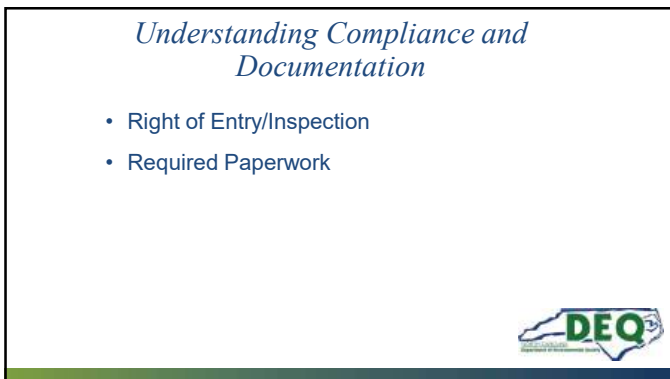


1



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 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.**



Inspection Date	Inspector(s)	Inspection Type	Range	Result	Site Name



5

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.



6

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



7

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.



8

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



9

SQG vs. LQG
Paperwork Requirements

<p>Small Quantity Generator</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>Large Quantity Generator</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
--	---




10

Hazardous Waste Determination
40 CFR 262.11(f)

VSQG
 SQG
 LQG

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.



11

SQG
 LQG

Notification of Hazardous Waste Activity

40 CFR 262.18






12

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.


13

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




14

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.



15

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



16

Other Questions About Your Notifications

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



17


Emergency Arrangements

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




18

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.




19





20

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)
(City, County, Contact Person)
(Address of the Facility)

Subject: Emergency Arrangements Response

Dear (Facility Contact Name):

I have received the information submitted by (Name of the Facility) to the office concerning hazardous waste generated and accumulated at your facility. Our agency is capable of providing the services included 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 (i.e. Fire Department, Police Department or Local Hospital)


Date Received (i.e. Emergency Authority Contact): _____

21

Emergency Arrangements

SQG
 LQG

- 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.





22

Emergency Coordinator

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

SQG
 LQG

- 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.





23

LQG

Contingency Plan

40 CFR 262.260 – 262.263



24

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.

25

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.

26

EQUIPMENT	CAPABILITIES/FUNCTION	LOCATION(S)
Absorbent Sods	Absorb 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. Personnel clean up personnel from contamination throughout in the event of a liquid spill.	Hazardous Material storage rooms
Buckets	1-gal handle and the bucket surface have the ability to collect absorbent materials or other dry materials.	At the central accumulation areas
Face Mask	Respiratory 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 persons present.	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
Spill Kit	Standard clear based industrial absorbent material used to absorb a spill and provide a temporary dam for spilled liquids. Solvent resistant gloves protect to the forearms and are used to minimize exposure to hazardous materials.	At all satellite and central accumulation areas. 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

27

Contingency Plan 40 CFR 262.261(f)



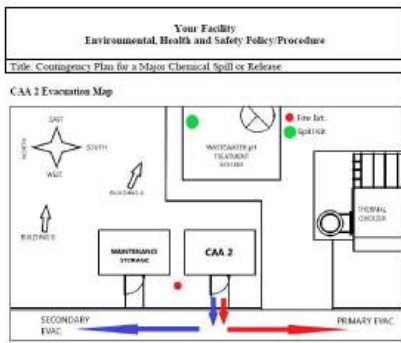
Contingency plan must describe the following:

- 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*



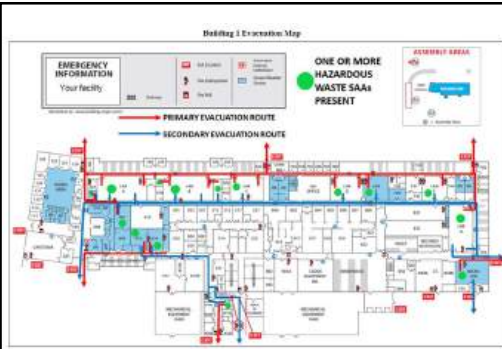
28



Example CP evacuation map from the HW central accumulation area
• With primary and secondary routes of evacuation



29




Example CP evacuation map from the HW satellite accumulation areas
• With primary and secondary routes of evacuation



30


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




31

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.




