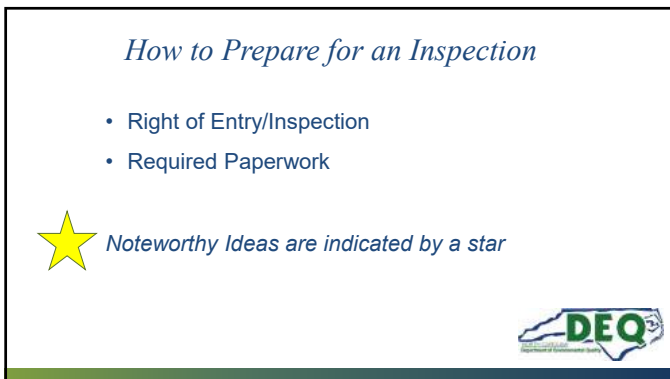


1




2




3

Goals






1. Get the inspector in the facility as fast as possible.
2. Get the inspector out of the facility as fast as possible.
3. Have your records organized. Why? See 1 & 2 above!



4

Upon Entry

- The inspector(s) will not sign any document or log requiring them to agree to confidentiality or camera limitations. We also won't agree to safety terms that interfere with the inspection.
- The inspector will respect the safety guidelines being taken by facilities but will not share personal health information.
- **Plan for this before the inspector arrives.**

Order name	Accession	Event name	Time	Project	Barcode

5

Equipment

- Camera
- Recording devices
- Sampling equipment







6

*North Carolina General Statute (N.C.G.S.)
130A-17*


Right of Entry



7

RCRA Section 3007 (a) and (b)



- Provides the authority to conduct inspections
 - Any Representative of EPA or a State may inspect the premises and records of any person who generates, treats, stores, transports, or disposes of hazardous waste
- Restrictions imposed on the inspectors:
 - Inspection must be conducted at a reasonable time
 - Inspections must be completed with reasonable promptness
- All information, records or reports obtained as a result of an inspection are public record
 - UNLESS a claim of confidentiality is made



8

N.C.G.S. 130A-304 – Confidential information protected

Confidential information is protected, if your facility makes a claim that meets the criteria in the general statute.

9

Things you need to do!



- Keep your records neat and orderly
- Ensure records are available for review
 - Location of records must be known by multiple staff
- Call your inspector for a compliance assistance visit (CAV), if you've never been inspected; if process changes occur; if new EHS staff.



10

Things you need to do after the inspection



- **Provide** any information requested by the inspector
- **Read** the inspection report
- **Pay special attention** to the inspector's comments & recommendations
- **Read** the Generator Compliance Manual



11

The Inspection: Records Review


- Documentation of Waste Determination
- Notification Records (EPA 8700-12) / Annual Fees
- Arrangements with Local Emergency Authorities
- Hazardous Waste Contingency Plan & Quick Reference Guide (QRG)
- Hazardous Waste Personnel Training Documents
- Biennial Report
- Hazardous Waste Central Accumulation Area (CAA) Inspection Records
- Hazardous Waste Manifests / Land Disposal Restrictions



12

SQG vs. LQG
Paperwork Requirements

<p><u>Small Quantity Generator</u></p> <ul style="list-style-type: none"> • Manifests/LDRs • Weekly (7 days) Inspections of Central Accumulation Area(s) • Documented arrangements made with local emergency authorities • Emergency info posted by phones/HW areas • Training - employees must be thoroughly familiar... • SQG renofication 	<p><u>Large Quantity Generator</u></p> <ul style="list-style-type: none"> • Manifests/LDRs • Weekly (7 days) inspections of Central Accumulation Area(s) • Documented arrangements made with local emergency authorities • Contingency Plan & Quick Reference Guide • Training <ul style="list-style-type: none"> - Documented RCRA training - Job description • Biennial Report
--	---




13

Hazardous Waste Determination
40 CFR 262.11(f)

VSQG
 SQG
 LQG

- Must maintain records supporting HW determinations, including records that identify whether a solid waste is a hazardous waste as defined in 40 CFR 261.3
 - Lab analysis, waste analyses, sampling
- These records must comprise the generator's knowledge of the waste and support the generator's determination, as described at paragraphs (c) and (d) of 40 CFR 262.11
 - Safety data sheets and/or other records used to make waste determinations
- Records must be maintained for at least 3 years from the date the waste was last sent to the on-site or off-site treatment, storage, or disposal



14

SQG
 LQG

Notification of Hazardous Waste Activity
40 CFR 262.18






15

EPA Identification Numbers

SQG
 LQG

A generator must not treat, store, dispose of, transport, or offer for transportation, hazardous waste without having received an EPA identification number from the administrator.

The EPA ID number will remain with the property.


