



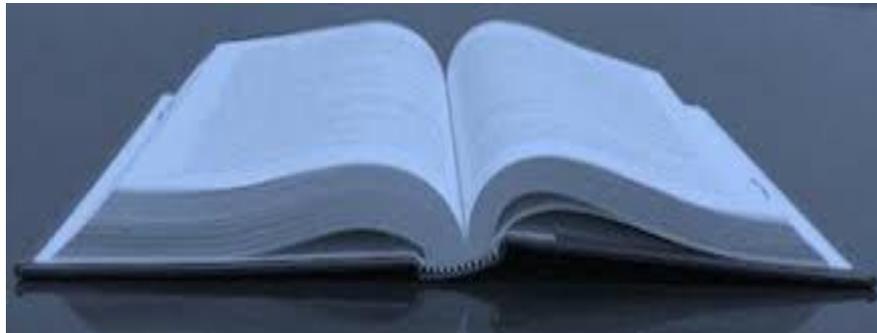
South Carolina Department of Health and Environmental Control

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



CHANGES

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

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

CHANGES

New Provision	VSQG	SQG	LQG
LQG Consolidation of VSQG wastes	X		X
Episodic Generation	X	X	
50-foot Waiver			X
Marking & Labeling		X	X
Marking RCRA Waste Codes		X	X
SQG Re-notification		X	
Contingency Plan Quick Reference Guide			X
Closure Notification			X
Closure as Landfill if Can't Clean Close			X

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

Definitions

§ 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 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.



NOTIFICATION

§ 261.12

- (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.

NOTIFICATION

§ 261.12

- (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

OMB# 2050-0024; Expires 05/31/2020

United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM	
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1. Reason for Submittal (Select only one.)

<input type="checkbox"/>	Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity)
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<input type="checkbox"/>	Site was a TSD facility and/or generator of ≥ 1,000 kg of non-acute hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent LQG regulations)
<input type="checkbox"/>	Notifying that regulated activity is no longer occurring at this Site
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
<input type="checkbox"/>	Submitting a new or revised Part A Form

2. Site EPA ID Number

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3. Site Name

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4. Site Location Address

Street Address			
City, Town, or Village		County	
State	Country	Zip Code	

5. Site Mailing Address

<input type="checkbox"/> Same as Location Address			
Street Address			
City, Town, or Village			
State	Country	Zip Code	

6. Site Land Type

<input type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input type="checkbox"/> Federal	<input type="checkbox"/> Tribal	<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
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7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

A. (Primary)	C.
B.	D.

LDRs

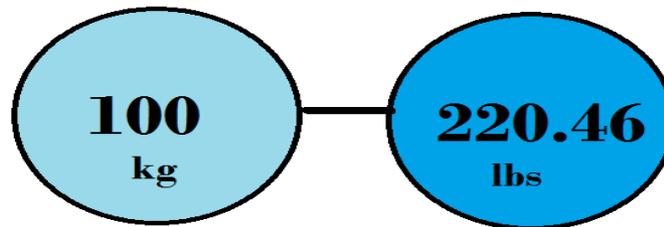
§ 268.7

- 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



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

EXAMPLE QUICK REFERENCE GUIDE

Note: This example was created by SCDHEC to be used as a guide to assist the regulated community with compliance. It does not substitute for or replace any regulatory requirements.

Contingency plan quick reference guide

ABC FACILITY
1234 RCRA Lane
Somewhere, SC 29000

Facility Contacts:

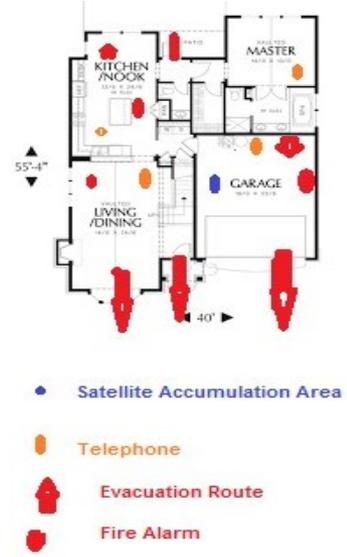
Primary Emergency Coordinator: Clark W. Gruboid Mobile Number (24/7): 803-555-0000
 Secondary Emergency Coordinator: Frank Shirley Mobile Number (24/7): 803-555-0001
 Tertiary Emergency Coordinator: Eddie Johnson Mobile Number (24/7): 803-555-0002

Note: ABC Facility operates 3 shift, 24/7, but the order of contact during an emergency is listed above.

