemical, or biological characteristics, requires special management standards due to concerns for safety regarding handling, management, or disposal.

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Waste Determinations

Step 5: What is your monthly generation?

Each calendar month:
- Calculate how many pounds of EACH hazardous waste you generate
- Cannot average over time
- Add up all weights for your monthly TOTAL

The total tells you which class you fall into.

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Waste Determinations

Example:
Paint Booth
- 15 pounds waste paint (D007)
- 10 pounds spent solvent (D001/D007/F003)
- 150 pounds paint related debris (D007)

Waste Acetone
- 40 pounds (D001)

215 pounds of waste generated this month.
Waste Determinations

If your monthly generation rate varies routinely, you must use the highest value.
Generator Classifications

Permit exempt classification system based on your monthly generation rate.

Designed to account for the amount of waste generated and apply appropriate regulatory oversight to protect human health and the environment.

Most classes are permit exempt as long as regulations are followed.

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<th>Kansas</th>
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<td>Large Quantity Generator</td>
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<tr>
<td>Small Quantity Generator</td>
<td>Small Quantity Generator</td>
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<tr>
<td>Very Small Quantity Generator</td>
<td>Kansas Small Quantity Generator</td>
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<tr>
<td>(Formerly Conditionally Exempt Small Quantity Generator)</td>
<td>Conditionally Exempt Small Quantity Generator</td>
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</table>

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Conditionally Exempt Small Quantity Generator

Hazardous Waste Monthly Generation:

Non-Acute Hazardous Wastes:
• Less than 55 pounds

Acutely Hazardous:
• Less than 2.2 pounds of P-Listed Hazardous Waste and F-Listed Dioxins:
  • F020
  • F021
  • F022
  • F023
  • F026
  • F027
• 220 pounds of spill cleanup residues and debris
55 Pounds of Water

This is only an approximation based on water weight. Your weights/volumes will vary!
Kansas Small Quantity Generator

Hazardous Waste Monthly Generation:

Non-Acute Hazardous Wastes:
• 55 pounds or more
• Less than 220 pounds

Acutely Hazardous:
• Less than 2.2 pounds of P-Listed Hazardous Waste and F-Listed Dioxins:
  • F020
  • F021
  • F022
  • F023
  • F026
  • F027
• 220 pounds of spill cleanup residues and debris
220 Pounds of Water

This is only an approximation based on water weight. Your weights/volumes will vary!
Small Quantity Generator

Hazardous Waste Monthly Generation:

Non-Acute Hazardous Wastes:
- 220 pounds or more
- Less than 2,200 pounds

Acutely Hazardous:
- Less than 2.2 pounds of P-Listed Hazardous Waste and F-Listed Dioxins:
  - F020
  - F021
  - F022
  - F023
  - F026
  - F027
- 220 pounds of spill cleanup residues and debris
Large Quantity Generator

Hazardous Waste Monthly Generation:

Non-Acute Hazardous Wastes:
- 2,200 pounds or more

Acutely Hazardous:
- 2.2 pounds or more of P-Listed Hazardous Waste and F-Listed Dioxins:
  - F020
  - F022
  - F026
- More than 220 pounds of spill cleanup residues and debris

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On-Site Management

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General Requirements

KSQGs, SQGs, and LQGs are required to:

• Notify KDHE of generator activity and obtain an EPA ID number (Form 8700-12)
• Update the notification within 60 days of any change in information
• Pay an annual monitoring fee to KDHE
### Bureau of Waste Management Forms

#### Solid Waste Forms

- Solid Waste Landfill
- Solid Waste Processing & Planning
- Solid Waste Closure/Post Closure Cost Estimating Worksheets
- Solid Waste Activities not Requiring a Permit
- Disaster Response Forms and Information
- Solid Waste Restrictive Covenants & Disclosures
- Solid Waste Financial Assurance & Corrective Action Forms

#### Hazardous Waste Forms

##### Hazardous Waste Permits

- Hazardous Waste Generator Forms
  - (The forms listed below are available on the Hazardous Waste Forms Page)
  - Day Accumulation Container Notification Form
  - Hazardous Waste Generator Book
  - Hazardous Waste Generator Fees
  - Hazardous Waste Manifest Form
  - Hazardous Waste Report Forms (Site Identification; Off-Site Identification; Waste Generation and Management; Waste Received from Off-Site; Monitoring Fees)
  - Hazardous Waste Variance Request
  - Kansas Generator Emergency Response Form
  - Kansas Hazardous Waste Transporter Registration
  - Kansas Used Oil Transporter Registration
  - Notification of Regulated (HWN) Activity
  - Off-Site Hazardous Waste Treatment Fees Reporting Form

