

# BASIC HAZARDOUS WASTE GENERATOR WORKSHOP 2016



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# BASIC WORKSHOP OVERVIEW

- Will not be a substitute for training your employees (job specific training is still required).
- Will introduce you to the basics of RCRA.
  - Waste Classification (waste determination)
  - Generator Requirements
  - Managing Containers
  - Compliance and Enforcement Overview
- Opportunity for questions.

# TOPICS FOR AFTERNOON – IN-DEPTH WORKSHOP

❖ Will discuss hazardous waste (HW) management topics in more detail, including:

- Notification Forms
- Changing Generator Status (routine and one-time events)
- Used Oil Requirements
- Used Antifreeze
- Aerosol Cans
- E-waste
- e-Manifesting Update
- Universal Waste
- K, U, and P-listings
- F001-F005 listings
- Review Solvent-Contaminated Wipes Rule in KS
- Solvent recycling and accounting
- Enforcement Case Overview
- Outreach – Compliance Training Manual

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# REGULATORY BACKGROUND

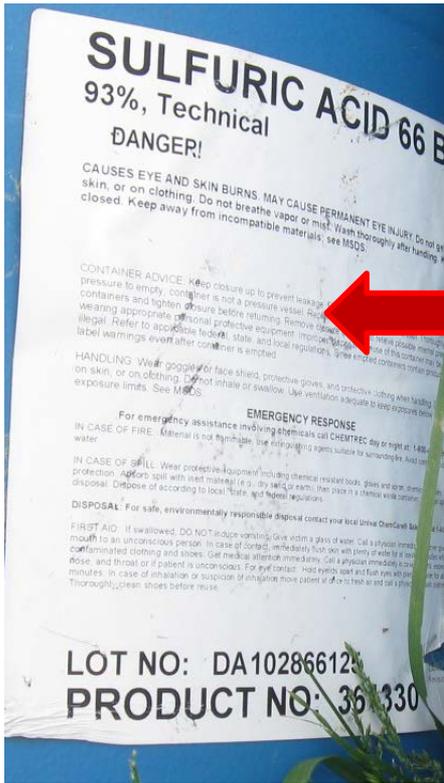
- Resource Conservation and Recovery Act (RCRA) enacted in 1976
- EPA implemented hazardous waste regulations in 1980
- Kansas Hazardous Waste Program began in 1982
- Major revisions to Kansas Hazardous Waste Program effective April 29, 2011
- Technical revisions and adoption of RCRA Corrective Action in 2013

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# Why???



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# Why???



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# RCRA OVERVIEW

The Resource Conservation and Recovery Act, or RCRA, is a cradle to grave law.

- All waste must be evaluated and properly managed from the point of generation until final disposal.
- Everyone handling, managing, and otherwise being in possession of that waste at the point of generation until final disposal can be held responsible for that waste.
- Ignorance of the law is not an excuse for not following the law.

# GENERATOR'S RESPONSIBILITY

All hazardous waste generators must:

- Identify all solid and hazardous waste streams
- Determine the quantity of each hazardous waste generated over time (no averaging)
- Ensure proper handling and disposal of all wastes

# WASTE STREAM OVERVIEW

## Waste Streams:

- What are your waste streams?
- How much of each waste stream is generated in a calendar 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?

# HAZARDOUS WASTE DETERMINATION

- Step one: Determine if it is discarded material. A material is considered discarded if it is:
  - Abandoned (disposed, burned, accumulated, treated, or stored)
  - Recycled (spent solvent in distillation system)
  - Considered inherently waste-like

# Abandoned?



Not organized, outside of fence, containers in poor condition.

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# Abandoned?



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# Inherently Waste Like?



Drum on its side, tall vegetation, and clutter.

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# Inherently Waste Like?



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# Abandoned or Discarded



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# Discarded



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# Inherently Waste Like

(And  
potentially  
very  
dangerous.)



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# HAZARDOUS WASTE DETERMINATION

• Step two, determine if it is a solid waste:

– Solid waste can be:

- Liquid
- Semi-Solid
- Gas



– Materials are solid waste even if they are recycled or are accumulated, stored, or treated prior to recycling.

# HAZARDOUS WASTE DETERMINATION

Example – Solids from distillation of waste solvent (solvent recycling unit)

- Step 1 – Is it discarded?

Yes, the material cannot be used again for any purpose.

- Step 2 – Is it solid waste?

Yes, it is a physical sludge/solid material.