Hazardous Waste Information:

Name of Waste	Waste Codes/ Hazards	Accumulation Location	Maximum Quantity Present	Response Notes	Special Notes to Emergency Response/Hospital
Paint Related Wastes (liquid)	D001 (ignitability, flash point <140°F); R003, F003	NE corner of Clark's garage, central accumulation area	Five, 55-gallon drums (2,065 pounds)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Paint Related Wastes (liquid)	D001 (ignitability, flash point <140°F); R003, F003	Two Satellite Accumulation Areas as noted with blue asterisks on the attached map	One, 55-gallon drum (440 pounds)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Absorbed Aqueous Liquid (AAL) Radioactive Waste	D001, D003, F019 (ignitability, reactivity); Flashpoint 50 °F.	SW corner of Clark's property near storm sewer manhole.	Off-Spec - 1 tank, 200 gallons	Use PPE to prevent contact with skin and eyes. Immediately prevent spills from entering drains and waterways. Prevent sources of ignition and open flames.	Contact Chemtrec for emergency medical treatment information at 1-800-424-9300. If in eyes, wash eyes for several minutes.

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

Old	New
<p>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:</p>	<p>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.</p>
	<p>(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.</p>
<p>(a) He should first determine if the waste is excluded from regulation under R.61-79.261.4</p>	<p>(b) A person must determine whether the solid waste is excluded from regulation under 40 CFR 261.4.</p>
<p>(b) He must then determine if the waste is listed as a hazardous waste in subpart D of R.61-79.261</p>	<p>(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.</p>

Comparison of Old vs. New §262.11 (cont.)

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

Comparison of Old vs. New §262.11 (cont.)

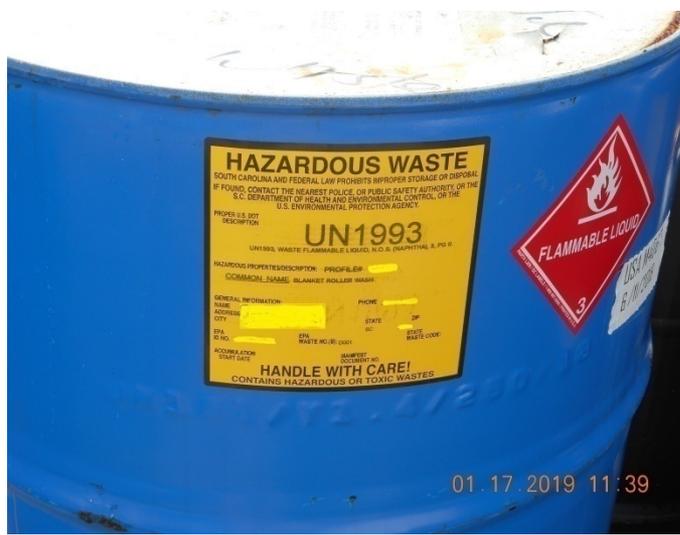
Old	New
<p>(c) For purposes of compliance with R.61-79. 268, or if the waste is not listed in subpart D of R.61-79.261, the generator must then determine whether the waste is identified in subpart C of R.61-79.261 by either: (1) Testing the waste according to the methods set forth in subpart C of R.61-79.261, 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.</p>	<p>(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</p>

Comparison of Old vs. New §262.11 (cont.)

Old	New
(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.	(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.
	(f) Recordkeeping for small and large quantity generators.
	(g) Identifying hazardous waste numbers for small and large quantity generators.

Requirement	Old Generator Requirement	Rule Change
SAA marking/labeling	The words “Hazardous Waste” or other words that identify the contents	The words “Hazardous Waste” <u>and</u> an indication of the hazard(s) of the contents
SQG/LQG 90/180/270-day labeling requirements	Containers: The words “Hazardous Waste” and the accumulation start date. Tanks: The words “Hazardous Waste”	Containers: <ol style="list-style-type: none"> 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.
SQG/LQG preparedness and prevention requirements and emergency procedures	Apply to 90/180/270-day accumulation areas	Apply to satellite accumulation areas and to 90/180/270-day accumulation areas
SQG/LQG arrangements with local authorities and the properties of hazardous waste handled at the facility	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	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
SQG/LQG pre-transport marking requirements	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	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

Container Labeling: The words “Hazardous Waste” and include an indication of the hazard(s) present.



