

Oklahoma Department of Environmental Quality
Small Quantity Generator (SQG)
Hazardous Waste Self-Certification Checklist

Company Name: EPA ID#:

Physical address of the facility:

City: State: Zip:

Company Contact: Telephone #:

Company Contact E-mail:

Business Owner: Owner Telephone:

Primary Products or Services:

Number of Employees: Years at This Location:

Hours of Operation: SIC Code:

Is this your first time self-certifying? YES ☐ NO ☐

This self-certification checklist is designed to help you understand the hazardous waste regulations as they apply to your facility and to help you stay in compliance from this point forward.

INSTRUCTIONS

- Mark YES if you are in compliance.
- Mark NO if you are out of compliance. If you answer NO, write in the comment box at the end of each section how and when you will return to compliance by correcting the violation.

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A.	General Requirements For more information, click here for Guidance Document Section A	Yes	No	N/A
1.	Does the physical address at your facility match the address associated with your EPA identification number?			
2.	Has your facility determined which wastes are hazardous wastes and which wastes are not hazardous wastes?			
3.	List your hazardous waste streams in the space provided below. Review your last year and find the month in which the most hazardous waste was generated. If you had more than five waste streams, list only the five that you generated in the highest volume. Be sure to write in the quantity of waste and specify whether the quantity is in gallons or pounds. Do not list used oil or other waste that you manage as universal waste (such as light bulbs, batteries, etc.)			
Waste Streams				
DESCRIBE EACH WASTE STREAM GENERATED		Amount Generated During Busiest Month		
		Quantity	Gallons	Pounds
3.1				
3.2				
3.3				
3.4				
3.5				
		Yes	No	N/A
4.	Does your facility use a transporter with an EPA identification number that is authorized to transport hazardous waste?			
5.	Does your facility dispose of all hazardous waste through a permitted treatment, storage or disposal (TSD) facility?			
6.	Does your facility remit the annual SQG fee?			
7.	If you answered "NO" to any of the questions in section A, please indicate the item (example A.4.) and explain how and by what date you plan to return to compliance.			

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B.	Hazardous Waste Management For more information, click here for Guidance Document Section B	Yes	No	N/A
1.	Does your facility use a hazardous waste manifest when hazardous waste, which is not covered by a reclamation agreement, is transported off-site?			
2.	Are all hazardous waste manifests completed and signed accurately?			
3.	Do you ensure all final signed manifests and other disposal records are maintained for 3 years?			
4.	Do you ensure each container of hazardous waste is in good condition?			
5.	Do you ensure each storage container of hazardous waste is labeled or marked with the words, "Hazardous Waste"?			
6.	Do you ensure each container of hazardous waste, while in a satellite accumulation area, is labeled with the words "Hazardous Waste" or with other words to identify its contents?			
7.	Do you ensure each container of hazardous waste is closed, except when adding or removing waste?			
8.	Do you ensure each container storing hazardous wastes, except satellite accumulation containers, have an accumulation start date clearly identified?			
9.	Do you ensure incompatible wastes are segregated from each other? For example, are acids and bases stored separately?			
10.	Do you ensure your waste is not stored for more than 180 days, or 270 days if you ship your waste to a TSD more than 200 miles?			
11.	Do you ensure no more than 6,000 kg (13,227 lbs) of hazardous waste is accumulated at any time?			
12.	Do you ensure the container storage area is inspected weekly and checked for: containers in poor condition, leaking containers, compatibility of wastes, hazardous waste labels, accumulation start dates, and ensure that the containers are closed?			
13.	Do you ensure that no hazardous waste is released to the air, land or surface waters?			
14.	If you answered "NO" to any of the questions in section B, please indicate the item (example B.4.) and explain how and by what date you plan to return to compliance.			

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C.	Training & Emergency Response For more information, click here for Guidance Document Section C	Yes	No	N/A
1.	Do you perform & <u>document</u> training to all personnel involved with hazardous waste management, and ensure they are thoroughly familiar with proper hazardous waste handling, emergency response procedures, and other job-specific hazardous waste management responsibilities of their jobs?			
2.	Do you have a designated emergency coordinator?			
3.	Have you posted emergency phone numbers and location of emergency equipment next to the telephone?			
4.	Have you determined and provided the appropriate emergency equipment for your facility?			
5.	Do you ensure there is sufficient aisle space around containers to allow unobstructed movement of personnel and equipment in container storage areas?			
6.	Have you attempted to make emergency response arrangements as appropriate for your facility?			
7.	If you answered “NO” to any of the questions in section C, please indicate the item (example C.4.) and explain how and by what date you plan to return to compliance.			

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D.	Other Waste For more information, click here for Guidance Document Section D	Yes	No	N/A
1.	Do you manage used fluorescent bulbs, batteries, pesticides and/or mercury containing equipment as universal waste? If not, are they properly managed as hazardous wastes?			
2.	If you generate lead-acid batteries, are they properly managed under a one-for-one core exchange program, as universal waste or hazardous waste?			
3.	Do you ensure that containers of used oil are marked with the words "Used Oil"?			
4.	Do you ensure that containers of used oil are in good condition and not leaking?			
5.	Do you ensure used oil spills are cleaned up and properly managed?			
6.	If used oil is transported off-site, do you ensure the transporter has a valid EPA ID number?			
7.	If you answered "NO" to any of the questions in section D, please indicate the item (example D.4.) and explain how and by what date you plan to return to compliance.			

**Oklahoma Department of Environmental Quality
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This is the end of the Small Quantity Generator Self-certification Checklist. Complete the certification below and print/save a copy for your files. If you wish to submit your certification via email, please submit the completed form to selfcertification@deq.ok.gov.