16

Re-notification for SQG and LQG
40 CFR 262.18

SQG
 LQG

Requires re-notification for SQGs and LQGs:

- ★ SQGs every four years starting September 1, 2021
 - Next one due September 1, 2025
 - Must be submitted to the Hazardous Waste Section by September 1 of each year the re-notification is required
 - <https://files.nc.gov/ncdeq/Waste%20Management/DWM/HW/Guidance%20Document%20table%20documents/2020/SQG-ReNotification.pdf>
- LQGs by March 1 of each even numbered year
 - Can use Biennial Report to notify




17

Electronic Notification

SQG
 LQG

Reminder:

- Now facilities request EPA ID numbers and update facility information electronically in EPA's RCRAInfo database instead of submitting a hard copy (EPA 8700-12 Form) to the HWS for entry in RCRAInfo
 - The only exception is a facility that submitting a RCRA Part A Application/Revision
 - They must still submit a hard copy (EPA 8700-23 Form) to the HWS Permit Writer in lieu of entering this information directly into RCRAInfo.



18

RCRAInfo Industry Application

- Link to a tutorial about registering for RCRAInfo Industry Application:
<https://files.nc.gov/ncdeq/Waste%20Management/DWM/HW/8700-guidelines/Electronic-Filing-of-EPA-Notifications.pdf>

Questions about registering?

Melodi Deaver 919-707-8204
 Melodi.Deaver@ncdenr.gov



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Other Questions About Your Notifications

- Andrew Minter 919-707-8265
Andrew.Minter@deq.nc.gov
- Laura Alexander 919-707-8214
Laura.Alexander@deq.nc.gov



20




Payment of Generator Fees

N.C.G.S. 130A-294.1



21




Hazardous Waste Fees

SQG
 LQG

LQG: \$1400
 Tonnage fee: \$0.70
 SQG: \$300.00
 HW Transporters: \$840
 TSD: \$1,680




22




Emergency Arrangements

SQG
 LQG

For SQGs: 40 CFR 262.16(b)(8)(vi)
 For LQGs: 40 CFR 262.256






23

Emergency Arrangements


LQG

Applicability for the Emergency Arrangements changed in 2018

- **For LQGs:** Arrangements must account for areas where hazardous waste is **generated and accumulated** (both satellite and central accumulation areas) at the facility
 - 40 CFR 262.250: The regulations of 40 CFR 262 Subpart M applies to those areas of a LQG where HW is generated or accumulated on site
 - ★ - 40 CFR 262.15(a)(8): All satellite accumulation areas operated by a LQG must meet the Preparedness, Prevention, and Emergency Procedures in 40 CFR 262 Subpart M




24


Emergency Arrangements 

Applicability for the Emergency Arrangements changed in 2018:


- **For SQGs:** Arrangements must account for areas where hazardous waste is **accumulated** (both satellite and central accumulation areas) at the facility
 - 40 CFR 262.16(b)(8)(vi): Requires a SQG to attempt to make emergency arrangements for the central accumulation area(s)
 - ★ - 40 CFR 262.15(a)(7): All satellite accumulation areas operated by a SQG must meet the preparedness and prevention regulations of 40 CFR 262.16(b)(8) and emergency procedures at 40 CFR 262.16(b)(9)




25

Emergency Arrangements 


- A SQG or LQG must attempt to make arrangements with the:
 - Local Police Department
 - Local Fire Department
 - Other Emergency Response Teams
 - Emergency Response Contractors
 - Equipment Suppliers
 - Local Hospitals
- Taking into account the types and quantities of HW handled at the facility
- Arrangements may be made with the LEPC, if determined to be the appropriate organization with which to make arrangements



26

Emergency Arrangements 

- As part of the arrangements, the generator must familiarize those agencies with:
 - Types and quantities of hazardous waste handled,
 - Types of injuries or illnesses that could result from fires, explosions, or releases at the facility,
 - The layout of the facility,
 - The properties of HW handled at the facility & associated hazards,
 - Places where facility personnel would normally be working,
 - Entrances to roads inside the facility, and
 - Possible evacuation routes.



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28

Emergency Arrangements

SGG
LQG

- When more than one police or fire department might respond to an emergency, the generator shall attempt to make *arrangements* designating primary emergency authority to a specific fire or police department, and *arrangements* with any others to provide support to the primary emergency authority.
- An LQG should document arrangements agreed to by local authorities in their contingency plan

(Facility Name)
(City, Facility Contact Name)
(Address of the Facility)

Subject: Emergency Arrangements Response

Dear (City/Police/Fire Dept):

I have received the information submitted by (Name of the Facility) to this office concerning hazardous waste generated and accumulated at your facility. Our agency is capable of providing the services indicated in the submitted information. I am also aware of the types, quantities, and properties of hazardous wastes generated and accumulated at the facility and the possible hazards associated with such materials, as detailed in the information that was submitted to this agency.

Sincerely,

Emergency Authority Contact (i.e., Fire Department, Police Department or Local Hospital)


Date Reviewed (by Emergency Authority Contact): _____

29

Emergency Arrangements


SGG
LQG

- A generator shall maintain records documenting the arrangements with the local fire department as well as any other organization necessary to respond to an emergency.
- The documentation must include documentation *in the operating record* that either confirms such arrangements actively exist or, in cases where no arrangements exist, confirms that attempts to make such arrangements were made.




30

Emergency Arrangements




- A facility possessing **24-hour response capabilities** may seek a waiver from the authority having jurisdiction over the fire code within the facility's state or locality as far as needing to make arrangements with the local fire department as well as any other organization necessary to respond to an emergency, provided that the waiver is documented in the operating record.



