

Hazardous Waste 101

Presented by:

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Stanislaus County DER, Hazardous Materials Division

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Areas to be Covered

- ▶ **Introduction to Hazardous Waste Laws & Regulations**
- ▶ **Definition of a Waste**
- ▶ **Hazardous Waste Classification**
- ▶ **Generator Status Requirements**
- ▶ **Storage and Handling Requirements**
- ▶ **Container Management**
- ▶ **Contingency Plan and Employee Training**
- ▶ **Transportation, Disposal and Recordkeeping**
- ▶ **Tiered Permitting Basics**
- ▶ **Common Hazardous Waste Violations**

Audience Intro

- ▶ Where are you joining us from?
- ▶ What are you hoping to get out of this presentation?
- ▶ How many years' experience do you have in hazardous waste management?

A Little About Us

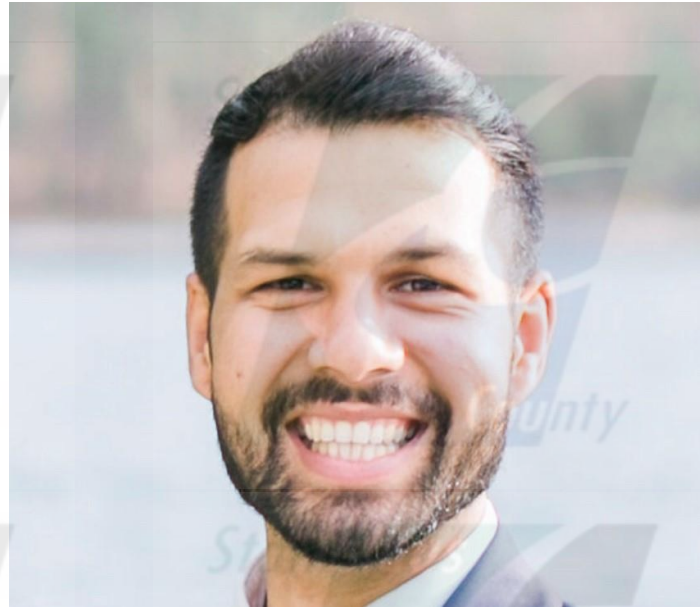
Sarah Yacoub

Sr. HMS, 6.5 years



Yama Noorzai

HMS II, 2 years



Hazardous Waste Laws and Regulations: Statute vs Regulation

Dual Governing Agencies:

Statute is law, regulation is the directive to follow the law

Federal: US Environmental Protection Agency (EPA)

Statute: Resource Conservation and Recovery Act (RCRA), 1976

Regulation: Title 40, Code of Federal Regulations (40 CFR)

State: CA Department of Toxic Substances Control (DTSC)

Statute: California Health and Safety Code, Chapter 6.5 (law) (HSC)

Regulation: California Code of Regulations, Title 22 (22 CCR)

Local: Certified Unified Program Agencies (CUPAs)

HSC Ch. 6.11 and Title 27, Title 27 CCR (27 CCR)

Love Canal, Niagara Falls, NY
- The first Federal Superfund Site, started RCRA



[Exclusive: Are Love Canal chemicals still making people sick? | Crime News | buffalonews.com](#)

Valley of the Drums, Kentucky - Toxic waste site of ~ 100,000 drums of hazardous waste



[The Valley of The Drums | Amusing Planet](#)

Times Beach, Missouri - Entire town evacuated due to dioxin contamination



[The Toxic Town of Times Beach, Missouri | Amusing Planet](#)

Purpose of Hazardous Waste Regulations

To ensure safe storage and proper disposal of hazardous waste and to prevent releases of hazardous waste to the environment

Federal Generator Improvement Rule (GIR)

- ▶ Revisions to 40 CFR § 262, hazardous waste generator regulations
- ▶ DTSC is required to adopt provisions within the rule that are more stringent
- ▶ Not effective in CA, **YET**
- ▶ For more information:
 - ▶ <https://dtsc.ca.gov/generator-improvements-rule/>

What Is a “Waste”

- ▶ The term “waste” means a **discarded** material in any form (solid, liquid, or gas) (HSC § 25124)
 - ▶ Discarded means relinquished by:
 - ▶ Disposal (to the land), burned, or incinerated (22 CCR 66261.2)
 - ▶ Accumulated/stored/treated before being disposed, burned, or incinerated
 - ▶ A material is a waste if it poses a threat to human health, or the environment, considered inherently waste-like:
 - ▶ **Mislabeled**/inadequately labeled and not corrected within **10 days** after discovery
 - ▶ Packaged in a deteriorated or damaged container and not corrected within **96 hours** of discovery

Is it a *Hazardous Waste*?

- ▶ A waste with properties that make it potentially dangerous or harmful to human health or the environment due to its quantity, concentration, or physical/chemical characteristics. These materials can be liquids, solids or gaseous
- ▶ These materials can be the by-products of manufacturing processes, discarded used materials, or discarded unused commercial products



Hazardous Waste in California

Important to know when conducting hazardous waste determination

- Waste will either be listed or will exhibit a characteristic

RCRA (Federally Regulated)

Listed Wastes

- ▶ F (Spent)
- ▶ K (Spent)
- ▶ P (Unspent)
- ▶ U (Unspent)

Characteristic Wastes

- ▶ Ignitable (D001)
- ▶ Corrosive (D002)
- ▶ Reactive (D003)
- ▶ Toxic (D004-D043)

Non-RCRA (Not Federally Regulated)

Presumptive Wastes

- ▶ Common Name
- ▶ Chemical Constituent

Characteristic Wastes

- ▶ Ignitable
- ▶ Corrosive
- ▶ Reactive
- ▶ Toxic

RCRA Listed Wastes

- ▶ F: Multi-use or nonspecific wastes
 - ▶ Spent solvents F001-F005, Metal finishing wastes (cyanides)
 - ▶ K: Waste from specific industries or specific sources
 - ▶ Wastewater sludges, organic chemical production, petroleum refining
 - ▶ P: Acutely hazardous, unused/off-spec chemicals
 - ▶ Nicotine, Warfarin, Acrolein
 - ▶ U: Pure, commercial grade, unused or off-spec chemicals
 - ▶ Benzene, Acetone, Formaldehyde, MEK
- ▶ Spent
- ▶ Unspent

Four Characteristics of Hazardous Waste

▶ Ignitability

- ▶ Has a flash point less than 140°F; oxidizers, flammable solids, ignitable compressed gases

▶ Corrosivity

- ▶ Liquids or solids that have a pH ≤ 2 or ≥ 12.5
- ▶ Non-aqueous solution mixed with equal parts water yields pH ≤ 2 or ≥ 12.5 ; acids, glass cleaner, hydroxides, bases, drain cleaners

▶ Reactivity

- ▶ Unstable and/or produces toxic gases when mixed with water
- ▶ Reacts violently with water
- ▶ Normally unstable and readily undergo violent change without detonating; Picric acid, peroxide forming chemicals, ethyl ethers, etc.