If not, please mail the completed form to:

OK DEQ
Attn: Ryan Kirk
Land Protection Division
P.O. Box 1677
Oklahoma City, OK 73101

For the purposes of this form, the Oklahoma Department of Environmental Quality accepts your typed name, title, and date as an electronic signature equivalent to your valid signature on a paper copy of the form.

I certify that:

- 1. I have personally examined and am familiar with the information contained in this submittal;**
- 2. The information contained in this submittal is, to the best of my knowledge, true, accurate and complete in all respects; and**
- 3. I am fully authorized to make this certification on behalf of this facility.**

I am aware that any gross misrepresentation in this self-certification, found during any follow-up inspection, will be taken into consideration by DEQ.

Facility Representative

Title

Date

Guidance Document for the Small Quantity Generator Self-Certification Checklist



2016

Purpose of this Guidance

This document is intended as general guidance for small quantity generators of hazardous waste and is meant to assist in compliance with the hazardous waste regulations. More specifically, this document gives section-by-section guidance and instruction on how to complete the compliance checklist for small quantity generators of hazardous waste. The guidance is not meant to modify or replace the promulgated regulations, which undergo periodic revisions. In the event of a conflict between this guidance and promulgated regulations, the regulations govern. Some portions of the hazardous waste regulations can be complex, especially in very unique situations that are infrequently seen at small quantity generator facilities. This guidance is designed to simplify these complex regulations for situations most often seen at these facilities. If you have questions about a situation not covered by this guidance, please contact the Land Protection Division at (405)702-5100 and ask for assistance with the Small Quantity Generator Self-Certification Program or by email at selfcertification@deq.ok.gov.

Phone Numbers for the Land Protection Division

Division Main number (405) 702-5100
For an EPA Identification Number (405) 702-5100
or
(405) 702-5176
Pollution Prevention Program..... (405) 702-9128

Other Phone Numbers

National Response Center (800) 424-8802
DEQ 24-Hour Emergency Response & Complaints Hotline..... (800) 522-0206

Web Sites

State of Oklahoma Home Page: <http://www.ok.gov/>
OK Department of Environmental Quality Home Page: <http://www.deq.state.ok.us/index.htm>
Hazardous Waste Web Page: <http://www.deq.state.ok.us/lpdnew/hwindex.html>
OK Self-Certification Web Page: <http://www.deq.state.ok.us/LPDnew/HW/SQGselfcert.html>
OK Self-Certification Email Address: selfcertification@deq.ok.gov

Mailing Address

Oklahoma Department of Environmental Quality
Land Protection Division
Attn: Self-Certification
707 North Robinson
P.O. Box 1677
Oklahoma City, OK 73101-1677

Section A – General Requirements

Questions and Answers

LINE A-1

[40 CFR 262.12(a)]

Does the physical address at your facility match the address associated with your EPA identification number?

The EPA identification number is assigned to your facility and stays with the physical location of the site. **The EPA identification number is address-specific.** The following list contains some, but not all, reasons for filing an updated notification form:

- If your facility changes ownership
- If your facility changes its mailing address
- If your facility moves to a new location
- If your facility changes generator status

The notification form used to make changes to a current notification or obtain a new EPA identification number can be found at the following web address, <http://www.deq.state.ok.us/lpdnew/forms/Haz%20Waste/8700-12.pdf>, or you may call (405) 702-5189 or (405) 702-5176 to request a hard copy. All OK DEQ hazardous waste forms can be found here, <http://www.deq.state.ok.us/lpdnew/forms/indexhazforms.html>.

If your facility moves to a **new physical location**, the facility will receive a new EPA identification number that is unique to the new address.

If you **no longer operate** at your previous location, submit the special “closed facility form” located at this address, <http://www.deq.state.ok.us/lpdnew/forms/Haz%20Waste/notificationformclosed.pdf>. Be sure to identify your old location and reference your old EPA identification number so that you will no longer be billed the annual SQG fee.

LINE A-2

[40 CFR 262.11]

Has your facility determined which wastes are hazardous wastes and which wastes are not hazardous wastes?

A hazardous waste is a solid, a liquid or a contained gaseous material that is no longer used, or that no longer serves the purpose for which it was produced and could pose dangers to human health and the environment after it is discarded.

Your business is likely to produce hazardous waste if you:

- ◆ Use solvents.
- ◆ Use petroleum products.
- ◆ Use dyes, paints, printing inks, thinners, solvents or cleaning fluids.
- ◆ Use pesticides or other related chemicals.
- ◆ Use materials that dissolve metals, paint, wood, paper or clothing.
- ◆ Use flammable materials.
- ◆ Use materials that burn the skin upon contact.
- ◆ Use materials that bubble or fume upon contact with water.
- ◆ Receive products accompanied by a shipping paper or label indicating that the product is hazardous.
- ◆ Use pharmaceuticals.

See Appendix A for information on identifying waste streams and examples of typical waste streams produced by Small Quantity Generators

Universal Waste

Oklahoma has adopted streamlined hazardous waste management regulations that govern the collection and management of certain generated wastes known as "universal wastes." The universal waste regulations reduce the management requirements for these wastes, while still ensuring the management of universal waste is conducted in a manner that is protective of human health and the environment. Even though universal wastes (such as waste batteries and spent fluorescent light bulbs) are still considered a hazardous waste, universal wastes and used oil are not counted towards your monthly hazardous waste generation volume. The hazardous wastes listed in Appendix A must be counted in every calendar month they are generated in order to correctly determine your generator category. Generator categories are as follows:

		Conditionally Exempt Small Quantity Generator (CESQG)	Small Quantity Generator (SQG)	Large Quantity Generator (LQG)
Monthly Generation Rate	Acute	< 1 kg of acutely HW	< 1 kg of acutely HW	> 1 kg of acutely HW
	Non-Acute	< 100 kg of HW	>100 kg but <1,000 kg of HW	>1,000 kg of HW
Maximum Accumulation	Acute	< 1 kg of acutely HW	< 1 kg of acutely HW	> 1 kg of acutely HW
	Non-Acute	< 1000 kg of HW	<6,000 kg of HW	No limit

Estimated conversions:

1 kg ~ 1 qt
 100 kg ~ 27 gal (~ ½ of a 55 gallon drum) or 220 lbs, depending on material
 1,000 kg ~ 270 gal (~ five (5) 55 gallon drums) 2,200 lbs, depending on material
 6,000 kg ~ 1,620 gal (~ thirty (30) 55 gallon drums) or 13,200 lbs, depending on material
 For liquids, specific gravity x 8.3 ~ lbs/gal

After counting your hazardous waste, you may find you are episodically changing from one generator category to another. You should always follow the regulations of the larger generator category to ensure that you are in compliance. See Appendix C of this guidance to see the difference in requirements between each generator category.

LINE A-3

[40 CFR 261.5(c)]

List your hazardous waste streams in the space provided below. Review your last year and find the month in which the most hazardous waste was generated. If you had more than five waste streams, list only the five that you generated in the highest volume. Be sure to write in the quantity of waste and specify whether the quantity is in gallons or pounds. Do not list used oil or other waste that you manage as universal waste (such as fluorescent light bulbs, batteries, etc.)

Identifying your hazardous wastes is the cornerstone to ensuring the wastes are managed properly. This question is intended to increase your awareness of hazardous wastes by requesting that you conduct an inventory of the hazardous wastes you generate in your busiest month. Look not only at the hazardous wastes you ship off-site but also include hazardous waste solvent you recycle if you have a distillation unit. In addition, if you have just become aware of hazardous wastes you may have previously improperly disposed of, make sure to properly manage them as hazardous wastes in the future, regardless of the quantity.

The following table is an example of typical waste streams to demonstrate how you should fill out the table.

Hazardous Waste Streams				
DESCRIBE EACH WASTE STREAM GENERATED		Amount Generated During Busiest Month		
		Quantity	Gallons	Pounds
3.1	Thinner & Spent Solvents	20	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.2	Waste Paint	5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.3	Acid Wash	25	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.4	Sand Blast Media	50	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.5	Parts Washer Solvent	30	<input checked="" type="checkbox"/>	<input type="checkbox"/>

What Waste Streams are Counted?

- ◆ All quantities of listed and characteristic hazardous wastes that are accumulated on the property for any period of time before disposal or recycling.

- ◆ All quantities of listed and characteristic hazardous wastes that are packaged and transported away from your business.
- ◆ Waste destined for recycling is counted as follows:
 - If a solvent wastes is NOT STORED prior to recycling, count only the F-listed or characteristic residue, sludge, pucks or still bottoms from the distillation unit.
 - If a solvent waste IS STORED prior to recycling, count the initial volume of waste that is generated, accumulated and put into the distillation unit the first time every month. The distillation bottoms are not counted in this case because that quantity of waste has already been counted once. However, the distillation bottoms must still be disposed of as a hazardous waste. Spent solvents generated, reclaimed and reused onsite do not need to be counted as long as these solvents have been counted once in a calendar month.

What Waste Streams are NOT Counted?

- ◆ Wastes that are specifically exempted from counting. Examples include lead-acid batteries that will be reclaimed; scrap metal that will be recycled; universal wastes such as mercury-containing lamps; and used oil that is recycled.
- ◆ Wastes that might be left in the bottom of containers that have been thoroughly emptied through conventional means such as pouring or pumping. An example would be residue left in paint cans that have been gravity drained in order to remove the contents.
- ◆ Wastes that are managed in an “elementary neutralization unit,” a “totally enclosed treatment facility,” or a “wastewater treatment unit” without being stored first. Examples are corrosive waste liquids such as caustic floor cleaners that are neutralized before putting down a drain.
- ◆ Wastes that are approved for discharge directly to Publicly Owned Treatment Works (POTWs) without being stored or accumulated first. If they are stored first, then discharged, they must be counted. Caustic cleaners are an example. Discharges to a wastewater treatment plant must comply with the Clean Water Act. Publicly Owned Treatment Works are public utilities, usually owned by the city, special districts or the county that treat industrial and domestic sewage for disposal. Check with your wastewater treatment plant before discharging ANY chemical to the sewer.
- ◆ Liquid wastes that are reclaimed continuously on-site without storing prior to reclamation, such as solvent recycling units in auto body shops. Note: the residues from the distillation process must be counted.
- ◆ Wastes that have already been counted once during the calendar month, and are treated on-site or reclaimed in some manner, and used again. Examples are solvents that are re-distilled onsite and reused in the same calendar month.

LINE A-4
[40 CFR 262.12(C)]

Does your facility use a transporter with an EPA identification number that is authorized to transport hazardous waste?

A transporter of hazardous waste must not transport hazardous waste without having received an EPA identification number. Out-of-state transporters can use an EPA identification number issued by their home state. A transporter with a valid EPA identification number is authorized by DEQ to transport hazardous waste in Oklahoma. The OK DEQ can verify a transporters EPA identification number. The Oklahoma Corporation Commission (OCC) also requires hazardous waste transporters to be registered. While DEQ does not routinely ascertain whether or not a hazardous waste transporter is registered with OCC, and we would not evaluate this during an inspection, you may contact OCC at (405) 521-2915 if you wish to determine if the transporter is registered with them.

LINE A-5
[OAC 252:515-19-31]

Does your facility dispose of all hazardous waste through a permitted treatment, storage or disposal (TSD) facility?