31

Emergency Coordinator



SQGs – 40 CFR 262.16(b)(9)(i) and LQGs – 40 CFR 262.264




- At least one employee on the premises or on call (i.e. available to respond to an emergency by reaching the facility within a short period of time)
- Has the responsibility for coordinating all emergency response measures

LQGs:

- Also have the responsibility for implementing the necessary emergency procedures outlined in 262.265





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Contingency Plan

40 CFR 262.260 – 262.263



33

Contingency Plan

- Every LQG must have a Contingency Plan
- It must describe the actions facility personnel must take in response to fires, explosions, or releases of hazardous waste
- Addresses areas where hazardous waste is generated and accumulated (both satellite and central accumulation areas)
- A copy of the plan must be kept onsite & sent to local emergency agencies or Local Emergency Planning Committee (LEPC) as appropriate.

34

Contingency Plan

40 CFR 262.261 – 262.262

- Must describe arrangements agreed to by emergency authorities (police, fire, hospital, etc.) or, if applicable, the Local Emergency Planning Committee
- The plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator (see 262.264)
 - List must be kept up to date
 - *Home address no longer required*
- All emergency equipment must be listed with a physical description of each item, its capabilities, and location

35

Example of list of emergency equipment with the description, capabilities and location.

Location of emergency equipment can also be shown on a map.

ILL LIST OF EQUIPMENT	EMERGENCY EQUIPMENT CAPABILITIES/FUNCTION	LOCATIONS
Absorbent Socks	Absorb hazardous waste liquid spills. Store at the facility for proper cleanup disposal.	At all satellite areas, central accumulation areas, and strategically placed throughout the facility.
Booms	Solvent resistant booms are large enough for personnel to step over spillage. Effective: Prevents floating personnel from contaminating shoreline in the event of a liquid spill.	Hazardous Material storage areas.
Brooms	Long handle and flat broom surface have the ability to collect absorbent materials or other debris.	At the central accumulation areas.
Face Mask	Respirating apparatus is designed to fit over the nose and mouth. Apparatus filters out by means of steel cup-like carbon cartridges. To be used when solvent vapors in confined areas make cause breathing difficulties or hazards to clothing personnel.	Near all satellite areas and central accumulation areas.
Face Shield	Protects the eye-face from potential splashes and contact with materials while allowing full visibility for working.	Satellite and central accumulation areas.
Fire Extinguisher	Multi-purpose (ABC) portable extinguisher is available to fight a fire which might occur during spill containment or collection.	Satellite and central accumulation areas.
Flare Day	Standard day based material identification material used to absorb a spill and provide a temporary dike for spilled liquid.	At all satellite and central accumulation areas.
Gloves	Solvent resistant gloves protect for the hands and are used to minimize exposure to hazardous materials.	At all satellite areas, central accumulation areas, and strategically placed throughout the facility.


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Contingency Plan
40 CFR 262.261(d)

LQG

Emergency coordinator option for facilities operating 24 / 7 / 365:

In situations where the LQG has an emergency coordinator continuously on duty because it operates 24 hours per day, every day of the year, the plan may list the staffed position (e.g. operations manager, shift coordinator, shift operations supervisor) as well as an emergency telephone number that can be guaranteed to be answered at all times.



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Contingency Plan
40 CFR 262.261(f)

LQG

Contingency plan must describe the following:

- Describe the Signal(s) used to begin evacuation (e.g. horn, high/low siren, siren followed by verbal instruction, etc.)
- Evacuation routes – the primary & secondary routes from all areas where HW is generated and/or accumulated (satellite accumulation areas and central accumulation areas)
 - This can be described in the plan; or,
 - Evacuation map (more common) showing primary and secondary routes of evacuation.

-Print this *in color*

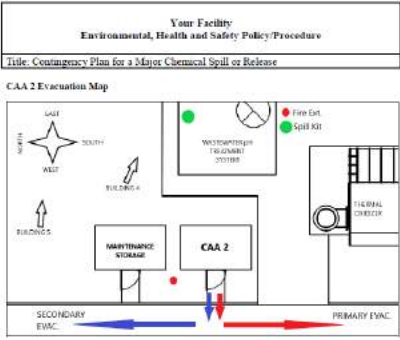


38

Your Facility
Environmental, Health and Safety Policy/Procedure


Title: Contingency Plan for a Major Chemical Spill or Release

CAA 2 Evacuation Map

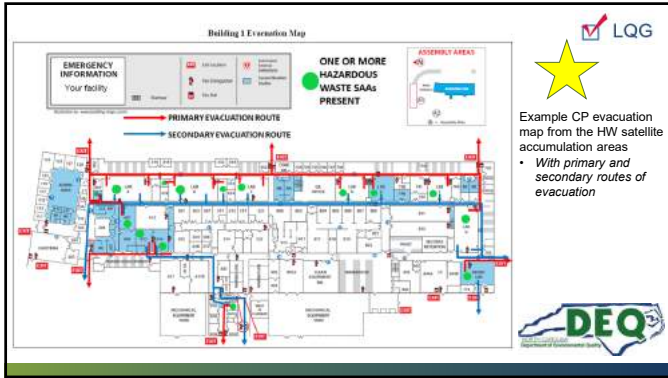


Example CP evacuation map from the HW central accumulation area

- With primary and secondary routes of evacuation



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40

Contingency Plan

40 CFR 262.263

LQG

Update the Contingency Plan *immediately* when:

- Regulations change
- The plan fails in an emergency
- Changes occur in facility design, construction, operation, maintenance, or other circumstances (e.g. add a CAA)
- Emergency coordinators change
- Emergency equipment changes

★ Must resend the portion(s) of CP & Quick Reference Guide with changes to local authorities

DEQ

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Contingency Plan - Quick Reference Guide

40 CFR 262.262(b)


LQG

- A Contingency Plan Quick Reference Guide (QRG) is a summary of your contingency plan that emergency responders can quickly access the necessary information to carry out the initial response to an emergency.
- A QRG is required to be submitted when a facility becomes a LQG (starting on March 1, 2018) or when an updated Contingency Plan is submitted to local emergency authorities.

DEQ


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Contingency Plan - QRG
40 CFR 262.262(b)




An existing LQG is required to create and submit a Quick Reference Guide when one of the following occurs causing the Contingency Plan to be amended and resubmitted:

- Emergency coordinator changes
- Emergency equipment changes
- Contingency Plan fails in an emergency
- The facility changes in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or changes the response necessary in an emergency (e.g. adding a CAA)




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Contingency Plan - QRG
40 CFR 262.262(b)



The QRG must include eight components:

1. Name of the emergency coordinator(s) and 7days/24-hour emergency telephone number(s)
2. Types/names of hazardous wastes (HW) in layman's terms & associated hazard of each HW present at any one time;
 - Example: toxic paint wastes, spent ignitable solvent, corrosive acid
3. Estimated maximum amount of each HW that may be present at any one time;
4. Identification of any HW where exposure would require unique or special treatment by medical or hospital staff




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EXAMPLE QRG REFERENCE GUIDE

This example was created by DEQ Region 1 to be used as a guide to assist the regulator in consistency with compliance. It does not substitute for or replace any regulatory requirements.

Contingency plan quick reference guide
ABC FACILITY
180 Old Main Street
Anytown, Iowa 52000



Facility Contacts:

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

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


Hazardous Waste Information:

Name of Waste	Waste Codes/Hazards	Location Accumulated	Maximum Amounts Present	Response Notes	Special Notes to Hospital/Treatment personnel
State Related Wastes (Spill)	D001 Ignitability, Flammable -140 F's, R005, R095 (Benzene, Methyl Ethyl Ketone, Toluene, Xylenes)	SW corner of Warehouse, hazardous waste storage area.	Five, 55 gallon drums (2,065 pounds)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
State Related Wastes (Spill)	D001 Ignitability, Flammable -140 F's, R005, R095 (Benzene, Methyl Ethyl Ketone, Toluene, Xylenes)	Two Satellite Accumulation Areas as noted with blue asterisks on the attached map.	One, 55 gallon drum (442 pounds)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Off-specification 2, 4-D, a herbicide. Spill in open to Aerial 4 (Spill)	D016 (toxicity), Halopoint D001	SW corner of warehouse near line product storage of Aerial 4.	Off-spec - 1 tank, 1,200 gallons. New product - 1 tank (same tank as off-spec), 1,200 gallons.	Use PPE to prevent contact with skin and eyes. Immediately prevent spill from entering drains and waterways. Prevent sources of ignition and open flames.	Contact Chemtrak for emergency medical treatment information at 319-363-6200. If in eyes, wash eyes for several minutes.

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★ *Contingency Plan - QRG* ✓ LQG
 40 CFR 262.262(b)

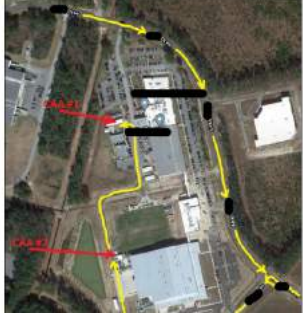
- 5. Map of facility showing where HWs are generated, accumulated, and treated, **as well as routes for accessing these wastes/areas. This includes satellite accumulation areas (SAAs) and central accumulation areas (CAAs)**
- 6. The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms)



46

QRG, continued **★** ✓ LQG

• Map of facility showing where hazardous wastes and generated, accumulated, and treated and routes for accessing these wastes.