# HAZARDOUS WASTE DETERMINATION

- Step three, determine if the waste is specifically excluded (40 CFR 261.4):
  - Discharged to the POTW or a permitted NPDES outfall
  - Mining overburden
  - Household waste
  - Agricultural waste
  - Oil and gas waste



# HAZARDOUS WASTE DETERMINATION

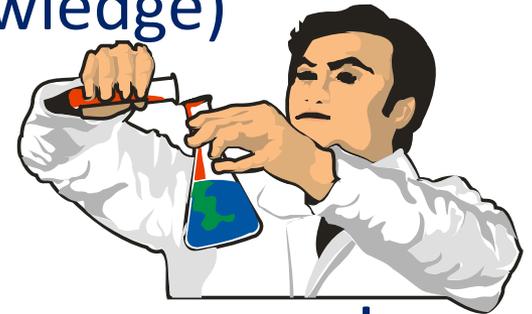
Example – Solids from distillation of waste solvent (solvent recycling unit)

- Step 3 – Is it excluded or exempted from the definition of solid or hazardous waste?

No, the material does not fall under any of the exemptions or exclusions so it is a solid waste subject to hazardous waste determination.

# HAZARDOUS WASTE DETERMINATION

- Step four, determine if the solid waste meets the definition of hazardous waste.
  - Determinations can be made in two ways:
    - Knowledge of process (generator knowledge)
    - Testing by KDHE-certified laboratory
- <http://www.kdhe.state.ks.us/envlab/>
- All waste determinations must be documented.



# HAZARDOUS WASTE DETERMINATION

- Is it “listed” hazardous waste?
- Is it “characteristic” hazardous waste?

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# LISTED HAZARDOUS WASTE

Does the waste appear on the F, K, P, or U lists?

- F-Listed (non-specific sources)
- K-Listed (specific sources)
- P-Listed (acutely hazardous discarded commercial chemicals - regulated at 2.2 lbs)
- U-Listed (discarded commercial chemicals)



# HAZARDOUS WASTE DETERMINATION

Example – Solids from distillation of waste solvent (solvent recycling unit)

- Is my waste a listed hazardous waste?

Maybe:

Look at the waste determinations for the solvents being recycled. If any of them are listed hazardous waste, then it is a listed hazardous waste for the same listings (most common F003, F005)

# HAZARDOUS WASTE DETERMINATION

Example – Solids from distillation of waste solvent (solvent recycling unit)

For our example, we will say that waste xylene used for cleaning was being recycled in the distillation unit. Xylene is on the F003 list so the waste solvent is F003 listed hazardous waste. Therefore, the still bottoms will also be an F003 listed hazardous waste.

# HAZARDOUS WASTE DETERMINATION

**Note**- the afternoon session will include a detailed discussion of the F001 through F005 listed wastes.

# CHARACTERISTIC HAZARDOUS WASTE

Does the waste meet one of the four characteristics?



Ignitability (D001)

(Flashpoint less than 140 °F)



Corrosivity (D002)

(pH  $\leq 2$  or  $\geq 12.5$ )



Reactivity (D003)



Toxicity (D004 –D043)

# HAZARDOUS WASTE DETERMINATION

Example – Solids from distillation of waste solvent (solvent recycling unit)

- Is my waste a characteristic hazardous waste?

Maybe – wet and sludgy still bottoms might flash below 140 degrees Fahrenheit. Hard, dry still bottoms are not generally ignitable under the definition.

# HAZARDOUS WASTE DETERMINATION

Example – Solids from distillation of waste solvent (solvent recycling unit)

Non-liquids (solids) are only considered ignitable if they are capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture, or spontaneous chemical changes and, when ignited, burn so vigorously and persistently that they create a hazard.

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# HAZARDOUS WASTE DETERMINATION

Example – Solids from distillation of waste solvent (solvent recycling unit)

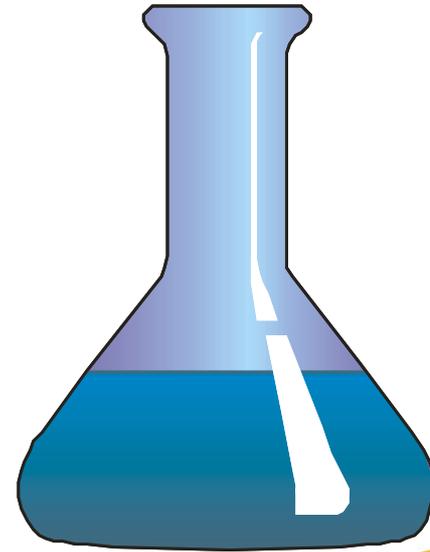
- Is my waste a characteristic hazardous waste?

