South Carolina Department of Health and Environmental Control

Generator Improvement Rule

Key Changes
Legal Disclaimer

• This Presentation is an overview of the Generator Improvement Rule-It will not cover everything!
• Please refer to the final rule
The Hazardous Waste Generator Improvement Rule reorganized the hazardous waste regulations to make them more understandable and strengthened some requirements to enhance protection of human health and the environment.
## CHANGES

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Old Citation in 40 CFR</th>
<th>New Citation in 40 CFR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Definition of Generator Categories</td>
<td>§260.10, 261.5, &amp; 262.34</td>
<td>§260.10</td>
</tr>
<tr>
<td>Hazardous Waste Determination and Recordkeeping</td>
<td>§262.11 and 262.40 (c)</td>
<td>§262.11</td>
</tr>
<tr>
<td>Generator Category Determination</td>
<td>§261.5 (c) - (e)</td>
<td>§262.13</td>
</tr>
<tr>
<td>VSQG (formerly CESQG)</td>
<td>§261.5 (a), (b), (f) – (j), and 258.28</td>
<td>§262.14</td>
</tr>
<tr>
<td>Satellite Accumulation Area</td>
<td>§262.34 (c), 265, 171, 265, 172, and 265.173 (a)</td>
<td>§262.15</td>
</tr>
<tr>
<td>SQG</td>
<td>§262.34 (d) – (f) and 268</td>
<td>§262.16</td>
</tr>
<tr>
<td>LQG</td>
<td>§262.34 (a), (b), (g)-(i), (m), and 268</td>
<td>§262.17</td>
</tr>
<tr>
<td>EPA Identification Numbers</td>
<td>§262.12</td>
<td>§262.18</td>
</tr>
<tr>
<td>Landfill Ban for Liquids</td>
<td>§258.28</td>
<td>§262.35</td>
</tr>
</tbody>
</table>
# Changes

<table>
<thead>
<tr>
<th>New Provision</th>
<th>VSQG</th>
<th>SQG</th>
<th>LQG</th>
</tr>
</thead>
<tbody>
<tr>
<td>LQG Consolidation of VSQG wastes</td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Episodic Generation</td>
<td>X</td>
<td>X</td>
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<tr>
<td>50-foot Waiver</td>
<td></td>
<td></td>
<td>X</td>
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<tr>
<td>Marking &amp; Labeling</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Marking RCRA Waste Codes</td>
<td></td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>SQG Re-notification</td>
<td>X</td>
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<tr>
<td>Contingency Plan Quick Reference Guide</td>
<td></td>
<td></td>
<td>X</td>
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<tr>
<td>Closure Notification</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Closure as Landfill if Can’t Clean Close</td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
CHANGES: Incompatible Wastes

- Generators are prohibited from accumulating incompatible hazardous wastes in the same SAA container;
- All SAA containers must be “washed” if subsequently they will be used to hold incompatible waste; and
- A dike, berm, or wall must be installed to separate incompatible waste units in a single SAA.
CHANGES: Reactive Wastes

• An area used for the accumulation of reactive wastes away from the point of generation should be managed as a CAA, not an SAA.

Note: Generators may move a container of reactive hazardous waste from an SAA to a CAA for storage and then back to the SAA for further accumulation of reactive wastes.
CHANGES:
Closed Containers

- A SAA container may be opened for “temporary venting” when necessary for “proper operation of equipment” or to “prevent dangerous conditions” such as pressure-builds.

Note: This flexibility does not apply to containers in central accumulation areas (CAA).
CHANGES:  
**Control of an Operator**

- The operator must have a regular presence in the SAA and be able to control accumulation of hazardous waste;
- Control over access to the area, building, or room in which a SAA is located is not necessarily required; and
- There can be more than one operator serving different functions for each SAA.
CHANGES: Three Day Rule

• “Three days” now means “three consecutive calendar days,” not three business or work days;

• No reprieve from counting days is provided despite hazardous waste is not being generated at the SAA or the facility is not operating;

• “Three consecutive calendar days” is not to be measured in hours, and as a result the SAA generator may actually have less than 72 hours to comply; and

