Hazardous Waste
Generators

ENVIRONMENTAL
QUALITY
WASTE MANAGEMENT & RADIATION CONTROL
Overview

- Generator Categories
- Requirements for VSQGs, SQGs, and LQGs
- Satellite Accumulation
<table>
<thead>
<tr>
<th>Generator Category</th>
<th>Quantity of Acute Hazardous Waste Generated in a Calendar Month</th>
<th>Quantity of Non-Acute Hazardous Waste Generated in a Calendar Month</th>
<th>Quantity of Residues from Cleanup of Acute Hazardous Waste Generated in a Calendar Month</th>
<th>Generator Category</th>
</tr>
</thead>
</table>
| > 1 kg  
> 2.2 lbs | Any Amount | Any Amount | Large Quantity Generator |
| Any Amount | ≥ 1,000 kg  
≥ 2,200 lbs | Any Amount | Large Quantity Generator |
| Any Amount | Any Amount | > 100 kg  
> 220 lbs | Large Quantity Generator |
| ≤ 1 kg  
≤ 2.2 lbs | > 100 kg and < 1,000 kg  
> 220 lbs and < 2,200 lbs | ≤ 100 kg  
≤ 220 lbs | Small Quantity Generator |
| ≤ 1 kg  
≤ 2.2 lbs | ≤ 100 kg  
≤ 220 lbs | ≤100 kg  
≤ 220 lbs | Very Small Quantity Generator |
<table>
<thead>
<tr>
<th>Hazardous waste #</th>
<th>Chemical abstracts #</th>
<th>Substance</th>
</tr>
</thead>
<tbody>
<tr>
<td>P003</td>
<td>107-02-8</td>
<td>Acrolein</td>
</tr>
<tr>
<td>P015</td>
<td>7440-41-7</td>
<td>Beryllium powder</td>
</tr>
<tr>
<td>P042</td>
<td>51-43-4</td>
<td>Epinephrine</td>
</tr>
<tr>
<td>P063</td>
<td>74-90-8</td>
<td>Hydrogen cyanide</td>
</tr>
<tr>
<td>P089</td>
<td>56-38-2</td>
<td>Parathion</td>
</tr>
<tr>
<td>P094</td>
<td>298-02-2</td>
<td>Phosgene</td>
</tr>
<tr>
<td>P095</td>
<td>75-44-5</td>
<td>Phosgene</td>
</tr>
<tr>
<td>P105</td>
<td>26628-22-8</td>
<td>Sodium azide</td>
</tr>
<tr>
<td>P106</td>
<td>143-33-9</td>
<td>Sodium cyanide</td>
</tr>
<tr>
<td>P108</td>
<td>157-24-9</td>
<td>Strychnine, &amp; salts</td>
</tr>
<tr>
<td>P001</td>
<td>181-81-2</td>
<td>Warfarin, &amp; salts, when present at concentrations greater than 0.3%</td>
</tr>
<tr>
<td>P064</td>
<td>624-83-9</td>
<td>Methyl isocyanate</td>
</tr>
<tr>
<td>P075</td>
<td>154-11-5</td>
<td>Nicotine, &amp; salts (this listing does not include patches, gums and lozenges that are FDA-approved over-the-counter nicotine replacement therapies).</td>
</tr>
<tr>
<td>P081</td>
<td>55-63-0</td>
<td>Nitroglycerine (R)</td>
</tr>
</tbody>
</table>
Generator Categories
Waste Storage Limits
R315-262-16

Very Small Quantity Generators (VSQG) - No more than 2,200 lbs (1,000 kg) of hazardous waste or 2.2 lbs (1 kg) of acute HW onsite at any time

Small Quantity Generators (SQG) - No more than 13,228 lbs (6,000 kg) of hazardous waste onsite or 2.2 lbs (1 kg) of acute HW onsite at any time
A gallon of water weighs 8.33 pounds
A 55 G drum of water weighs about 458 pounds