GHS - Hazard Pictograms and Related Hazard Classes		
Explosive Bomb <ul style="list-style-type: none"> • Explosive • Self-reactives • Organic Peroxides 	Corrosion <ul style="list-style-type: none"> • Skin corrosion/burns • Eye damage • Corrosive to metals 	Flame Over Circle <ul style="list-style-type: none"> • Oxidizing gases • Oxidizing liquids • Oxidizing solids
Gas Cylinder <ul style="list-style-type: none"> • Gases under pressure 	Environment <ul style="list-style-type: none"> • Aquatic toxicity 	Skull & Crossbones <ul style="list-style-type: none"> • Acute toxicity (fatal or toxic)
Exclamation Mark <ul style="list-style-type: none"> • Irritant (eye & skin) • Skin sensitizer • Acute toxicity • Narcotic effects • Respiratory tract irritant • Hazardous to ozone layer (non-mandatory) 	Health Hazard <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive toxicity • Respiratory sensitizer • Target organ toxicity • Aspiration toxicity 	Flame <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-heating • Emits flammable gas • Self-reactives • Organic peroxides

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HAZARD LABELS

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



HAZARD LABELS

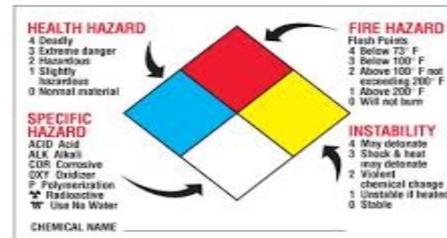
- The HazMat labels or placards used by the USDOT to identify its nine hazard classes of hazardous materials:
 - Explosive (six divisions and 13 compatibility groups)
 - Compressed gas (three divisions)
 - Flammable and combustible liquid
 - Flammable and reactive solids (three divisions)
 - Oxidizers 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).

GHS - Hazard Pictograms and Related Hazard Classes		
 Expanding Bomb <ul style="list-style-type: none"> • Explosives • Self-reactives • Organic Peroxides 	 Corrosion <ul style="list-style-type: none"> • Skin corrosion/irritation • Eye damage • Corrosive to metals 	 Flame Over Circle <ul style="list-style-type: none"> • Oxidizing gases • Oxidizing liquids • Oxidizing solids
 Gas Cylinder <ul style="list-style-type: none"> • Gases under pressure 	 Environment <ul style="list-style-type: none"> • Aquatic toxicity 	 Skull & Crossbones <ul style="list-style-type: none"> • Acute toxicity (fatal or toxic)
 Exclamation Mark <ul style="list-style-type: none"> • Irritant (eye & skin) • Skin sensitizer • Acute toxicity • Narcotic effects • Respiratory tract irritant • Hazardous to ozone layer (non-mandatory) 	 Health Hazard <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive toxicity • Respiratory sensitizer • Target organ toxicity • Aspiration toxicity 	 Flame <ul style="list-style-type: none"> • Flammables • Peroxides • Self-heating • Extremely flammable gas • Self-reactive • Organic peroxides



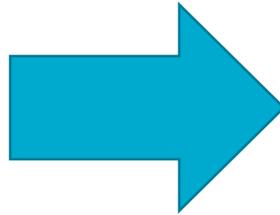
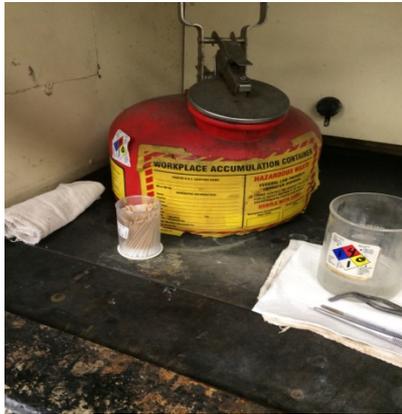
SAA: CONTAINER LABELING AND MARKING

§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.

TANKS

§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.