



North Carolina Hazardous Waste Workshop
Paperwork Review
Fall 2024



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Environmental Specialist II

**Hazardous Waste Section
Division of Waste Management**

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919-270-3507



Understanding Compliance and Documentation

- Right of Entry/Inspection
- Required Paperwork



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!



Upon Entry

- The inspector(s) will not sign any document or log requiring them to agree to any 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.***



Humboldt State University Controlled IT Spaces Visitor Log Rev. 2/1/12					
Controlled IT Space Room Number _____					
Visitor AGREEMENT TO ACCEPT RESPONSIBILITY					
<ul style="list-style-type: none">• Access to the HSU Data Center, Core Distribution Rooms, and Telecommunications Spaces is limited to authorized personnel only. Unauthorized access to the HSU Data Center, Core Distribution Rooms, or Telecommunications spaces must be reported to University Police and the Information Security Office.• Violators are subject to disciplinary action up to and including dismissal from employment, expulsion from the University, and civil or criminal prosecution, as appropriate. Disciplinary action shall be conducted in accordance with applicable collective bargaining agreements or other appropriate University policies.• By signing below, I certify that I have read and understand the above terms, and agree to the terms.					
Visitor Name	Company/Org	Escort Name	Date:	Time In	Time Out



Authority of Entry under N.C. General Statute 130A-17

- Right of Entry: NC Hazardous Waste inspectors have the authority to enter premises as necessary to enforce environmental laws.
- Administrative Warrants: If entry is refused, an administrative search and inspection warrant can be obtained under G.S. 15-27.2.
- Imminent Hazard: No warrant is required if there is an imminent hazard present.



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



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.



The Inspection: Records Review

- Documentation of Waste Determination
- Notification Records (EPA 8700-12)
- 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



SQG vs. LQG
Paperwork Requirements

Small Quantity Generator

- 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 renotification

Large Quantity Generator

- Manifests/LDRs
- Weekly (7 days) inspections of Central Accumulation Area(s)
- Documented arrangements made with local emergency authorities
- Contingency Plan & Quick Reference Guide
- Training
 - Documented RCRA training
 - Job description
- Biennial Report



Hazardous Waste Determination

40 CFR 262.11(f)



Waste Identification:

Documentation must clearly identify and describe the waste being evaluated. Includes both non-hazardous and hazardous waste.



Methods of Determination:

Record the methods used to determine if the waste is hazardous, including any tests or analytical data.



Generator Knowledge:

Document the generator's knowledge of the waste, including materials and processes that produced it.



Supporting Documentation:

Include any Safety Data Sheets (SDS), process flow diagrams, or other relevant information.



Record Retention:

Maintain all documentation for at least three years from the date the waste was last sent for treatment, storage, or disposal.





SQG

LQG

Notification of Hazardous Waste Activity

40 CFR 262.18



EPA Identification Numbers



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.

NCR000000

NCD987654321



Re-notification for SQG and LQG

40 CFR 262.18



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



Electronic Notification



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.



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



Other Questions About Your Notifications

- Laura Alexander 919-707-8214
Laura.Alexander@deq.nc.gov





Emergency Arrangements

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

For LQGs: 40 CFR 262.256



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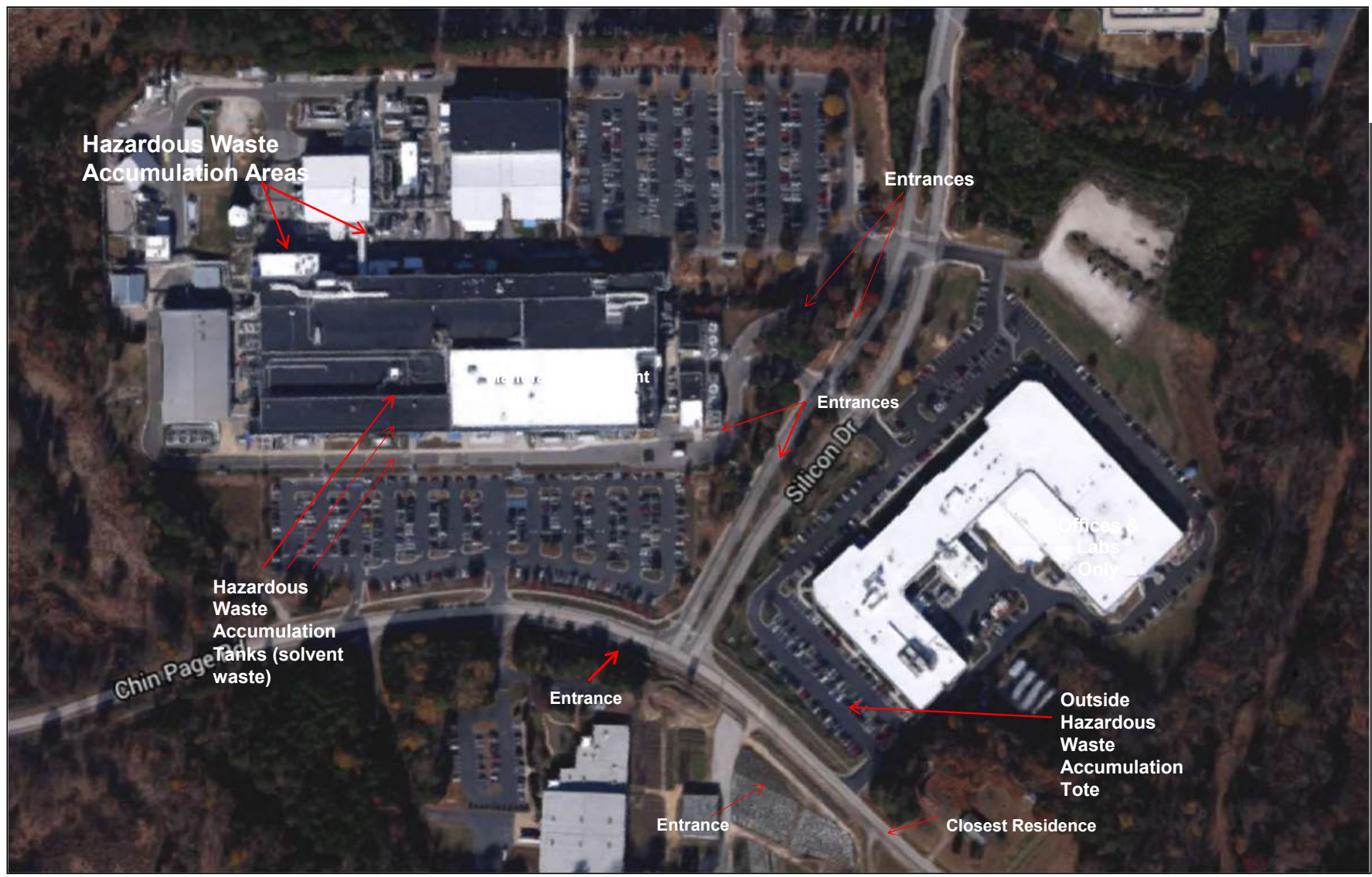
Emergency Arrangements With Local Authorities.