• Full hazardous waste storage container requirements are only triggered for “excessive wastes,” which are defined as that portion of SAA hazardous wastes exceeding regulatory caps.
CHANGES:
Waiver of 50-ft Setback

• LQGs may approach the authority having jurisdiction (AHJ) over the fire code within the facility's state or locality (e.g., fire marshal) to apply for a waiver from the requirement if the AHJ believes that the precautions taken by the facility make the waiver appropriate and safe.
Definitions

§ 262.1

• Conditions for exemption/ Independent requirement
  • Condition for Exemption – a requirement to obtain an exemption... for example personnel training, container and tank standards.
  • Independent Requirements – a requirement without relation to a conditional exemption... for example the pre-transport waste packaging requirements of 262.30.
Definitions

§ 260.10

• Acute hazardous waste/ Non-acute hazardous waste
• Central accumulation area
• Generators: Large quantity, Small quantity generator, Very small quantity- formerly Conditionally Exempt Small Quantity
Definitions

§ 260.10

• **Large Quantity Generator (LQG)** – generating within a calendar month
  - Greater than or equal to 1000 kg (2200 lbs.) of non-acute waste
  - Greater than 1 kg (2.2 lbs.) of acute waste [261.31 or 261.33(e)]
  - Greater than 100 kg (220 lbs.) of any contaminated soil, water, or debris from a spill of acute waste
§ 260.10

• **Small Quantity Generator (SQG)** – generating within a calendar month
  • Greater than one hundred 100 (220 pounds) but than 1000 kg (2200 lbs.) of non-acute waste
  • Less than 1 kg (2.2 lbs.) of acute waste [261.31 or 261.33(e)]
  • Less than 100 kg (220 lbs.) of any contaminated soil, water, or debris from a spill of acute waste
Definitions

- Central accumulation area means any on-site hazardous waste accumulation area with hazardous waste accumulating in units subject to either R.61-79.262.16 (for small quantity generators) or R.61-79.262.17 for large quantity generators).
Definitions

• Certified Laboratory" means a laboratory that has been approved by the Department to perform specific analyses referenced in R.61-79.260 through R.61-79.270. Laboratory certification is necessary for parameters of interest under SW-846 and other methods approved by EPA.
• (a) Every generator within the State who produces a hazardous waste and has not previously done so shall file with the Department a Notification Form for that waste within thirty (30) days of the effective date of this regulation.
NOTIFICATION
§ 261.12

• (b) Every generator within the State who produces a new hazardous waste shall file with the Department a revised or new Notification Form for that waste within thirty (30) days after such waste is first produced.

• (c) Every generator within the State who produces a hazardous waste which is classified or listed for the first time by a revision of R.61-79.261 shall file with the Department a revised or new Notification Form for that waste within ninety (90) days after the effective date of such revision.
(d) The notification shall be on a form designated by the Department, shall be completed as required by the instructions supplied with such forms. The information to be furnished on the form shall include but not be limited to the location and general description of such activity, the identified or listed hazardous wastes handled by such person and, if applicable, a description of the production of energy recovery activity carried out at the facility and such other information as the Department deems necessary. A generator shall file a revised or new Notification form whenever the information previously provided becomes outdated or inaccurate.
**EPA FORM 8700-12**

**United States Environmental Protection Agency**

**RCRA SUBTITLE C SITE IDENTIFICATION FORM**

**1. Reason for Submittal (Select only one.)**

- [ ] Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of one year (includes ISRA activity)
- [ ] Submitting as a component of the Hazardous Waste Report for ___________ (Reporting Year)
- [ ] Site was a TSD facility and/or generator of ≥ 1,000 lb of non-acute hazardous waste, ≥ 1 lb of acute hazardous waste, or ≥ 100 lb of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent UGDR regulations)
- [ ] Notifying that regulated activity is no longer occurring at this Site
- [ ] Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
- [ ] Submitting a new or revised Part A Form

**2. Site EPA ID Number**

<p>| | | | | | |</p>
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<thead>
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</thead>
</table>

**3. Site Name**

<p>| | | | | | |</p>
<table>
<thead>
<tr>
<th></th>
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<th></th>
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</tr>
</thead>
</table>

**4. Site Location Address**

- **Street Address**
- **City, Town, or Village**
- **State**
- **County**
- **Zip Code**

