



The National Park Service EnviroFact Sheet

Environmental Management Program
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Managing Hazardous Waste: Generator Requirements (HW-1) DRAFT

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Generating hazardous waste

is an outcome of some park activities. How that waste should be managed depends on the amount generated *per month*.

Depending upon their generator status, parks are subject to different regulatory requirements regarding:

- Accumulation standards;
- Pre-transport requirements;
- Recordkeeping and reporting; and
- Disposal.

In order to effectively manage hazardous waste, parks must properly:

- Identify hazardous waste;
- Determine their hazardous waste generator status;
- Conduct preparedness and prevention emergency planning; and
- Choose a TSDF.

These topics are more fully addressed in the other hazardous waste EnviroFact Sheets. Also, for examples of the types of hazardous waste generated at parks, see the individual waste stream EnviroFact Sheets.

FOR MORE INFO...

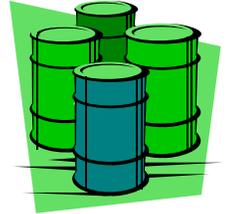
Resources for CESQGs:
http://www.epa.gov/epaoswer/osw/gen_trans/cesqg_resources.htm

Hazardous Waste Generator Requirements:
http://www.epa.gov/epaoswer/osw/gen_trans/gen_info.htm

APPLICABLE REGULATIONS

The Resource Conservation and Recovery Act (RCRA) establishes hazardous waste management standards based on a facility's generator status. The regulations specific to generator requirements are found in 40 CFR Parts 261 and 262.

While most states simply follow federal regulations regarding waste management, some states may have additional, more stringent requirements. Review your state's regulations to determine which regulations are applicable to your park's operations.



GENERATOR REQUIREMENTS

Conditionally Exempt Small Quantity Generators (CESQGs) generate less than 100 kg/month of hazardous waste or less than 1 kg acutely hazardous waste. CESQGs must comply with the following requirements:

- Obtain an EPA ID number from EPA or the state that manages the program (NPS policy);
- Fill out a hazardous waste manifest (supplied by EPA or the state) for all hazardous waste shipped from the facility (recommended as a best management practice);
- Accumulate less than 1,000 kilograms of waste on-site at any time; and
- Package, label, and placard all waste shipments according to Department of Transportation (DOT) requirements.

NPS recommends that CESQGs meet the storage, disposal, and manifest requirements applicable to SQGs (see below).

Small Quantity Generators (SQGs) can generate 100 to 1000 kg/month of hazardous waste. SQGs must comply with the following requirements:

- Obtain an EPA ID number from EPA or the state that manages the program;
- Accumulate less than 6,000 kgs of waste on-site at any time;
- Accumulate waste on-site no more than 180 days (270 days if TSDF is more than 200 miles away);
- Characterize **all** waste streams to determine if they are hazardous;
- Complete a hazardous waste manifest (supplied by EPA or state) for all hazardous waste shipped from the facility;
- Properly label and manage containers (see checklist item 4 on the following page);
- Package, label, and placard all waste shipments according to DOT requirements;
- Keep appropriate records (see checklist item 9 on the following page);
- Train personnel on proper waste handling procedures (see checklist item 7 on the following page);
- Perform minimal emergency response planning; and
- Prepare a Contingency Plan and a Preparedness and Prevention Plan (see the EnviroFact Sheet – "Managing Hazardous Waste: Planning for an Emergency (HW-5)")

Large Quantity Generators (LQGs) can generate more than 1,000 kg/month of hazardous waste. LQGs must meet all of the requirements of SQGs **plus** the following:

- Provide more extensive training to staff;
- Accumulate waste on-site no more than 90 days (there is no limit to the amount of waste accumulated on-site at any time);
- Provide secondary containment at the hazardous waste accumulation area that equals the volume of the largest container or 10% of the total volume stored, whichever is greater;
- Conduct weekly inspections of hazardous waste accumulation areas;
- Provide additional emergency response planning, including development of a Contingency Plan (see the EnviroFact Sheet – "Managing Hazardous Waste: Planning for an Emergency (HW-5)"); and
- Submit Biennial Reports to the EPA (see checklist item 9 on the following page).

SATELLITE ACCUMULATION

SQGs and are allowed to accumulate up to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste at or near the point of generation before counting that waste towards their monthly generation totals. Such "satellite" accumulation or collection containers must remain under the control of the person operating the process that generates the waste. Once the container is filled, the excess waste must be dated and moved within three days to the designated hazardous waste storage area.

HAZARDOUS WASTE GENERATOR COMPLIANCE CHECKLIST

Checklist Item	Notes
1. Determine state hazardous waste requirements applicable to different hazardous waste generators.	
2. Ensure that the Notification of Regulated Waste Activity (EPA Form 8700-12 or designated state form) has been filed and the facility has obtained an EPA identification number.	
3. Ensure that "satellite" accumulation areas are properly managed.	
4. Ensure that hazardous waste containers are properly labeled with the words "Hazardous Waste," the type of waste in the container, and the date the generator began to accumulate the waste. Further, ensure that containers are: <ul style="list-style-type: none"> • In good condition with no apparent leaks; • Compatible with the waste they contain; • Kept closed during storage, except when adding or removing waste; • Handled and stored in a manner that prevents or lessens the chance that they may become damaged (i.e., punctures, leaks); and • Inspected at least weekly in the hazardous waste storage areas. 	
5. Ensure that waste is transported off-site in accordance with proper DOT regulations.	
6. Ensure that hazardous waste is sent only to properly permitted TSDFs.	
7. Ensure that employees are properly trained. At a minimum, facility personnel should be familiar with emergency procedures, equipment, and systems, including: <ul style="list-style-type: none"> • Communications or alarm systems; • Response to fires or explosions; • Response to ground-water contamination incidents; and • Shutdown of operations. 	
8. Where applicable, ensure that employees who generate or handle hazardous waste are trained in: <ul style="list-style-type: none"> • Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; and • Key parameters for automatic waste feed cut-off systems. 	
9. Ensure that training records include: <ul style="list-style-type: none"> • Job title for each position that is related to hazardous waste management, and the name of the employee performing the job; • Written job descriptions for each position listed; • Written descriptions of the type and amount of introductory and continuing training that is given to persons filling a position listed; and • Documentation of the training and job experience given. 	
10. Ensure that required records are maintained, including: <ul style="list-style-type: none"> • Hazardous waste manifests; • Notification of Regulated Waste Activity (EPA Form 8700-12); • Documentation of <i>waste characterizations</i> on each waste stream (records should be organized by waste stream and include all waste analyses, MSDSs, or other data used to characterize the waste); • Hazardous waste records of the amount of waste generated each month; • Hazardous waste training records (required for LQGs and a BMP for SQGs); • Exception Reports—to be filed with EPA if the generator does not receive a copy of the manifest signed by the designated facility owner or operator within 45 days of the date the waste was accepted by the initial transporter (60 days for a SQG); • Biennial Reports, which must be prepared by March 1 of each even numbered year by LQGs that ship any hazardous waste off-site to a TSDF; and • Land Disposal Restriction (LDRs) Notifications, which must be completed for specific hazardous waste streams such as solvent, lead, or benzene-containing waste (e.g., lead-based paint waste from abatement projects). 	