- **For LQGs and SQGs:** Arrangements must account for areas where hazardous waste is **generated and accumulated** (both satellite and central accumulation areas) at the facility.
 - Coordination: Document attempts to make arrangements with local emergency authorities, such as fire departments, police, hospitals, and LEPCs.
 - Information Sharing: Provide them with the necessary information about the hazardous waste handled at the facility. What, Where, Who, Quantity.
 - Retention: Maintain all emergency arrangement documentation for at least three years after the arrangement is made.



SQG
 LQG



Emergency Arrangements



- When more than one police or fire department might respond to an emergency, designate a primary emergency authority to a specific fire or police department.
- ***An LQG should document arrangements agreed to by local authorities in their contingency plan. Page 119 in the Generator Compliance Manual.***



(Facility Name)
(Attn: Facility Contact Name)
(Address of the Facility)

Subject: Emergency Arrangements Response

Dear (Facility Contact Name):

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 described in the information that was submitted to this agency.

Sincerely,

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

Date Reviewed:(by Emergency Authority Contact) _____

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.



Emergency Coordinator

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



- Identify and document an emergency coordinator who is available at all times to respond to emergencies.
- Has the responsibility for coordinating all emergency response measures.
- For LQGs it can be a staffed position if the facility operates 24/7/365.





Contingency Plan

40 CFR 262.260 – 262.263



Contingency Plan



- Development: LQGs must develop a detailed contingency plan for responding to emergencies.
- Documentation: Ensure that copies of the plan are kept on-site and shared with local authorities.
- 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)
- Documentation: Ensure that copies of the plan are kept on-site and shared with local authorities.



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
- Emergency Equipment:
 - Inventory: Maintain a documented inventory of emergency equipment available on-site (e.g., fire extinguishers, spill control materials, communication systems).
 - Location: Ensure the location of the emergency equipment is documented and accessible.





III. LIST OF EQUIPMENT	EMERGENCY EQUIPMENT CAPABILITIES/FUNCTION	(Ref. 40 CFR 262.261(e) LOCATION(S))
Absorbent Socks	Absorbs hazardous waste liquid spills found at the facility for proper cleanup/disposal.	At all satellite areas, central accumulation areas, and strategically placed throughout the facility.
Boots	Solvent resistant boots are large enough for personnel to wear over regular footwear. Prevents cleanup personnel from contaminating footwear in the event of a liquid spill.	Hazardous Material storage room
Broom	Long handle and flat brush surface have the ability to collect absorbent materials or other dry materials.	At the central accumulation areas
Face Mask	Breathing apparatus is designed to fit over the nose/mouth. Apparatus filters air by means of dual replaceable carbon cartridges. To be used when solvent vapors in confined areas might cause breathing difficulties or hazards to cleanup personnel.	Near all satellite areas and central accumulation areas
Face Shield	Protects the eye/face from potential splashes and contacts 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
Floor Dry	Standard clay based industrial absorbent material used to absorb a spill and provide a temporary dike for spilled liquids.	At all satellite and central accumulation areas
Gloves	Solvent-resistant gloves protect to the forearm and are used to minimize exposure to hazardous materials.	At all satellite areas, central accumulation areas, and strategically placed throughout the facility

- Example of list of emergency equipment with the description, capabilities and location.
- Location of emergency equipment can also be shown on a map.
- Page 107



Contingency Plan

40 CFR 262.261(f)



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.