**5. Site Mailing Address**

- **Street Address**
- **City, Town, or Village**
- **State**
- **Country**
- **Zip Code**

**6. Site Land Use**

- [ ] Private
- [ ] County
- [ ] District
- [ ] Federal
- [ ] Municipal
- [ ] State
- [ ] Other

**7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 3-digit codes)**

- [ ] A
- [ ] B
- [ ] C
- [ ] D

LDRs

§ 268.7

• Testing, tracking, and recordkeeping requirements for generators, treaters, and disposal facilities
  • (a)(5) – If a generator is managing and treating prohibited wastes or contaminated soil in tanks, containers, or containment building must develop and follow a written waste analysis plan that must be kept on site in the generators records
GENERATOR: Very Small Quantity Generator (VSQG)

• VSQGs generate no more than 100 kilograms of HW in a calendar month and never accumulate more than 1,000 kilograms of HW at any time.

100 KG to Lbs

100 kg = 220.46 lbs
GENERATOR: Very Small Quantity Generator (VSQG) § 261.5

- Perform HW determinations (§ 262.11)
- Obtain a EPA ID Number using EPA Form 8700-12
- Cannot accumulate > 1,000 kg at any time
- Cannot store waste greater than 180 days if > 1,000 kg
- Ensure delivery of HW to a recycling facility, MSW landfill or TSDF.
- Keep records documenting proper disposal
GENERATOR:
Small Quantity Generator (SQG)

SQGs generate more than 100 kilograms but less than 1,000 kilograms of HW in a calendar month and never accumulate more than 6,000 kilograms of HW at any time.
GENERATOR:
Small Quantity Generator (SQG)

- Obtain a EPA ID Number using EPA Form 8700-12
- Cannot exceed the 6,000 kg accumulation/180 day storage time limit
- Retain records including manifests, test results, etc., at a minimum of three (3) years
- Training of personnel regarding proper HW handling and emergency response
GENERATOR: Small Quantity Generator (SQG)

- If tanks are used for management of HW, meet the tank requirements of 265.201. This includes daily and weekly inspections, required maintenance, spill response and closure standards.

- If a SQG fails to meet applicable requirements, the full generator standards (and perhaps TSDF standards) may be applicable.
Emergency Preparedness:

- Extended to all areas of hazardous waste accumulation including SAAs.

- These include a fire alarm or internal communication device, a portable fire extinguisher, a communication device such as telephone (cell phone) or two way radio in order to summon help if necessary and spill response equipment appropriate for the waste accumulated (a spill kit).
Emergency Response

• Previous regulations required generators to make arrangements with Local Emergency Planning Commissions (LEPCs) for potential emergency situations.

• The GIR expands this to require documentation of these arrangements/efforts with the LEPCs. In addition, LQGs must prepare a Quick Reference Guide of their contingency plans containing the information most critical for immediate response to an emergency situation.
Eight Elements of the Quick Reference Guide

• Types/names of hazardous waste and associated hazards
• Estimated maximum amounts of hazardous waste onsite
• Hazardous wastes requiring special treatment
• Map highlighting where hazardous wastes are generated, accumulated, and treated
• Map of facility and surroundings that identifies routes of access and evacuation
• Location of water supply
• Identification of onsite notification systems
• Name of emergency coordinator and contact information
## EXAMPLE QUICK REFERENCE GUIDE

### Contingency Plan Quick Reference Guide

**ABC FACILITY**

1234 NOFO ALMS

Somewhere, SC 29009

**Contact Information:**

- **Primary Emergency Coordinator:** Clark W. Griswold
  - Mobile Number: (24/7) 803-555-0000
- **Secondary Emergency Coordinator:** Frank Shirley
  - Mobile Number: (24/7) 803-333-0002
- **Tertiary Emergency Coordinator:** Eddie Johnson
  - Mobile Number: (24/7) 803-355-0002