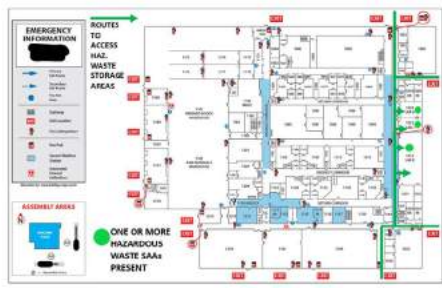


47

QRG, continued ✓ LQG

• Map of facility showing where hazardous wastes and generated, accumulated, and treated **and routes for accessing these wastes.**

★



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Contingency Plan - QRG
40 CFR 262.262(b)



- 7. Locations of water supply (e.g., fire hydrant and its flow rate)
- 8. Street map of facility in relation to surrounding businesses, schools, residential areas to understand how best to get to facility and also evacuate citizens and workers



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QRG, continued



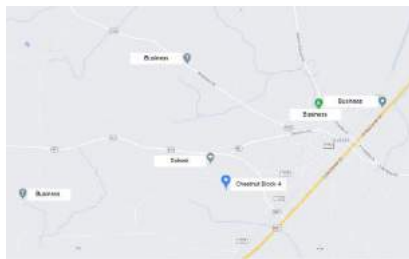
- Street map of facility in relation to surrounding businesses, schools, and residential areas to understand how best to get to the facility and also evaluate citizens and workers.



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QRG, continued

- Street map of facility in relation to surrounding businesses, schools, and residential areas to understand how best to get to the facility and also evaluate citizens and workers.




51

Required Emergency Information
40 CFR 262.16(b)(9)(ii)




The SQG must post the following information **next to telephones or in areas directly involved in the generation and accumulation of HW:**

- The name and emergency telephone number of the emergency coordinator
- Location of fire extinguishers and spill control material, and, if present, fire alarm; and
- The telephone number of the fire department (unless the facility has a direct alarm).



52

SQG Emergency Info Posted



Emergency Contacts Telephone Posting

Post this at all exit fire extinguishers to areas where hazardous waste is generated or accumulated.

Emergency Contacts:

- Fire Department: _____
- Police Department: _____
- Hospital: _____
- State 24-Hour Emergency Response Line: _____
- National Response Center (24-Hour): 1 800 424 9802

Location of Emergency Response Equipment:


- Fire extinguishers: _____
- Fire alarm (if present): _____
- Spill control materials: _____
- Special equipment (if present): _____


©2010 Emergency response priority requirement for each quality program (SQG, LQG, etc.)

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Personnel Training

For LQGs: 40 CFR 262.17(a)(7)
For SQGs: 40 CFR 262.16(b)(9)(iii)





54

Who must be trained? ✓ LQG

- Emergency Coordinators for hazardous waste
- Employees who manage hazardous waste

Including, but not limited to those who:


- Sign manifests
- Perform weekly inspections
- Move hazardous waste from satellite to central accumulation area
- Add/remove hazardous waste to/from hazardous waste central accumulation container

★ • Contractors with hazardous waste management duties 

55

What training is required? ✓ LQG

- Training must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

★ • HAZWOPER training alone may not satisfy all the hazardous waste requirements since its an OSHA requirement for workplace safety standards and not hazardous waste specific. 

56

What training is required? ✓ LQG

Hazardous Waste Management:

- HW accumulation areas (SAAs and CAAs)
- Container and/or tank management
- Weekly inspections
- Waste determinations
- Waste packaging
- Properties of facility's hazardous waste





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What training is required?



Emergency Response:

- Alarm/types of communication
- Implementing the contingency plan (fire, explosion, and/or spill)
- Evacuation routes
- Emergency equipment function, inspection, and repair
- Site shutdown procedures



58

Emergency Coordinator Training



- Contingency plan content and implementation
 - Appropriate responses to fires, explosions, and releases (including impacts to waterways)
- Communication and alarm systems
- Must assess both the direct & indirect effects of the emergency
- Understand what information the National Response Center (NRC) will need if they are notified
- When to notify HWS staff and the information required (40 CFR 262.265(j))



59

Who can provide RCRA training?



Training program must be directed by a person trained in hazardous waste management procedures (qualified either by experience or education).



60

When and how often is training required? ✓ LQG

- Training must be completed within six months of new employment or position change with HW management responsibilities (if different duties)
- Employees must not work in unsupervised positions until they have completed the training requirements
- Personnel must participate in annual review of the initial training required



61

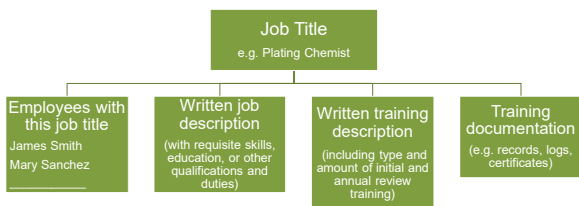
ANNUAL REVIEW =

At least every 365 days




62

Training Recordkeeping Requirements ✓ LQG




63




Required Training Records

The LQG must maintain the following documents and records at the facility:

- The job title for each position at the facility related to hazardous waste management and the name of each employee filling that job title.




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Required Training Records

- A written job description for each position
 - Must include the requisite skill, education, or other qualifications, and duties of the facility personnel assigned to each position
 - Must include hazardous waste management responsibilities



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Sample Job Description

Head Chemist, Plating Company
Job Description

State: Georgia
Job Title: Plating Chemist

Summary: Plating is critical to the steel and many other advanced industrial chemicals. Must have the ability to effectively determine proper plating processes.

Minimum Requirements: Master's in chemistry with 3+ years of experience or Bachelor's degree with 10+ years of experience.