▶ Toxicity

- ▶ Has potential, when eaten, inhaled, or touched to harm humans or the environment; Arsenic, Zinc, mercury, lead, etc.



The Mixture Rule 22 CCR § 66261.3, §66261.30

- ▶ If the mixture contains a RCRA listed waste, it is always a hazardous waste
- ▶ If the mixture contains only a non-RCRA listed waste, it is presumed to be hazardous waste unless proven otherwise (lab analysis)

The Rule

If your facility generates any amount of hazardous waste, your facility is a hazardous waste generator

California Waste Codes

- ▶ **Restricted Waste** 700–800 (banned from landfill without treatment)
- ▶ **Inorganics** 100–199 (metal dust, alkaline solution with metals, etc.)
- ▶ **Organics** 200–300 (waste oil, latex waste, pesticides, etc.)
- ▶ **Sludge's** 400–499 (degreasing sludge, paint sludge, etc.)
- ▶ **Miscellaneous** 500–600 (lab waste chemicals, etc.)

CALIFORNIA WASTE CODES

California Restricted Wastes – Use First, if applicable		Sludge	
711	Liquids with cyanides > 1000 mg/l	411	Alum and gypsum sludge
721	Liquids with arsenic > 500 mg/l	421	Lime sludge
722	Liquids with cadmium > 100 mg/l	431	Phosphate sludge
723	Liquids with chromium (VI) > 500 mg/l	441	Sulfur sludge
724	Liquids with lead > 500 mg/l	451	Degreasing sludge
725	Liquids with mercury > 20 mg/l	461	Paint sludge
726	Liquids with nickel > 134 mg/l	471	Paper sludge/pulp
727	Liquids with selenium > 100 mg/l	481	Tetraethyl lead sludge
728	Liquids with thallium > 130 mg/l	491	Unspecified sludge waste
731	Liquids with polychlorinated biphenyls > 50 mg/l	Miscellaneous	
741	Liquids with halogenated organic compounds > 1000 mg/l	511	Empty pesticide containers 30 gallons or more
751	Solids or sludge with halogenated organic comp. > 1000 mg/kg	512	Other empty containers 30 gallons or more
791	Liquids with pH < 2	513	Empty containers less than 30 gallons
792	Liquids with pH < 2 with metals	521	Drilling mud
801	Waste potentially containing dioxins	531	Chemical toilet waste
CALIFORNIA NON-RESTRICTED WASTES		541	Photochemicals / photo processing waste
Inorganics			

Hazardous Waste Determination 22 CCR §66262.11

- ▶ Generators should consider the following:
 - ▶ Is it a waste? 22 CCR § 66261.2
 - ▶ Is it a hazardous waste? 22 CCR § 66261.3
 - ▶ Is it being treated? HSC § 25123.5
 - ▶ Are there any exclusions/exemptions? 22 CCR § 66261.4
- ▶ Determinations can be made by:
 - ▶ Having a representative sample of the waste analytically tested
 - ▶ By applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used

It is the generators responsibility to make the determination

The background of the slide features a repeating pattern of the Stanislaus County logo, which consists of a stylized 'S' and 'C' intertwined, with the words 'Stanislaus' and 'County' written below it. The logos are semi-transparent and arranged in a grid. A large, light green triangle is positioned on the right side of the slide, pointing towards the center.

Hazardous Waste Generator Requirements

EPA Identification Numbers

- ▶ All California generators must have an ID Number
 - Cradle to Grave
- ▶ One ID Number (state or federal) for each business and location
 - Federal: issued to generators of more than 100 kg of RCRA hazardous waste and/or 1 kg of acutely hazardous waste per calendar month
 - State: issued to generators of less than 100 kg of RCRA hazardous waste and/or 1 kg of RCRA acutely hazardous waste per month, **and any amount of a non-RCRA hazardous waste**
- ▶ U.S. EPA or California ID Number depends on total waste and quantity of RCRA waste generated monthly
 - State (CAC, CAL, CAE, CAH)
 - Federal (CAR, CAD, CAT, CA)

22 CCR 66262.12

CA DTSC Electronic Verification Questionnaire (EVQ)

- ▶ Handlers are required to complete to maintain the active status of their EPA ID numbers
- ▶ Who: If:
 - ▶ Company's EPA ID number was active any time during the previous fiscal year (7/1/XX - 6/30/XX)
 - ▶ Companies who shipped HW using an assigned EPA ID number during the calendar year (1/1/XX - 12/31/XX)
- ▶ When: DTSC begins sending eVQ notifications in July
 - ▶ The deadline to file the eVQ is 30 days from the date the HW handler receives the first notification to file from DTSC
- ▶ How: The eVQ is filed electronically through the [eVQ system](#)
- ▶ Failure to complete the eVQ by the deadline constitutes as failure to comply with CA HSC Section 25205.15 & 25205.16 and **will result in DTSC inactivating your EPA ID number**

Hazardous Waste Generator 22 CCR § 66260.10

- ▶ What is a generator?
 - ▶ Any person, by site, whose act or process produces a hazardous waste, or who causes it to be subject to regulation as a hazardous waste
 - ▶ This includes any facility that stores, accumulates, produces, treats, recycles, handles, transports or disposes of a hazardous waste.



Determining Generator Status

Determined by the quantity of hazardous waste generated monthly

► Waste Counting:

DO COUNT

- Manifested Wastes
- Consolidated Wastes (bill of lading)
- Hazardous Waste, pre-treatment

DON'T COUNT

- Excluded Recyclable Materials HSC §25143.2

Alternate Management Wastes:

- Scrap Metal
- Universal Waste
- Electronic Waste
- Crushed/punctured, drained metal oil filters
- Spent lead acid batteries
 - Counted if sent for disposal

Applicable Generator Statuses

22 CCR § 66260.10, 22 CCR § 66262.34

LQG	\geq 1000 kg Hazardous Waste (HW) and/or $>$ 1 kg Acutely Hazardous (AH) Waste and/or $>$ 1 kg Extremely Hazardous (EH) Waste during any calendar month.
SQG	1000 kg HW and \leq 1 kg AH and/or EH waste during any calendar month.
CESQG	100 kg Hazardous Waste and \leq 1 kg AH and/or EH waste during any calendar month.

