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

On-site Management
  • Containers
  • Training
  • Emergency Preparedness

Generator Classifications

Navigating KDHE Website
  • Resources
  • CAVs
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.
Hazardous Waste Generator Workshop

Why?

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

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

Solid Waste

Universal Waste

Hazardous Waste

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

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

40 CFR §261.2
Our Mission: To protect and improve the health and environment of all Kansans.
**Hazardous Waste Generator Workshop**

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

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### 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
- Medical Sharps Disposal
- Medical Sharps Disposal for Livestock
- Household Hazardous Waste Program Report - SFY17
- Kansas Coal Combustion Residues Documents
- Kansas Solid Waste Program Report - SFY17

---

### Compliance, Assistance, & Enforcement
- Accredited Environmental Laboratories
- Old City Dump Cleanup Program
- City/County Illegal Dump Cleanup Program
- File a Complaint
- Compliance Assistance Visits Program
- Solid & Hazardous Waste Compliance Documents

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### Composting
- Composting at Livestock Facilities Information Sheet
- Composting Forms

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### Hazardous Waste Generators & Transporters
- Biennial HW Report
- e-Manifest
- EPA’s RCRAInfo Database
- Hazardous Waste Compliance Calendars
- Hazardous Waste Fees
- Hazardous Waste & Used Oil Forms
- Hazardous Waste Generator Handbook
- Hazardous Waste Transporter List
- Used Oil Transporter List

---

### Disposal Without a Permit
- Generator Liquid Waste Profile Sheet
- Kansas Open Records Request (KORA)
- Request a Compliance Assistance Visit
- Mausoleum Permitting
- Solid & Hazardous Waste Compliance Documents
- Special Waste Disposal Request

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### Maps & Databases
- EPA’s RCRAInfo Database
- Old City Dump Locations
- Solid Waste Facilities Database and Map

---

### Other Information
- Accredited Environmental Laboratories
- Debris Management Plan
- Ebola Waste is “Hazardous” — Secretary’s Policy
- Hazardous Waste Compliance Calendars
- Land-Spreading Oil and Gas Drilling Waste
- Medical Sharps Disposal for Livestock
- Medication Disposal Options
Our Mission: To protect and improve the health and environment of all Kansans.
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?

### Waste Determinations
- Identify waste streams
- Is it a solid waste?
- Exemptions
- Is it hazardous?
- How much are you generating?
- Generator Classification?

### On-Site Management
- Notification
- Container Management
- Training
- Emergency Preparedness
- Record Keeping

### Disposal
- Disposal Options
- Transportation
- Manifests
- Land Disposal Restrictions (LDRs)

---

*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)
Waste Determinations

Our Mission: To protect and improve the health and environment of all Kansans.
Burned (Furnace, Energy Recovery, etc.)

Our Mission: To protect and improve the health and environment of all Kansans.
Accumulated or Stored

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

Generated
- Out of Process
- Unusable/Off-Spec

Accumulated and Stored

Recycled
- Regenerated into usable product

Our Mission: To protect and improve the health and environment of all Kansans.
### Table 1

<table>
<thead>
<tr>
<th></th>
<th>Use constituting disposal (§261.2(c)(1))</th>
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<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>
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</tr>
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<tbody>
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**Note:** The terms “spent materials,” “sludges,” “by-products,” and “scrap metal” and “processed scrap metal” are defined in §261.1.

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Our Mission: To protect and improve the health and environment of all Kansans.
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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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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Inherently Waste-Like

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

40 CFR §261.20

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Characteristic Waste

**D001 – Ignitibility**
- Flashpoint < 140° F (60° C)
- §261.21

**D002 – Corrosivity**
- pH ≤ 2 or ≥ 12.5
- §261.22

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Characteristic Waste

D003 – Reactivity

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

D004-D043 – Toxicity
• §261.24

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>
</tr>
</thead>
<tbody>
<tr>
<td>D018</td>
<td>Benzene</td>
<td>71-43-2</td>
<td>0.5</td>
</tr>
<tr>
<td>D008</td>
<td>Lead</td>
<td>7439-92-1</td>
<td>5.0</td>
</tr>
</tbody>
</table>

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

Toxicity Characteristic Leaching Procedure (TCLP)

- Soil sample extraction method for chemical analysis employed as an analytical method to simulate leaching through a landfill.
  - Volatile Compounds
  - Heavy Metals
  - Pesticides/Herbicides
  - Base Neutral Acids

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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)
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. Working on port to Microsoft Store.
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.
Waste Determination

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.
Waste Determination

Example:

Paint Booth
- 15 pounds waste paint (D007)
- 10 pounds spent solvent (D001/D007/F003)

Maintenance
- 40 pounds solvent-contaminated wipes (F002)
- 150 pounds spent blast media (D007)

215 pounds of waste generated this month.
Waste Determination

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

In addition, some waste streams may only be generated every other month or only a couple times per year. Don't forget to count these!
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 standards to protect human health and the environment.

Most classes are permit exempt as long as regulations are followed.
<table>
<thead>
<tr>
<th>Federal</th>
<th>Kansas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Large Quantity Generator</td>
<td>Large Quantity Generator</td>
</tr>
<tr>
<td>Small Quantity Generator</td>
<td>Small Quantity Generator</td>
</tr>
<tr>
<td>Very Small Quantity Generator</td>
<td>Kansas Small Quantity Generator</td>
</tr>
<tr>
<td>(Formerly Conditionally Exempt Small Quantity Generator)</td>
<td>Conditionally Exempt Small Quantity Generator</td>
</tr>
</tbody>
</table>

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

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Hazardous Waste Generator Workshop

55 Pounds of Water

This is only an approximation based on water weight.