Responsibilities:

- Propose and implement successful plating processes
- Develop experiments to address process goals based on interpretation of results, with limited guidance
- May train, supervise or direct other scientists at the assistant level

Technical Skills:

- Expert understanding of applied theory of plating chemistry related to projects
- Broad knowledge of plating process machinery and their applications
- Deep understanding of plating knowledge
- Effectively participate in development of project plans to meet goals and objectives

Communication Skills:


- Provides regular updates to colleagues
- Prepares written reports detailing plating processes
- Writes clear and concise notes as laboratory notebook

Safety:

- Responsible for maintaining safe working environment
- Observes Head Chemist Plating Company safety policies and procedures
- Provides safety leadership by example

Hazardous Waste Management:

- Responsible for compliance with all applicable laws and regulations
- Responsible for the safe handling, storage, and disposal of hazardous waste
- Responsible for the safe handling, storage, and disposal of hazardous waste
- Responsible for the safe handling, storage, and disposal of hazardous waste
- Responsible for the safe handling, storage, and disposal of hazardous waste



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Example of Supplemental Job Descriptions for Staff with Hazardous Waste Responsibilities

ABC Plating Company, North Carolina
Revised June 2023

HAZARDOUS WASTE JOB FUNCTIONS/TRAINING:

The hazardous waste management team consists of the following positions:

Position/Job Title	Employee Name	Level of Training	Responsibilities
EMS Manager	Maureen Robinson	<ul style="list-style-type: none"> Site Waste Management Hazardous Waste Management Responsible for Hazardous Operations DOT Hazardous Materials Transportation 49 CFR Parts 171-180 Review of Contingency Plan 	Overall program management/program support; Transfer hazardous waste to the central accumulation area; Emergency response; Primary emergency coordinator; Sign manifests.
Planting Chemical Supervisor	James Walker Autumn Rowland	<ul style="list-style-type: none"> Site Waste Management Hazardous Waste Management Review of Contingency Plan DOT Hazardous Materials Transportation 49 CFR Parts 171-180 	Transfer hazardous waste to central accumulation area; Weekly inspections; Prepare hazardous waste for shipment; Sign manifests; Emergency response; Secondary emergency coordinator.
Planting Chemist	Wes Hays Dustin Kim Dan Gidner Andrew Steiner	<ul style="list-style-type: none"> Site Waste Management Hazardous Waste Management Waste Handling Operations Review of Contingency Plan 	Transfer hazardous waste to central accumulation area.



TRAINING FREQUENCY:
Facility personnel must successfully complete the training described above within six months after the date of their employment or assignment to a new position with hazardous waste management responsibilities. Employees must not work in unapproved positions until they have completed this training. Annual refresher training is required for all facility personnel listed above and will not exceed 300 days from the previous year.

*Note—this document would supplement the NYS job descriptions that list the requisite skills, education, or other qualifications of facility personnel assigned to each position.

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Required Training Records

- A written description of the type and amount of both introductory and continuing training
- Records that document the training or job experience required has been given and completed

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JOB DESCRIPTION/TRAINING RECORD FOR HAZARDOUS WASTE MANAGEMENT/DEPOSAL POSITIONS PER 49 CFR 162.17(a)(7)

This record must be maintained at the facility.

FACILITY: _____ COUNTY: _____ UNIT: _____

ADDRESS: _____ CITY, STATE: _____

PHONE: _____ DATE: _____

EMPLOYEE NAME: _____

JOB TITLE: _____


HAZARDOUS WASTE RELATED QUALIFICATIONS AND DUTIES (INCLUDE REQUIREMENTS, EDUCATION OR OTHER QUALIFICATIONS)

The above person works with and handles hazardous materials and wastes at the worksite located at _____ CITY, STATE. This person has the appropriate qualifications to read, understand, write, and communicate written and verbal information regarding handling and managing hazardous wastes. Training is required within six months of assuming duty and once a year thereafter. This employee's responsibilities for proper handling, documenting, inspecting, and transporting hazardous wastes. This employee is also responsible for responding to emergencies. The above individual communicated these duties on _____, 20____.




DATE	DESCRIPTION OF TRAINING (ENTER THE TITLE, A BRIEF DESCRIPTION AND THE NAME OF THE INSTRUCTOR. NOTE WHETHER THE TRAINING IS ON-SITE OR OFF-SITE)	EMPLOYEE SIGNATURE




69

Required Training Records 


- Keep training records in order and up to date
 - *Employee name, job title, job description, HW duties, and training dates/types in one location*
- Keep a copy of these records in the hazardous waste files (not just in human resources' files!)


70

Training Records Retention 



- Training records on current personnel must be kept until closure of the facility.
- Training records on former employees must be kept for at least three years from the date the employee last worked at the facility.
- Training records must accompany personnel transferred within the same company.



71

Personnel Training for SQG 
 40 CFR 262.16(b)(9)(iii)

The generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.


72

DOT Hazardous Materials Training
49 CFR 172 – Not HW regulations!!


