

**Utah Department of Environmental Quality
Division of Waste Management and Radiation Control**

**P.O. Box 144880
Salt Lake City, Utah 84114-4880**

**Phone (801) 536-0200
Fax (801) 536-0222**



**WASTE MANAGEMENT
& RADIATION CONTROL**

**SMALL BUSINESS ASSISTANCE
PROGRAM**

DWMRC REPRESENTATIVE:

Name: (Printed) _____

Signature: _____

Title: Environmental Scientist/Engineer

Date: _____

UTAH DEQ SMALL BUSINESS ASSISTANCE FORM

Facility: _____

Date: _____

R315-262-11 DETERMINATION OF WHETHER A WASTE IS HAZARDOUS

ACTION NEEDED: _____

R315-262-18 NOTIFICATION AND EPA HAZARDOUS WASTE IDENTIFICATION NUMBERS

___ If you generate between 100 and 1,000 Kgs (220-2,200 lbs.) of **non-acute** hazardous waste per month AND less than 1 Kg of **acutely hazardous waste** AND less than 100 kg of residues from a cleanup of acute hazardous waste, you are classified as a Small Quantity Generator (SQG), and must notify the Director of the Utah Division of Waste Management and Radiation Control (UDWMRC) to obtain an EPA ID Number.

___ If you are a Small Quantity Generator, you must obtain an EPA ID Number (Form 8700-12) in order to offer hazardous waste for management to a transporter, or to a treatment, storage and disposal facility (TSDF) that also has an EPA ID Number. Prior to September 1, 2021, and every 4 years afterwards (prior to September 1st), you must renotify the Director of UDWMRC using EPA Form 8700-12.

ACTION NEEDED: _____

R315-262-20 thru 25 MANIFESTS

- ___ Use approved manifest forms 8700-22 and 8700-22A, or the Electronic Manifesting System, when offering hazardous wastes for transport to a TSDF.
- ___ Designate another TSDF facility or instruct a transporter to return wastes if they are undeliverable.
- ___ Fill out all applicable sections of the manifest.
- ___ If a SQG reclaims a waste under a contractual reclamation agreement, a manifest is not required. Certain conditions must be met: R315-262-20(e).
- ___ Keep copies of contractual reclamation agreements for three years after service ends.

ACTION NEEDED: _____

R315-262-40 RECORDKEEPING

- ___ Keep copies of all manifests for three years.
- ___ Keep all records, including determination of generation rates, waste characterization documentation, disposition, etc., for three years.

ACTION NEEDED: _____

R315-262-42 EXCEPTION REPORTING

___ If the TSDF does not return the generator's original copy of the manifest (or sign electronically in the Electronic Manifesting System) within 60 days from the date the waste was accepted by the initial transporter, submit a letter to the Director of UDWMRC that states this, and provide a copy of the manifest.

ACTION NEEDED: _____

R315-262-30 thru 33 PACKAGING, LABELING, MARKING AND PLACARDING

___ Package, label and mark waste containers in accordance with D.O.T. 49 CFR requirements prior to shipment offsite.

ACTION NEEDED: _____

R315-262-16(b) ACCUMULATION OF HAZARDOUS WASTE

- ___ Do not store hazardous wastes for longer than 180 days, or 270 days (R315-262-16(c), R315-262-16(d)), if applicable, without a permit.
- ___ Do not exceed 6000 Kg of hazardous wastes stored in your facility at any time.
- ___ Mark the date that accumulation of hazardous waste began on each container (not required for satellite accumulation containers).
- ___ Label each hazardous waste container or tank with the words "HAZARDOUS WASTE", and an indication of the hazards of the contents (such as D.O.T. hazmat labels, NFPA chemical hazard labels, OSHA pictograms, or EPA waste characteristics (i.e., ignitable, corrosive, reactive, toxic)).
- ___ Containers holding hazardous waste must be in good condition.
- ___ Hazardous wastes must be stored in containers that are compatible with the waste.
- ___ Containers holding hazardous waste must be kept closed, except when adding or removing waste.
- ___ Do not open, handle or store containers of hazardous waste in a manner which could cause a release.
- ___ Containers of hazardous waste must be inspected weekly for signs of leakage or deterioration. A log should be kept to document inspections.
- ___ Incompatible wastes, or incompatible wastes and materials should not be placed into the same container.
- ___ Hazardous wastes should not be stored in containers that previously held an incompatible material, unless cleaned prior to doing so.
- ___ Incompatible wastes should be separated by means of a dike, berm, or similar method.