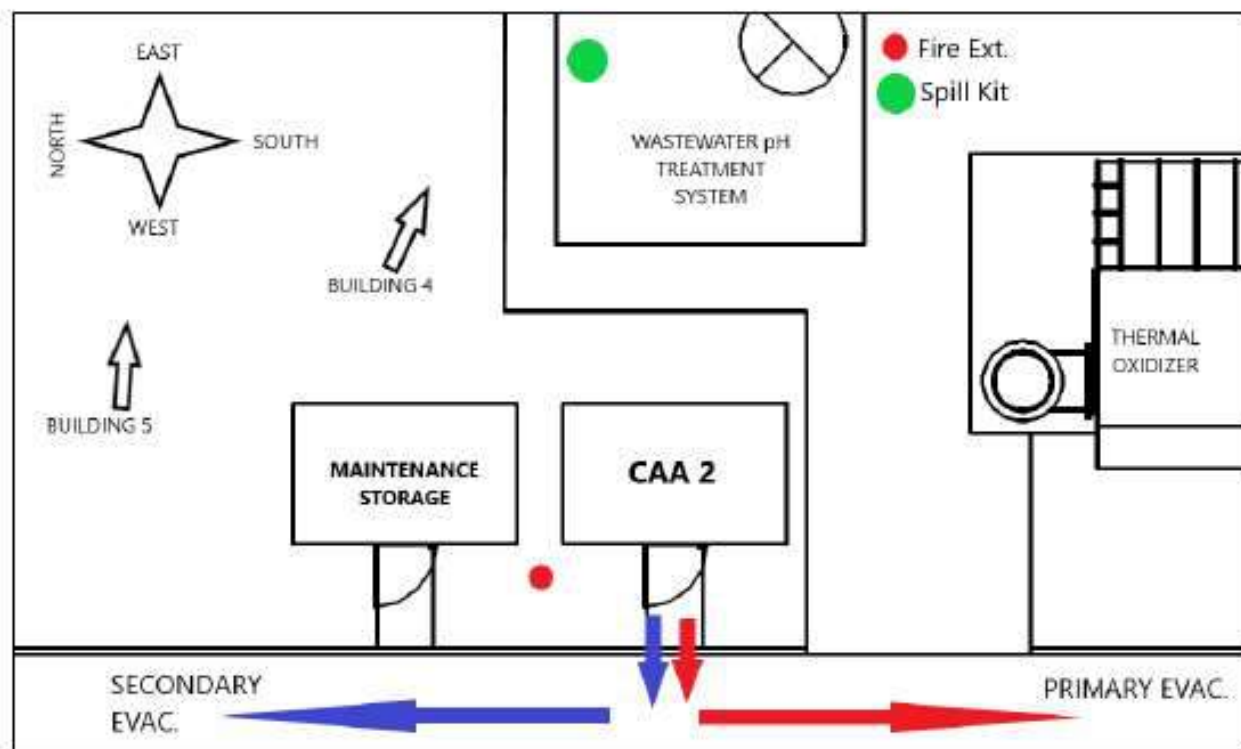
-Print this *in color*



Your Facility
Environmental, Health and Safety Policy/Procedure

Title: Contingency Plan for a Major Chemical Spill or Release

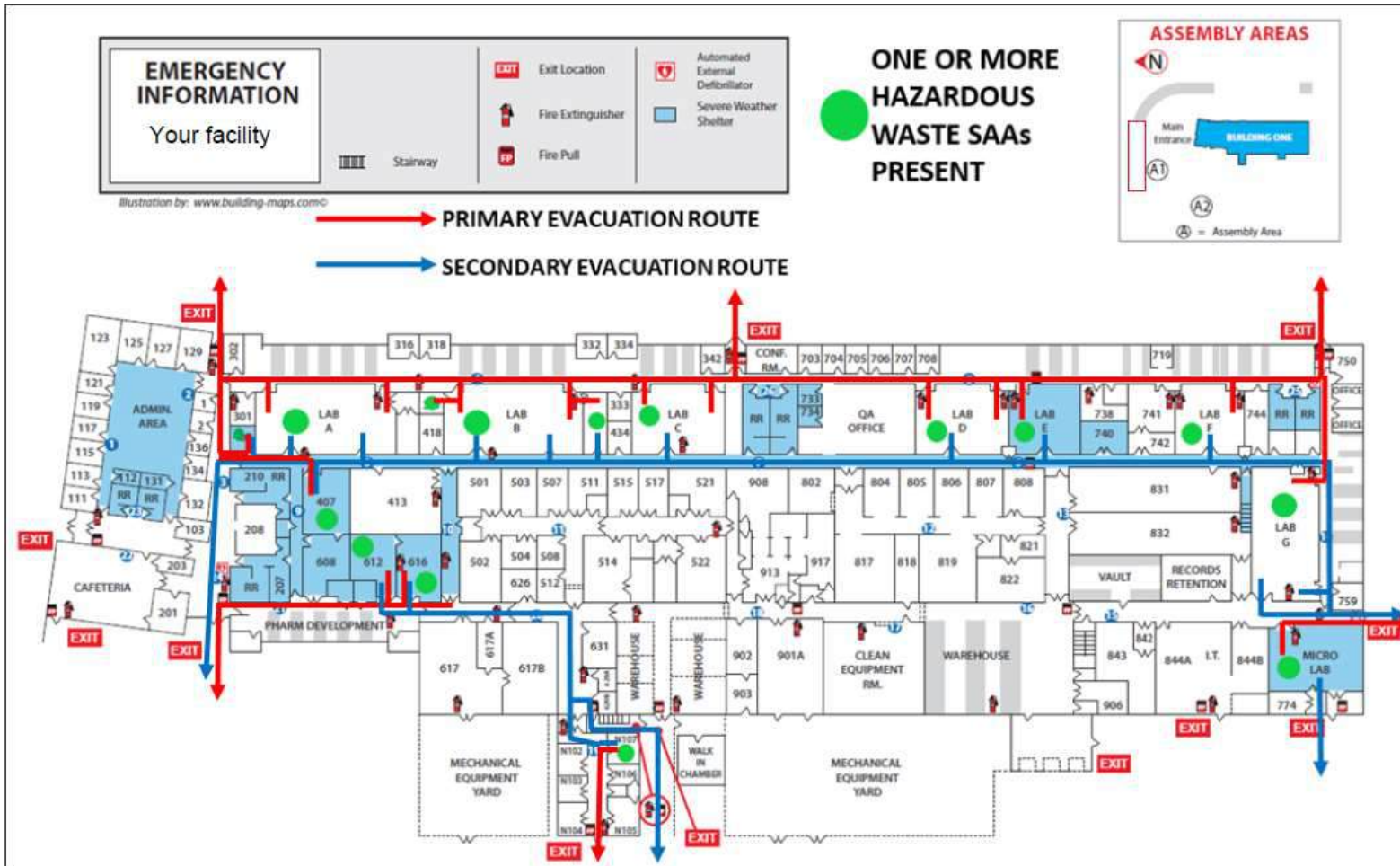
CAA 2 Evacuation Map



Example CP evacuation map from the HW central accumulation area

- *With primary and secondary routes of evacuation*

Building 1 Evacuation Map



Example CP evacuation map from the HW satellite accumulation areas

- *With primary and secondary routes of evacuation*

Contingency Plan

40 CFR 262.263



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



Contingency Plan - Quick Reference Guide

40 CFR 262.262(b)



- LQGs must prepare a quick reference guide (QRG) summarizing the contingency plan's key elements for local emergency responders.
 - The QRG should aim for clarity and brevity to ensure quick and easy access during emergencies.
 - Confirm that local emergency responders have the most recent version.
- Use Visual Aids:
 - Include maps, diagrams, and flowcharts to visually represent key information, like emergency routes and equipment locations.



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



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
990 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:

Name of Waste	Waste Codes/Hazards	Location Accumulated	Maximum Amounts Present	Response Notes	Special Notes to Hospital/Treatment personnel
Paint Related Wastes (liquid)	D001 (ignitability, flash point <140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity)	NW 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
Paint Related Wastes (liquid)	D001 (ignitability, flash point <140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity)	Two Satellite Accumulation Areas as noted with blue asterisks on the attached map.	One, 55-gallon drum (440 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, (brand name is Amine 4) (liquid)	D016 (toxicity); Flashpoint 190 °F.	SW corner of warehouse near new product storage of Amine 4.	Off-Spec – 1 tank, 1,000 gallons New product – 1 tank (same tank as off-spec), 1,000 gallons	Use PPE to prevent contact with skin and eyes. Immediately prevent spills from entering drains and waterways. Prevent sources of ignition and open flames.	Contact Chemtrac for emergency medical treatment information at 1-800-424-9300. If in eyes, wash eyes for several minutes.