100 Kg ~ 27 gal ~ 220 lbs

1000 Kg ~ 270 gal ~ 2,200 lbs

Permitted Accumulation Times

- ▶ Storage time is based on the quantity of hazardous waste generated and stored; from start accumulation date = first drop of waste

LQG	90 days
SQG	180 days or 270 days if shipped ≥ 200 miles; max: 6000 kg onsite
CESQG	No time limit until 100 kg is reached (then same limits as SQG); max:1000 kg onsite

Hazardous Waste Accumulation Areas

- ▶ Located in secure area with access controlled
- ▶ Post warning sign “Danger Hazardous Waste Accumulation Area - Unauthorized Personnel Keep Out”
- ▶ Emergency Equipment
 - ▶ Shower/Eye Wash Stations
 - ▶ Fire Extinguishers
- ▶ Spill Control Equipment



Satellite Accumulation 22 CCR § 66262.34(e)

- ▶ Satellite accumulation occurs at or near where waste is generated - requirements apply to hazardous waste (not universal wastes)
- ▶ Must be under the direct control of operator at all times:
 - Line of sight; and/or
 - Access to container under control of operator
 - All individuals (operators) with access/control must be trained



Satellite Accumulation 22 CCR § 66262.34(e)

- ▶ Maximum 55 gal per process; 1 quart of acutely hazardous waste
- ▶ Time limit: 1 year or when container is full, whichever occurs first.
- ▶ Within 3 days after reaching the maximum storage quantity, a new accumulation date must be marked on the container
- ▶ Waste is removed offsite within the specified accumulation time limit (90/180/270 days) from the date 55 gal is reached

Storing Accumulated Hazardous Waste too Long 22 CCR § 66262.34

- ▶ Failure to send hazardous waste offsite for storage, treatment, or disposal within accumulation time limits facility is operating as a Treatment, Storage, Disposal Facility (TSDF) without a permit.
- ▶ Minimum Class II violation due to clear economic advantage

VIOLATION

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Container Management

Container 22 CCR § 66260.10

- ▶ Any device that is open or closed, and **portable**, in which material can be stored, handled, treated, transported, recycled or disposed of



Tank 22 CCR § 66260.10

- ▶ A **stationary** device, designed to contain an accumulation of hazardous waste constructed primarily of non-earthen materials (e.g. wood, concrete, steel, plastic) which provide structural support
 - ▶ *Not intended to be moved while in use*
- ▶ “Tank System” means the tank itself and **all attached piping and ancillary equipment**



Container Requirements

- ▶ Hazardous waste container must be:
 - ▶ Compatible with the waste stored inside (22 CCR § 66265.172)
 - ▶ Properly labeled (22 CFR § 66262.34(f))
 - ▶ Kept closed with tight fitting lids when waste is not being added to or removed from it
 - ▶ Maintained in good condition to prevent rupture/leakage (22 CCR § 66265.171)
 - ▶ Inspected weekly
 - ▶ Stored to provide adequate aisle space
 - ▶ Stored separately from incompatibles

Hazardous Waste Tank/Container Labeling

22 CCR § 66262.34(f)

- ▶ Must Include:
 - ▶ The words “Hazardous Waste”
 - ▶ Generator’s name and address
 - ▶ Accumulation start date (date first drop of waste is added)
 - ▶ Contents
 - ▶ Physical state
 - ▶ Hazardous properties

Labels must be legible, visible and in good condition!

HAZARDOUS WASTE
STATE AND FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY, THE U.S. ENVIRONMENTAL PROTECTION AGENCY
OR THE CALIFORNIA DEPARTMENT OF HEALTH SERVICES

GENERATOR INFORMATION:
NAME _____
ADDRESS _____ PHONE _____
CITY _____ STATE _____ ZIP _____
EPA ID NO. _____ MANIFEST DOCUMENT NO. _____
EPA WASTE NO. _____ CA WASTE NO. _____ ACCUMULATION START DATE _____
CONTENTS, COMPOSITION: _____

PHYSICAL STATE: [] SOLID [] LIQUID | HAZARDOUS PROPERTIES: [] FLAMMABLE [] TOXIC
[] CORROSIVE [] REACTIVE [] OTHER

[_____]

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

1992 Lab Safety Supply Inc., Janesville, WI 53547 Reorder No. 20648

Closed Containers

- ▶ Hazardous waste containers must be kept closed during transfer and storage, except when adding or removing waste
- ▶ **Remember:** an open funnel is not a closed lid



Container Integrity

- ▶ If a container holding a hazardous waste is not in good condition (i.e. rusting, leaks, structural defects) the generator must transfer the waste to a container in good condition



**Needs to be repackaged
within 96 hours**

Container Inspections

- ▶ Hazardous waste containers used for storage shall be inspected **at least weekly**
- ▶ Weekly container inspections are not required to be documented
- ▶ Inspecting for:
 - ▶ Is the area free of debris, spills, leaks?
 - ▶ Are container tops free of spillage?
 - ▶ Are all containers in good condition?
 - ▶ Are all containers properly closed?
 - ▶ Are the labels properly filled out and legible?
 - ▶ Have wastes been disposed of within the permitted accumulation time?
 - ▶ Is there adequate aisle space?
 - ▶ Are incompatibles stored separately?



Tank Inspections

- ▶ Hazardous waste tanks should be inspected **at least weekly for CESQG or SQG & daily for LQG**
- ▶ Daily tank inspection for LQG are **required to be documented**
- ▶ **Higher risk potential = higher standards for management**
- ▶ LQG Hazardous Waste tank systems require a Tank Integrity Assessment every 5 years by an independent PE for LQG
- ▶ May also require:
 - ▶ Secondary containment
 - ▶ Leak detection

The background of the slide features a repeating watermark of the Stanislaus County logo. The logo consists of a stylized 'S' shape with a leaf-like element on top, set against a light blue background. The word 'Stanislaus' is written in a serif font above the 'S', and 'County' is written in a smaller serif font below it. The watermark is repeated across the entire slide in a light, semi-transparent color.

Contingency Plans & Employee Training Requirements

Training Plan Elements 22 CCR § 66265.16

- ▶ CESQG & SQG: Basic training required.
 - ▶ All generators must ensure all employees are thoroughly familiar **with proper waste handling & emergency procedures, relevant to their responsibilities** during normal facility operations and emergencies.
 - ▶ Training documentation not required unless otherwise specified by the CUPA inspector (egregious or recalcitrant violator)
 - ▶ Annual training is a BMP



LQG Training Requirements 22 CCR § 66265.16

- ▶ Must comply with the requirements of section 22 CCR 66265.16
 - **Written plan required**
 - HW Job Titles
 - Description of each job title/duties
 - Name of employee at each job title
 - Frequency of training
 - Documentation of initial (**within 6 months of hire**) and **annual** emergency response training
- ▶ Required per § 66265.16, *new requirements effective 7/1/2019*
- ▶ Program must also be designed to ensure the following every 24 months:
 - ▶ General awareness training: Training for all facility personnel that provides description of facility, an overview of facility operations including but not limited to security and safety considerations and
 - ▶ Function-specific job training: Training for all personnel who handle hazardous waste
- ▶ Employees must successfully complete a program of classroom instruction or on-the-job training directed by a person trained in hazardous waste management