32

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



33

ESAMPA, GROSS MONTGOMERY COUNTY
 This example was created by the QRG. It is to be used as a guide to assist in the development of your own facility's contingency plan. It does not substitute for a review and register requirements.

Contingency plan quick reference guide
 ABC FACILITY
 3000 Oak Main Street
 Anytown, Iowa 50000

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

Note: ABC Facility operates 24hrs, 24/7. See the order of contact during an emergency is listed below.

Hazardous Waste Information:

Name of Waste	Waste Codes/Placards	Location Accumulated	Maximum Amounts Present	Response Rites	Special Notes to Response/Treatment Personnel
Paper Solvent (Waste #994)	D001 (ignitible), R001 (corrosive, flammable liquid), H011 (toxic), H021 (irritant), T001 (toxicity)	HW Storage of Warehouse, Satellite Accumulation Area	Five 55 gallon drums (240 gallons)	If personnel come into direct contact with material, decontaminate at the hospital if any (if needed) prior to treatment.	None
Paper Solvent (Waste #994)	D001 (ignitible), R001 (corrosive, flammable liquid), H011 (toxic), H021 (irritant), T001 (toxicity)	Four Satellite Accumulation Areas located within the warehouse on the attached site.	One 55 gallon drum (240 gallons)	If personnel come into direct contact with material, decontaminate at the hospital if any (if needed) prior to treatment.	None
Oil (used in a generator, AC, a furnace, wood frame in basement, floor)	H011 (toxic), H228 (extremely flammable liquid), H252 (corrosive to metals), H302 (harmful if swallowed), H311 (irritant), H314 (corrosive to skin), H315 (irritant), H317 (sensitivity), H332 (harmful if inhaled), H334 (respiratory irritation), H335 (irritant or allergen in dust or smoke)	Oil drum - 55 gallon Fuel product - 55 gallon Oil drum and fuel tank 1,000 gallons	Oil drum - 55 gallon Fuel product - 55 gallon Oil drum and fuel tank 1,000 gallons	Use PPE to protect contact with skin and eyes, immediately remove spills from operating trucks and workways. Remove sources of ignition and open flames.	Contact Chemical for emergency medical treatment information at 1-800-424-9300. If in case, wash eyes for several minutes.


34

Contingency Plan - QRG
 40 CFR 262.262(b)

LQG

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)**

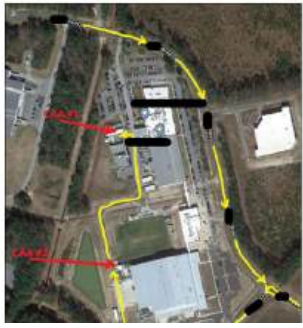
6. The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms)



35

QRG, continued

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

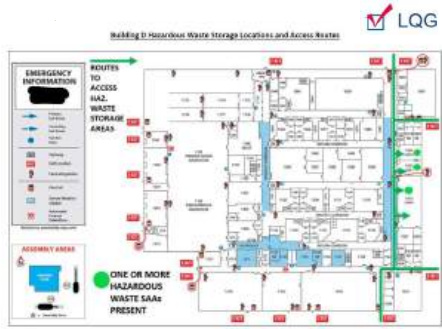


LQG

36

QRG, continued

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



37

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



38

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.



39

• 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.

40

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

Required Emergency Information

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.

41

SQG Emergency Info Posted

Emergency Contacts Telephone Posting

Emergency Coordinator: (252) 999-1000
 Fire Department: (252) 999-1000
 Police Department: (252) 999-1000
 State 24-Hour Emergency Response Line: (252) 999-1000
 National Response Center: (252) 999-1000

Emergency Contact	Emergency Telephone Number
Fire Department	
Police Department	
Nearest Hospital	
State 24-Hour Emergency Response Line	
National Response Center (24-Hour)	1-800-424-9303


Location (Emergency Response Equipment)	Equipment
Fire extinguishers	
Spill control material	
Spill kit	
Fire alarm	

42

SQG
 LQG

Personnel Training

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




43

LQG

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




44

LQG

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.



