

Kansas Department of Health and Environment
Bureau of Waste Management Policy 2016-P1
Bulking and Storing Wastes at Satellite HHW Facilities

Purpose

This policy clarifies the conditions under which a satellite household hazardous waste (HHW) facility may bulk HHW and store the bulked HHW. This policy does not address the bulking and storage of used oil, which is not HHW.

Background

The Kansas Department of Health and Environment (KDHE) issues permits to HHW facilities across the state. In addition, KDHE registers smaller satellite HHW facilities, which collect HHW from the community and deliver the HHW to a permitted “host” HHW facility.

This is to clarify the HHW regulations (KAR 28-29-1100 to -1107) concerning bulking of HHW at satellite HHW facilities. In general, a satellite HHW facility will place waste in storage cabinets and subsequently deliver the waste to the host HHW facility without removing the waste from the original container. In some cases, it would be more practical for the satellite HHW facility to bulk the waste on-site before transporting the waste to the host facility.

Because satellite HHW facilities are not required to have all of the safety features of a permitted facility, bulking of HHW and storage of the bulked HHW is only allowed under certain conditions, as described in the following section.

Action

Satellite HHW facilities may bulk HHW and may store bulked HHW in a location other than an HHW storage cabinet if the facility complies with all of the following.

Training

Each staff person that conducts any HHW-handling activities other than placing original HHW containers into an HHW storage cabinet must have a minimum of 24 hours of classroom training related to the proper handling of hazardous materials and complete refresher training (minimum of eight hours) each calendar year thereafter. Documentation of training must be kept in the satellite HHW facility’s operating record.

Bulking of HHW

Non-flammable waste, including latex paint and antifreeze, may be bulked at satellite HHW facilities.

Oil-based paint (including associated solvents) is the only flammable HHW which may be bulked at a satellite HHW facility. The bulking of oil-based paint must take place outside, unless otherwise approved by KDHE.

Bulked HHW must be placed in a container that is compatible with the waste.

Storage of Bulked HHW

HHW may be placed in a host HHW facility trailer directly after bulking. The trailer must be secured to prohibit both unauthorized access into the trailer and removal of the trailer from the facility.

Bulked HHW that is not placed directly in a host HHW facility trailer and does not fit into the HHW storage cabinet must be stored according to the following:

1. The design and location of the storage area must be described in the satellite HHW facility operating plan and approved by KDHE.
2. The storage area must be protected from the elements.
3. The storage area must have secondary containment.
4. Oil-based paint must be stored in a detached structure, such as a four-barrel outdoor storage shed, unless otherwise approved by KDHE.
5. The facility operator must comply with the requirements of KAR 28-29-1102(b)(1)(B), (C), and (D) [i.e., the containers must be labeled, closed, and inspected].
6. No more than 220 gallons (four 55-gallon drums) of oil-based paint and 220 gallons (four 55-gallon drums) of non-flammable HHW may be stored on-site. This amount is in addition to what is stored in storage cabinets and the host facility trailer.
7. Bulked waste must be transferred off-site at least once a year.

Operating Plan

Satellite HHW facilities that wish to expand their operational activities to bulk and store HHW must update their operating plan to include the above requirements and submit the updated plan to the Bureau of Waste Management for review and approval prior to engaging in these activities.

This policy will remain in effect until it is revoked or until it is rendered obsolete by future amendments to solid waste law or regulations.



William L. Bider
Director, Bureau of Waste Management



Date