##### Orphan Hazardous Waste Disposal
Preparedness and Prevention
KSQGs and SQGs

Emergency Coordinator
- Available 24/7
- Able to reach facility within a short period of time
- Familiar with emergency procedures and locations of waste

Post the following information next to a telephone
- Name and telephone number of emergency coordinator;
- Location of fire extinguishers, spill control material and fire alarm (if present);
- Telephone number of the fire department, unless direct alarm is available

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ATTACHMENT C
HAZARDOUS WASTE EMERGENCY RESPONSE

EMERGENCY COORDINATOR: ________________________________
HOME PHONE NUMBER: ________________________________
CELL PHONE NUMBER (Optional): __________________________

ALTERNATE EMERGENCY COORDINATOR: ________________________________
HOME PHONE NUMBER: ________________________________
CELL PHONE NUMBER (Optional): __________________________

FIRE DEPARTMENT PHONE NUMBER: ________________________________
(unless there is a direct alarm)

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EQUIPMENT LOCATION
(A map showing the locations is sufficient)

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FIRE EXTINGUISHERS: ________________________________
SPILL CONTROL: ________________________________
FIRE ALARMS (if present): ________________________________

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RESPONSE ACTION

FIRE: Call the Fire Department or extinguish the fire using an appropriate fire extinguisher.

SPILL: Contain the flow of hazardous waste. Clean up the hazardous waste and any contaminated materials or soil as soon as possible.

FIRE, EXPLOSION, OR RELEASE, WHICH THREATENS HUMAN HEALTH OR
SURFACE WATER:
Notify the National Response Center with the following information:
1. Name, address, and U.S. EPA ID Number of generator
2. Date, time, and type of incident
3. Quantity and type of hazardous waste involved
4. Extent of any injuries
5. Estimated quantity and disposition of recovered materials

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NATIONAL RESPONSE CENTER 1-800-424-8802
KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT (785) 296-1679
Preparedness and Prevention
KSQGs and SQGs

Training

- Must provide within 6 months of hire or transfer to new position
- Must provide annual training
- Document the training (who, what, when) and maintain for 3 years.

Please Note:

- Training must be sufficient to ensure all personnel are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies.
Preparedness and Prevention
KSQGs, SQGs, and LQGs

Must be equipped with:

- Internal communications or alarm system
- A device 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, foam producing equipment, automatic sprinklers, or water spray systems
Preparedness and Prevention
KSQGs, SQGs, and LQGs

Must attempt arrangements with local emergency organizations, including:

- Familiarize police, fire departments, and hospitals with the facility, hazardous waste handled, etc.
- Designate one department as the primary emergency authority where more than one might respond.
- Maintain agreements with state emergency response teams, emergency response contractors, and equipment suppliers as necessary.

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Preparedness and Prevention
KSQGs, SQGs, and LQGs

Maintain and operate facility to minimize the possibility of:

- Fire
- Explosion
- Unplanned Sudden Release
- Unplanned Non-Sudden Release

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Preparedness and Prevention
KSQGs, SQGs, and LQGs

Test and maintain all emergency and communications equipment to assure proper operation in an emergency.

Ensure personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste.
Prepare and maintain (update) a contingency plan that meets all of the requirements of 40 CFR §265 Subpart D, including:

- Name, address, and contact information for the Emergency Coordinator
- Arrangements with all emergency services
- List and location of all emergency equipment at the facility, their description, and their capabilities
- Emergency procedures
- Evacuation plan

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Preparedness and Prevention
LQGs Only

Must ensure the contingency plan is available in case of an emergency.

Must train employees and maintain required training records.
Management of Waste

Accumulation of waste can occur in

- Satellite Accumulation Containers
- Storage Containers
- Tanks
Management of Waste

All containers and tanks must be:

- Labeled with the words “Hazardous Waste”
- In good condition and compatible with the contents
- Kept closed unless actively adding or removing waste
Management of Waste

Good Container:

Preprinted labels are great for legibility and will meet the requirement, but...
Management of Waste

Good Container:

Labels can be handwritten on an adhesive applied to the container...
Management of Waste

Good Container:

Or written directly on the container.

