

# ANNUAL SAFETY TRAINING – 2014

## Module # 10

### HAZARDOUS WASTE GENERATOR TRAINING

State, Federal, and local County laws require employees that handle hazardous waste to receive training. The requirements can be found in the Code of Federal Regulations, 40 CFR 260 and also for some States (such as California) they have their State EPA regulations that must be followed such as the California Code of Regulations, CCR Title 22, and Division 4.5. Each location collecting hazardous waste for shipment must have an EPA identification number. All waste must be collected, stored, and labeled in accordance to the guidelines listed by the regulatory agencies.

#### Accumulation and Collection:

All hazardous waste must be collected and stored in containers approved by the Department of Transportation (DOT) and in accordance with local county and fire department regulations. Provisions for secondary containment must be considered to prevent leakage or spillage and all hazardous waste must be stored in flammable rated and or corrosive resistant containers. On site quantity limitations are as follows: A Large Quantity Generators (LQG), which produces more than 1,000 kg per month, can store hazardous waste on site for no more than 90 days from the first day the waste begins accumulation in a specific container. A Small Quantity Generators (SQG), which produces between 100-1,000 kg per month, can store hazardous waste for up to 270 days from the day the waste begins accumulation in a specific container, so long as the disposal site is located more than 200 miles from the facility. 180 days is the time limit allowable if the disposal site is not at least 200 miles from the accumulation site.



#### Labeling:

All containers used in the collection of Hazardous Waste require a label that meets the regulatory standards for labeling. The label must include the words “HAZARDOUS WASTE” at the top and must read as the follows: **“State and Federal Law Prohibits Improper Disposal, If Found, Contact The Nearest Police or Public Safety Authority, or the U.S. Environmental Protection Agency or in California (CA), the “Cal EPA, California Department of Toxic Substances.”** The label must also contain the Hazardous Waste Generator information including company name and address (address where the waste is generated), the site EPA identification number, the EPA waste number, the California waste number (CA only), the accumulation start date (the first day waste began collecting), the content/composition description, the physical state of the waste (solid or liquid), the hazardous waste properties/characteristics (corrosive, reactivity, flammable, toxic), and the DOT proper shipping name with the UN or NA number with prefix. For satellite collection containers that are emptied daily, the accumulation date on the label must state, “Emptied Daily”. The most common acceptable label is yellow (see below) with a black or red border that includes all of the information mentioned. All Universal Waste, including fluorescent bulbs containing mercury and mercury thermostats, must be labeled in a similar fashion and collected for proper recycling (see below). Note: If you are not utilizing the Universal Waste system for the items mentioned, then all universal waste types must be shipped under the “hazardous Waste” guidelines.



#### Manifesting:

The manifest is one of the most important pieces in the hazardous waste management process as it completes the documentation portion of the cradle to grave process. If anything goes wrong in the shipment or disposal process the manifest can track the shipment back to the generator. It is important to only allow a DOT certified and approved hazardous waste transporter to provide shipment of hazardous waste to a transfer storage disposal facility. The Uniform Hazardous Waste Manifest is a multiple copy tracking document that must be properly filled out and signed for every hazardous waste shipment. The document contains 20 different fields that include the

generator and transporter information and information on the waste material being picked up and shipped. All material identifications, the type of containers, emergency information, and the exact quantities of the waste being picked up, must be accurately completed and described. At the time of pick up, the shipping location will receive 2 manifest copies to file with the signatures and names of the person shipping the waste and the name of the transporter. The 2<sup>nd</sup> copy must be sent within 30 days of shipment to the Department of Toxic Substance Control (DTSC). The shipping location will also receive a copy from the Transfer Storage Disposal Facility (TSDF), noting when the shipment was received and routed for recycling or destruction. When the (TSDF) copy is received, it must be filed together with the original copy for record retention. All shipments of hazardous waste require matching copies to be maintained together in files or binders for recordkeeping purposes.

**Other key Items:**

1. Hazardous waste needs to be accurately identified through determination testing, or RCRA (Federal) or CCR (California) listings prior to offering for transport and disposal.
  2. Hazardous Waste Containers must remain closed unless waste is being added or removed.
  3. Main accumulation areas must be inspected weekly for proper labeling, integrity of drums, to ensure containment and secondary containment is sound, and metal drums and containers are properly grounded.
  4. Manifests must be properly managed (initial manifest and destruction certificate should be matched and filed together and stored indefinitely).
  5. Emergency / Contingency Plans must be current and in place, Large Quantity Generators have more stringent requirements as defined in 40 CFR 260 and in CA, CCR Title 22, Division 4.5. All employees must be aware of all emergency procedures including emergency eye wash stations, safety showers, emergency exits, location of fire extinguishers, and the evacuation routes of the facility they work in.
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