Lets say our still bottoms are rock hard, and will therefore only carry the F003 waste code, so it is a listed waste, but not characteristic for ignitability, corrosivity, or reactivity.

# TOXICITY

Analyze using the Toxicity Characteristic Leaching Procedure (TCLP) for one or more of the following:

- Heavy Metals
- Volatile Compounds
- Pesticides/Herbicides
- Base Neutral Acids



# HAZARDOUS WASTE DETERMINATION

Example – Solids from distillation of waste solvent (solvent recycling unit)

- Is my waste toxic?

Maybe; I can use the Safety Data Sheets (SDS) for all of my solvents. None of them contain metals or anything else (Volatiles) on the toxic list. However, if the solvents were used to clean parts containing heavy metals, analytical testing may be required.

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# DOCUMENT THE DETERMINATION

- Document how each waste determination was made.  
(Required for hazardous and non-hazardous waste.)
- Include copies of all supporting documentation that was used (analytical reports, design plans, SDSs, etc.).
- Waste profiles by themselves are not generally sufficient waste determinations or documentation.
- Keep documentation for 3 years from the date the waste was last shipped off site.

## Waste Determination Documentation Form

Facility Name: XYZ Company

Waste Name: Still Bottoms

Description of Process: Distillation of Waste solvent

Pounds of waste generated each month: 25 lbs

Does this waste meet the definition of a solid waste?  Yes  No

Is this waste exempt from the definition of solid waste or hazardous waste?  Yes  No

Was laboratory analysis used to make this determination?  Yes  No

If yes, record the name and KDHE certificate number for the laboratory: \_\_\_\_\_  
If yes, **attach** a copy of the analytical results to this sheet.

Was knowledge of the process used to make this determination?  Yes  No

If yes, list the name and date of each document (MSDS, process flow diagrams, etc.) reviewed and/or **attach** them to this sheet:

\_\_\_\_\_

Sherwin-Williams All surface Enamel-Oil Base Satin Ultradeep Base – A11T214

Science Lab.com Xylenes

\_\_\_\_\_

\_\_\_\_\_

Is this waste non-hazardous?  Yes  No

Is this waste a listed hazardous waste?  Yes  No  
If yes, list waste codes: F003

Is this waste a characteristic hazardous waste?  Yes  No  
If yes, list waste codes: \_\_\_\_\_

List the name and title of the person making this determination: Rebecca Wenner, Env Scientist

Date of this determination: 7/16/2015

# CONTRACTORS AND CONSULTANTS

- Don't rely entirely on your contractor and/or waste disposal company.
  - It is your (the generator's) responsibility to make the waste determination.
  - You (the generator) sign the manifest confirming that the information is correct.
  - The contractor may not know very much about your processes and may miss listed and characteristic hazardous waste (HW).
  - You receive the violations, not the contractor!



# HAZARDOUS WASTE DETERMINATION

- New Kansas Hazardous Waste Determination App
- “Kansas Waste Determination”
- Developed as result of a partnership between KDHE, BWM, and SBEAP
- Available on both Android and iOS





# Things that are not HAZARDOUS WASTES



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

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# Things that are not HAZARDOUS WASTES

- Radioactive Waste

- Regulated under the Atomic Energy Act (AEA)
- Mixed waste containing HW are regulated under both AEA and RCRA

- PCB

- Regulated under the Toxic Substances Control Act (TSCA)

# Things that are not HAZARDOUS WASTES

- Asbestos

- May be disposed of as a “special waste”

- Special Wastes

- Solid wastes that are not subject to regulation as a HW but may still pose a threat to human health or the environment

- Authorizations for disposal must be in place prior to disposal. Contact the special waste coordinator (Tony Guy) at 785-296-1600

# Other Wastes to Consider

- Universal Waste – hazardous waste
  - Batteries (most types)
  - Pesticides (some animal drugs and feed are excluded)
  - Mercury-containing equipment (a device containing elemental mercury integral to its function, but excluding batteries and lamps)
  - Lamps (most commonly fluorescent bulbs, but can be any bulb containing mercury)

# Other Wastes to Consider

- Latex paint is a solid waste.
  - Can be solidified prior to disposal.
- Oil, solvent, or metal containing paint is typically a hazardous waste.
  - Cannot be allowed to evaporate
    - Unlawful Act – Treatment
  - RCRA Empty – If less than one inch of material remains (residue), it will not be subject to hazardous waste regulation.