- ½ drum = VSQG
- >27 gallons = SQG
- 4 drums = SQG
- 5 drums = LQG
A gallon of water weighs 8.33 pounds
A 55 G drum of water weighs about 458 pounds
VSQG 2,200 lbs at any time – 264 gallons
SQG 13,228 lbs at any time – 1588 gallons
## Generator Category Exercise

<table>
<thead>
<tr>
<th>Chemical</th>
<th>Density (lbs/gal)</th>
<th>VSQG Monthly 220 lbs to gal</th>
<th>VSQG Total 2200 lbs to gal</th>
<th>VSQG Total in 55gal drums</th>
<th>SQG Monthly 2200 lbs to gal</th>
<th>SQG Monthly (drums)</th>
<th>SQG Total 13228 lbs to gal</th>
<th>SQG Total in 55 gal drums</th>
</tr>
</thead>
<tbody>
<tr>
<td>gasoline</td>
<td>6.30</td>
<td>34.9</td>
<td>349.2</td>
<td>6.3</td>
<td>349.2</td>
<td>6.3</td>
<td>2099.7</td>
<td>38.2</td>
</tr>
<tr>
<td>acetone</td>
<td>6.64</td>
<td>33.1</td>
<td>331.3</td>
<td>6.0</td>
<td>331.3</td>
<td>6.0</td>
<td>1992.2</td>
<td>36.2</td>
</tr>
<tr>
<td>methyl ethyl ketone (MEK)</td>
<td>6.74</td>
<td>32.6</td>
<td>326.4</td>
<td>5.9</td>
<td>326.4</td>
<td>5.9</td>
<td>1962.6</td>
<td>35.7</td>
</tr>
<tr>
<td>isopropyl alcohol (IPA)</td>
<td>6.82</td>
<td>32.3</td>
<td>322.6</td>
<td>5.9</td>
<td>322.6</td>
<td>5.9</td>
<td>1939.6</td>
<td>35.3</td>
</tr>
<tr>
<td>toluene</td>
<td>7.18</td>
<td>30.6</td>
<td>306.4</td>
<td>5.6</td>
<td>306.4</td>
<td>5.6</td>
<td>1842.3</td>
<td>33.5</td>
</tr>
<tr>
<td>water</td>
<td>8.33</td>
<td>26.4</td>
<td>264.1</td>
<td>4.8</td>
<td>264.1</td>
<td>4.8</td>
<td>1588.0</td>
<td>28.9</td>
</tr>
<tr>
<td>glacial acetic acid</td>
<td>8.74</td>
<td>25.2</td>
<td>251.7</td>
<td>4.6</td>
<td>251.7</td>
<td>4.6</td>
<td>1513.5</td>
<td>27.5</td>
</tr>
<tr>
<td>hydrochloric acid</td>
<td>9.83</td>
<td>22.4</td>
<td>223.8</td>
<td>4.1</td>
<td>223.8</td>
<td>4.1</td>
<td>1345.7</td>
<td>24.5</td>
</tr>
<tr>
<td>methylene chloride</td>
<td>10.52</td>
<td>20.9</td>
<td>209.1</td>
<td>3.8</td>
<td>209.1</td>
<td>3.8</td>
<td>1257.4</td>
<td>22.9</td>
</tr>
<tr>
<td>nitric acid</td>
<td>11.70</td>
<td>18.8</td>
<td>188.0</td>
<td>3.4</td>
<td>188.0</td>
<td>3.4</td>
<td>1130.6</td>
<td>20.6</td>
</tr>
<tr>
<td>trichloroethylene (vinyl chloride)</td>
<td>12.51</td>
<td>17.6</td>
<td>175.9</td>
<td>3.2</td>
<td>175.9</td>
<td>3.2</td>
<td>1057.4</td>
<td>19.2</td>
</tr>
<tr>
<td>perchloroethylene/tetrachloroethylene</td>
<td>13.46</td>
<td>16.3</td>
<td>163.4</td>
<td>3.0</td>
<td>163.4</td>
<td>3.0</td>
<td>982.8</td>
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<tr>
<td>sulfuric acid</td>
<td>15.30</td>
<td>14.4</td>
<td>143.8</td>
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<td>143.8</td>
<td>2.6</td>
<td>864.6</td>
<td>15.7</td>
</tr>
</tbody>
</table>
VSQG Must:

1. Identify its hazardous waste
2. Store no more than 1,000 kg (2,200 lbs) of hazardous waste or 1 kg (2.2 lbs) of acute HW onsite at any time
3. Ensure delivery to an off-site treatment, storage, or disposal facility authorized to manage VSQG waste
Hazardous Waste Determination

1. Is it a solid waste?
   - Yes
   - No

2. Is it an excluded waste?
   - Yes
   - No

3. Does it meet a listing description?
   - Yes
   - No

4. Does it exhibit a characteristic?
   - Yes
   - No

If the waste is not a solid waste, it is not subject to RCRA subtitle C.
If it is an excluded waste, it is not subject to RCRA subtitle C.
If it meets a listing description and exhibits a characteristic, the waste is hazardous and subject to subtitle C regulation.

Waste is hazardous and subject to subtitle C regulation
Disposing of VSQG Hazardous Waste

R315-262-14

- Hazardous waste treatment, storage or disposal facility (TSDF)
- Municipal or industrial solid waste management facility
- Facility that uses, reuses or recycles the waste
- Universal Waste handling facility (for universal waste)
- Consolidate to a Large Quantity Generator under the control of the same person as the VSQG
Consolidation Labeling Requirements

IGNITABLE
CORROSIVE
REACTIVE
TOXIC

EPA Characteristics  DOT Shipping Labels  OSHA GHS Pictograms  NFPA 704 Labels
There is no quantity limit for shipments from the VSQG to the LQG

No hazardous waste manifest is required and hazardous waste transporters do not have to be used

The VSQG and the LQG can be in different states
Shipping VSQG Hazardous Waste

Must comply with all DOT requirements:
Marking, Placarding, Shipping papers

Shipping on an electronic manifest:

* If your transporter uses e-manifests, you will need an EPA ID number
* Fill out form 8700-12 and send it to Kaci McNeill
Small Quantity Generators (SQG)
Waste Generation and Storage Limits

- Generate more than 220 lbs (100 kg) but less than 2,200 lbs (1,000 kg) hazardous waste in a month
- Generate up to 2.2 lbs (1kg) pounds acute hazardous waste in a month
- No more than 13,228 pounds (6,000 kg) of hazardous waste onsite
- May accumulate onsite for 180 days or 270 days if transported more than 200 Miles
## Generator Category Exercise

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</tbody>
</table>
SQG Requirements
R315-262-18

* EPA Identification Number
* Hazardous Waste Transporter and TSD
* Re-notification
SQG Requirements
R315-262-20, R315-262-40, R315-262-42

Manifest Requirements

* Use
* Recordkeeping
* Exception Reporting
Containers

- Compatible with the Waste and In Good Condition
- Keep Containers Closed
- Label Containers with the Words “Hazardous Waste” and an Indication of the Hazards of the Contents
- Not Handle or Store Containers so that They Might Rupture, Leak or Be Damaged
- Inspect Central Accumulation Areas Weekly
Acceptable Open Container
SQG Requirements
R315-262-16

Accumulation of Incompatible Wastes

- Not Placed in Same or Unwashed Containers
- Separated by Dike, Berm, Wall or Other Device
Labeling Requirements
At the Point of Generation

EPA Characteristics
DOT Shipping Labels
OSHA GHS Pictograms
NFPA 704 Labels
HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:

NAME __________________________ PHONE __________________________

ADDRESS __________________________ STATE UT ZIP

CITY __________________________

MANIFEST TRACKING NO ____________ ACCUMULATION START DATE ____________

EPA WASTE NO __________________________

RQ, UN1263, WASTE PAINT RELATED MATERIAL, 5, PG III

(WASTE PAINT RELATED MATERIALS - LIQUID)

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

STYLE WM37

LAB1MASTER® (800) 621-5908 www.lab1master.com
Labeling Requirements
Prior to Shipping

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:
NAME: Generic College
ADDRESS: 123 College Street, College Town, CT 06032
PHONE: (800) 123-4567
CITY: College Town
STATE: CT
ZIP: 06032
MANIFEST TRACKING NO.: 123456789ABC
ACCUMULATION START DATE: 12/10/2007
EPA ID NO.: CT000123456
EPA WASTE NO.: D002

WASTE (Corrosive Liquids, N.O.S. B, UN 760)

III (Sulfuric Acid, Hydrochloric Acid)

HANDLE WITH CARE!