Oklahoma regulations prohibit any hazardous waste from being disposed at a solid waste landfill in the state; therefore you must dispose of your hazardous waste at a treatment, storage and disposal (TSD) facility that has been permitted under the hazardous waste regulations by the State of Oklahoma, other states, or the U.S. EPA. A list of commercial hazardous waste TSD facilities in Oklahoma can be found at

<http://www.deq.state.ok.us/lpdnew/hwpermits/HWPermits.htm>.

LINE A-6
[OAC 252:205-21-2(b)]

Does your facility remit the annual SQG fee?

Oklahoma regulations require SQGs to pay a \$25 fee. This is an annual monitoring and inspection fee that helps fund the program.

Section B – Hazardous Waste Management

Questions and Answers

LINE B-1 and B-2

[40 CFR 262.20] [40 CFR 262 Appendix] [40 CFR 268.7]

Does your facility use a hazardous waste manifest when hazardous waste, which is not covered by a reclamation agreement, is transported off-site?

Are all hazardous waste manifests completed and signed accurately?

The manifest is a multi-copy shipping document designed to track shipments of hazardous wastes from their point of generation to their final destination. In other words, “cradle to grave.” The generator, the transporter, and the designated facility each must sign this document and keep a copy. The manifest must include the EPA Identification number of the generator, all transporters and the treatment, storage and disposal facility.

The treatment, storage, and disposal facility or the transporter usually supplies its customers with blank manifest forms. You may also obtain the uniform hazardous waste form from an EPA-approved printing company. A small quantity generator not shipping under a reclamation agreement must use a properly completed hazardous waste manifest when shipping hazardous waste off-site. Regardless of who fills out the manifest, it is always the **generator’s** responsibility to ensure that the information included is correct and complete.

Your facility EPA Identification number must be at the top of the document. The hazardous waste transporter and designated treatment, storage, and disposal facility must also be listed. The waste must be described accurately in the space provided. The treatment, storage, and disposal facility signs the bottom of the manifest when they receive your waste. They then send you a copy of the manifest with their signature. This is your legal proof that the treatment, storage, and disposal facility received your waste. You should contact your treatment, storage, and disposal facility if they have not sent you the signature of receipt within 45 days of your initial shipment, and contact the ODEQ Land Protection Division if you have not received the signature of receipt within 60 days of shipment.

In some cases, your facility is exempt from the manifesting requirements for waste sent off-site and reclaimed under a contractual reclamation agreement. Under this type of agreement, the generator arranges for an off-site facility to pick up the generator’s waste, reclaim it, and then return the reclaimed material to the generator. Examples include spent solvents or hazardous shop rags sent off-site for recovery. For a generator’s waste to be exempt from the manifesting requirements under a reclamation agreement, the generator must ensure:

- The waste is reclaimed under a contractual agreement.
- The type of waste and frequency of shipments are specified in the agreement.
- The vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste; and
- The generator maintains a copy of the reclamation agreement in his/her files for a period of at least three years after termination or expiration of the agreement

See below for an example of a properly completed hazardous waste manifest.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number OKB987521123	2. Page 1 of 1	3. Emergency Response Phone (405) 555-9999	4. Manifest Tracking Number 000111111PPK
5. Generator's Name and Mailing Address Facility ABC 123 Broadway Downtown, OK 73101		Generator's Site Address (if different than mailing address)			
Generator's Phone: 405-555-5050					
6. Transporter 1 Company Name Transporter A1		U.S. EPA ID Number OKH999555111			
7. Transporter 2 Company Name		U.S. EPA ID Number			
8. Designated Facility Name and Site Address Haz Waste Disposal INC 999 Outskirts Rd Red Dirt, OK 77981		U.S. EPA ID Number OKW745896123			
Facility's Phone: 405-555-1000					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type	11. Total Quantity	12. Unit WE/Vol.
	X	RQ, UN1263, Waste Paint, 3, PG III	5 DM	275	G
13. Waste Codes D001 F003 F005					
14. Special Handling Instructions and Additional Information					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Offeror's Printed/Typed Name Ryan Generator		Signature <i>Ryan Generator</i>		Month Day Year 7 1 14	
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
17. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name Chris Transporter		Signature <i>Chris Transporter</i>		Month Day Year 7 1 14	
Transporter 2 Printed/Typed Name		Signature		Month Day Year	
18. Discrepancy					
18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
Manifest Reference Number: _____					
18b. Alternate Facility (or Generator) U.S. EPA ID Number					
Facility's Phone: _____					
18c. Signature of Alternate Facility (or Generator) Month Day Year					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1. _____		2. _____		3. _____	
4. _____					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a					
Printed/Typed Name Mike Disposal		Signature <i>Mike Disposal</i>		Month Day Year 7 9 14	

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

A land disposal restriction (LDR) form should have been completed for each waste stream identified on the manifest. The LDR documentation is required so that your waste is properly identified for treatment before it is land disposed. The disposal facility must know not only the hazardous waste codes associated with your hazardous waste, but also any underlying hazardous constituents that may be present in your waste in low concentrations. An accurately completed LDR form ensures proper treatment of your hazardous waste before it is disposed. The LDR form must be included with the first shipment sent to the disposal facility and must be included with first shipment to a different facility, if you change disposal facilities. The transporter or designated facility usually provides an LDR form to the generator. However, the regulations do not require the use of a specific form as long as all of the required information is provided to the designated facility. It is the **generator's** responsibility to meet this requirement even though the hazardous waste disposal facility you are working with may fill out the forms for you.

LINE B-3

[40 CFR 262.44(a) → 262.40(a), (c) and (d)] [40 CFR 262.44(a) → 262.40(2)(b)]

Do you ensure all final signed manifests and other disposal records are maintained for 3 years?