# Other Wastes to Consider

- Floor Sweepings
- Mop Heads
- Disinfectants/Cleaning solvents
- Sandblast Media
- Wipes – Solvents, Paint
- Uniforms/Aprons/Rags
- PPE
- Aerosol Cans
- Paint filters; direct spray vs overspray
- Masking Media (e.g., tape and paper)

# GENERATOR CLASSIFICATIONS

Kansas has four generator classes:

- Conditionally Exempt Small Quantity Generator (CESQG) (about 4,350 in KS)
- Kansas Small Quantity Generator (KSQG)  
–Unique to Kansas (about 700 in KS)
- Small Quantity Generator (SQG) (about 572 in KS)
- Large Quantity Generator (LQG) (about 251 in KS)

# GENERATOR CLASSIFICATIONS

## CESQG – Conditionally Exempt Small Quantity Generator

- Generates less than 55 pounds (lbs) of HW per month; and
- Generates less than 2.2 lbs of acutely HW per month; and
- Accumulates less than 2.2 lbs of acutely HW at any time.

# GENERATOR CLASSIFICATIONS

## KSQG – Kansas Small Quantity Generator

- Generates 55 lbs or more, but not more than 220 lbs of HW per month; and
- Generates less than 2.2 lbs of acutely HW per month; and
- Accumulates less than 2.2 lbs of acutely HW at any time.

# GENERATOR CLASSIFICATIONS

## SQG – Small Quantity Generator

- Generates more than 220 lbs but less than 2,200 lbs of HW per month; and
- Generates less than 2.2 lbs of acutely HW per month; and
- Accumulates less than 2.2 lbs of acutely HW at any time.

# GENERATOR CLASSIFICATIONS

## LQG – Large Quantity Generator

- Generates 2,200 lbs or more of HW per month; and/or
- Generates 2.2 lbs or more of acutely HW per month; and/or
- Accumulates more than 2.2 lbs of acutely HW at any time.

# GENERAL REQUIREMENTS

KSQGs, SQGs, and LQGs must meet the following requirements:

- Obtain an EPA ID number
- Update notification form within 60 days of information changing

**Note: Notification forms will be covered in detail in the afternoon session.**

- Pay an annual monitoring fee to KDHE.

# PREPAREDENESS & PREVENTION

- KSQGs and SQGs must meet all of the following requirements if they accumulate hazardous waste on-site:
  - Have an emergency coordinator available 24/7
    - They should be able to reach the facility within 30 minutes.
    - They must be 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.

Example form  
available  
on KDHE's Website

**HAZARDOUS WASTE EMERGENCY RESPONSE**

EMERGENCY COORDINATOR: \_\_\_\_\_

HOME PHONE NUMBER: \_\_\_\_\_

CELL PHONE NUMBER (Optional): \_\_\_\_\_

ALTERNATE: \_\_\_\_\_

HOME PHONE NUMBER: \_\_\_\_\_

CELL PHONE NUMBER (Optional): \_\_\_\_\_

FIRE PHONE NUMBER (unless there is a direct alarm): \_\_\_\_\_

**EQUIPMENT LOCATION**

(A map showing the locations is sufficient)

FIRE EXTINGUISHERS: \_\_\_\_\_

FIRE ALARMS (if present): \_\_\_\_\_

SPILL CONTROL: \_\_\_\_\_

**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:

- Name, address, and US EPA ID number of generator
- Date, time, and type of incident
- Quantity and type of hazardous waste involved
- Extent of any injuries
- Estimated quantity and disposition of recovered materials

**NATIONAL RESPONSE CENTER 1-800-424-8802**

**KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT (785) 296-1679**

# PREPAREDENESS & PREVENTION

- KSQGs and SQGs (Continued)
  - Provide training to employees to ensure that all personnel are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies
    - Provide training within 6 months of hire or transfer to a new position;
    - Provide annual training;
    - Document the training and maintain records for 3 years.