Contingency Plan - QRG

40 CFR 262.262(b)

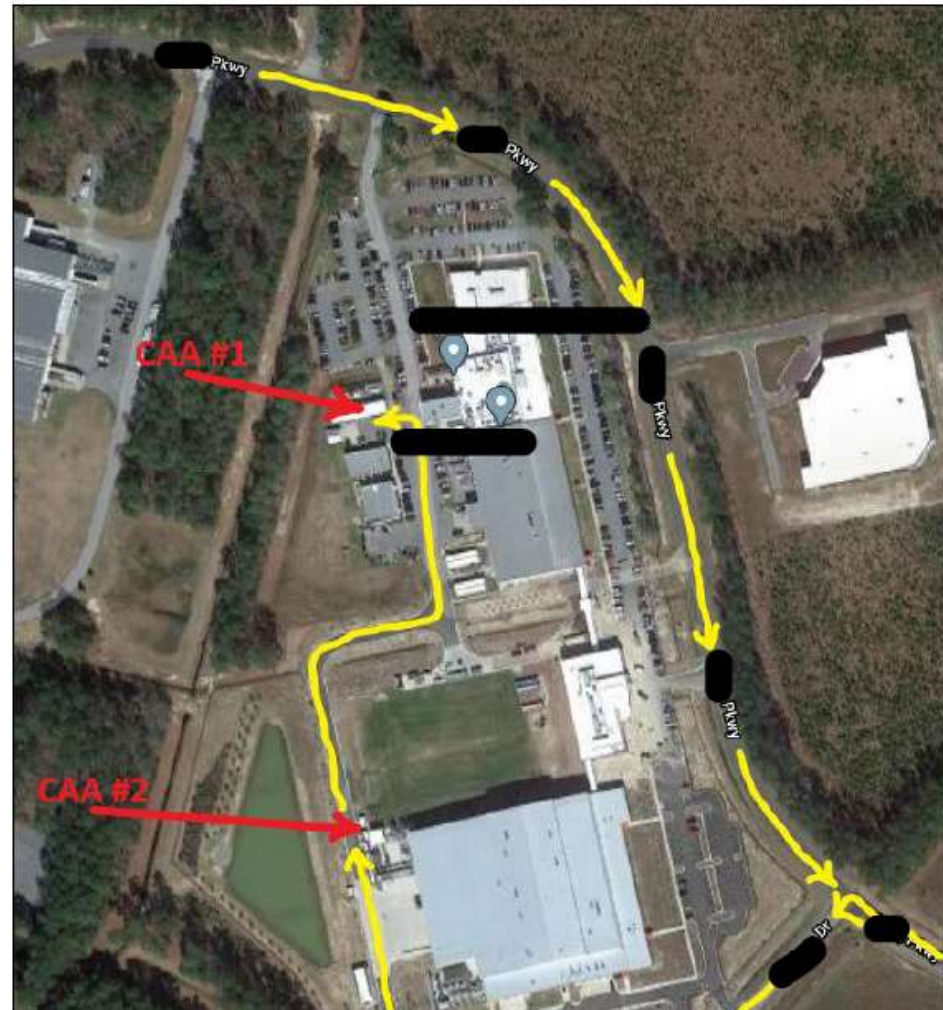


5. Map of facility showing where HWs are generated, accumulated, and treated, **as well as routes for accessing these wastes/areas. This includes satellite accumulation areas (SAAs) and central accumulation areas (CAAs)**
6. The identification of on-site notification systems (e.g., a fire alarm that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