WASTE MANAGEMENT & RADIATION CONTROL
SQG Central Accumulation Area
R315-262-16(b)

- 180/270-Day Areas
- Containers
  - Labeling – accumulation start date
  - Inspect Weekly
  - Preparedness & Prevention
  - Emergency Procedures
  - Training
Must be Equipped with:
- Internal Communication or Alarm System
- Device Capable of Summoning Emergency Assistance
- Portable Fire Extinguishers
- Spill Control and Decontamination Materials
- Water at Adequate Volume and Pressure

Must Test and Maintain All Equipment
Must Have Sufficient Aisle Space
AISLE SPACE

Inadequate

Adequate
SQG Preparedness and Prevention
R315-262-16

* Notify Local Fire, Police, Emergency Response Teams and Hospitals or LEPCs

* Waiver for 24 Hour Internal Response

* Ensure that Employees are Familiar with Proper Waste Handling and Emergency Procedures

* Emergency Coordinator On Site or On Call
SQG Preparedness and Prevention

R315-262-16

Posted Near the Phone

• Name and Number of Facility Emergency Coordinator(s)
• Location of Fire Extinguishers
• Location of Spill Control Equipment
• Location of Fire Alarms
• Telephone Number of the Fire Department
Emergency Contact(s) Telephone Posting

This information is to be posted next to telephones or in areas of a small quantity generator of hazardous waste (SQG) directly involved in the generation and accumulation of hazardous waste. [R315-262-16(b)(9)(ii)]

Emergency Coordinator(s):

<table>
<thead>
<tr>
<th>Emergency Coordinator Name</th>
<th>Emergency Telephone Number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Emergency Contacts:

<table>
<thead>
<tr>
<th>Emergency Contact</th>
<th>Phone Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire Department <em>(unless direct alarm)</em></td>
<td></td>
</tr>
<tr>
<td>The following emergency contact information is not required but is recommended.</td>
<td></td>
</tr>
<tr>
<td>Police Department</td>
<td></td>
</tr>
<tr>
<td>Hospital</td>
<td></td>
</tr>
<tr>
<td>State Emergency/Spill Notification or Reporting</td>
<td>801-536-0200/801-536-4123</td>
</tr>
<tr>
<td>Local/Regional Notification or Reporting <em>(e.g., LEPC)</em></td>
<td></td>
</tr>
<tr>
<td>National Response Center <em>(24-Hour)</em></td>
<td>1.800.424.8802</td>
</tr>
</tbody>
</table>

Location of Emergency Response Equipment:

<table>
<thead>
<tr>
<th>Fire extinguishers</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Spill control material</td>
<td></td>
</tr>
<tr>
<td>Fire alarm <em>(if present)</em></td>
<td></td>
</tr>
</tbody>
</table>
LQG Requirements

R315-262-17

- LQGs Must Obtain an EPA Identification Number Using Site ID Form (EPA Form 8700-12) (R315-262-18)
- All LQGs Must Re-Notify the Division by March 1 of Each Even-Numbered Year with Biennial Report
- Accumulate Hazardous Waste Onsite for No More than 90 Days
Containers

* Compatible with the Waste and In Good Condition
* Keep Containers Closed
* Label Containers with the Words “Hazardous Waste” and an Indication of the Hazards of the Contents
* Not Handle or Store Containers so that They Might Rupture, Leak or Be Damaged
* Inspect Central Accumulation Areas Weekly

LQG Container Requirements
R315-262-17
Labeling Requirements
At the Point of Generation