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Management of Waste

Open Container:

Although some processes require a direct discharge into the waste container, the tubes do not create a complete seal by themselves.
Management of Waste

Closed Container:

A cap or bung which allows a tube connection can provide the seal required to be considered closed.
Management of Waste

Poor Condition:

Containers are dented, preventing them from closing properly.

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Management of Waste

Not Compatible with Container:

Corrosive wastes should not be placed in metal containers.

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Management of Waste

Satellite Accumulation Containers

- At or near the point of generation
- Under the control of the operator
- Only one container for each waste stream at each point of generation
- 55 gallons or less
- Must be managed as a storage container within three days of no longer meeting the definition of a satellite.
Management of Waste

Day Accumulation Containers

• At or near the point of generation
• Under the control of the operator
• Only one container for each waste stream at each point of generation
• 6 gallons or less
• Must be emptied into a container at the end of each day, or each shift if operating 24-hours.
Management of Waste

Good Container:

- At or near the point of generation
- Under the control of the operator
- Marked “Hazardous Waste”
- Closed
- In good condition
- 55 gallons or less
Management of Waste

Container Issues:

- Not marked “Hazardous Waste”
- Open
- More than one container of the same waste at the same point of generation.
Management of Waste

More Than One Container:

Not compliant unless each container holds a separate waste stream.
Management of Waste

Storage Containers

- Marked with the accumulation start date
  - Date hazardous waste is first added, or date the satellite container became a storage container.
- Separate incompatibles
  - Dike, Berm, etc.
- Adequate aisle space to allow unobstructed movement in case of emergency.
- LQGs must store D001 and D003 waste at least 50 feet from property line.
Management of Waste

Storage Areas

- Can be located indoors or outdoors
  - Recommend they be covered and/or on pallets
  - Recommend secondary containment
- No state or federal limit on number of storage areas
Management of Waste

Good Storage:

- Adequate aisle space
- Easily assess labeling and condition of containers
- Recommend stacking no more than two high
Management of Waste

Poor Aisle Space:

Boxes blocking the aisle and hindering access to containers
Management of Waste

Poor Aisle Space:

Access to any containers behind the outer row is not possible.

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Management of Waste

Inspections

- CESQGs and KSQGs – Monthly
- SQGs and LQGs – Weekly

What to look for

- Deterioration and Leaks
- Container Requirements (closed, labeled, dated)
Management of Waste

Document

• Date and Time of Inspection
• Name of Inspector (Not Initials)
• Observations Made
• Date and Nature of Remedial Actions Taken
Management of Waste

Time on site:
- LQGs – 90 days or less
- SQGs – 180 days or less
  - May have up to 270 days if the waste is transported more than 200 miles
- CESQGs and KSQGs – No limit*

Weight restrictions:
- SQGs – 13,200 lb (6,000 kg)
  - Subject to TSDF permitting requirements
- CESQGs and KSQGs – 2,200 lb
  - Subject to SQG requirements

* See CESQG and KSQG weight restrictions.
Management of Waste

Universal Waste

• Universal waste (UW) is a subset of hazardous waste.
• Kansas follows EPA rules for UW.

UW in Kansas includes:

• Batteries
• Certain pesticides
• Mercury-containing equipment
• Lamps (including fluorescent bulbs)
Management of Waste

UW batteries, mercury-containing equipment, and lamps, must be labeled (on container or each individual item):

- “Universal Waste - ___________”; or
- “Waste ___________”; or
- “Used ___________”.

- Fill in the blank with: Batteries, mercury-containing equipment (or mercury thermostats), or lamps.

UW pesticides must be labeled either:

- “Universal Waste – Pesticides”; or
- “Waste Pesticides”.

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Management of Waste

Containers must be:

- Closed except when adding or removing waste.
- In good condition.

UW may be accumulated on site for up to one year. Must be able to demonstrate this by:

- Dating each container or the group of containers (such as on a pallet); or
- Date the accumulation area; or
- Maintain a written inventory or log
Management of Waste

UW can be shipped under a bill of lading or other shipping papers. A Uniform Hazardous Waste Manifest is not required.