QRG, continued

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

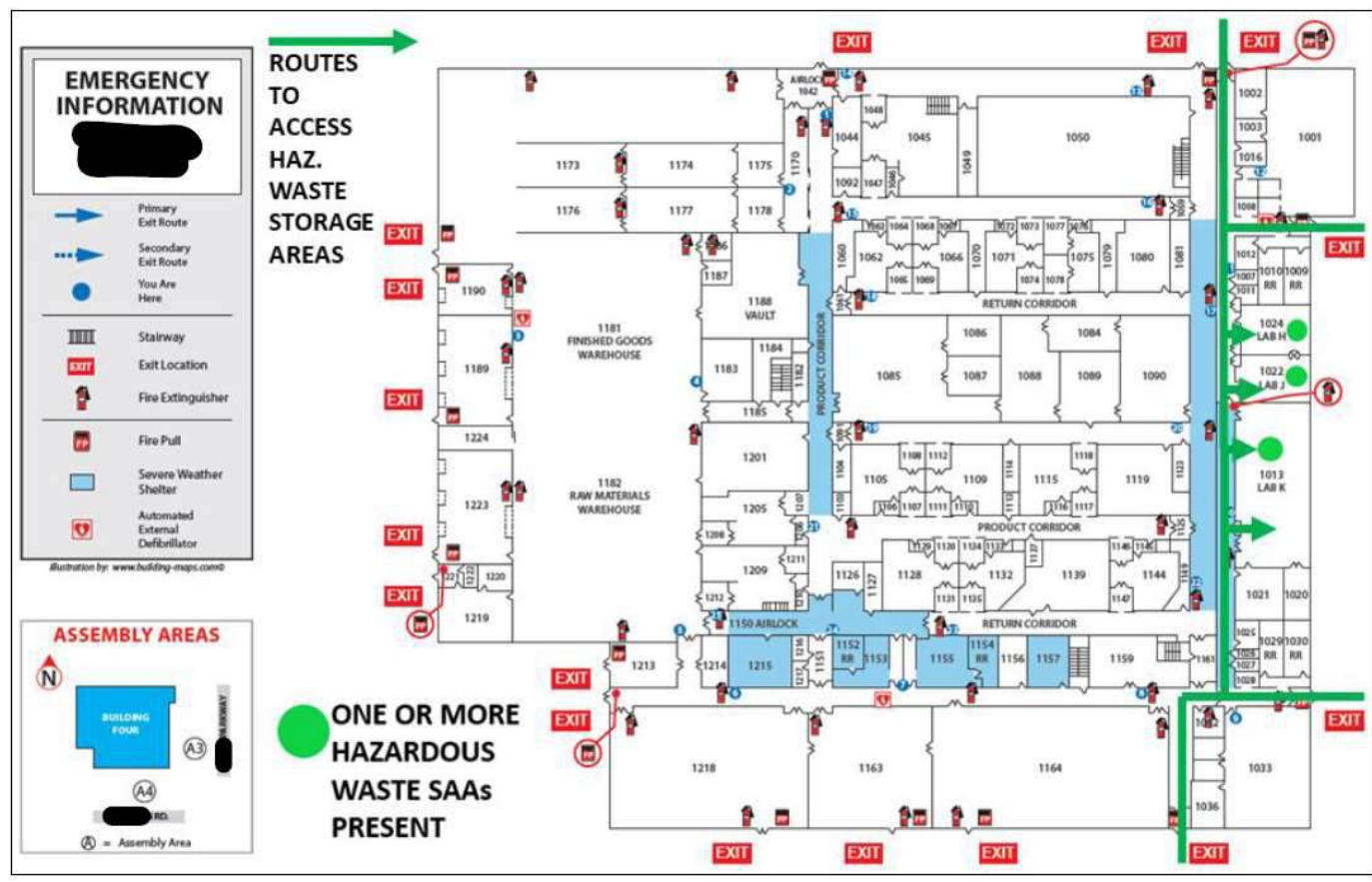


QRG, continued



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

Building D Hazardous Waste Storage Locations and Access Routes



Contingency Plan - QRG

40 CFR 262.262(b)



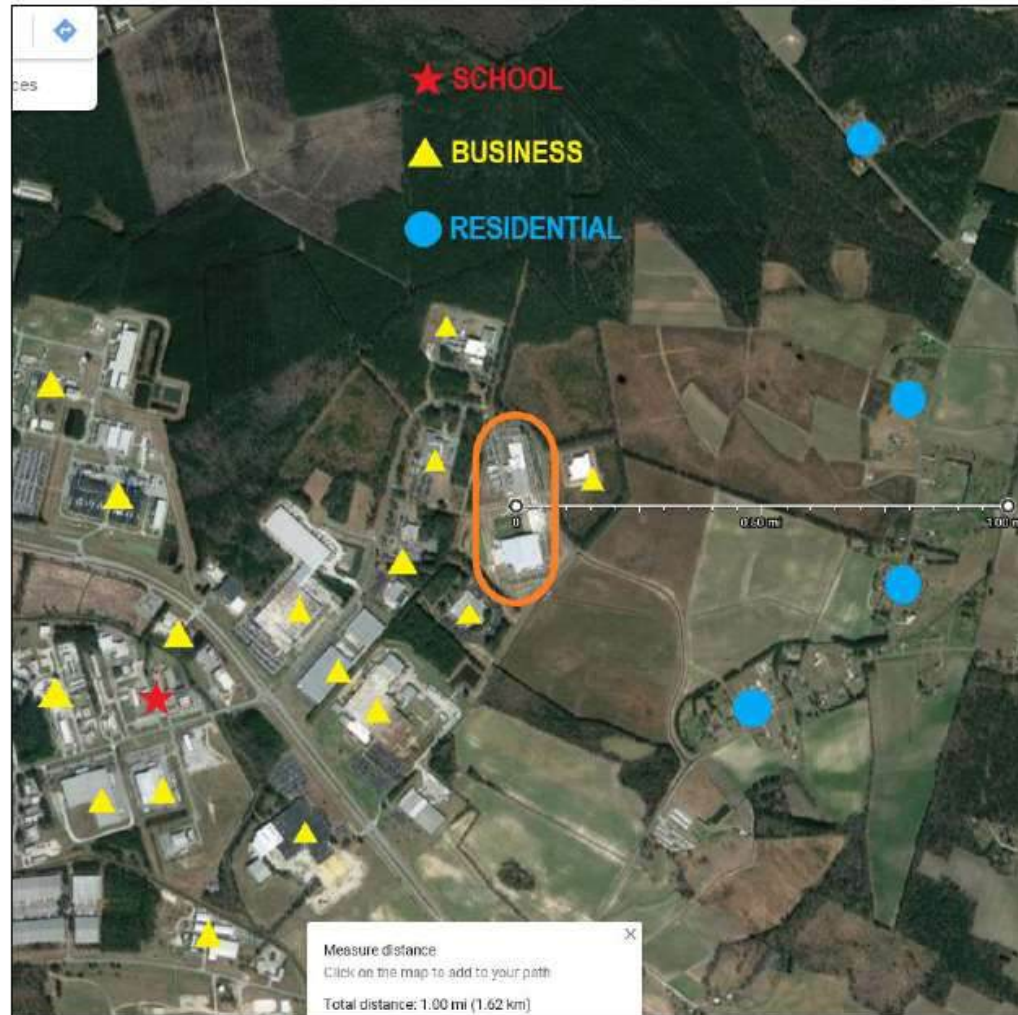
7. Locations of water supply (e.g., fire hydrant and its flow rate)
8. Street map of facility in relation to surrounding businesses, schools, residential areas to understand how best to get to facility and also evacuate citizens and workers



QRG, continued

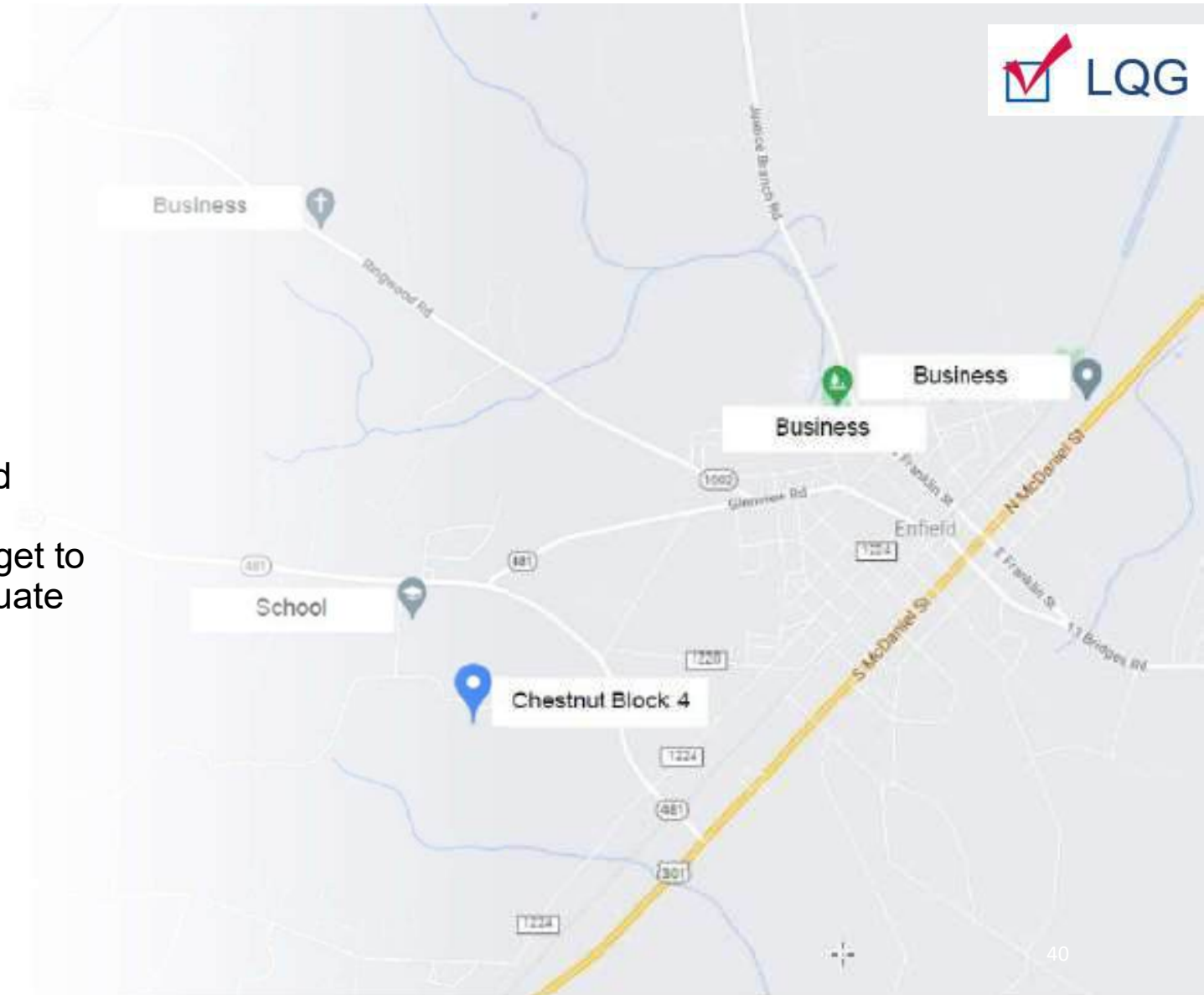
- Street map of facility in relation to surrounding businesses, schools, and residential areas to understand how best to get to the facility and also evaluate citizens and workers.