ACTION NEEDED: _____

R315-263-30, 31, 33 SPILLS OF HAZARDOUS WASTE

___ When a spill of hazardous waste occurs, the generator must take appropriate action to minimize the threat to human health and the environment.

___ If more than 1 Kg (2.2 lbs.) of acutely hazardous waste, or 100 Kg (220 lbs.) of non-acute hazardous waste is spilled, the Utah Dept. of Environmental Quality must be notified by calling (801) 536-4123.

___ For a spill that could threaten human health outside the facility or when the small quantity generator has knowledge that a spill has reached surface water, both the National Response Center (800) 424-8802, and the Utah DEQ (801) 536-4123 should be notified.

___ The person responsible for the material at the time of the spill shall clean up the spilled material, residues, and any contaminated media.

___ Within 15 days after a spill of hazardous waste, the person responsible must submit a written report that contains the information in R315-263-33.

ACTION NEEDED: _____

UTAH DEQ SMALL BUSINESS ASSISTANCE FORM Continued

R315-262-16(b)(8) PREPAREDNESS AND PREVENTION

- ☐ Operate your facility in such a manner that minimizes the possibility of fire, explosion or any unplanned releases.
- ☐ You must have the following equipment, unless the wastes you store do not pose the hazards that the equipment is designed to respond to:
 - Internal communications or alarm capable of instruction (intercom, etc.)
 - A device capable of summoning outside emergency assistance (direct alarm to fire dept., or telephone, etc.)
 - Portable fire extinguishers, water at adequate pressure and volume to supply fire fighting needs
 - Alarms and communication devices accessible to personnel where hazardous wastes are being handled
- ☐ Maintain and perform periodic testing, if possible, on communication systems, fire, spill response, decontamination and protective equipment
- ☐ If there is ever only ONE employee on the premises during operations, does that employee have immediate access to a communications device capable of summoning emergency assistance?
- ☐ Adequate aisle space must be maintained for containers in storage areas, to allow for unobstructed movement during emergencies.
- ☐ The facility must make arrangements to familiarize police, fire, and emergency response teams with the facility layout, nature of wastes handled, locations where personnel normally work, facility entrances and/or evacuation routes
- ☐ The facility must make arrangements with state emergency response teams, emergency response contractors, and response equipment suppliers
- ☐ The facility should designate a primary emergency authority (such as a specific police/fire department), in cases where multiple police and/or fire departments could respond
- ☐ The facility should make efforts to familiarize local hospitals with the nature/properties of the hazardous wastes handled, and the types of injuries/illnesses which could result from fires, explosions, or releases of these wastes.
- ☐ Maintain documentation of notification letters, responses/lack of responses/refusals for emergency assistance requests between local fire, police, and hospitals that your facility has made/received.

ACTION NEEDED: _____

R315-262-16(b)(7) LAND DISPOSAL RESTRICTIONS

- ☐ If you perform treatment on hazardous waste, for the purposes of meeting Land Disposal Restriction standards, you must develop and follow a written waste analysis plan (WAP). The WAP must be based upon a laboratory analysis of the waste and must contain all necessary elements for a WAP.
- ☐ Maintain a current Land Disposal Restriction Notice for each waste that is land disposal restricted. The first shipment of a land disposal restricted hazardous waste must have an accompanying LDR notification with the manifest for that shipment.
- ☐ LDR records for all hazardous wastes generated must be maintained for at least three years after the waste is shipped offsite.

ACTION NEEDED: _____

R315-262-16(b)(9) EMERGENCY PROCEDURES

- ☐ Designate and authorize an emergency coordinator(s) who is (are) readily available by some means, at all times.
- ☐ Post the following information next to telephones at the facility, and in areas where hazardous wastes are handled:
 - Name and telephone number of the emergency coordinator(s)
 - Locations of fire extinguishers, spill control equipment, and fire alarms
 - Telephone number of the local fire department (or equivalent response organization)
- ☐ Ensure that all employees are familiar with hazardous waste handling and emergency procedures.
- ☐ The emergency coordinator must respond appropriately to emergencies that have the potential of involving hazardous wastes.