45

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




46

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




47



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))




48


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.

49

When and how often is training required? 

- 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.

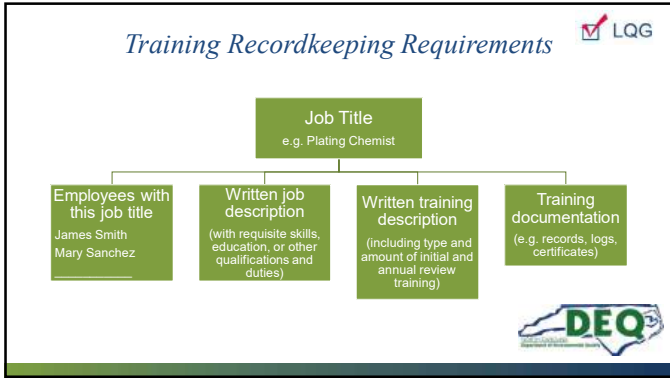


50




ANNUAL REVIEW =
At least every 365 days

51




52


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.



53


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



54

Special Training Document
ABC Plating Company, North Carolina
 Job Descriptions



Topic: Hazardous Waste
Job Title: Plating Chemist

Summary: Plating Chemist is the lead for every operation and advanced technical chemist. This person is holding the chemical processes in production.

Minimum Requirements: Master's is desirable with 3+ years of experience or Bachelor's degree with 18+ years of experience.

Responsibilities:

- Produce and maintain successful plating processes
- Design or improve to address product goals based on interpretation of needs, with technical guidance
- Site visit, operation and other activities of the plant level

Technical Skills:

- Expert understanding of applied theory of plating chemistry related to process
- Broad knowledge of plating process machine and their application
- Basic mechanical of plating knowledge
- Efficiently participate in development of process plan to meet goals and objectives

Communication Skills:


- Participate regular meetings in conference
- Prepare written reports about plating process
- Write clear and concise entries in laboratory notebook

Safety:

- Accountable for maintaining safe working environment
- Observe ABC Plating Company safety policies and procedures
- Participate being leading to provide safety examples


Hazardous Waste Management:

- Responsible for safe handling, storage, and disposal of hazardous waste
- Make appropriate communication to line of company and to Permit, ABC Plating Company, and as appropriate, with personnel in charge of environmental reporting and environmental emergency response coordination as appropriate
- Classify Emergency Personnel in operation locations
- Work closely between emergency crews, response contractors and ABC Plating staff
- Monitor Waste Transfer
- Accurately inventory and label waste containers and follow to their final central accumulation area
- Attend HCS, Training, Emergency, Hazardous Waste, Incident, and other environmental and safety training



55

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
EH&S 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 173-180 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	Jenna 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 173-180 	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 Aaron Kim Dan Girdner Andrea Stornes	<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

56



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.

Certificate of Training

Presented to

Name: _____

For (insert date in correct month) _____

Given Me _____ Day of _____ Month _____ 20____

Signature: _____ Date: _____



This form is provided under a license under 02-0108

57

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



This record is to be maintained at the facility.

Facility: _____ UNIT: _____
 ADDRESS: _____
 FEDERAL JOB ORDER NO.: _____ DATE: _____
 EMPLOYEE NAME: _____
 JOB TITLE: _____

HAZARDOUS WASTE RELATED QUALIFICATIONS AND DUTIES (INCLUDE ACQUIRED SKILL, 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 14 months of assuming duty and once a year thereafter. This employee is responsible for proper handling, accumulating, inspecting, and transporting hazardous wastes. This employee is also responsible for responding to emergencies. The above individual commanded these duties on _____, 20____.

DATE	DESCRIPTION OF TRAINING (ENTER THE TITLE, A BRIEF DESCRIPTION AND THE NAME OF THE INSTRUCTOR. ALSO STATE WHETHER THE TRAINING IS CLASSROOM, ON-THE-JOB, OR COMPUTER BASED/ONLINE)	EMPLOYEE SIGNATURE



58



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!)

59



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.



60

 SQG

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.

61

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>




62

 LQG


Biennial Report

40 CFR 262.41




63

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




64

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.