Example form  
 available  
 in the Compliance/  
 Training Manual  
 on KDHE's Website

ATTACHMENT A

HAZARDOUS WASTE MANAGEMENT TRAINING DOCUMENTATION

Employee Name: \_\_\_\_\_  
 Employee Title/Position: \_\_\_\_\_  
 Waste or area for which employee responsible: \_\_\_\_\_

Description of Training	Date	Initials
Hazardous Waste Generator Classifications		
KDHE notification of hazardous waste activity		
Identification of hazardous waste (hazardous waste determination)		
Emergency response (fire, spills, etc.)		
Ensure that emergency preparedness requirements are met (Arrangements are made with local emergency response agencies including fire, police, and hospitals)		
Recordkeeping		
Container management		
Labeling containers "Hazardous Waste"		
Properly closing hazardous waste containers		
Marking storage containers with the accumulation start date		
Inspecting hazardous waste storage areas to ensure that containers are in good condition, properly labeled and closed, have proper aisle space and that incompatible wastes are not stored together.		
Properly documenting hazardous waste storage area inspections		
Ensuring that satellite accumulation containers are properly managed		

# PREPAREDENESS & PREVENTION

- All KSQGs, SQGs, and LQGs must:
  - 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

# PREPAREDENESS & PREVENTION

- All KSQGs, SQGs, and LQGs must:
  - Equip the facility with:
    - 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

# PREPAREDENESS & PREVENTION

- All KSQGs, SQGs, and LQGs :
  - Must attempt to 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

# PREPAREDENESS & PREVENTION

- All KSQGs, SQGs, and LQGs must:
  - 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.
  - Ensure personnel have immediate access to internal alarm or emergency communication device when handling hazardous waste.

# FAILURE TO MAINTAIN AND OPERATE

No effort made to stop leaking from tote of flammable materials



# PREPAREDENESS & PREVENTION

- LQGs must:
  - Prepare and maintain (update) a contingency plan that meets all of the requirements of 40 CFR 265 Subpart D.
  - Ensure that the contingency plan is available in case of an emergency.
  - Train employees and maintain required training records.

# PREPAREDENESS & PREVENTION

- Contingency plans must include:
  - Name, address, and contact information for the emergency coordinator.
  - Arrangements for all emergency services.
  - List and location of all emergency equipment at the facility, their description, and capabilities.
  - Emergency procedures.
  - Evacuation plan.

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# MANAGEMENT ON-SITE

- On-site accumulation of hazardous waste can occur in:
  - Satellite Accumulation Containers  
(includes Day containers)
  - Storage Containers  
(less than 90-day [LQG] or less than 180-day [SQG] accumulation containers)
  - Tanks

# MANAGEMENT ON-SITE

- All containers and tanks must be:
  - Labeled with the words “Hazardous Waste”
  - In good condition and compatible with the contents of the container or tank
  - Kept closed unless actively adding or removing waste

# SATELLITE CONTAINERS

- Satellite containers must meet the following requirements:
  - Be at or near the point of generation
  - Under the control of the operator
  - Only 1 container for each waste stream at each point of generation (different than EPA)
  - 55 gallons or less in size
  - Marked with the words “Hazardous Waste” (more specific than EPA)
  - Closed and in good condition
  - Must be managed as a storage container within three days of no longer meeting the definition of a satellite

# SATELLITE CONTAINERS

- Day containers must meet the following requirements:
  - Be at or near the point of generation
  - Under the control of the operator
  - Only 1 container for each waste stream at each point of generation (different than EPA)
  - 6 gallons or less in size
  - Marked with the words “Hazardous Waste” (more specific than EPA)
  - Closed and in good condition
  - Must be emptied at the end of each day, or each shift if operating 24-hours.

# SATELLITE CONTAINERS



This container is marked with the words “Hazardous Waste” and is thus properly labeled.

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# GOOD SATELLITE CONTAINERS



This container meets satellite container requirements:

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

# SATELLITE CONTAINERS



Although handwritten, this container is marked with the words “Hazardous Waste” and is thus properly labeled.

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# SATELLITE CONTAINERS

Good example of satellite container:

- Closed
- Labeled with words “Hazardous Waste”
- At or near point of generation
- Less than 55 gallons
- Under control of the operator



# SATELLITE CONTAINERS

These containers do not meet these satellite container requirements:

- Not closed
- Not labeled with the words “Hazardous Waste”



# SATELLITE CONTAINERS

These containers do not meet these satellite container requirements:

- Not closed
- Not labeled with words “Hazardous Waste”
- Two satellite containers at the same point of generation



# GOOD SATELLITE CONTAINERS



- This container meets satellite container requirements:
- At or near the point of generation
  - Under the control of the operator
  - Marked “Hazardous Waste”
  - Closed
  - In good condition
  - 55 gallons or less.