LQG Employee Training Recordkeeping

- ▶ Training records on current personnel must be documented and kept until the business closes
- ▶ Training records on former employees must be kept for at least three years



Contingency Plan 22 CCR § 66265.50 - 66265.56

- ▶ A contingency plan is a written plan that has **emergency procedures designed to minimize hazards** to human health and the environment
- ▶ Aids emergency responders with providing aid to any hazardous materials related incident
- ▶ **All hazardous waste generators are responsible to plan for emergencies at their business & must have a contingency plan**



CESQG, SQG Contingency Plan Requirements

- ▶ Basic Plan only
- ▶ Must post info near a phone
- ▶ Name, number of emergency coordinator
- ▶ Location of emergency equipment
- ▶ 911 or local fire department number
- ▶ At all times, there must be at least one employee either on the premises or on call available to respond to an emergency
- ▶ **BMP is to be prepared, consider using available template**
 - ▶ Emergency Procedures

LQG Contingency Plan Requirements

22 CCR § 66265.50

- ▶ **Higher risk potential = higher standards for management**
- ▶ LQGs must complete a **full** contingency plan
- ▶ Contents of the Plan:
 - ▶ Description of actions in response to fires, explosions or sudden release of hazardous waste
 - ▶ Arrangements with local emergency responders
 - ▶ Names and phone numbers of all persons acting as emergency coordinators
 - ▶ A list of all emergency equipment and communications in the event of a sudden release or fire
 - ▶ An evacuation plan for all facility personnel
 - ▶ Phone numbers for OES, 911, and local CUPA



Consolidated Emergency Response / Contingency Plan

Common Violations Related to Contingency Plan/Employee Training

- ▶ Failure for LQG's to maintain complete Employee Training Plan
- ▶ Failure for LQG's maintain previous three years employee training records
- ▶ Failure to maintain required Contingency Plan information onsite

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Transportation, Disposal & Recordkeeping Requirements

Hazardous Waste Tracking- The Manifest

22 CCR § 66263.42 & HSC §25160.2

- ▶ Federal and State law requires hazardous waste to be tracked from cradle to grave
- ▶ **Generator's responsibility** to ensure the manifest is complete and accurate
- ▶ Same applies to Consolidated Manifests and Bill of Lading for Non-RCRA hazardous waste
 - ▶ Used Oil
 - ▶ Waste Antifreeze
 - ▶ Parts washer solvents
- ▶ Hazardous waste disposal records shall be maintained for minimum of **previous three years**
- ▶ **6/30/18, e-manifest requirements went into effect in all states**

Please print or type. (Form designed for use on 8 1/2" (12-pitch) typewriter.) Form Approved OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number	
3. Generator's Name and Mailing Address		Generator's Site Address (if different from 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:						
GENERATOR	9a. HAZ	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	11. Total Quantity	12. UMF No./Vol.	13. Waste Codes
	1					
	2					
	3					
	4					
14. Special Handling Instructions and Additional Information						
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/accorded, 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 identification 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 _____ Signature _____ Month _____ Day _____ Year _____						
TRANSPORTER INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port 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 _____						
DESIGNATED FACILITY	18. Discrepancy					
	19a. 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					
	19b. Alternate Facility (or Generator)		Manifest Reference Number: _____ U.S. EPA ID Number _____			
	Facility's Phone: _____ Month _____ Day _____ Year _____					
19c. Signature of Alternate Facility (or Generator) _____ Month _____ Day _____ Year _____						
20. Designated Facility Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. _____		2. _____		3. _____		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 19a						
Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____						

EPA Form 8700-22 (Rev. 2-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Generator Recordkeeping Requirements

▶ **Generators of HW must keep:**

- ▶ Copies of Hazardous Waste manifests for the last three years.
- ▶ Documentation used to make the waste determination i.e. laboratory analysis, SDS sheets etc.
- ▶ Employee training records for hazardous waste (LQGs)
- ▶ Biennial reports if RCRA LQG; kept for three years
- ▶ SB14 Source Reduction reports (some LQGs >12,000 Kg per year)
- ▶ Inspection records of hazardous waste tanks (LQGs)
- ▶ HW Tank PE assessment and certification records (LQGs)

Biennial Reporting & Source Reduction (SB 14)

Biennial Reporting:

- ▶ Applies to RCRA LQGs only (>1000 kg/month of HW or >1 kg/month acutely HW) and TSDf's
- ▶ Does not include Non-RCRA waste
- ▶ Due March 1 of every even numbered year, for the previous year
- ▶ Report is submitted to DTSC
- ▶ **Failure to submit a report to DTSC is considered a Class I violation**

Source Reduction Reporting (SB 14):

- ▶ Applies when generating more than 12,000 kg (26,400 lbs/3,100 gal/13.2 tons) of HW or > kg of acutely HW in a year
- ▶ Due every 4 years, includes:
 - ▶ Source Reduction Evaluation Review and Plan
 - ▶ Hazardous Waste Management Performance Report (Performance Report)
 - ▶ Summary Progress Report (SPR)
- ▶ Only the SPR is submitted to DTSC, all other elements are maintained on site for inspection

Common Violations Related to Recordkeeping Requirements

- ▶ Failure of owner/operator to maintain previous three years disposal documentation
- ▶ Failure of the owner/operator to ensure that manifests are properly completed:
 - ▶ Correct EPA ID number
 - ▶ Correct address
 - ▶ Correct waste codes and amounts

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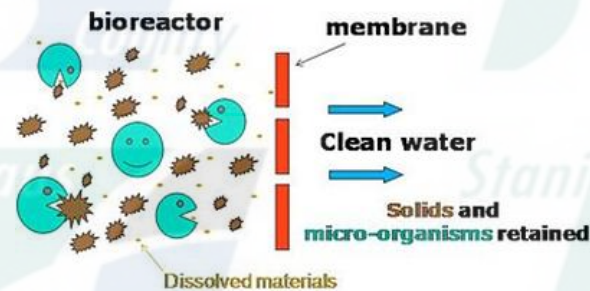
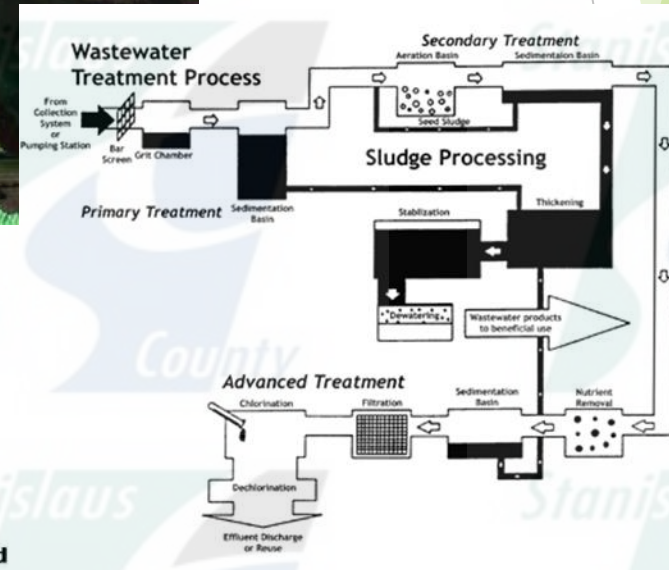
Tiered Permitting, the Basics

Tiered Permitting: Treatment of Hazardous Waste

- ▶ Treatment is defined as, “Any method, technique, or process which changes or is designed to **change the physical, chemical, or biological character or composition** of any hazardous waste or any material contained therein, or **removes or reduces its harmful properties or characteristics** for any purpose including, but not limited to, energy recovery, material recovery or reduction in volume.”