One Mile Radius Street Map



Orange oval - facility

- *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.



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).
- Use visual aids when possible.



My Company Incorporated
 191 Somewhere Road
 Greenville, North Carolina 27834



SQG Emergency Info Posted

Emergency Coordinator: _____ (252) 999-9999
 Pitt County Fire Department: (252) 999-9999
 CHEMTREC: (800) 424-9300
 Pitt County Sheriff's Office: (252) 999-9999
 Emergency Response: (252) 999-9999
 Hospital: (252) 999-9999

Emergency Contacts Telephone Posting

Post this sheet near the telephone(s) in areas where hazardous waste is generated or accumulated.

Emergency Coordinator(s)

Coordinator name	Emergency telephone number

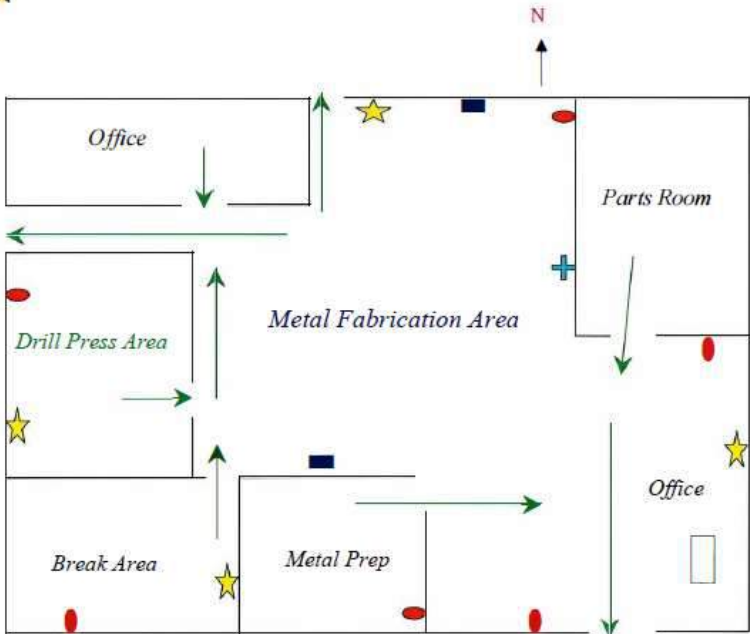
Emergency contact	Phone number
Fire Department	
Police Department	
Hospital	
State 24-Hour Emergency Response Line	
National Response Center (24-Hour)	1-800-424-8802

Location of Emergency Response Equipment

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

[Fulfills emergency contact telephone posting requirements for small quantity generators in §262.16(b)(9)(ii)]

- FIRST AID KIT
- FIRE EXTINGUISHERS
- SPILL KITS
- EXIT ROUTES
- FIRE ALARMS





Personnel Training

For LQGs: 40 CFR 262.17(a)(7)

For SQGs: 40 CFR 262.16(b)(9)(iii)





Who must be trained?

- 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



What training is required?

- 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.

What training is required?

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





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

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(i)*)





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).



Document the qualifications of the instructors conducting the training.

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.

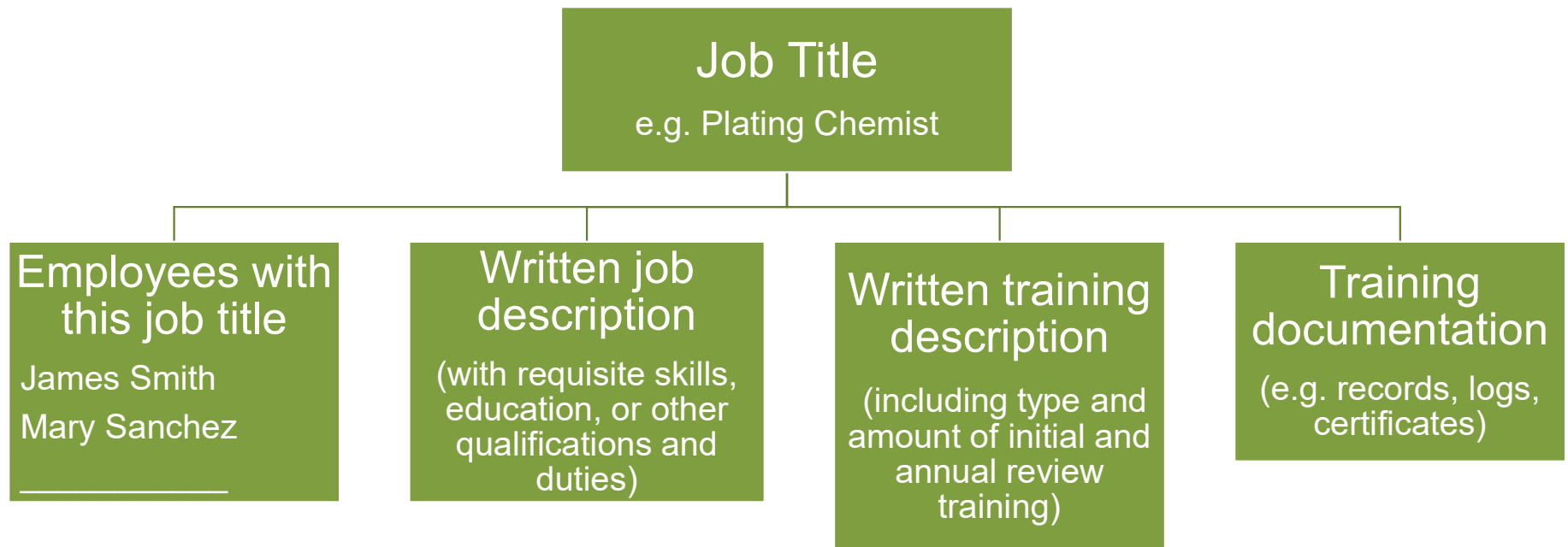




ANNUAL REVIEW =

At least every 365 days

Training Recordkeeping Requirements





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.