65



Inspection Records

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



66



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.

67



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.

68



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.

69

SQG
 LQG

Hazardous Waste Manifests

40 CFR 262 Subpart B (262.20 – 262.27)




70

SQG
 LQG

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

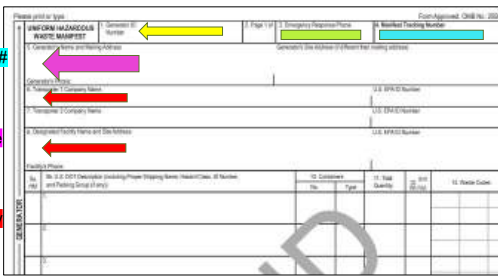


71

SQG
 LQG

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



72

SQG
 LQG

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)

73

Hazardous Waste Manifest, cont.

74

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

75

SQG
 LQG

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.

76

SQG
 LQG

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

77

SQG
 LQG

Land Disposal Restrictions
40 CFR 268



78

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.



79

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



80

USEPA FEDERAL HEALTH, SAFETY, AND ENVIRONMENTAL AGENCY
REGULATORY INFORMATION AND SERVICES CENTER (RISPC)



Generator Name: ██████████

U.S. EPA ID Number: NCR 000 ██████████

Waste Description: Analytical Control Unit from the Primary Production of Steel in Beach, Florida. (HSR1 - Non-hazardous)

Designated Facility: American One Recycling Corp.
341 Technology Dr.
Barnwell, SC 29002

U.S. EPA ID Number: 600-800-0719-19

This information is provided for informational purposes only. It is not intended to be used as a substitute for the applicable regulatory requirements. The user is responsible for ensuring that all data and information are correct and that the applicable regulatory requirements are met.

Waste Code	Proportion	Regulating Level
9001	1.00	State
9002	0.00	State
9003	0.00	State
9004	0.00	State
9005	0.00	State
9006	0.00	State
9007	0.00	State
9008	0.00	State
9009	0.00	State
9010	0.00	State
9011	0.00	State
9012	0.00	State
9013	0.00	State
9014	0.00	State
9015	0.00	State
9016	0.00	State
9017	0.00	State
9018	0.00	State
9019	0.00	State
9020	0.00	State
9021	0.00	State
9022	0.00	State
9023	0.00	State
9024	0.00	State
9025	0.00	State
9026	0.00	State
9027	0.00	State
9028	0.00	State
9029	0.00	State
9030	0.00	State
9031	0.00	State
9032	0.00	State
9033	0.00	State
9034	0.00	State
9035	0.00	State
9036	0.00	State
9037	0.00	State
9038	0.00	State
9039	0.00	State
9040	0.00	State
9041	0.00	State
9042	0.00	State
9043	0.00	State
9044	0.00	State
9045	0.00	State
9046	0.00	State
9047	0.00	State
9048	0.00	State
9049	0.00	State
9050	0.00	State
9051	0.00	State
9052	0.00	State
9053	0.00	State
9054	0.00	State
9055	0.00	State
9056	0.00	State
9057	0.00	State
9058	0.00	State
9059	0.00	State
9060	0.00	State
9061	0.00	State
9062	0.00	State
9063	0.00	State
9064	0.00	State
9065	0.00	State
9066	0.00	State
9067	0.00	State
9068	0.00	State
9069	0.00	State
9070	0.00	State
9071	0.00	State
9072	0.00	State
9073	0.00	State
9074	0.00	State
9075	0.00	State
9076	0.00	State
9077	0.00	State
9078	0.00	State
9079	0.00	State
9080	0.00	State
9081	0.00	State
9082	0.00	State
9083	0.00	State
9084	0.00	State
9085	0.00	State
9086	0.00	State
9087	0.00	State
9088	0.00	State
9089	0.00	State
9090	0.00	State
9091	0.00	State
9092	0.00	State
9093	0.00	State
9094	0.00	State
9095	0.00	State
9096	0.00	State
9097	0.00	State
9098	0.00	State
9099	0.00	State



81

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.



82

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.



83


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.




84

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.



85




You did it!
Congratulations



86

Photo Credits

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



87