Hazardous Waste Treatment Methods:

- ▶ Neutralization
- ▶ Flocculation
- ▶ Precipitation
- ▶ Filtering
- ▶ Ion Exchange
- ▶ Gravity Separation
- ▶ Heating
- ▶ And many more...



Tiers of Tiered Permitting

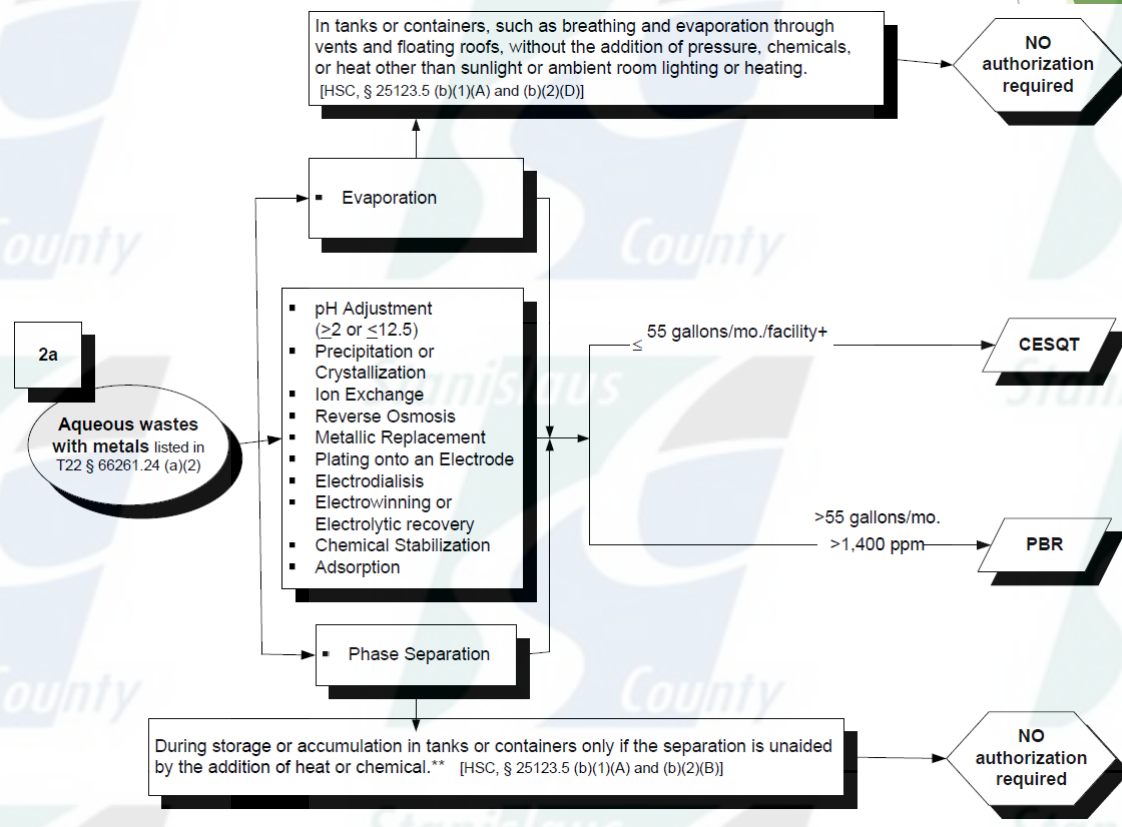
- ▶ 5 Tiers
- ▶ Local Agency (CUPA) has oversight of 3 tiers:
 - ▶ **Permit by Rule (PBR)** - onsite treatment process, high volumes, multiple waste streams, more complex
 - ▶ **Conditionally Authorized (CA)** - onsite treatment for specific waste such as metal-bearing rinse waters, single wastes
 - ▶ **Conditional Exemption (CE)** - onsite treatment for low-risk, small quantities such as oil/water separation. This Tier has subdivisions too!
- ▶ DTSC has oversight of top 2 tiers:
 - ▶ **Full Permit** - Includes all facilities requiring a RCRA facility permit, plus selected non-RCRA activities pursuant to 22 CCR. DTSC is the lead agency.
 - ▶ **Standardized Permit** - A facility that manages waste not regulated under RCRA, but regulated as a hazardous waste by California. These facilities include, but are not limited to recyclers, used oil transfer station, and precious metals recyclers. DSTC is lead agency

Subdivisions of CE Tier

- **CESQT**-Conditionally Exempt Small Quantity Treatment (Health and Safety Code (HSC §25201.5(a)) [The CESQT facility can only treat a total volume of not more than 55 gallons/month; no other tiered permitting activity occurring at site]
- **CESW**-Conditionally Exempt Specified Waste stream (HSC 25201.5(c))
- **CEL**-Conditionally Exempt-Limited (HSC 25201.14)
- **CECL**-Conditionally Exempt Commercial Laundries (HSC 25144.6(c))

Conditions of Tiered Permitting

- ▶ For TP to apply the following conditions have to be met:
 - ▶ The material is a waste
 - ▶ The waste is hazardous at the **point of generation**: when a material first meets the definition of a waste and has been determined as hazardous
 - ▶ Waste is generated and treated on site
 - ▶ Treatment process should be covered or listed on the Tiered Permitting Flowchart and/or in HSC or 22 CCR



The background of the slide features a repeating pattern of the Stanislaus County logo, which consists of a stylized 'S' and 'C' intertwined, with the word 'Stanislaus' above and 'County' below. The logos are semi-transparent and arranged in a grid. A large, light green triangle is positioned on the right side of the slide, pointing towards the center.

Common Hazardous Waste Violations

Generator properly labeled all containers or tanks containing hazardous waste as required CCR §66262.34

- Label must contain:
 - “Hazardous Waste”
 - Name & address of business
 - Physical state & hazardous properties of waste
 - Contents
 - Accumulation start date



Generator Labeling Requirements

HAZARDOUS WASTE

STATE & FEDERAL LAW PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY,
THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR
THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.