- This workshop does not qualify for the Dept. of Transportation Hazardous Materials Training that is required for people who sign a hazardous waste manifest *in addition to other "Hazmat employees"...*

Resources:


- Hazmat Transportation Training Requirements brochure:
<https://www.phmsa.dot.gov/training/hazmat/hazmat-transportation-training-requirements>
- Hazmat Transportation Training Modules:
<https://www.phmsa.dot.gov/training/hazmat/training-modules>




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Biennial Report
40 CFR 262.41



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Biennial Report 

- LQG must prepare and submit a single copy of a Biennial Report by March 1 of each even numbered year; 2021 activities were due March 1, 2022
- Biennial Report covers generator activities during the previous year
 - 2019 Biennial Report was due March 1, 2020 (covering 2019 activity)
 - 2019 Biennial Report filed through RCRAInfo Industry Application (no longer filed through Easitrak)
- LQG must keep a copy of each Biennial Report for 3 years




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SQG
 LQG

Inspection Records

For LQGs: 40 CFR 262.17(a)(1)(v)
 For SQGs: 40 CFR 262.16(b)(2)(iv)



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SQG
 LQG

Hazardous Waste Manifests

40 CFR 262 Subpart B (262.20 – 262.27)




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SQG
 LQG

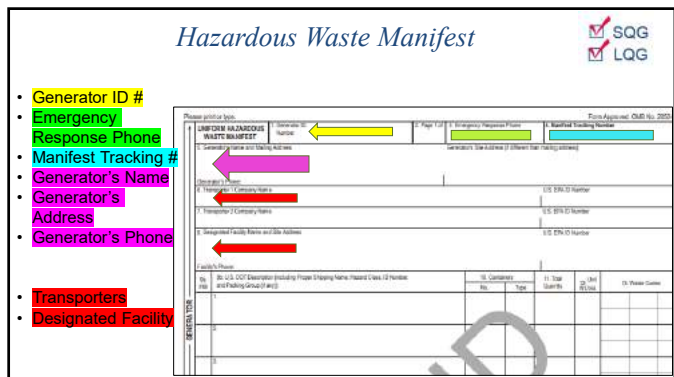
Hazardous Waste Manifest

May be the single most important document for a generator!

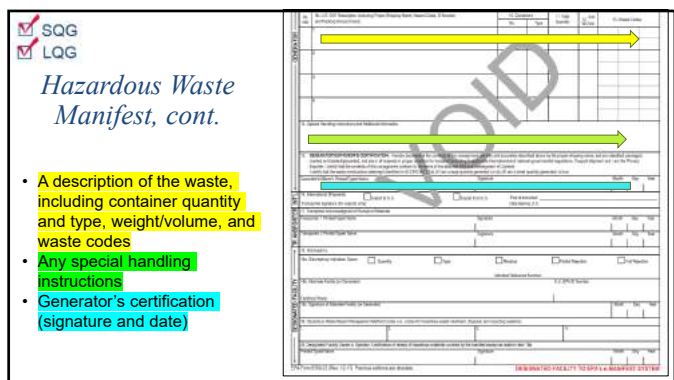
- “Cradle-to-Grave” mandated by Congress
- Manifests document the cradle to grave
- The manifest clearly documents who, what, where, when, and how much has been sent
- Facilities (TSDs) mishandle, go bankrupt, etc. and the waste and/or contamination will have to be dealt with



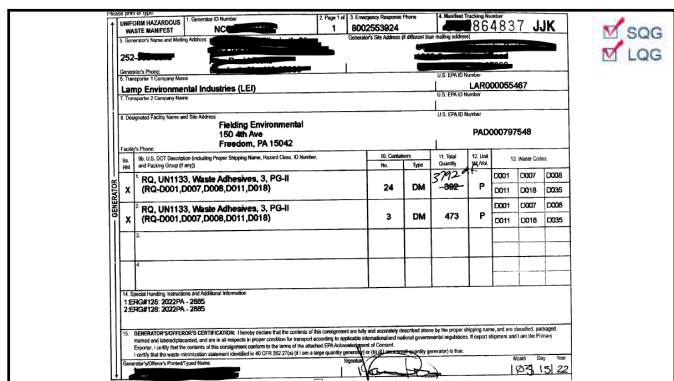
78



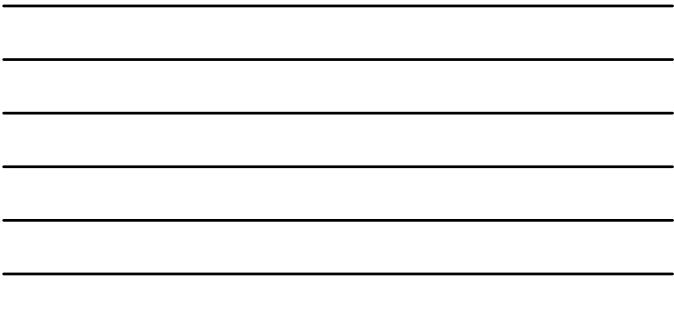
79



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81



Hazardous Waste Manifest

- Make sure manifests are up to date
- Keep in the order of their shipping dates
- Put the copy signed by destination facility in front



Recommended to KEEP THEM FOREVER!!!