IGNITABLE
CORROSIVE
REACTIVE
TOXIC

EPA Characteristics
DOT Shipping Labels
OSHA GHS Pictograms
NFPA 704 Labels
Labeling Requirements
Prior to Shipping
Conditions for Accumulation of Ignitable and Reactive Wastes

- 50 Feet from Property Line Approved in Writing
- Prevent Accidental Ignition or Reaction
  - Protect from sources of ignition
  - No Smoking signs posted
LQG Central Accumulation Area
R315-262-17(a)

- 90-Day Areas
- Containers
  - Labeling – accumulation start date
  - Special requirements
  - Inspect Weekly
  - Preparedness & Prevention
  - Emergency Procedures
  - Training

WASTE MANAGEMENT & RADIATION CONTROL
LQG Preparedness & Prevention
R315-262-250 through 265

* Must be Equipped with:
  * Internal Communication or Alarm System
  * Device Capable of Summoning Emergency Assistance
  * Portable Fire Extinguishers/Fire Control Equipment
  * Spill Control and Decontamination Materials
  * Water at Adequate Volume and Pressure

* Must Test and Maintain All Equipment
* Must Have Sufficient Aisle Space
LQG Preparedness & Prevention
R315-262-250 through 265

* Attempt to Make Arrangements with Local Fire, Police, Emergency Response Teams and Hospitals or LEPCs
  * Determine potential need
  * Familiarize with facility layout
  * Document attempts and arrangements
* Emergency Coordinator On Site or On Call
Written Hazardous Waste Contingency Plan must include:

- Description of Actions to be Taken
- Descriptions of Arrangements Agreed to by Local Emergency Responders or LEPCs
- Names and Phone Numbers of Emergency Coordinators or Position Title and Phone Number
- List of Emergency Equipment
- Evacuation Plan
LQG Hazardous Waste Contingency Plan
R315-262-250 through 265

* Spill Prevention, Control and Countermeasures Plan (SPCC) or “One Plan”

* Copies of the Contingency Plan

* Amendment of the Plan
LQG HW Contingency Plan
R315-262-250 through 265

* Quick Reference Guide
  * Types/Names of Hazardous Waste and Hazards
  * Estimated Maximum Amounts of Waste
  * Wastes Where Exposure Would Require Unique/Special Medical Treatment
  * Maps of Waste Locations and Routes of Access and Evacuation
  * Location of Water Supply
  * Identification of On-Site Notification Systems
  * Names and Phone Numbers of Emergency Coordinators
EXAMPLE QUICK REFERENCE GUIDE

This example was created by EPA Region 7 to be used as a guide to assist the regulated community with compliance. It does not substitute for or replace any regulatory requirements.

Contingency plan quick reference guide
ABC FACILITY
1000 SW Main Street
Anytown, Iowa 50000

Facility Contacts:

Primary Emergency Coordinator: George Washington Mobile Number (24/7): 515-555-0000
Secondary Emergency Coordinator: Abraham Lincoln Mobile Number (24/7): 515-555-0001
Tertiary Emergency Coordinator: Martha Washington Mobile Number (24/7): 515-555-0002

Note: ABC Facility operates 3 shift, 24/7, but the order of contact during an emergency is listed above.

Hazardous Waste Information:

<table>
<thead>
<tr>
<th>Name of Waste</th>
<th>Waste Codes/Hazards</th>
<th>Location Accumulated</th>
<th>Maximum Amounts Present</th>
<th>Response Notes</th>
<th>Special Notes to Hospital/Treatment personnel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paint Related Wastes (liquid)</td>
<td>D001 (ignitability, flash point &lt;140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity)</td>
<td>NW corner of Warehouse, hazardous waste storage area</td>
<td>Five, 55-gallon drums (2,065 pounds)</td>
<td>If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.</td>
<td>None</td>
</tr>
<tr>
<td>Paint Related Wastes (liquid)</td>
<td>D001 (ignitability, flash point &lt;140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity)</td>
<td>Two Satellite Accumulation Areas as noted with blue asterisks on the attached map.</td>
<td>One, 55-gallon drum (440 pounds)</td>
<td>If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.</td>
<td>None</td>
</tr>
<tr>
<td>Off-specification 2, 4-D, a herbicide, (brand name is Amine 4) (liquid)</td>
<td>D016 (toxicity); Flashpoint 190 °F.</td>
<td>SW corner of warehouse near new product storage of Amine 4.</td>
<td>Off-Spec – 1 tank, 1,000 gallons New product – 1 tank (same tank as off-spec), 1,000 gallons</td>
<td>Use PPE to prevent contact with skin and eyes. Immediately prevent spills from entering drains and waterways. Prevent sources of ignition and open flames.</td>
<td>Contact Chemtrac for emergency medical treatment information at 1-800-424-9300. If in eyes, wash eyes for several minutes.</td>
</tr>
</tbody>
</table>
Satellite Accumulation Area for Paint Related Waste Material (D001, F003, F005)