**Notes:** ABC facility operates 3 shifts, 24/7, but the order of contact during an emergency is listed above.

### Hazardous Waste Information:

<table>
<thead>
<tr>
<th>Name of Waste</th>
<th>Waste Code(s) Hazard</th>
<th>Accumulation Location</th>
<th>Maximum Quantity Present</th>
<th>Response Notes</th>
<th>Special Notes to Emergency Response/Hospital</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paint Related Waste (Liquid)</td>
<td>2002 (ignitability, flash point &lt;40°F), 2620, 6003</td>
<td>NE corner of Clark's garage, central accumulation area</td>
<td>One, 5-gallon drum (440 pounds)</td>
<td>If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.</td>
<td>None</td>
</tr>
<tr>
<td>Paint Related Waste (Liquid)</td>
<td>0002 (ignitability, flash point &lt;40°F), 2620, 6003</td>
<td>Two Satellite Accumulation Areas equipped with hose reels on the attached map</td>
<td>One, 5-gallon drum (440 pounds)</td>
<td>If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.</td>
<td>None</td>
</tr>
<tr>
<td>Absorbed Aqueous Liquid (ACL) Radiactive Waste</td>
<td>0902, 4010, 3999 (ignitability, reactivity, Radioactivity)</td>
<td>NE corner of Clark's property near storm sewer manhole.</td>
<td>Off-Spec-1 tank, 200 gallons</td>
<td>Use PPE to prevent contact with skin and eyes. Immediately prevent spills from entering drains and waterways. Prevent a source of ignition and open flames.</td>
<td>Contact Chemists for emergency medical treatment information at 1-800-324-2000. If in eyes, wash eyes for several minutes.</td>
</tr>
</tbody>
</table>
Example: Floor Plan and Maps
Renotification
§ 262.18(d)(1) vs. § 262.44(b)

(d)- A small quantity generator must renotify the Department starting in 2021 and every four (4) years thereafter using EPA Form 8700-12. This renotification must be submitted by September 1st of each year in which renotifications are required.

(b)- Annual declaration: must declare status annually on or before January 31 by submission of a completed form as designated by the Department on which he certifies that he is a small quantity generator and provisionally exempt from full regulation and that should his status change during the calendar year he will comply fully with all requirements including quarterly reporting.
Renotification § 262.18(d)(2)

- A large quantity generator must renotify the Department by March 1st of each even-numbered year thereafter using EPA Form 8700-12. Quarterly Reports covers this requirement under 262.41
§ 262.11(a) The hazardous waste determination for each solid waste must be made

- at the point of waste generation,
- before any dilution, mixing, or other alteration of the waste occurs,
- and at any time that it has, or may have, changed its properties.
- hazardous waste characteristics (ignitable, corrosive, reactive or toxic) I Can Remember That

Applicable to SQG and LQGs and requires documentation retention for three years
Acceptable knowledge may include:

• process knowledge;
• knowledge of products, by-products, and intermediates produced by the process;
• chemical or physical characterization of wastes;
• information on the chemical and physical properties of the chemicals used or produced by the process or otherwise contained in the waste;
• testing that illustrates the properties of the waste; or other reliable and relevant information about the properties of the waste or its constituents.
§262.11(f): Recordkeeping

- Small and large quantity generators must maintain records supporting its hazardous waste determinations, including records that identify whether a solid waste is a hazardous waste, as defined by 40 CFR 261.3.
- Records must be maintained for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal.
- The records must include, but are not limited to, the following types of information:
  - the results of any tests, sampling, waste analyses, or other determinations made in accordance with this section;
  - records documenting the tests, sampling, and analytical methods used to demonstrate the validity and relevance of such tests;
  - records consulted in order to determine the process by which the waste was generated, the composition of the waste, and the properties of the waste; and
  - records which explain the knowledge basis for the generator’s determination, as described at 40 CFR 262.11(d)(1).
§262.11(g): Waste Codes

• If the waste is determined to be hazardous, small quantity and large quantity generators must identify all applicable EPA hazardous waste numbers in subparts C and D of part 261. **Prior to shipping** the waste off site, the generator also must mark its containers with all applicable EPA hazardous waste numbers according to § 262.32.
## Comparison of Old vs. New §262.11