Employees who handle or have responsibility for managing UW must be given information describing the proper handling and emergency procedures appropriate to the type(s) of UW handled (Training).
Compliance Evaluation Inspections

Inspections are unannounced

- Routine inspections are chosen months in advance, based on the following:
  - Generator classification
  - Amount of time since last inspection
  - Industry sector priorities established by EPA or KDHE Enforcement

Complaints can result in a full RCRA inspection

Compliance Assistance Visits (CAV) are available
Compliance Evaluation Inspections

Intro and review  Walk-through  Records review  Exit briefing
Compliance Evaluation Inspections

Questions the inspector will ask about your waste streams:

• How much of each waste stream is generated in a month?
• How is each managed/contained/stored?
• How is each disposed?
• Is it hazardous waste?
• How did you determine whether or not it is hazardous?
• What documentation do you have for your determination?
Inspection Checklists

A Waste Compliance Inspection Report:

• Basic information about the facility
• Name and Address
• Participants
• Number of Employees
• Site Contact
• Any Recent Changes
• Other Pertinent Information Not Mentioned Elsewhere
Inspection Checklists

Hazardous Waste Generator Requirements:

- Waste Stream Table
- General Requirements
- Universal Waste
- Generator Requirements
- Container Management
- Reporting and Recordkeeping

- Prepare and Train – KSQGs and SQGs
- Personnel Training for LQGs
- Manifest Requirements
- LDR Requirements
- Prepare and Prevent Requirements
- Contingency Plan for LQGs
Common Violations

Waste Determinations

- Ensure you evaluate all waste streams, including any new, changing, or one-time wastes.
- Ensure you maintain documentation for your determinations in an easy to find location.
Common Violations

**Container Management**

- Pay attention during your inspections.
- Time off does not mean inspections do not need to be conducted. The waste is still there.
- Ensure employees understand container requirements.
Common Violations

Preparedness and Prevention

• Ensure you have your emergency information posted, preferably in a common area such as the plant floor.

• Ensure any updates to the facility contingency plan is addressed in a timely manner. If the emergency contact leaves, try to make the update in the contingency plan part of the transition process.
Common Violations

Training

• Maintain your documentation. This is your proof the training was conducted.
• Ensure all employees who handle hazardous waste containers receive the training.
Available Resources

• Website: http://www.kdheks.gov/waste
• Hazardous Waste Generator Handbook
  • Compliance/Training Manual
• Inspector Checklists
• Technical Guidance Documents and Policies
Facility name
EPA I.D. #
Generator category

Tip: If a waste needs to be tested to confirm or confirm a determination, generators must use an MRO certified lab. A list of certified labs may be found at Kansas Department of Health and Environment.

Note: The “Kansas Waste Determination” app offers an electronic system for recording determinations. It is free, and available for both Apple and Android products.

Weekly/Monthly Inspection Log

Data entered by weekly or monthly inspections was conducted:

Data entered by week:

Each container clearly marked with the word “HAZARDOUS WASTE”?
T N T N T N T N

Each container properly labeled?
T N T N T N T N T N

Container disposed of in good condition?
T N T N T N T N T N

Incompatible waste segregated?
T N T N T N T N T N

Appropriate training and/or written training plan completed?
T N T N T N T N T N

Accumulating CEGSS and KSQSS are required to conduct monthly inspections of hazardous waste storage areas. CEGSS and KSQSS are required to conduct weekly inspections of hazardous waste storage areas.

Week 1 Inspected by:
Week 2 Inspected by:
Week 3 Inspected by:
Week 4 Inspected by:

2018 Hazardous Waste Compliance Calendar

2018 Hazardous Waste Compliance Calendar

Inspection Logs and Tips

FEBRUARY 2018

Sun Mon Tues Wed Thu Fri Sat
28 29 30 31 1 2 3
4 5 6 7 8 9 10
11 12 13 14 15 16 17
18 19 20 21 22 23 24
25 26 27 28 29 30

Matters on the calendar:
-A web-based hazardous waste storage inspection was conducted.
-The hazardous waste was properly disposed of?
-What is the name of the facility?
-What is the type of waste generated?
-What is the hazardous waste in the waste?
-What is the hazardous waste in the waste?

Documenting Hazardous Waste Determinations

With this...
Available Resources

- KDHE wants to help all generators achieve compliance. Please call us with any questions at 785-296-1600.
- Small Business Environmental Assistance Program (SBEAP) operated by the Pollution Prevention Institute (PPI) at KSU 1-800-578-8898 (free anonymous assistance).
Contact Information

• BWM web site:  
  http://www.kdheks.gov/waste

• Ken Powell  
  785-296-1121  
  ken.powell@ks.gov

• Brian Burbeck  
  785-296-1613  
  brian.burbeck@ks.gov

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Questions
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