Fire Alarms (ring on-site only, there are no fire alarms that notify off-site personnel)

Telephone for off-site notification of emergency

Indicates evacuation route out of the building.

Note 1: Hazardous waste (paint related waste) is generated and accumulated inside each of the two paint booths, and is accumulated in the hazardous waste storage area. Amine 4 can be a hazardous waste if it is off-specification and it is generated and accumulated in the SW corner at the Amine 4 tank.

Note 2: Smoke detectors are located throughout the office and main warehouse on the ceiling, in a grid about every 25 feet. Smoke detectors are connected to an automatic sprinkler system.
Street Map

- Park
- Vacant Lots
- Residential
- Residential
- Residential
- Residential
- School, K-8
- Fire Hydrant, 750 GPM
- ABC Facility, 1000 Main Street
- Vacant Lots Currently Used As Hay Field
Emergency Procedures Performed by Emergency Coordinator

* Imminent or Actual Emergency Situation
  * Activate Alarms, Notify Agencies
  * Identify Character, Source, Amount and Extent of Release
* Assess Hazards to Human Health and Environment
* Report and Notify
  * Don’t leave out Waste Management and Radiation Control at 801-536-0200; after hours 801-536-4123
* Take Reasonable Measures to Prevent Spread
* Document in Operating Record and Submit Final Report
Facility Personnel Must Successfully Complete Training
- Relevant Hazardous Waste Management Procedures
- Response to Emergencies
- HAZWOPER Can be Used
- Complete Within Six Months and Annually
- Rules Explicitly Allow Computer-Based Training
LQG Training
R315-262-17

Documentation and Records

* Job Title and Name
* Job Description
* Type and Amount of Introductory and Continuing Training
* Record of Training for Each Employee
  * Current
  * Former
<table>
<thead>
<tr>
<th>Job Title / Environmental Responsibilities</th>
<th>General Awareness</th>
<th>Job Specific RCRA</th>
<th>Job Specific Other¹</th>
<th>Emergency Response</th>
<th>Employee</th>
</tr>
</thead>
<tbody>
<tr>
<td>ENVIRONMENTAL MANAGER</td>
<td>New Hire RCRA; Annual Onsite RCRA</td>
<td>Initial 40 hr RCRA</td>
<td></td>
<td>Annual Emergency Contingency Plan (ECP) Training</td>
<td></td>
</tr>
<tr>
<td>Primary HW emergency coordinator; sampling and characterizing wastes; hazardous waste handling and cleanup; prepare drums and shipping papers and manifests for shipment; recordkeeping; training.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ENVIRONMENTAL ENGINEER</td>
<td>New Hire RCRA; Annual Onsite RCRA</td>
<td>Initial 40 hr RCRA</td>
<td>Full DOT HAZMAT-every 3 years</td>
<td>Annual ECP Training; HAZWOPER w/Annual refresher</td>
<td></td>
</tr>
<tr>
<td>Alternate HW emergency coordinator; sampling and characterizing wastes; hazardous waste handling and cleanup; prepare drums and shipping papers and manifests for shipment; recordkeeping; training.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>OPERATORS</td>
<td>New Hire RCRA; Annual Onsite RCRA</td>
<td>Annual (job-specific) training</td>
<td>Full DOT HAZMAT-every 3 years</td>
<td>Annual ECP Training; HAZWOPER or RCRA training w/Annual refresher</td>
<td></td>
</tr>
<tr>
<td>Hazardous waste handling and cleanup; prepare hazardous waste for shipment; prepare shipping papers and manifests for shipment; recordkeeping.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WATER TREATMENT OPERATORS</td>
<td>New Hire RCRA; Annual Onsite RCRA</td>
<td></td>
<td>DOT-Warehouse-every 3 years</td>
<td>Annual ECP Training; HAZWOPER w/Annual refresher</td>
<td></td>
</tr>
<tr>
<td>Emergency Response</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ENVIRONMENTAL SPECIALIST</td>
<td>New Hire RCRA; Annual Onsite RCRA</td>
<td>Initial 40 hr RCRA Annual RCRA Refresher</td>
<td>Full DOT HAZMAT-every 3 years</td>
<td>Annual ECP Training; HAZWOPER w/Annual refresher</td>
<td></td>
</tr>
<tr>
<td>Sampling and characterizing wastes; hazardous waste handling and cleanup; prepare drums and shipping papers and manifests for shipment; recordkeeping; training.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ENVIRONMENTAL Technician</td>
<td>New Hire RCRA; Annual Onsite RCRA</td>
<td></td>
<td>Full DOT HAZMAT-every 3 years</td>
<td>Annual ECP Training; HAZWOPER w/Annual refresher</td>
<td></td>
</tr>
<tr>
<td>Prepare shipping papers and manifests for shipment; recordkeeping; training.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
LQG Central Accumulation Area Closure