<table>
<thead>
<tr>
<th>Old</th>
<th>New</th>
</tr>
</thead>
<tbody>
<tr>
<td>A person who generates a solid waste, as defined in R.61-79.261.2, must determine if that waste is a hazardous waste using the following method:</td>
<td>A person who generates a solid waste, as defined in R.61-79.261.2, must make an accurate determination as to whether that waste is a hazardous waste.</td>
</tr>
<tr>
<td>(a) He should first determine if the waste is excluded from regulation under R.61-79.261.4</td>
<td>(a) The hazardous waste determination for each solid waste must be made at the point of waste generation, before any dilution, mixing, or other alteration of the waste occurs, and at any time in the course of its management...that may change the properties of the waste such that the RCRA classification of the waste may change.</td>
</tr>
<tr>
<td>(b) He must then determine if the waste is listed as a hazardous waste in subpart D of R.61-79.261</td>
<td>(b) A person must determine whether the solid waste is excluded from regulation under 40 CFR 261.4.</td>
</tr>
<tr>
<td>(c) If the waste is not excluded under 40 CFR 261.4, the person must then use knowledge of the waste to determine if the waste meets any of the listing descriptions under subpart D of 40 CFR part 261.</td>
<td>(c) If the waste is not excluded under 40 CFR 261.4, the person must then use knowledge of the waste to determine if the waste meets any of the listing descriptions under subpart D of 40 CFR part 261.</td>
</tr>
</tbody>
</table>
### Comparison of Old vs. New §262.11 (cont.)

<table>
<thead>
<tr>
<th>Old</th>
<th>New</th>
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</thead>
<tbody>
<tr>
<td>(c) Continued Acceptable knowledge that may be used in making an</td>
<td>(c) Continued Acceptable knowledge that may be used in making an</td>
</tr>
<tr>
<td>accurate determination as to whether the waste is listed may include</td>
<td>accurate determination as to whether the waste is listed may include</td>
</tr>
<tr>
<td>waste origin, composition, the process producing the waste, feedstock,</td>
<td>waste origin, composition, the process producing the waste, feedstock,</td>
</tr>
<tr>
<td>and other reliable and relevant information. If the waste is listed,</td>
<td>and other reliable and relevant information. If the waste is listed,</td>
</tr>
<tr>
<td>the person may file a delisting petition under R. 61-79.260.20 and</td>
<td>the person may file a delisting petition under R. 61-79.260.20 and</td>
</tr>
<tr>
<td>260.22 to demonstrate to the Administrator that the waste from this</td>
<td>260.22 to demonstrate to the Administrator that the waste from this</td>
</tr>
<tr>
<td>particular site or operation is not a hazardous waste.</td>
<td>particular site or operation is not a hazardous waste.</td>
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</tbody>
</table>
Comparison of Old vs. New §262.11 (cont.)

<table>
<thead>
<tr>
<th>Old</th>
<th>New</th>
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</thead>
<tbody>
<tr>
<td>(c) For purposes of compliance with R.61-79. 268, or if the waste is not listed in subpart D of R.61-79.261, the generator must then determine whether the waste is identified in subpart C of R.61-79.261 by either: (1) Testing the waste according to the methods set forth in subpart C of R.61-79.261, or according to an equivalent method approved by the Administrator under R.61-79.260.21; or (2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.</td>
<td>(d) The person then must also determine whether the waste exhibits one or more hazardous characteristics as identified in subpart C of R.61-79.261 by following the procedures in paragraph (d)(1) or (2) of this section, or a combination of both. (1) The person must apply knowledge of the hazard characteristic of the waste in light of the materials or the processes used to generate the waste. Acceptable knowledge may include process knowledge; testing that illustrates the properties of the waste; or other reliable and relevant information about the properties of the waste or its constituents. A test other than a test method set forth in subpart C of R.61-79.261, or an equivalent test method approved by the Administrator under R.61-79.260.21, may be used as part of a person’s knowledge to determine whether a solid waste exhibits a characteristic of hazardous waste. However, such tests do not, by themselves, provide definitive results. Persons testing their waste must obtain a representative sample of the waste for the testing, as defined at R.61-79.260.10. (2) When available knowledge is inadequate to make an accurate determination, the person must test the waste according to the applicable methods set forth in subpart C of R.61-79.261 or according to an equivalent method approved by the Administrator under R.61-79.260.21</td>
</tr>
</tbody>
</table>
Comparison of Old vs. New §262.11 (cont.)