Your weights/volumes will vary!

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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

Our Mission: To protect and improve the health and environment of all Kansans.
220 Pounds of Water

This is only an approximation based on water weight.

Your weights/volumes will vary!

Our Mission: To protect and improve the health and environment of all Kansans.
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
  - F022
  - F026
- 220 pounds of spill cleanup residues and debris

40 CFR §262.34 and K.A.R. 28-31-262/262a

Our Mission: To protect and improve the health and environment of all Kansans.
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
  - F021
  - F022
  - F023
  - F026
  - F027
- More than 220 pounds of spill cleanup residues and debris

Our Mission: To protect and improve the health and environment of all Kansans.
On-Site Management

Our Mission: To protect and improve the health and environment of all Kansans.
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
- Household Hazardous Waste
- Grant Forms and Recipient Listings
- Waste Tires Permitting
- Orphaned Waste Tire Program

Hazardous Waste Forms

- Hazardous Waste Permits
- Hazardous Waste Generator Forms
- Orphaned Hazardous Waste Disposal

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

Our Mission: To protect and improve the health and environment of all Kansans.
**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): | __________________________ |

<p>| FIRE DEPARTMENT PHONE NUMBER: |</p>
<table>
<thead>
<tr>
<th>(unless there is a direct alarm)</th>
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</table>

**EQUIPMENT LOCATION**

- (A map showing the locations is sufficient)

| FIRE EXTINGUISHERS: |
| __________________________ |
| SPILL CONTROL: |
| __________________________ |
| FIRE ALARMS (if present): |
| __________________________ |

<table>
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<tbody>
<tr>
<td>RESPONSE ACTION:</td>
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<tr>
<td>Call the Fire Department or extinguish the fire using an appropriate fire extinguisher.</td>
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<td>FIRE:</td>
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<td>Contain the flow of hazardous waste.</td>
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<tr>
<td>SPILL:</td>
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<td>Clean up the hazardous waste and any contaminated materials or soil as soon as possible.</td>
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<td>FIRE, EXPLOSION, OR RELEASE, WHICH THREATENS HUMAN HEALTH OR</td>
</tr>
<tr>
<td>SURFACE WATER:</td>
</tr>
<tr>
<td>Notify the National Response Center with the following information:</td>
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</tbody>
</table>

| 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 |

| NATIONAL RESPONSE CENTER 1-800-424-8802 |
| KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT (785) 296-1679 |
Hazardous Waste Generator Workshop

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.

Our Mission: To protect and improve the health and environment of all Kansans.
Hazardous Waste Generator Workshop

Preparedness and Prevention KSQGs and SQGs

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

Our Mission: To protect and improve the health and environment of all Kansans.
Preparedness and Prevention KSQGs and SQGs

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.
Preparedness and Prevention KSQGs and SQGs

Maintain and operate facility to minimize the possibility of:

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

Our Mission: To protect and improve the health and environment of all Kansans.
Preparedness and Prevention KSQGs and SQGs

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.
Hazardous Waste Generator Workshop

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

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

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

All containers 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...
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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.
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Closed Container:

A cap or bung which allows a tube connection can provide the seal required to be considered closed.
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Poor Condition:

Containers are dented, preventing them from closing properly.
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Poor Condition:

Lid is cracked and will no longer completely contain contents if knocked over.

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Not Compatible with Container:

Corrosive wastes should not be placed in metal containers.
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**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.
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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.

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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

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Container Issues:

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

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More Than One Container:

Not compliant unless each container holds a separate waste stream.
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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
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Good Storage:

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

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**Poor Aisle Space:**

Boxes blocking the aisle and hindering access to containers

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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.

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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

Not properly managed.

- Not Containerized
- Labels on lamps?
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).
Management of Waste

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

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Compliance Evaluation Inspections

Intro and review → Walk-through → Records review → Exit briefing

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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

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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; don’t inspect on autopilot.
- 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.
Additional 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).
Available Resources

• Website: http://www.kdheks.gov/waste
  • Hazardous Waste Generator Handbook
    • Compliance/Training Manual
  • Inspector Checklists
  • Technical Guidance Documents and Policies
SBEAP

• Website: https://www.sbeap.org/services-programs/hazwaste

• Contains information and helpful links:
  • Waste Determination App
  • Hazardous Waste Compliance Calendars
  • YouTube Compliance Video – Container Management (New)
  • Training Module (New)
### Hazardous Waste Generator Workshop

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**Facility name**

- [ ] EPA I.D. #

**Generator category**

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**Weekly/Monthly Inspection Log**

<table>
<thead>
<tr>
<th>Facility name</th>
<th>EPA I.D. #</th>
<th>Generator category</th>
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<tbody>
<tr>
<td><strong>Facility name</strong></td>
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</table>

**Description of daily monitoring and documentation conducted.**

- [ ] EPA I.D. #
- [ ] Generator category

**Note:**

- The “Kanal Waste Generator” app offers an electronic system for record keeping, documentation, and inspection data. It is free and available for both Apple and Android products.

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**2018 Hazardous Waste Compliance Calendar**

**Inspection Logs and Tips**

**FEBRUARY 2018**

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**Note:**

- For additional information, call KSHB at 785-296-6600 or 866-932-5958 at 8 a.m.—5 p.m. on weekdays.
Waste Determination

“Kansas Waste Determination” App

Developed through a partnership between KDHE-BWM and SBEAP

Available on both Android and Apple app stores. Working on port to the Microsoft Store.

Will generate a sufficient waste determination document; however,

• Only as accurate as the information you provide.
• Will need to attach all supporting documentation.

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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
Thank you/Questions