- Closure Notification Standards for Units (R315-262-17(a)(8))
  - Notice in Facility Operating Record
    or
  - Meet Closure Performance Standards and Notify
    - Minimize or Eliminate Post-Closure Escape of Waste
    - Remove or Decon Equipment, Structures, Soil and Residue
    - Close as a Landfill

WASTE MANAGEMENT & RADIATION CONTROL
LQG Unit Closure

- Facility Closure Notification
  - Notify 30 Days Prior to Closing
  - Comply with Closure Performance Standards
  - Notify 90 Days After Closing
  - Can Request Extension to the 90 Days
Applies Only to a VSQG and a LQG Under the Control of the Same Person (Company)
  * See R315-260-10 for Definition of “Person”

VSQG Requirements
  * Label Containers with the Words “Hazardous Waste” and New Labeling Requirements

No Hazardous Waste Manifest is Required and Hazardous Waste Transporters Do Not Have to be Used

Applies Only to VSQGs – SQGs Cannot Consolidate Waste to a LQG
New VSQG Consolidation
R315-262-17(f)

LQG Requirements

- Notifies the Director Using Site ID Form (EPA Form 8700-12) and Identifies Which VSQGs are Participating
- Recordkeeping for Each Shipment – Normal Business Records
- Manages Consolidated Waste as LQG Hazardous Waste
- Adds Accumulation Start Date to Container Labels
- Biennial Reporting Will Use a Different Source Code for the VSQG Consolidated Waste to Distinguish from the LQG’s Own Generated Waste
Satellite Accumulation
R315-262-15

- At or Near the Point of Generation
- Under the Control of the Operator
- 55 Gallons or Either 1 Quart or 2.2 Pounds (1 Kilogram)
- “Hazardous Waste” and Indication of Hazards
- Containers Kept Closed Except Under Limited Circumstances
- Container Must be Dated and Moved to a Central Accumulation Area or Offsite Within 3 Consecutive Calendar Days

WASTE MANAGEMENT & RADIATION CONTROL
Questions?

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(801)-536-0255
Frequent Hazardous Waste Violations

- No Waste Determination – commercial products, unknowns, antifreeze
- Containers – open, labeling
- Training – not documented, no job descriptions or don’t include hazardous waste duties, manifest signers not trained, type & amount of initial and continuing training not documented
- Contingency Plan not current because emergency coordinator changed; contingency plan missing various elements
- No quick reference guide
- Manifest and LDR records incomplete