The treatment, storage, and disposal facility signs the bottom of the manifest when they receive your waste. They then send you a copy of the manifest with their signature. This is your legal proof that the treatment, storage, and disposal facility received your waste.

Properly signed manifests must be kept on file by the generator for at least three years. You must be able to provide your manifest records upon request by a hazardous waste inspector. If you choose to have your manifest records at an office that is not located at your facility, it is recommended that you keep copies of your shipping records at your facility location also.

The hazardous waste manifest is a tracking mechanism for you to track your waste shipments from the time it leaves your facility until it is properly disposed of at a permitted treatment, storage, and disposal facility. It is your responsibility to follow up on your hazardous waste shipments and ensure they are properly disposed of. A copy of the hazardous waste manifest with the signature of the owner or operator of the disposal facility must be received by the generating facility within 60 days of shipping. It is recommended you call your disposal facility and inquire about your waste shipment a couple of weeks before the 60 day deadline. If no such copy is received within 60 days, you must submit a legible copy of the manifest to the ODEQ Land Protection Division with some indication that you have not received confirmation of delivery from the treatment, storage and disposal facility.

LINE B-4

[40 CFR 262.34(d)(2) → 265.171]

Do you ensure each container of hazardous waste is in good condition?

Containers used to store hazardous waste must be in good condition and cannot be stored in a manner to cause a rupture or leak. Hazardous waste containers can become damaged due to weathering when they are stored outside. Also, hazardous waste containers are occasionally placed in pathways where cars are moved, for example in parking lots and against fences. If hazardous waste containers are damaged by automobiles or other equipment, they can leak and

hazardous waste can be released to the environment. The hazardous waste stored in a container must be compatible with the type of container and not cause the container to rupture, leak, or corrode.

Examples of Containers in Poor Condition



These containers are stacked 3 and 4 high with no labeling or accumulation dates. There is a high potential for these containers to fall and cause a rupture or leak.

This container has been exposed to the outdoor elements for so long it has become discolored. The deterioration of the material has caused a rupture and leak of hazardous waste.



These waste paint containers are stored with no labeling or accumulation dates. Due to the exposure to the outdoor elements, there is a high potential for leaks to occur.

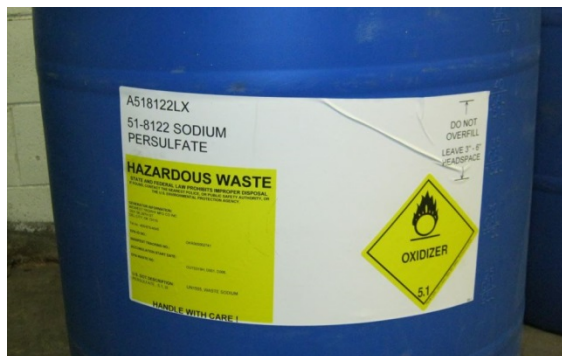
Do you ensure each storage container of hazardous waste is labeled or marked with the words, “Hazardous Waste”?

Do you ensure each container of hazardous waste, while in a satellite accumulation area, is labeled with the words “Hazardous Waste” or with other words to identify its contents?

You must have hazardous waste storage containers (full containers in the storage area awaiting disposal) labeled with the words “Hazardous Waste.” The words “Hazardous Waste” can be marked on a container anyway the generator chooses, as long as the words are clearly legible.

Generators are allowed to accumulate small quantities of waste in what are known as satellite accumulation areas (SAA). The SAA is accumulation of waste at or near the point of generation and must be under control of the operator of the generating process. The SAA is limited to 55 gallons for non-acute waste and one (1) quart for acutely hazardous waste. While containers are in SAA, they must be marked with the words “Hazardous Waste” or some other words that identify the contents. Generators typically identify a SAA for individual processes. An example would be a paint booth operator with a 55 gallon drum inside the paint booth for accumulating paint waste. The drum could be labeled as “Paint Waste” while in the SAA. Once the drum becomes full, (55 gallons) it must be dated and the generator has 3 days to move it to the 180 day storage area. Once in the storage area, the container must be labeled with the words “Hazardous Waste”. There is more discussion on storage areas further in this guidance document.

Examples of properly labeled storage containers waiting for off-site disposal:



Examples of properly labeled satellite accumulation area containers:



Do you ensure each container of hazardous waste is closed, except when adding or removing waste?

One of the primary causes of noncompliance is containers not being closed. Containers of hazardous waste must be kept closed except when waste is being added or removed. Generally, the DEQ interprets closed as “spill proof and vapor tight”. Flip top funnel lids can be purchased for containers holding liquid paint wastes and for other wastes such as disposable rags or still bottoms. Flip top funnel lids with the top closed are considered to be closed containers as long as the contents of the container will not spill out if the drum or container is tipped over. In the case of waste liquids stored in containers with flip top funnel lids, the lid should have a latching mechanism.



This container has the funnel left out of the bung. This would be a violation for the container not being closed. It is also not labeled with “Hazardous Waste” or the contents of the container.

This container has a funnel top that is screwed into the bung and latched. This is a good example of a closed container. Note that it is also correctly labeled with its contents while being used as a satellite accumulation container.



Line B-8

[40 CFR 262.34(d)(4) → 262.34(a)(2)]

Do you ensure each container storing hazardous wastes, except satellite accumulation containers, have an accumulation start date clearly identified?

The accumulation start date is essentially the “storage” start date. This date must be placed on the container when waste is first placed into the container for storage purposes. This date must be clearly written and visible for inspection. Satellite accumulation containers do not need to be dated until they are full.



Line B-9

[40 CFR 262.34(d)(2) → 265.177(c)]

Do you ensure incompatible wastes are segregated from each other? For example, are acids and bases stored separately?