# SATELLITE CONTAINERS



Open because  
it is not  
latched.

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# SATELLITE CONTAINERS



Open satellite container, duct tape is not a sufficient latch.

This drum is adequately labeled because “hazardous waste” label is legible through clear liner.

# SATELLITE CONTAINERS

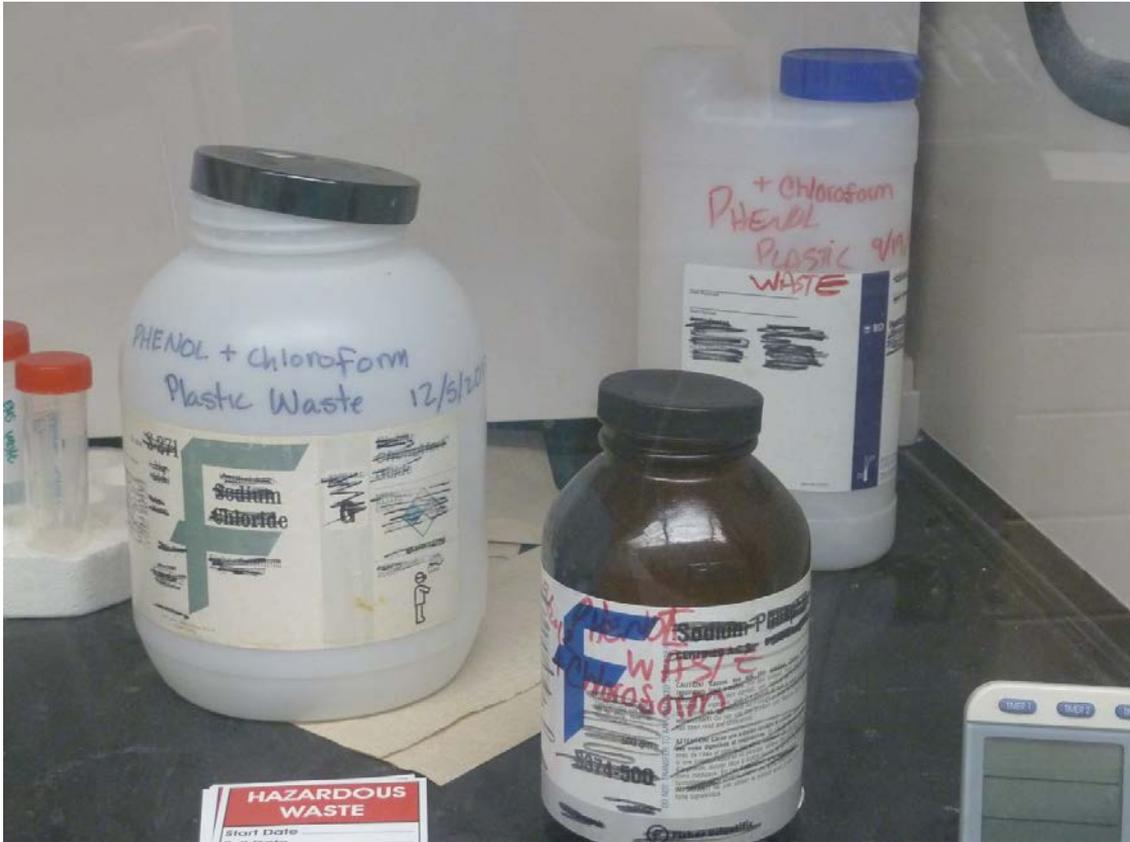


Open satellite  
container

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# SATELLITE CONTAINERS



These containers do not meet these satellite container requirements:

- Not closed
- Not labeled with words “Hazardous Waste”

# SATELLITE CONTAINERS



Two (2)  
Containers at  
the same point  
of generation

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# SATELLITE CONTAINERS



Two (2)  
Containers at  
the same point  
of generation

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# STORAGE AREAS

- There is no state or federal limit to the number of storage areas at a facility.
- Can be located indoors or outside  
(we recommend that they be under cover, and/or on pallets, but it is not required).
- Secondary containment is recommended but is not required.
- LQGs must store ignitable hazardous waste at least 50 feet from the property line.

