

Hazardous Waste Management & Minimization

Manifest Certification

Presented by:
John Handzo
(775) 834-3674



Business Environmental Program
College of Business

University of Nevada, Reno

Today's Session

- Brief Review of Hazardous Waste basics
 - Container Requirements
 - Labeling
 - Storage
 - Weekly Inspection
- Manifest Certification: Signatory Regulations and Requirements
- Brief review of Training Records
- Questions & Answers



Container Requirements

- Must be compatible with the contents;
- Must be in good condition;
- Lid must remain closed and secured in place unless adding or removing materials;
- Secondary containment;
- Properly labeled;
- Weekly inspections;
- Static grounding protection is a best management practice

Container Labeling in CENTRAL STORAGE

- Must include:
 - The words “HAZARDOUS WASTE”;
 - Description of the contents;
 - EPA Waste Code(s);
 - Beginning Date of Accumulation

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY
OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

Generator's Name _____
Generator's Address _____ City _____ State _____
Generator's City _____ State _____ ZIP Code _____
EPA ID No. _____
Date of Generation/accumulation _____ EPA Waste No. _____
DOT Proper Shipping Name _____
Hazardous Material (_____)
EPA No. _____
DOT No. _____

**HANDLE WITH CARE — THIS CONTAINER IS DANGEROUS AND CONTAINS
HAZARDOUS OR TOXIC WASTE**

In the event of a spill or release of this hazardous waste, contact the
U.S. Coast Guard National Response Center at (800) 424-8802
for information and assistance.

Container Labeling at SATELLITE ACCUMULATION

- Label container “Hazardous Waste” or other words that identify the content of the containers; NAC 444.8671 excludes these containers from the labeling requirement to include the hazardous Waste Code;
- SQGs may co-locate Satellite Containers within Central Storage.
- Must justify “At or Near the point of generation”, AND “Under the control of the process operator”
- BMP suggests secondary containment and static grounding protection.
- CESQG facilities are not subject to the SA rule.
 - See 40 CFR 261.5
- **City of Sparks must use full HW labeling**

Container Storage

- CESQG
 - Generate < 220 lbs. per calendar month; do NOT have a storage timeline; Can store less than 2,200 lbs. of hazardous waste or <2.2 lbs. of acute hazardous waste
- SQG
 - Generate > 220 lbs. but < 2,200 lbs. per calendar month; Storage timeline is 180 days or 270 days if the TSDF is more than 200 miles from the facility. Can store <13,200 lbs. of hazardous waste or <2.2 lbs. of acute hazardous waste.
- LQG
 - Generate > 2,200 lbs. or > 2.2 lbs. of acute hazardous waste per calendar month; Storage timeline is < 90 days; No Storage volume limit.

Container Weekly Inspection

- SQG and LQG required to inspect the hazardous waste storage area weekly. Weekly is defined as 7-days, 7-days + 1-hr is a violation.
- Inspections must note:
 - Date and Time of Inspection;
 - Name of Inspector (Signature);
 - Observations made;
 - Date and Time of any corrective actions.
- Maintain written records of inspections for at least 3 years.
- Does not apply to Satellite Accumulation container(s).

Uniform Hazardous Waste Manifest:

- The manifest allows all parties involved in hazardous waste management to track the movement of the waste from generator to disposal.
- The manifest contains the following federally required information:
 - Name, address, and EPA ID number of the generator, transporter and destination/designated facility;
 - DOT description of the waste's hazards;
 - The quantities of waste;
 - Container type.
- The manifest must be signed by anyone handling/transferring the waste, i.e., generator, transporter, *second transporter*, designated facility.

Manifest Certification: Signatory Regulations & Requirements

- Hazardous waste generators are also “shippers” of hazardous materials subject to DOT’s hazardous materials transportation regulations;
- The generator’s certification language on the manifest is essentially the same certification language that DOT refers to as the “shipper’s certification.” See 49 CFR §172.204;
- The training requirements for hazardous materials employees are defined in the DOT Hazardous Materials Regulations at 49 CFR Part 172, Subpart H.