ACTION NEEDED: _____

R315-273 UNIVERSAL WASTES, FLUORESCENT LIGHT TUBES

- ☐ High mercury fluorescent light tubes must be recycled or disposed as hazardous waste. Any broken tubes must be managed as a hazardous waste but can still be recycled. Do not dispose of tubes in the regular trash or in the dumpster.
- ☐ Label either the waste tubes or container holding the tubes as "UNIVERSAL WASTE-MERCURY CONTAINING LAMPS".
- ☐ If you would like to crush the lamps, an application must be submitted and approved to the Director of Waste Management and Radiation Control.

ACTION NEEDED: _____

R315-15 STANDARDS FOR USED OIL GENERATORS

- ☐ Use permitted used oil transporter, (name, address and telephone number of transporter).
- ☐ Storage tanks and associated piping in good condition and labeled "Used Oil".
- ☐ Burn only their own used oil in vented space heater with a max. cap. of 0.5 million BTUs or in (>0.5 cap.heater).
- ☐ Hot drain punctured oil filters. Method of filter disposal. Discarded in trash or recycled. If recycled, by whom?
- ☐ Clean up any used oil spills and any contaminated soil.
- ☐ For Spills greater than 25 gallons ,or smaller releases that pose a potential threat to human health or the environment, must be reported to DEQ at 801-536-4123.

ACTION NEEDED: _____

COMMENTS – If you have any questions, please call the Division at (801) 536-0200.

Example of Employee Training Log (this is only an example and must be adapted specifically to your facility)

XYZ Company Employee Training Log

Date: April 9, 2015

Time: 10:00 am to 11:00 am

Discussion lead by: John Doe, Health and Safety Coordinator

Topics Discussed

I. Hazardous Waste Accumulation Time

- a. Do not store hazardous wastes for longer than 180 days on site.
- b. Label each container or tank with the words "Hazardous Waste."
- c. Mark/label each container with an indication of the hazards of its contents.

II. Use and Management of Containers

- a. Maintain a log weekly on the hazardous waste containers; containers closed, labeled, dated and in good condition. If not, please contact the emergency coordinator in order to rectify the problem.

III. Other topics as discussed

- a.
- b.

Employee Name (Please Print)

Employee Signature

- 1. _____
- 2. _____
- 3. _____
- 4. _____
- 5. _____

These are only examples that will help you to comply with the regulations. You must **adapt** the following information and it make specific to **your** facility.

SEE #10c

Today's date:

Letters to: Your Hospital
 Your local Police Department
 Your local Fire Department

Dear Sir or Madame:

In accordance with Utah Administrative Code R315-262-16(b)(8)(vi) and 40 CFR 262.16(b)(8)(vi), we are required to notify you that we generate hazardous waste(s). The waste(s) that we generate is (are) ...(examples might be: waste paints, paint sludges, Methyl Ethyl Ketone, Acetone, other solvents, acids, bases, listed wastes, etc).

We make every effort to properly manage our wastes, but in the event of an emergency we may require your assistance. In the event of an unforeseen emergency, you may be requested to respond.

Your name and title

Your company name

See 7f

**IN CASE OF AN EMERGENCY DIAL 911
EMERGENCY COORDINATOR IS CARL CAREFUL –
EXT 2536
FIRE EXTINGUISHERS LOCATION MARKED ON THE WALL
SPILL CONTROL EQUIPMENT LOCATED AT TIME CLOCK**

See 12b

**UNIVERSAL WASTE
LAMPS**

DATE: _____

These are only examples that will help you to comply with the regulations. You must adapt the following tables and it make specific to your facility.

CONTAINER MANAGEMENT LOG

Date	Inspector's <i>Name</i>	Are containers labeled with the words "HAZARDOUS WASTE", and a label/ marking that indicates the hazards of its contents?		Is accumulation date marked on all hazardous waste containers and is that date less than 180 days old?		Are hazardous waste containers closed and are all bungs and bung rings secure?		If any columns are marked NO describe what was done to bring the container into compliance?
		Yes	No	Yes	No	Yes	No	

MANIFEST MANAGEMENT LOG

Date	Manifest number	Total pounds of hazardous waste (convert all amounts to pounds)		Generator copy of manifest signed by transporter & our company representative		Land Disposal Restriction certification (LDR) with matching manifest number		Signed copy from disposal facility mailed back to us within 60 days		Are these three forms stapled together?		If any columns are marked NO, what is being done to bring manifest file into compliance?
		Total Pounds		Yes	No	Yes	No	Yes	No	Yes	No	