# STORAGE AREAS

- Storage containers must meet the following requirements:
  - Incompatibles must be separated (this includes separating waste from products to which they are incompatible)
  - Aisle space must be adequate to allow unobstructed movement of people and equipment in case of an emergency

# GOOD STORAGE AREAS

Good aisle space



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# GOOD STORAGE AREAS

Good indoor  
storage area



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# GOOD STORAGE AREAS



Good outdoor storage (but recommend only 2 drums high)

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# STORAGE AREAS



Aisle space is a problem

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# STORAGE AREAS



Aisle space is a problem, boxes and bags all contain hazardous waste

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# STORAGE AREAS

- Insufficient space between incompatible wastes



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# STORAGE CONTAINERS

- Requirements for storage containers (continued):
  - In addition to the requirements previously mentioned
    - marked with the accumulation start date (date that storage began)

# STORAGE AREAS



This drum is labeled “hazardous waste”, but has no accumulation start date and is in poor condition – Note the large dent on left side.

# STORAGE AREAS

Poor condition



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# STORAGE AREAS



No ring on  
container

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# STORAGE AREAS

Not clearly marked “Hazardous Waste”



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# Universal Waste



- Not closed
- Not labeled
- No date tracking method

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# STORAGE CONTAINERS

- Must be inspected weekly (LQG and SQG) or monthly (KSQG and accumulating CESQG).
  - Must inspect for deterioration and leaks
  - Should include review of all storage container requirements (i.e., closed, labeled, dated)

# STORAGE CONTAINERS

- Inspections must be documented and records maintained on-site for 3 years. Must document all of the following:
  - Date and time of the inspection
  - Name of the inspector (not initials)
  - Notation of the observations made
  - Date and nature of any repairs or other remedial actions.



# STORAGE CONTAINERS

- Accumulation time limits:
  - LQGs – 90 days or less
  - SQGs – 180 days or less (or 270 days or less if the waste is transported more than 200 miles)
    - If exceed 13,200 lbs (6,000 kg) of hazardous waste on-site or exceed time limit, then must meet TSD requirements (obtain a permit).

# STORAGE CONTAINERS

- Accumulation time limits:
  - KSQGs – No accumulation time limit (unless you accumulate more than 2,200 pounds on-site, then you become an SQG and the 180-day limit starts)
  - Exceeding time limits could:
    - Result in paying fees for the higher generator class or TSDf activity; and
    - If TSDf activity, require a permit.



# COMPLIANCE EVALUATION INSPECTION

- 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 INSPECTION

- Inspections can be broken into four basic parts:
  - Introduction and review of information
  - Walk-through inspection of facility
  - Records review
  - Exit briefing



# COMPLIANCE EVALUATION INSPECTION

- 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?

# COMPLIANCE EVALUATION INSPECTION

- The 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

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# COMPLIANCE EVALUATION INSPECTION

- The 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 and HOW TO PREVENT THEM

- Waste Determinations
- Container Management
- Preparedness and Prevention
- Training
- Unlawful Acts

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# RESOURCES AVAILABLE

- Website

- Hazardous Waste Generator Handbook
- Compliance/Training Manual
- Inspector Checklists
- Technical Guidance Documents and Policies

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# Finding things on KDHE's website

- KDHE homepage: <http://kdheks.gov/>



**AD ASTRA PER ASPERA**  
**Kansas**  
Department of Health and Environment

Sam Brownback, Governor  
Susan Mosier, MD, Secretary

Home Public Health Environment Health Care Finance Laboratories News

Get the Facts About  
**Norovirus**

Blue Green Algae Bloom Season  
Get the Facts About Norovirus  
Kansas Environmental Conference  
Zika

A to Z Topic Listing

Administration

- Office of the Secretary
- Center for Performance Management
- Kansas Health Equity Resources
- Legislative Testimony & Reports

People Want to Know

- #ThinkTravelHistory
- Air Permitting
- Avian Influenza

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# Finding things on KDHE's website

- BWM homepage: <http://www.kdheks.gov/waste/index.html>

The screenshot shows the homepage of the Bureau of Waste Management on the KDHE website. At the top, there is a banner with the Kansas state seal and the motto "AD ASTRA PER ASPERA" above the text "Kansas Department of Health and Environment". To the right of the banner, it lists "Sam Brownback, Governor" and "Susan Mosier, MD, Secretary". Below the banner is a navigation menu with buttons for "Home", "Public Health", "Environment", "Health Care Finance", "Laboratories", and "News". Underneath the navigation menu is a sub-header "Bureau of Waste Management" and social media icons for Facebook, Twitter, YouTube, RSS, and LinkedIn.