Wastes that could react if they come into contact with each other (for example could cause a fire, explosion, toxic gases or are otherwise incompatible) must not be placed in the same container or an unwashed container that previously held an incompatible material. If you were storing a strong oxidizing agent like bleach (sodium hypochlorite) right next to a hydrocarbon (petroleum distillates), it would result in a violation and it is potentially dangerous if the containers were to leak. A storage container holding hazardous waste that is incompatible with other wastes nearby must be separated from the other materials by a dike, berm, wall, etc.



This is a good example of how to segregate incompatible waste, acids and bases. The concrete berm would prevent any leaks from one side going to the other.

Line B-10

[40 CFR 262.34(d) or (e)]

Do you ensure your waste is not stored for more than 180 days, or 270 days if you ship your waste to a TSD more than 200 miles?

A small quantity generator is only allowed to store hazardous waste on site at the facility for 180 days (or 270 days if the treatment, storage and disposal facility is more than 200 miles away). All hazardous waste generated on site must be shipped offsite to a permitted treatment, storage, and disposal facility within this time frame.

A one-time 30-day extension to the 180/270-day accumulation time limit may be requested from the DEQ for temporary and unforeseen circumstances.

Line B-11

[40 CFR 262.34(d)(1)]

Do you ensure no more than 6,000 kg (13,227 lbs) of hazardous waste is accumulated at any time?

A small quantity generator may store no more than 6,000 kilograms or 13,227 pounds of hazardous waste on site at any one time without a storage permit issued by the DEQ. If you are storing more than these amounts, you must have a permit from the DEQ. Remember that 6,000kg is approximately thirty (30) 55-gallon drums.

Line B-12

[40 CFR 262.34(d)(2) → 265.174]

Do you ensure the container storage area is inspected weekly and checked for: containers in poor condition, leaking containers, compatibility of wastes, hazardous waste labels, accumulation start dates, and ensure that the containers are closed?

You must check for leaking and deteriorating containers of hazardous waste at least weekly. The DEQ recommends you keep a log for inspecting the containers for leaks and deterioration. This log should also be used to ensure your containers of hazardous waste are in full compliance with all the container requirements. See Appendix B for one example of a weekly inspection log.

Line B-13

[OAC 252:205-5-4]

Do you ensure that no hazardous waste is released to the air, land or surface waters?

You must not dispose of any hazardous waste on the ground, into the air, in storm drains, into any surface waters or the normal trash. Examples of hazardous wastes commonly, but illegally, thrown into the trash include certain solvent-contaminated rags, perchloroethylene (perc) dry cleaning lint, blasting media and fluorescent light bulbs that are high in mercury. You may be liable for cleanup cost from contamination resulting from improper disposal of hazardous waste.

Section C – Training & Emergency Response Questions and Answers

LINE C-1

[40 CFR 262.34(d)(5)(iii)]

Do you perform & document training to all personnel involved with hazardous waste management, and ensure they are thoroughly familiar with proper hazardous waste handling, emergency response procedures, and other job-specific hazardous waste management responsibilities of their jobs?

Small quantity generators are required to perform training for all employees who are involved with hazardous waste, including the management of hazardous waste, handling procedures and signing hazardous waste manifests. Every employee should also be trained on who the emergency coordinator is and what to do during emergency procedures.

You should maintain documentation of hazardous waste training. It is recommended that you keep a roster of employees' names, dates and subject matter of hazardous waste training, including signatures that document the completion of hazardous waste training.

Small quantity generator training for managers and employees must include specific hazardous waste subject matter such as hazardous waste labeling, when to mark a container of hazardous waste with an accumulation start date, keeping hazardous waste containers closed, weekly inspections of hazardous waste containers, emergency coordinator information, manifest tracking and record keeping. In addition, whenever hazardous waste is being handled, all personnel involved must have immediate access to an internal alarm or emergency communication device. This could include a radio or cell phone.

OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) training alone is not sufficient for hazardous waste training. A small quantity generator must ensure that all employees are thoroughly familiar with proper hazardous waste handling and emergency response procedures relevant to their job responsibilities.

Below is a good example of training topics and how to document that the training has been completed. Individuals who complete hazardous waste manifests and Land Disposal Restriction (LDR) forms would require more extensive training. The DEQ suggest new employees receive initial hazardous waste training as soon as possible after beginning employment and annual training for all employees. Contact DEQ for information concerning the training seminar that will meet the annual training requirement.

Hazardous Waste Training

Personnel signing below have been trained on the following hazardous waste requirements. The training included:

- Hazardous waste identification
- “Cradle-to-Grave” transport
- Hazardous waste manifests
- Land disposal restriction forms
- Container labeling with the words “Hazardous Waste”
- “Used Oil” labels
- Satellite accumulation containers
- Hazardous waste spill clean-ups
- Accumulation start dates
- Hazardous waste compatibility
- Aisle space
- Emergency coordinator contact information
- Emergency coordinator phone postings
- Arrangements with local fire department

Printed Name:

Signature:

Date:

Do you have a designated emergency coordinator?

You must have a designated emergency coordinator. This individual should be onsite or on call with the responsibility for coordinating emergency response measures 24-hours a day. He or she must be familiar with the hazardous waste regulations, the facility operations, and the location of emergency response equipment and the hazardous waste containers located at the facility. All employees must know who the emergency coordinator is and how to contact them in an emergency situation.

The Emergency Coordinator's responsibilities include the following:

- In the event of a fire, call the fire department or attempt to extinguish the fire.
- In the event of a spill, contain the hazardous waste to the extent possible and as soon as possible clean up the waste and any contaminated surfaces, materials or soils; and
- In the event of fire, explosion, or any other incident, which could threaten human health outside the facility or where a spill has reached surface water (including storm sewers), the emergency coordinator must immediately contact the National Response Center (call 1-800-424-8802) and the DEQ 24-hour Emergency Response Hotline (call 1-800-522-0206).