PROPER D.O.T. SHIPPING NAME: _____ UN OR NA #: _____

GENERATOR'S NAME AND ADDRESS:

NAME: _____
ADDRESS: _____
CITY: _____ STATE: CA ZIP: _____

GENERATOR'S EPA ID NUMBER: _____ MANIFEST TRACKING NUMBER: _____

ACCUMULATION START DATE: ____/____/____ CA WASTE NUMBER: _____ EPA WASTE NUMBER: _____

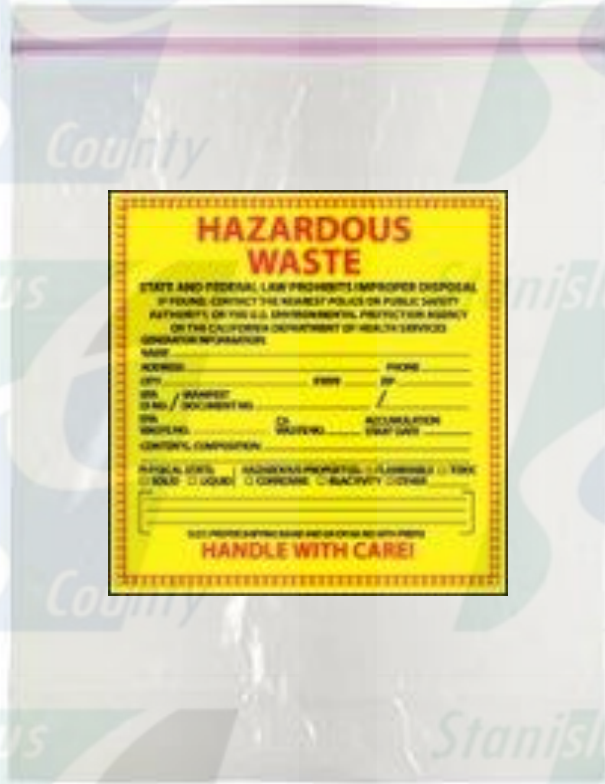
CONTENTS, COMPOSITION: _____

PHYSICAL STATE: SOLID LIQUID
HAZARDOUS PROPERTIES: FLAMMABLE TOXIC
 CORROSIVE REACTIVE OTHER

COMPLETE FOR STORAGE **HANDLE WITH CARE!** COMPLETE FOR TRANSPORT
CONTAINS HAZARDOUS OR TOXIC WASTES

Date
when 1st
drop of
waste
goes in!

Option for keeping labels in good condition



- ▶ Place a filled out label in a sealed plastic bag and tape the edges of the bag to the storage container
- ▶ Perform required weekly container storage area inspections, 22 CCR 66265.174
 - ▶ Look for leaking containers, deterioration of containers, labeling requirements, etc.

Owner/Operator has properly trained all employees on waste handling and emergency procedures CCR §66262.34

- ▶ At a minimum you must address the following topics:
 - ▶ Procedures for handling hazardous materials/hazardous wastes
 - ▶ Implementing the Emergency Response Plan
 - ▶ Use of emergency response equipment and materials
 - ▶ Procedures for contacting and coordinating with emergency response agencies (Fire, PD, SCDER)

The facility has an active EPA ID number CCR §66262.12(a)



- ▶ An EPA ID number is necessary for all generators of HW (except for HWG <100 kh/month of "silver-only" hazardous waste)
- ▶ Federal EPA ID Numbers:
 - ▶ >1 kg of RCRA acutely HW/month, and/or
 - ▶ >1 kg of other RCRA HW/month
- ▶ CA EPA ID Numbers:
 - ▶ <100 kg of RCRA HW/month, and/or
 - ▶ <1 kg of RCRA acutely HW/month, and
 - ▶ Any amount of non-RCRA HW
- ▶ CA HWGs are required to annually verify EPA ID numbers to avoid deactivation

CAL000362789
CAD008382053
CAL000292921 CAD047896097
CAL000250586 CAL000369706
CAR000192260 CAR000222927
CAR000169433 CAR000167676
CAL000369429
CAL000351637 CAR000167049
CAL000324223
CAT000611517 CAL000208289
CAD980673198

Owner/Operator maintained previous 3 years required disposal documentation 22 CCR 66262.20, 66266.81, CA HSC 25250.19

- ▶ Copies of signed Uniform Hazardous Waste Manifests
- ▶ Copies of Manifests or bill of lading for spent lead acid batteries
- ▶ Disposal documentation for used oil



This image shows a blank, printed form for hazardous waste manifests. The form is divided into several sections, including fields for 'Generator', 'Transporter', and 'Receiver'. It also contains a table with columns for 'Date', 'Quantity', and 'Description'. The form is designed to be filled out with specific information related to the disposal of hazardous waste.



This image shows a photograph of a filled-out hazardous waste manifest form. The form is yellowed and has handwritten entries in various fields. It includes a 'Service Order' section at the top, followed by a table with columns for 'Date', 'Quantity', and 'Description'. The form is signed and stamped, indicating it has been processed.

Failure to send HW offsite for treatment, storage, or disposal within 180/90 days of accumulation

▶ CESQG

- ▶ 180 days from the date 100 kg (220 lbs.) limit is reached

▶ SQG

- ▶ ≤180 days or
- ▶ ≤270 days - if generator transports their waste, or offers their waste for transportation, ≥200 miles for offsite treatment, storage, or disposal 22 CCR Section 66262.34(d)(2) and (3)

▶ LQG

- ▶ ≤90 days 22 CCR Section 66262.34(a)

Generator has posted required emergency information 22 CCR 66265.50

- Assists generators, state and local agencies in responding to emergencies
- Needs to be maintained at the facility
- Content:
 - Actions facility personnel shall take in response to an emergency
 - Contact information for designated facility emergency responder
 - Emergency equipment at facility
 - Evacuation plan
 - Regulatory agency phone numbers

HAZARDOUS WASTE CONTINGENCY PLAN

For use by County Station Agencies or when approved by your Local Authority

Facilities that generate 1,000 kilograms or more of hazardous waste per month, or accumulate more than 6,000 kilograms of hazardous waste on-site at any one time, must prepare a Contingency Plan. Facilities that generate or use more than 1 kilogram of acutely hazardous waste (AHW) or more than 100 kilograms of other hazardous waste shall also prepare a Contingency Plan. Many facilities that are required to prepare a Contingency Plan are already subject to Hazardous Materials Disaster Plan (HMDP) reporting requirements due to the generation of hazardous materials waste that are subject to the Emergency Response Contingency Plan of the Unified Program. You have selected the Contingency Plan requirements, and set out steps to complete the Contingency Plan.

This site-specific Contingency Plan is the facility's plan for dealing with emergencies and shall be implemented immediately whenever there is an accident or actual fire, explosion, or release of hazardous waste or a hazardous waste situation which could threaten human health, the environment. At least one copy of the plan shall be maintained at the facility for use in the event of an emergency and be accessible to the local agency. A copy of the plan and any revisions need be provided to any contractor, landlord, or agency with whom special fire, hazardous emergency services agreements have been made (see Section 2, below).