Electronic copies are acceptable



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Exception Reporting

40 CFR 262.42



If an LQG does not receive a signed copy of the manifest from the designated facility within 35 days, the generator must contact the transporter or designated facility to determine the status of the hazardous waste.

File an Exception Report with the HWS if generator has not received a copy of the manifest within 45 days (60 days for SQGs) of the date the waste was accepted by the initial transporter.



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Exception Reporting

40 CFR 262.42



LQG Exception Report must include:

- Legible copy of the manifest
- Cover letter signed by the generator or his authorized representative explaining efforts taken to locate the hazardous waste and the results of those efforts
- Must keep copy of Exception Report on file for 3 years

SQG "Exception Report" must include:

- Legible copy of the manifest with an indication the generator did not receive confirmation of delivery



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Land Disposal Restrictions

40 CFR 268



85

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 LQG

Land Disposal Restrictions (LDR)

- LDR Program applies to everyone handling HW (except VSQGs)
- Generator must determine if hazardous waste is to be treated before being land disposed
- Can use knowledge of the waste or testing...then check the treatment standards listed in 40 CFR 268.40 or 268.45
- Must keep all supporting information used to make determination in your files



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 LQG

LDR Requirements

- Generator must issue a one-time notification to the Treatment Facility
 - Must certify whether the waste meets treatment standards or that the TD will make the determination
 - Must sign the certification
- Another notification is required when treatment facility, process, or the waste changes
- Documentation must be kept in facility file – keep at least 3 years



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LDR Form Example 

Generator Name: ██████████

US EPA ID Number: NCH 000 ██████████

Waste Description: Emulsion Coated Clay from the Primary Production of Steel in Electric Furnaces (HS91 - Non-hazardous)


Designated Facility: American Zinc Recycling Corp. 3611 Technology Dr. Burnsville, NC 28727

US EPA ID Number: SCF1 000 711 018


HERITAGE[®] RESLDR1 LAND DISPOSAL RESTRICTIONS (LDR) NOTICE AND CERTIFICATION Page 1 of 1

Tracking No. 091122 EPA ID No. NC ██████████ 61 Waste Stream Number: W105 2 W143


Waste Code	Regulation (Non-conflicting) <small>40 CFR 262.30-33</small>	Regulation (Conflicting) <small>40 CFR 262.34-35</small>	Hazardous Waste Code	Whether Or Not Resource Conservation <small>(Check Only)</small>	IS <small>(Check Only)</small>	IS <small>(Check Only)</small>	IS <small>(Check Only)</small>	IS <small>(Check Only)</small>	Conforms Reference/Identify Chemical, Code "YES" or "NO?"		Applicable Certificate (One per line)
									YES	NO	
D001, D002, D003, D004	ww (sgsf)				48					YES	1
D001	ww (sgsf)				3					NA	1
D001, D015, D035	ww (sgsf)				48					YES	1
D001	ww (sgsf)				1, 2					NA	1
					ww (msw)						



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Pre-Transport Requirements 
40 CFR 262 Subpart C


262.30 Packaging
262.31 Labeling
262.32 Marking
262.33 Placarding



Before transporting hazardous waste or offering hazardous waste for transportation off-site, a generator must comply with the applicable Department of Transportation regulations on packaging, labeling, marking, and placarding as defined in 49 CFR.



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LQG CAA Closure and Facility Closure 

If a large quantity generator of hazardous waste intends to permanently cease the accumulation of hazardous at its site it must make specific notifications and meet certain performance standards.


- Notify no later than **30 days** prior to facility closure using a 8700-12 notification.
- Notify within **90 days** after closure of facility using a 8700-12 notification that the facility has met or not met the closure performance standards.

Closure performance standards

- LQG must close each hazardous waste container accumulation area.
- LQG must also remove or decontaminate all contaminated equipment, structures, soil, and any remaining hazardous waste.
- Any hazardous waste generated during closure must be managed as a hazardous waste by the LQG.




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Just Closing a CAA and not the Facility 

If you are planning to stop using a CAA temporarily or permanently.

- Place a notice in the facility's operating record within 30 days after closure of the hazardous waste accumulation unit. Notice must identify the location of the unit within the facility. If the waste accumulation unit is subsequently reopened, the generator may remove the notice from the operating record.
- Or perform the steps on the previous slide.



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You did it!
Congratulations



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Photo Credits

- Slide 72 - <http://www.fritcar.com/>
- Slide 90 - DOT: https://www.google.com/imgres?imgurl=https%3A%2F%2Fj9w6z4d2.rocketcdn.me%2Fwp-content%2Fuploads%2F2019%2F02%2FHazardous-Labels.png&imgrefurl=https%3A%2F%2Ftanktransport.com%2F2020%2F02%2Fexemptions-lengthy-for-hazmat-placarding%2F&btnid=GuV26A4p7EmPbM&vet=12ahUKEwi7P7kqOfvANVHEFMKHQDSBeoQMygLegUIARDbAg..&docid=mL_Q4spbuM&w=1264&h=750&q=hazardous%20materials%20placards&ved=2ahUKEwi7P7kqOfvANVHEFMKHQDSBeoQMygLegUIARDbAg



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