DOT Training Requirements

- General Awareness/Familiarization:
 - Overview of DOT requirements and;
 - Training to recognize and identify hazardous materials;
- Function Specific Training:
 - Specifically applicable to the function performed by the employee;
- Safety Training:
 - Emergency Response information, and;
 - Exposure & Personal Protective Equipment requirements, and;
 - Preventive Methods & Procedures for avoiding accidents, i.e., Proper handling procedures.
- Security Awareness Training:
 - Awareness of security risks associated with hazardous materials transportation and methods designed to enhance transportation security, and;
 - How to recognize and respond to possible security threats.

DOT Training Requirements cont.

- OSHA Hazard Communication training or EPA training or EMPLOYER training required by other Federal Agencies may be used to satisfy these training requirements
- Training must be completed within 90-days after employment or change in job function.
 - The employee can perform their functions under direct supervision of a properly trained & knowledgeable hazmat employee.
- DOT recurring training once every 3 years.
- RCRA refresher training is annually!
- Each hazmat employer is responsible for compliance with the requirements of this subchapter regardless of whether the training required by this subpart has been completed.

DOT Training Recordkeeping Requirements

DOT Recordkeeping

- Hazmat employee's name;
- The most recent training completion date of the hazmat employee;
- Description, copy, or the location of the training materials used to meet the requirements;
- Name and address of the person providing the training; and
- Certification that the hazmat employee has been trained and tested, as required.

RCRA Recordkeeping

- Job title for each position handling hazardous waste
 - Name of the employee filling the position
- Written Job description:
 - Requisite skill, education, other qualifications, & duties assigned
- Written description of training or job experience required
- Training records retained for 3 yrs.

Certification of Waste Minimization Program

- RCRA per §262.27 requires generators to develop & implement Waste Minimization Program/Efforts.
- LQG program:
 - To reduce the volume & toxicity of waste to the economically practicable degree; and
 - Select the practicable method of treatment, storage, or disposal currently available that minimizes the present & future threat to human health & the environment.
- SQG program:
 - Certifies that it made a good-faith effort to minimize waste generation; and
 - Selected the best available & affordable waste management method.



Certification cont.

- DOT “shipper’s certification” states:
 - I certify that the materials shipped are properly classified, described, packaged, marked and labeled, and in proper condition for transportation according to DOT regulations. See 49 CFR §172.204(a)(1), (2).
- EPA Memo states: “We interpret our requirements for generators and the manifest to be consistent with DOT’s requirements for hazardous materials shippers and shipping papers. Therefore, we interpret our regulation on use of the manifest to mean that any representative of a generator who signs the generator’s certification on behalf of the generator must similarly have actual knowledge of the facts specified in the generator’s certification.”
- **MOST IMPORTANTLY: Signee has knowledge of the hazardous waste being generated at the facility & the proper way to manage it!**

Rejected Load

- **DO IT CORRECT THE FIRST TIME AND AVOID THE NIGHTMARE!**
- The TSD must contact the generator for a decision on where to forward the waste.
 - If the original transporter is still present, then the rejected load is considered still in transport. The TSD signs the manifest and redirects the load to an alternate TSD or back to the generator!
 - If the original transporter is not present, the TSD will initiate a new manifest.
 - The generator needs to obtain copies of all the manifests!

Manifest Final Comments

- LQGs:
 - The final signed copy of the manifest should be returned to the generator within 35 days of shipment.
 - If the final signed copy is not received within 45 days of shipment, the generator must file an Exception Report with NDEP.
- SQGs:
 - If the final signed copy is not received within 60 days of shipment, the generator must send a copy of the manifest to NDEP with a statement that they have not received the final signed manifest.
- Manifests for hazardous waste shipped out of state must be sent to NDEP.
- Manifest contain the information to complete the RCRA Biennial Generator Report. Therefore, manifests must be kept on file for 3 years.

Manifests

QUESTIONS?

Nevada | Business Environmental Program

- Free and Confidential
- Hazardous Waste and Pollution Prevention Assistance
- Phone, email and on-site assistance
- Fact Sheet Publications
- Seminars and Group Presentations
- Energy Efficiency Assistance
- Funding provided by Nevada Division of Environmental Protection and Federal EPA

Assistance Line (800) 882-3233

WWW.UNRBEP.ORG