Have you posted emergency phone numbers and location of emergency equipment next to the telephone?

In addition to identifying an emergency coordinator for your business, you must post the following information by the telephone(s):

- The name and telephone number of the emergency coordinator.
- Location of fire extinguishers and spill control material, and, if present, fire alarms.
- Telephone number of the fire department, unless the facility has a direct alarm.

Emergency contact information should be placed in common areas and any area where an employee would go to use the phone in case of an emergency. Ensure your information is accurate and up to date. The form on the following page can be used to meet the requirements of the emergency information posting.

Emergency Contacts Telephone Posting

Post this sheet near the telephone(s) in areas where hazardous waste is handled or stored.

Emergency Coordinator(s)	Work Phone	Cell Phone
(Primary)		
(Secondary)		

Fire Department Phone _____

Police Department Phone _____

Hospital Phone _____

Oklahoma 24-hour Emergency Response Line Phone 1-800-522-0206

National Response Center (24-hour) Phone 1-800-424-8802

Location of Emergency Response Equipment

Fire Extinguishers _____

Fire Alarm (if present) _____

Spill Control Materials _____

Special Equipment (if present) _____

Have you determined and provided the appropriate emergency equipment for your facility?

Unless none of the hazards posed by the facility could require a particular type of equipment, emergency response equipment typically includes:

- Internal communication or alarm system capable of providing emergency instructions to facility personnel.
- A telephone, a hand-held two-way radio, a cell phone or other device capable of summoning emergency assistance.
- Fire-control equipment, spill-control equipment and decontamination equipment; and
- Water at adequate volume and pressure to supply a water hose or foam-producing equipment or automatic sprinklers or water spray systems.

All facility communications or alarm systems, fire protection equipment, spill-control equipment and decontamination equipment must be tested and maintained as necessary to assure its proper operation in time of emergency.

Do you ensure there is sufficient aisle space around containers to allow unobstructed movement of personnel and equipment?

Aisle space between containers must be maintained to allow unobstructed movement of emergency response personnel or equipment. Sometimes there is not much storage space at small facilities. DEQ hazardous waste inspectors will generally consider about two feet of aisle space as being adequate. Below is a photo of inadequate aisle space and would result in a violation. The facility has no way to inspect the far containers for leaks and would be unable to implement spill response actions due to the lack of aisle space.



Have you attempted to make emergency response arrangements as appropriate for your facility?

You must attempt to make arrangements with local authorities such as the fire department, emergency response contractors, police, and local hospitals to familiarize the local authorities with the layout, waste located at you facility, and the types of injuries or illnesses that could result from fires, explosions, or releases at your facility. The information given to the authorities should include: the layout of the facility; hazards associated with the waste at your facility; where personnel would be working, entrances to the facility and possible evacuation routes. These communications should be documented and maintained at your facility. They could be in the form of phone logs, certified mail receipts or email logs.

See Appendix D for an example of an Emergency Response and Spill Prevention Plan.

Section D – Other Waste

Questions and Answers

LINE D-1 and D-2

[40 CFR 273] [40 CFR 266.80]

Do you manage used fluorescent bulbs, batteries, pesticides and/or mercury containing equipment as universal waste? If not, are they properly managed as hazardous wastes?

If you generate lead-acid batteries, are they properly managed under a one-for-one core exchange program, as universal waste or hazardous waste?

Most spent mercury-containing lamps have mercury present in a concentration that is equal to or greater than 0.2 mg/L, and therefore must be managed as hazardous wastes or universal wastes. Regardless of the concentration, if your spent lamps contain any mercury, you should recycle them instead of throwing them in the trash.



You have the option to manage your mercury-containing lamps as a universal waste instead of as a traditional hazardous waste. Under the universal waste regulations, there are reduced management standards so you are not subject to the full hazardous waste requirements. Part of the reduced management benefit is that universal wastes do not count towards your monthly generation volume of hazardous waste and therefore do not affect your generator category. The reduced management standards are designed to encourage recycling and still protect the environment by ensuring proper recovery of mercury in the lamps.

If you choose to manage your mercury-containing lamps as a universal waste, you must make sure to label containers of used lamps as “Universal Waste Lamps,” “Used Lamps” or “Waste Lamps,” and hold them on site for no more than one year. Make sure to store your unused lamps and your spent lamps in a way to prevent breakage and potential release of mercury to the environment. After collection, you can send the universal waste to another universal waste handler, a destination facility, or a foreign destination. You can talk to your waste vendor about the different options.

This “Universal Waste” option is also available for batteries, pesticides or other mercury containing equipment. The standards described above, such as labeling, collection and storage, also apply to these other “Universal Waste.”

Lead-acid batteries have another management option as well, most commonly known as a core exchange program. This core exchange program is the best management option for spent lead-acid batteries as the cores are desired for the monetary value of the components. Core exchanged lead-acid batteries do not count toward your generator status nor do they need to be labeled. These batteries should be stored in a manner protective of human health and the environment.

LINE D-3

[40 CFR 279.22(c)(1)]

Do you ensure that containers of used oil are marked with the words “Used Oil”?

Used oil generators must store used oil in tanks or containers that are in good condition, not leaking, and labeled with the words “Used Oil.” Fill pipes used to transfer used oil into underground storage tanks must also be labeled with the words “Used Oil.” Do not label the containers, tanks or fill pipes as “Waste Oil.”



Used oil tank incorrectly labeled as “Waste Oil.”

Used oil tank correctly labeled as “Used Oil.”