A. Facility Information:

Facility Name:	Address:
City:	State:

B. Emergency Coordinator:

All personnel qualified to act as the Facility's Emergency Coordinator must be listed in this plan. (Note: Emergency Coordinator responsibilities are described in Section 7, below.) If more than one person are qualified, list the names, titles, telephone and 24-hour telephone numbers, and pager numbers of the designated individuals on an attached page so the skills on which they will assume responsibility as alternates. Mark "Check" the box for each Emergency Coordinator submission table, below, and follow the list a page number as the space provided.

Name	Primary Emergency Contact	Secondary Emergency Contact
NAME	PHONE	PHONE
ADDRESS	ADDRESS	ADDRESS
CITY	CITY	CITY
STATE	STATE	STATE

(Check box and if applicable, Additional Emergency Coordinators are listed on page _____ of this plan.)

C. Evacuation Plan:

If the following show upholds will be used to begin evacuation of the facility (check all that apply):

Bell Alarm System Treated (e.g., siren) Other (Specify): _____

EMERGENCY PROCEDURES

Post near telephones and in appropriate areas

In case of a fire, spill, or other emergency involving hazardous chemicals or wastes, do the following:

Major Emergency

- Evacuate the affected areas per the facility Evacuation Plan
- Call 911 and report the emergency
- Report the emergency to the facility Emergency Coordinator

Minor Emergency

- Try to control the emergency if you are trained to do so and can do so safely
- Report the emergency to the facility Emergency Coordinator

Facility Emergency Coordinators

Name	Work Phone	24 Hour Phone
Primary EC:		
1st Alternate EC:		
2nd Alternate EC:		

Emergency Agencies

Agency	Phone No.
Fire Dept. / Ambulance / Police	911
Generator's Office of Emergency Services	(800) 852-7550
	1 2

CALIFORNIA ENVIRONMENTAL REPORTING SYSTEM (CERS) CONSOLIDATED EMERGENCY RESPONSE / CONTINGENCY PLAN

Prior to completing this Plan, please refer to the INSTRUCTIONS FOR COMPLETING A CONSOLIDATED CONTINGENCY PLAN

FACILITY ID # _____ CERS ID # _____ AL DATE OF PLAN PREPARATION/REVISION (MM/DD/YYYY) _____

BUSINESS NAME (Same as Facility Name or DBA - Doing Business As) _____

BUSINESS SITE ADDRESS _____

BUSINESS SITE CITY _____ CA ZIP CODE _____

TYPE OF BUSINESS (e.g., Painting Contractor) _____ INCIDENTAL OPERATIONS (e.g., Fleet Maintenance) _____

THIS PLAN COVERS CHEMICAL SPILLS, FIRES, AND EARTHQUAKES INVOLVING (Check all that apply):

1. HAZARDOUS MATERIALS; 2. HAZARDOUS WASTES

INTERNAL FACILITY EMERGENCY RESPONSE WILL OCCUR BY (Check all that apply):

1. CALLING PUBLIC EMERGENCY RESPONDERS (e.g., 9-1-1)
 2. CALLING HAZARDOUS WASTE CONTRACTOR
 3. ACTIVATING IN-HOUSE EMERGENCY RESPONSE TEAM

In the event of an emergency involving hazardous materials and/or hazardous waste, all facilities must IMMEDIATELY:

- Notify facility personnel and evacuate if necessary in accordance with the Emergency Action Plan (Title 8 California Code of Regulations §3220);
- Notify local emergency responders by calling 9-1-1;
- Notify the local Unified Program Agency (UPA) at the phone number below; and
- Notify the State Warning Center at (800) 852-7550.

Facilities that generate, treat, store or dispose of hazardous waste have additional responsibilities to notify and coordinate with other response agencies. Whenever there is an imminent or actual emergency situation such as an explosion, fire, or release, the Emergency Coordinator must follow the appropriate requirements for the category of facility and type of release involved:

- Title 22 California Code of Regulations §66265.56, Emergency Procedures for generators of 1,000 kilograms or more of hazardous waste in any calendar month.
- Title 22 California Code of Regulations §66265.596, Response to Leaks or Spills and Disposition of Leaking or Unfit-for-Use Tank Systems.
- Title 40 Code of Federal Regulations §162.6, Notification requirements for a release of a hazardous substance equal to or greater than the reportable quantity.
- Title 22 California Code of Regulations §66262.2 and Title 40 Code of Federal Regulations §162.3(a)(2)(3) for generators of less than 1,000 kilograms of hazardous waste in any calendar month.

Following notification and before facility operations are resumed in areas of the facility affected by the incident, the Emergency Coordinator shall notify the local UPA and the local fire department's hazardous materials program, if necessary, that the facility is in compliance with requirements to:

- Provide for proper storage and disposal of recovered waste, contaminated soil or surface water, or any other material that results from an explosion, fire, or release at the facility; and
- Ensure that no material that is incompatible with the released material is transferred, stored, or disposed of in areas of the facility affected by the incident until cleanup procedures are completed.

EMERGENCY RESPONSE PHONE NUMBERS:

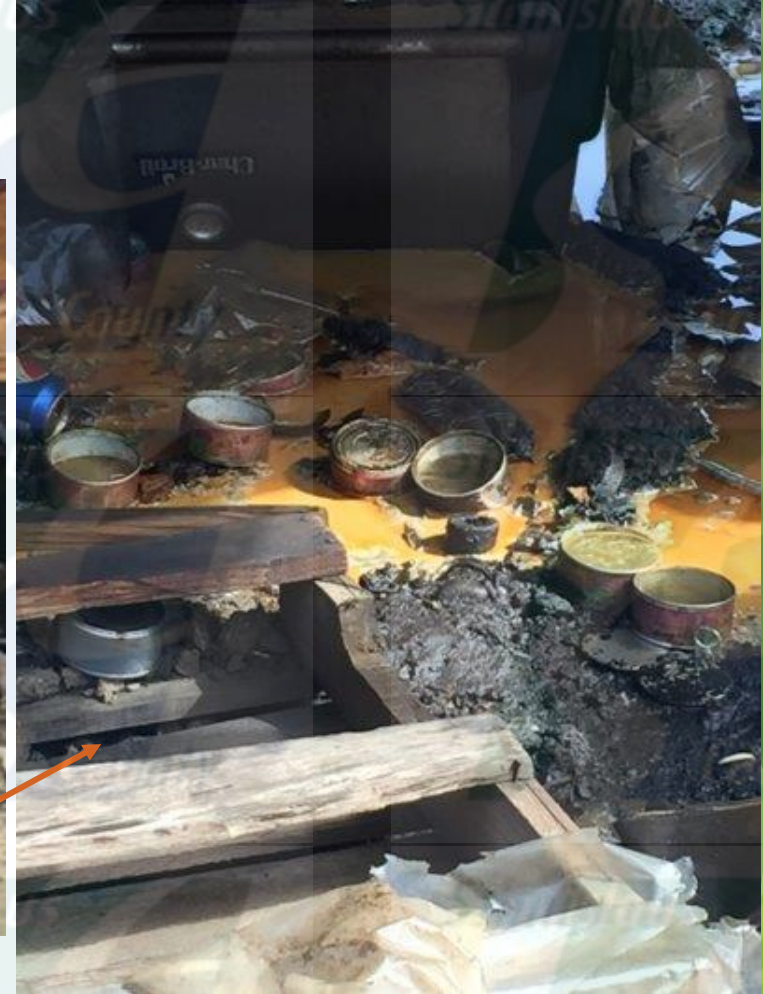
AMBULANCE, FIRE, POLICE AND CHP	9-1-1
CALIFORNIA STATE WARNING CENTER (CSWC)/CAL OES	(800) 852-7550
NATIONAL RESPONSE CENTER (NRC)	(800) 424-8802
POISON CONTROL CENTER	(800) 222-1222
LOCAL UNIFIED PROGRAM AGENCY (UPA)	
OTHER (Specify)	
NEAREST MEDICAL FACILITY / HOSPITAL NAME	