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



Sample Training Documents
Hard Chrome Plating Company
Job Description



Name: Dewayne Johnson
Job Title: Plating Chemist

Summary: Plating Scientist is the level for very experience and/or advanced technical chemists. Must have the ability to effectively determine proper plating processes.

Minimum Requirements: Master's in chemistry with 5+ years of experience or Bachelor's degree with 10+ years of experience.

Responsibilities:

- Proposes and implements successful plating processes
- Designs experiments to address project goals based on interpretation of results, with limited guidance
- May train, supervise or direct other scientists at the associate level

Technical Skills:

- Expert understanding of applied theory of plating chemistry related to projects
- Broad knowledge of plating process reactions and their applications
- Basic understand of plating knowledge
- Effectively participates in development of project plan to meet goals and objectives

Communication Skills:

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

Safety:

- Accountable for maintaining safe working environment
- Observes Hard Chrome Plating Company safety policies and procedures
- Provides strong leadership by principle and by example

Hazardous Waste Management:

- ~~Secondary Emergency Coordinator.~~
 - Remain familiar with the contingency plan and procedures set forth in the plan
 - Make appropriate communications in time of emergency with Fire/Police, Hard Chrome Plating executive staff as appropriate, with personnel in charge of environmental reporting, and environmental emergency response contractors as appropriate
 - Direct Emergency Personnel to appropriate locations
 - Act as liaison between emergency crews, response contractors and Hard Chrome Plating staff
- Hazardous Waste Handler
 - Awareness and satellite accumulation (including but not limited to) caps, labeling, dating
 - Periodically removing satellite waste containers and deliver to less than central accumulation area
 - Annual RCRA Training including Emergency Coordinator (secondary) refresher, Contingency Plan training, RCR hazardous waste training



Staff with Hazardous Waste Responsibilities



ABC Plating Company, North Carolina

Revised June 2021

HAZARDOUS WASTE JOB FUNCTIONS/TRAINING:

The hazardous waste management team consists of the following positions:

Position/Job Title	Employee Name	Level of Training	Responsibilities
EHS Manager	Heather Goldman	<ul style="list-style-type: none"> • Site Waste Management • Hazardous Waste Management • Hazwoper First Responder 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. Signs manifests.
Plating Chemist Supervisor	Jenne Walker Autumn Romanski	<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. Signs manifests. Emergency response. Secondary emergency coordinator.
Plating Chemist	Wes Hare Aram Kim Dan Girdner Andrea Stermer	<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

Required Training Records

- Curriculum: Maintain detailed records of the topics covered in the training, such as waste handling procedures, emergency response, and regulatory requirements.
- Attendance: Keep a record of which employees attended the training sessions, including dates and times.



**JOB DESCRIPTION/TRAINING RECORD FOR HAZARDOUS WASTE
MANAGEMENT/DISPOSAL POSITIONS PER 40 CFR 262.17(a)(7)**



This record must be maintained at the facility.

FACILITY: *facility name* _____ UNIT: *Plant number* _____

ADDRESS: *address of facility* _____

PHONE: *000-000-0000* _____ DATE: _____

EMPLOYEE NAME: _____

JOB TITLE: _____

HAZARDOUS WASTE RELATED QUALIFICATIONS AND DUTIES **(INCLUDE REQUISITE SKILLS, EDUCATION, OR OTHER QUALIFICATIONS).**

The above person works with and handles hazardous materials and wastes at the work site located at _____, CITY, STATE. This person has the appropriate qualifications to read understand, apply, 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 is responsible for proper handling, documenting, inspecting, and transporting hazardous wastes. This employee is also responsible for responding to emergencies. The above individual commenced these duties on _____ 20_____.

DATE	DESCRIPTION OF TRAINING ENTER THE TITLE, A BRIEF DESCRIPTION AND THE NAME OF THE INSTRUCTORS. NOTE WHETHER THE TRAINING IS: CLASSROOM, ON-THE-JOB, OR COMPUTER BASED/ELECTRONIC	EMPLOYEE SIGNATURE



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!)

Training Records Retention

01

Training records on current personnel must be kept until closure of the facility.

02

Training records on former employees must be kept for at least three years from the date the employee last worked at the facility.

03

Training records must accompany personnel transferred within the same company.

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.



*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>





Biennial Report

40 CFR 262.41



Biennial Report



- LQG must prepare and submit a single copy of a Biennial Report by March 1 of each even numbered year; 2023 activities were due March 1, 2024
- Biennial Report covers generator activities during the previous year
 - 2023 Biennial Report was due March 1, 2024 (covering 2019 activity)
 - Biennial Report is filed through RCRAInfo Industry Application (no longer filed through Easitrak)
- LQG must keep a copy of each Biennial Report for 3 years



Biennial Report

- **Report Contents:**
 - **Waste Description:** Provide detailed descriptions of the types and quantities of hazardous waste generated during the reporting period.
 - **Management Methods:** Document the methods used for waste management, including treatment, storage, and disposal practices.
 - **Facility Information:** Include details about the facility, such as location, EPA ID number, and contact information.
- **Common Pitfalls:**
 - **Incomplete Data:** Avoid missing or inaccurate information, which can lead to non-compliance.
 - **Late Submission:** Ensure timely submission to avoid non-compliance.
- **Tips for Compliance:**
 - **Pre-Submission Review:** Double-check all data and entries before submitting.
 - **Software Tools:** Consider using software tools to help track waste generation and streamline the reporting process.





Inspection Records

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





Inspection Records

- Inspection Requirements:
 - Frequency: Conduct inspections of hazardous waste storage areas at least once a week.(Every 7 days).
 - Scope: Inspect containers, tanks, and other storage areas for signs of leaks, deterioration, or potential hazards.
- Inspection Checklist:
 - Container Condition: Check for corrosion, dents, and proper labeling.
 - Containment Systems: Ensure secondary containment systems are intact and functional.
 - Spill Control Equipment: Verify that spill kits and emergency equipment are readily available and in good condition.
 - Aisle Space: Confirm adequate aisle space is maintained for easy access and emergency response.