## Waste Management

**Bill Bider, Director**  
Phone: (785) 296-1600 Fax: (785) 296-8909  
1000 SW Jackson, Suite 320  
Topeka, KS 66612-1366

*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.*

**Announcements and News**

- Household Hazardous Waste Program Report - SFY15
- Implementation of RCRA Corrective Action in Kansas - October 2013
- Kansas Coal Combustion Residuals Documents
- Kansas Solid Waste Program Report - SFY15
- Landfill Gas Fact Sheet
- Stormwater Rules at SW Facilities

**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

**Waste Mgmt Links**

- [Contact Us](#)
- [BWM Staff Listing](#)
- [What's New](#)
- **Events**
- [2016 KICK Calendar Contest](#)
- [Winners' Recognition](#)
- [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 \(KORA\)](#)

**Composting**      **Hazardous Waste Program**

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# Finding things on KDHE's website

## Compliance, Assistance, & Enforcement

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

- First bullet is a link to the KDHE certified lab database.
- Last bullet links to several useful documents (see next slide)

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# Finding things on KDHE's website

[A to Z Topic Listing](#)

## **Bureau of Waste Management Solid & Hazardous Waste Compliance Documents**

<a href="#">Waste Home</a>
<a href="#">Compliance, Assistance, &amp; Enforcement</a>
<a href="#">Composting</a>
<a href="#">Hazardous Waste Generator Program</a>
<a href="#">Hazardous Waste Permitting</a>
<a href="#">Household Hazardous Waste</a>
<a href="#">Regulations, Policies, &amp; Technical Guidance</a>
<a href="#">Reports, Publications, &amp; Newsletters</a>
<a href="#">Solid Waste Permitting</a>
<a href="#">Waste Reduction, Public Education, &amp; Grants</a>
<a href="#">Waste Tire Program</a>

<a href="#">Kansas Statutes and Regulations</a>
<a href="#">Hazardous Waste Generator Handbook</a>
<a href="#">Solid Waste Checklists</a>
<a href="#">Hazardous Waste Checklists</a>
<a href="#">Used Oil Checklists</a>
<a href="#">Forms and Examples</a>

- [GEN525-Day Accumulation Container Notification Form](#)
- [GEN520-Kansas Generator Emergency Response Information](#) (.doc) (.pdf)
- [GEN500-Notification of Regulated Waste Activity](#)
- [Right to Inspect \(K.A.R. 28-31-12\)](#) (.doc) (.pdf)
- [Sample Job Description](#) (.doc) (.pdf)
- [Sample Outside Emergency Response Agency](#) (.doc) (.pdf)
- [Special Waste Disposal Request](#)
- [Training/Compliance Manual](#) (.pdf)
- [COM215-Used Oil Transporter Application](#)
- [Weekly Inspection Form](#) (.xls) (.pdf)
- [Landfill Approval and Permit Applications](#)
- [Landfill Closure Cost Estimating Worksheets](#)
- [Disposal of Solid Waste Without a Permit](#)
- [Solid Waste Processing & Planning Facility Forms](#)
- [Composting Forms](#)
- [E-Waste Permit Forms](#)
- [Household Hazardous Waste Facility Application and Annual Report Forms](#)
- [Solid Waste Processing Facility Closure Cost Estimating Worksheets](#)
- [Solid Waste Activities Not Requiring a Permit](#)
- [Solid Waste Restrictive Covenant Forms](#)
- [Solid Waste Disclosure Statements](#)
- [Solid Waste Closure, Post-Closure, Corrective Action, and Financial Assurance Forms](#)

<a href="#">Penalty Matrices</a>
<a href="#">BWM/DOE Policies</a>
<a href="#">BWM Technical Guidance Documents</a>

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# Finding things on KDHE's website

## Hazardous Waste Program

- EPA's RCRAInfo Database
- Hazardous Waste Fees
- Hazardous Waste & Used Oil Forms
- Hazardous Waste Generator Handbook
- Hazardous Waste Transporter List
- Used Oil Transporter List

## Regulations, Policies, & Technical Guidance

- Policies
- Proposed Regulations
- Statutes and Regulations
- Technical Guidance Documents

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# RESOURCES AVAILABLE

- 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  
[kpowell@kdheks.gov](mailto:kpowell@kdheks.gov)
- Brian Burbeck  
785-296-1613  
[bburbeck@kdheks.gov](mailto:bburbeck@kdheks.gov)

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# Questions



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[www.kdheks.gov](http://www.kdheks.gov)

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