<table>
<thead>
<tr>
<th>Old</th>
<th>New</th>
</tr>
</thead>
<tbody>
<tr>
<td>(d) If the waste is determined to be hazardous, the generator must refer to parts 261, 264, 265, 266, 267, 268, and 273 of this chapter for possible exclusions or restrictions pertaining to management of the specific waste.</td>
<td>(e) If the waste is determined to be hazardous, the generator must refer to parts 261, 264, 265, 266, 267, 268, and 273 of this chapter for other possible exclusions or restrictions pertaining to management of the specific waste.</td>
</tr>
<tr>
<td>(f) Recordkeeping for small and large quantity generators.</td>
<td>(g) Identifying hazardous waste numbers for small and large quantity generators.</td>
</tr>
</tbody>
</table>
**Recordkeeping**

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**Land Disposal Restriction Notification**

<table>
<thead>
<tr>
<th>Company</th>
<th>Columbia, SC</th>
</tr>
</thead>
<tbody>
<tr>
<td>ORGANIZER NAME</td>
<td>SCHEC000009</td>
</tr>
<tr>
<td>CITY/STATE</td>
<td>Columbia, SC</td>
</tr>
<tr>
<td>MANIFEST DOCUMENT NUMBER</td>
<td>9000000-TEG</td>
</tr>
</tbody>
</table>

The form is submitted in accordance with the regulations published by 40 CFR 264, which grant the best available of active landfilled disposal waste. These indicate how any waste must be managed to ensure compliance with land disposal restrictions.

**WARNING:** The groundwater and/or surface water associated with this facility are protected by state regulations. The protection of water quality is critical to public health. At this facility, water quality is protected through the implementation of the US EPA's Best Management Practices (BMPs) and the South Carolina Department of Health and Environmental Control (DHEC) regulations. Failure to comply with these guidelines may result in fines or other penalties.

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**Analysis of Recordkeeping**

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>04/01/2019</td>
<td>09:00</td>
<td>Start of Day</td>
</tr>
<tr>
<td>04/02/2019</td>
<td>10:00</td>
<td>Recordkeeping</td>
</tr>
<tr>
<td>04/03/2019</td>
<td>11:00</td>
<td>Site Inspection</td>
</tr>
</tbody>
</table>

**Signature:**

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>John Doe</td>
<td>EMS Manager</td>
<td>04/02/2019</td>
</tr>
<tr>
<td>Requirement</td>
<td>Old Generator Requirement</td>
<td>Rule Change</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>SAA marking/labeling</td>
<td>The words “Hazardous Waste” or other words that identify the contents</td>
<td>The words “Hazardous Waste” and an indication of the hazard(s) of the contents</td>
</tr>
<tr>
<td>SQG/LQG 90/180/270-day labeling requirements</td>
<td>Containers: The words “Hazardous Waste” and the accumulation start date. Tanks: The words “Hazardous Waste”</td>
<td>Containers: 1. The words “Hazardous Waste,” 2. Indication of the hazard(s) of the contents 3. Accumulation start date  Tanks and containment buildings: The words “Hazardous Waste” and an indication of the hazard(s) of the contents.</td>
</tr>
<tr>
<td>SQG/LQG preparedness and prevention requirements and emergency procedures</td>
<td>Apply to 90/180/270-day accumulation areas</td>
<td>Apply to satellite accumulation areas and to 90/180/270-day accumulation areas</td>
</tr>
<tr>
<td>SQG/LQG arrangements with local authorities and the properties of hazardous waste handled at the facility</td>
<td>Must attempt to make arrangements, as appropriate, to familiarize police, fire departments, emergency response teams, emergency response contractors, equipment suppliers, and local hospitals with the layout of the facility and the properties of hazardous waste handled at the facility</td>
<td>Must attempt to make arrangements, as appropriate, to familiarize police, fire departments, emergency response teams, emergency response contractors, equipment suppliers, local hospitals, and the LEPC with the layout of the facility</td>
</tr>
<tr>
<td>SQG/LQG pre-transport marking requirements</td>
<td>DOT marking For containers of ≤119 gal capacity: “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, address, and EPA ID number Manifest tracking number</td>
<td>DOT marking For containers of ≤119 gal capacity: “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, address, and EPA ID number Manifest tracking number EPA hazardous waste codes</td>
</tr>
</tbody>
</table>
Container Labeling: The words “Hazardous Waste” and include an indication of the hazard(s) present.
HAZARD LABELS