Owner/Operator determined whether waste is a hazardous waste and retained waste analysis for 3 year 22 CCR 66262.11

- ▶ Is it a waste?
 - ▶ *Is it a hazardous waste?*
- ▶ A person who generates a waste shall determine if that waste is a hazardous waste by:
 1. Testing the waste via approved methods (This analysis must be retained for 3 years)
 2. Applying generator knowledge of the hazard characteristic of the waste in light of the materials or processes used and the characteristics of the waste



Importance of Hazardous Waste Determination



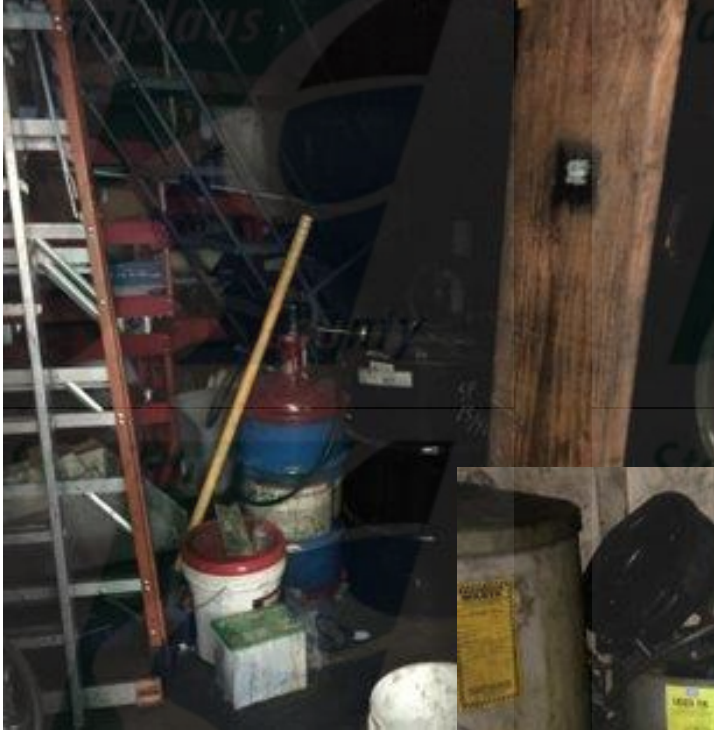
Hazardous Waste?

Generator inspects all hazardous waste containers pursuant to CCR § 66262.34

- ▶ Containers must be inspected at least weekly for:
 - ▶ Leaks, deterioration, and proper label requirements have been met
- ▶ Written logs are not required, however based on the condition of the storage area, violations will be cited
- ▶ Hazardous Waste Tank Inspection:
 - ▶ Daily inspections required.
 - ▶ No written logs required for SQG, written logs **ARE** required for LQG



Hazardous Waste Container Inspection



All Containers of Hazardous Waste Were Closed Except When Adding or Removing Waste CCR§ 66262.34

- ▶ A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.
- ▶ A container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.





County

County

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Stanislaus

Stanislaus

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Stanislaus

Stanislaus

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County

Stanislaus

Stanislaus

USED OIL

WASTE INCINERATOR

County

County

County

County

Stanislaus

Stanislaus



Stanislaus

Stanislaus

Stanislaus

Stanislaus

Stanislaus

Owner/Operator has obtained and maintains a hazardous waste tank system assessment CCR § 66265.192

- ▶ LQG facilities are required to conduct a hazardous waste tank system assessment Pursuant to CCR 66265.192(a)
- ▶ Assessment must be conducted by an independent certified professional engineer and must be conducted every 5 years
- ▶ Assessment requirements can be found in:
- ▶ CCR 66265.192(k)



Tank Inspections

- ▶ CESQG & SQG


- ▶ No written logs. Daily inspection of discharge controls (e.g. bypass systems), monitoring data, and level in tank. Weekly inspection of tank and containment for leaks.
§66262.34(d)(2)

- ▶ LQG

- ▶ Required daily. Written logs required 22 CCR § 66265.195

Return to Compliance Process

- ▶ Violations must be corrected within 30 days of receipt (unless specified otherwise)
- ▶ Compliance can be confirmed through a follow-up inspection or through the provision of required documentation
- ▶ Once all cited violations have been corrected, an inspector will issue a Summary of Return to Compliance form

		STANISLAUS COUNTY	
DEPARTMENT OF ENVIRONMENTAL RESOURCES		3800 Cornucopia Way, Suite C, Modesto, CA 95358	
Phone: (209) 525-6700 Fax: (209) 525-6774			
SUMMARY OF RETURN TO COMPLIANCE REPORT OFFICIAL NOTICE			
Owner: _____	Operator: _____		
Facility: _____	Address: _____		
Phone Number: _____	EPA#: _____	Date: _____	
Program: <input type="checkbox"/> APSA <input type="checkbox"/> CalARP <input type="checkbox"/> HMBP <input type="checkbox"/> HW Generator <input type="checkbox"/> UST <input type="checkbox"/> Other			
CONSENT TO ENTER GIVEN BY: _____			
<small>This facility _____ is _____ is not in compliance with all regulatory and statutory requirements. Deficiencies listed must be corrected within _____ days. Stanislaus County Ordinance requires a charge of \$123 per re-inspection of your facility if violations are not corrected by the noted date.</small>			
INSPECTOR: _____	RECEIVED BY: _____ (Print) _____ (Signature)		

Questions? ? ?

Contact Information:

Sarah Yacoub

Sr. HMS

Email: syacoub@envres.org

Direct: (209) 525-6705

Yama Noorzai

Email: ynoorzai

Direct: (209) 525-4749