Inspection Records

- Documentation:
 - Inspection Log: Record the date, time, and findings of each inspection in a logbook or electronic system.
 - Inspector Information: Include the name of the individual who conducted the inspection.
 - Corrective Actions: Document any issues found and the corrective actions taken, along with the completion date.
- Record Retention:
 - Retention Period: Maintain inspection records for at least three years from the date of inspection
 - Accessibility: Ensure records are easily accessible for regulatory review during inspections or audits.

Inspection Records

- **Best Practices:**
- **Consistent Scheduling:** Establish a routine inspection schedule to ensure inspections are conducted regularly.
- **Training:** Ensure all personnel involved in inspections are properly trained and aware of what to look for.
- **Follow-Up:** Promptly address any issues identified during inspections to maintain compliance and safety.





Hazardous Waste Manifests

40 CFR 262 Subpart B (262.20 – 262.27)



Hazardous Waste Manifest



May be the single most important document for a generator!

- 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



Key Components of the Hazardous Waste Manifest



- Generator ID #
- Emergency Response Phone
- Manifest Tracking #
- Generator's Name
- Generator's Address
- Generator's Phone
- Transporters
- Designated Facility

Please print or type.

Form Approved: OMB No. 2050-

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number	
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)				
Generator's Phone:						
6. Transporter 1 Company Name				U.S. EPA ID Number		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address				U.S. EPA ID Number		
Facility's Phone:						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WT./Vol.	13. Waste Codes
		No.	Type			
1.						
2.						
3.						

DRAFT



Hazardous Waste Manifest, cont.

- A description of the waste, including container quantity and type, weight/volume, and waste codes
- Any special handling instructions
- Generator's certification (signature and date)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes
		No.	Type			
1.						
2.						
3.						
4.						
14. Special Handling Instructions and Additional Information						
15. GENERATOR/SOFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offor's Printed/Typed Name		Signature			Month	Day Year
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Part of entry/exit: _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name		Signature			Month	Day Year
Transporter 2 Printed/Typed Name		Signature			Month	Day Year
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
18b. Alternate Facility (or Generator)				Manifest Reference Number		
				U.S. EPA ID Number		
18c. Signature of Alternate Facility (or Generator)						
					Month	Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1.	2.	3.	4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name		Signature			Month	Day Year

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete. DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM



Hazardous Waste Manifest, cont.

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NC [REDACTED]	2. Page 1 of 1	3. Emergency Response Phone 8002553924	4. Manifest Tracking Number [REDACTED] 864837 JJK				
5. Generator's Name and Mailing Address 252- [REDACTED] [REDACTED] [REDACTED] Generator's Phone: [REDACTED]				Generator's Site Address (if different than mailing address) [REDACTED] [REDACTED] [REDACTED]					
6. Transporter 1 Company Name Lamp Environmental Industries (LEI)				U.S. EPA ID Number LAR000055467					
7. Transporter 2 Company Name				U.S. EPA ID Number					
8. Designated Facility Name and Site Address Fielding Environmental 150 4th Ave Freedom, PA 15042 Facility's Phone:				U.S. EPA ID Number PAD000797548					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Vol.	13. Waste Codes		
			No.	Type					
	X	1. RQ, UN1133, Waste Adhesives, 3, PG-II (RQ-D001,D007,D008,D011,D018)	24	DM	372 392	P	D001	D007	D008
	X	2. RQ, UN1133, Waste Adhesives, 3, PG-II (RQ-D001,D007,D008,D011,D018)	3	DM	473	P	D001	D007	D008
							D011	D018	D035
14. Special Handling Instructions and Additional Information 1.ERG#128: 2022PA - 2885 2.ERG#128: 2022PA - 2885									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Officer's Printed/Typed Name [REDACTED]							Signature [REDACTED]		Month Day Year 10 15 22

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





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.



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



Land Disposal Restrictions

40 CFR 268



Land Disposal Restrictions (LDR)



- LDR Program applies to everyone handling HW (except VSQGs)
- Purpose of LDR:
 - Protection: LDRs ensure that hazardous waste is treated to reduce its toxicity before disposal on land, protecting human health and the environment.
- LDR Notification Form:
 - Submit a notification form to the receiving facility indicating whether the waste meets LDR treatment standards. Applicable to each waste stream.
 - Contents: Include waste codes, treatment standards, test results and any additional information required.



LDR Requirements

40 CFR 268.7(a)(1)-(9)



- Certification:
 - Generator Certification: Certify that the waste either meets the treatment standards or will be treated to meet the standards before disposal.
 - Facility Certification: Receiving facilities must certify that the waste has been treated to meet LDR standards before disposal
- Another notification is required when the treatment facility, process, or the waste changes
- Documentation must be kept for at least 3 years



UTS FEDERAL/SOUTH CAROLINA ONE-TIME LAND DISPOSAL
RESTRICTION NOTIFICATION AND CERTIFICATION FORM



Generator Name: [REDACTED]

US EPA ID Number: NCR 000 [REDACTED]

Waste Description: Emission Control Dust from the Primary Production of Steel in Electric Furnaces. (K061 – Non-wastewater)

Designated Facility: American Zinc Recycling Corp
941 Technology Dr
Barnwell, SC 29812

US EPA ID Number: SCR 000 771 618

[REDACTED] North Carolina as required by 40CFR 268.7 provides to America Zinc Recycling Corp the notification that the material being shipped under the Manifest Document Number listed below and all future shipments are subject to land disposal restrictions. This waste is prohibited from land disposal since it does not meet the applicable treatment standards in 40CFR 268.40 indicated below.

Waste Code	Regulated Hazardous Constituent	Regulatory Level (Non-wastewater) TCLP, mg/l
K061	Antimony	1.15
	Arsenic	5.0
	Barium	21
	Beryllium	1.22
	Cadmium	0.11
	Chromium (Total)	0.60
	Lead	0.75
	Mercury	0.025
	Nickel	11
	Selenium	5.7
	Silver	0.14
	Thallium	0.20
	Zinc	4.3

[REDACTED] Name [REDACTED] Signature [REDACTED] 965 State Manifest Doc. No. 12/23/ Date



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.



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.



Common Pitfalls and How to Avoid Them

- **Incomplete or Missing Manifests.**
 - Ensure all hazardous waste manifests are accounted for and completed properly.
- **Missing or Inadequate Contingency Plans/QRGs**
 - Ensure that Contingency Plans/QRGs are updated and contain the necessary information.
 - Double check emergency coordinator information.
- **Failure to Conduct or Document Weekly Inspections.**
 - Ensure that weekly inspections are conducted every seven days from the previous inspection.
 - Ensure that weekly inspections are properly documented.



Remember!



- 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.





You did it!
Congratulations





Photo Credits

- Slide 72 - <http://www.fritcar.com/>