• Words indicating the applicable hazardous waste characteristic(s): ignitable, corrosive, reactive, or toxic.
HAZARD LABELS

- The HazMat labels or placards used by the USDOT to identify its nine hazard classes of hazardous materials:
  - Explosive (six divisions and 13 compatibility groups)
  - Compressed gas (three divisions)
  - Flammable and combustible liquid
  - Flammable and reactive solids (three divisions)
  - Oxidizers and organic peroxides
  - Poisonous materials and infectious substances
  - Radioactive materials
  - Corrosives
  - Miscellaneous
HAZARD LABELS

• A hazard statement or pictogram used by the Occupational Safety and Health Administration (OSHA) as part of what is popularly known as the Global Harmonization System.

• A chemical hazard label as used by the National Fire Protection Association (NFPA).
SAA: CONTAINER LABELING AND MARKING

§262.15(a)(5)

• “Hazardous waste”
• An indication of the hazards of the contents.
SAA: CONTAINER MANAGEMENT

Bulk drum in Central Accumulation Area for satellite accumulation container.
§262.16(b)(6) & §262.17(a)(5)

• “Hazardous waste”
• An indication of the hazards of the contents.

Note: A tank containing hazardous waste is not required to be marked or labeled with the date of initial accumulation. The length of time the hazardous waste in a tank has been on-site is to be documented by use of inventory logs, monitoring equipment, or other records.
CAA: CONTAINER LABELING AND MARKING

§262.16(b)(6) & §262.17(a)(5)

• “Hazardous waste”
• Date of initial accumulation
• An indication of the hazards of the contents.

Note: A VSQG is not required to label or mark its containers of hazardous waste.
CONTAINER LABELING FOR TRANSPORT

- 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 and Address ____.
- Generator’s EPA Identification Number ____.
- Manifest Tracking Number ____.
- EPA Hazardous Waste Number(s) ____.
EPISODIC GENERATION

- Allowed once per year
- Notification requirements
- Labeling requirement for accumulation of episodic waste
- Initiation and completion must be within 60 days depending on generator status
- No change in generator status
EPISODIC EVENTS

- Planned
  - Lab cleanout
  - Maintenance
EPISODIC EVENTS

- Unplanned
  - Leaks or spills
  - Off-spec material
EPISODIC EVENTS

• Apply for EPA ID number using EPA Form 8700-12

• Notification for a planned event must be 30 days prior

• Notification of an unplanned event must be within 72 hours via telephone, email or fax
EPISODIC EVENTS

• Containers must be compatible with the waste, labeled “Episodic Hazardous Waste” with hazard code(s), accumulation and dated when episodic event began
EPISODIC EVENTS

• Storage limit is 60 Days:

  • The planned episodic event limit starts on the first day of any activities associated with the event;

  • The unplanned episodic event limit begins on the first day the hazardous waste is generated.
VSQG Waste Consolidation

- VSQGs may send their waste to LQGs under the control of the same person for consolidation and management provided certain conditions are met by VSQG and LQG.

“Control” means: power to direct the policies of the generator, whether by stock ownership, voting rights or otherwise. (does not include contractors)

“Person” means an individual, trust, firm, joint stock company, Federal Agency, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body.
VSQG Waste Consolidation

- LQGs must meet the following conditions:
  - Make a 30 day notification prior to receiving first shipment using EPA Form 8700-12
  - Must include VSQG name, address and telephone number plus contact name with telephone number
  - Update notice within 30 days of any changes
- Manage under 90-day rules
- Label with date received in addition to 90-day markings
- Retention of shipment records for 3 years from
CLOSURE

• For closure of a facility, the LQG must notify EPA or SCDHEC no later than 30 days prior to closing the facility, and notify EPA or SCDHEC within 90 days after closing the facility.

• The notice shall state that it has complied with closure performance standards, or notify if it can’t complete a clean closure of the facility. The LQG can request an extension but must notify EPA or SCDHEC within 75 days after closing the facility.