LINE D-4 and D-5

[40 CFR 279.22(b)(1) and (2)] [40 CFR 279.22(d)]

Do you ensure that containers of used oil are in good condition and not leaking?

Do you ensure used oil spills are cleaned up and properly managed?

Used oil containers must be in good condition and stored in a manner to prevent leaks. Keeping used oil containers closed is not a state or federal regulation; however it is considered a best management practice. And, depending on your storm water requirements, uncovered containers of used oil could become a storm water issue.

Upon detecting a release of used oil to the environment, the generator must stop the release, contain it, and clean up the release of used oil. You must also take measures to prevent future releases of used oil from occurring. Possible measures to prevent a release of used oil to the environment would be to use secondary containment, keep your containers closed, and not storing used oil near floor drains.



This is an example of used oil containers that were in poor condition and began to leak. The facility has also failed to properly clean up the release of used oil.

LINE D-6

[40 CFR 279.24]

If used oil is transported off-site, do you ensure the transporter has a valid EPA ID number?

Generators should only allow pick up of used oil by transporters who have notified with the DEQ as a Used Oil Transporter and have received an EPA ID number. Generators can verify a transporters EPA ID numbers by calling the DEQ Land Protection Division at (405) 702-5100.

Appendix A

Identifying Waste Streams and Typical Hazardous Waste Streams Produced by Small Quantity Generators

Two Types of Hazardous Waste

1. **Characteristic wastes**: Your waste may be characteristic if it has a certain property that would make it hazardous. These wastes are assigned EPA waste codes beginning with the letter D:

- **D001 - Ignitable**

- It is a liquid with a flash point less than 140°F,
- It is not a liquid but is capable of causing a fire that burns so vigorously that it creates a hazard,
- Is an oxidizer,
- It is an ignitable compressed gas.

- **D002 - Corrosive**

- It is a liquid and has a pH less than or equal to 2 or greater than or equal to 12.5,
- It is a liquid that dissolves steel at a rate greater than .25 inch per year.

- **D003 - Reactive**

- It is unstable,
- It is explosive,
- It undergoes rapid or violent chemical reaction,
- It produces toxic gases when mixed with water or other materials,
- It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors or fumes.

- **D004 through D043 - Toxic**

- It is a metal, pesticide or organic chemical at high enough concentrations that it is toxic based on the Toxicity Characteristic Leaching Procedure (TCLP) test method 1311.
- Common metals that are hazardous at certain levels are lead, arsenic, barium, chromium, cadmium, silver, and mercury. Common organics that are characteristic include benzene, methyl ethyl ketone (MEK) and perchloroethylene.

The table below found at 40 CFR section 261.24, indicates the hazardous waste code, the contaminant, the Chemical Abstract Number (CAS No.) and the regulatory limit as determined by the Toxicity Characteristic Leaching Procedure (TCLP).

Table 1—Maximum Concentration of Contaminants for the Toxicity Characteristic

EPA HW No. ¹	Contaminant	CAS No. ²	Regulatory Level (mg/L)
D004	Arsenic	7440-38-2	5.0
D005	Barium	7440-39-3	100.0
D018	Benzene	71-43-2	0.5
D006	Cadmium	7440-43-9	1.0
D019	Carbon tetrachloride	56-23-5	0.5
D020	Chlordane	57-74-9	0.03
D021	Chlorobenzene	108-90-7	100.0
D022	Chloroform	67-66-3	6.0
D007	Chromium	7440-47-3	5.0
D023	o-Cresol	95-48-7	4200.0
D024	m-Cresol	108-39-4	4200.0
D025	p-Cresol	106-44-5	4200.0
D026	Cresol		4200.0
D016	2,4-D	94-75-7	10.0
D027	1,4-Dichlorobenzene	106-46-7	7.5
D028	1,2-Dichloroethane	107-06-2	0.5
D029	1,1-Dichloroethylene	75-35-4	0.7
D030	2,4-Dinitrotoluene	121-14-2	30.13
D012	Endrin	72-20-8	0.02
D031	Heptachlor (and its epoxide)	76-44-8	0.008
D032	Hexachlorobenzene	118-74-1	30.13
D033	Hexachlorobutadiene	87-68-3	0.5
D034	Hexachloroethane	67-72-1	3.0
D008	Lead	7439-92-1	5.0
D013	Lindane	58-89-9	0.4
D009	Mercury	7439-97-6	0.2
D014	Methoxychlor	72-43-5	10.0
D035	Methyl ethyl ketone	78-93-3	200.0
D036	Nitrobenzene	98-95-3	2.0
D037	Pentachlorophenol	87-86-5	100.0
D038	Pyridine	110-86-1	35.0
D010	Selenium	7782-49-2	1.0
D011	Silver	7440-22-4	5.0
D039	Tetrachloroethylene	127-18-4	0.7
D015	Toxaphene	8001-35-2	0.5
D040	Trichloroethylene	79-01-6	0.5
D041	2,4,5-Trichlorophenol	95-95-4	400.0
D042	2,4,6-Trichlorophenol	88-06-2	2.0
D017	2,4,5-TP (Silvex)	93-72-1	1.0
D043	Vinyl chloride	75-01-4	0.2

¹Hazardous waste number.²Chemical abstracts service number.³Quantitation limit is greater than the calculated regulatory level. The quantitation limit therefore becomes the regulatory level.⁴If o-, m-, and p-Cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used. The regulatory level of total cresol is 200 mg/l

2. **Listed wastes:** Your waste is considered hazardous if it appears on one of four lists in the Federal Hazardous Waste Regulations. Listed wastes are assigned EPA waste codes beginning with letters F, K, P or U as follows:

- **F listed hazardous wastes** are wastes from *non-specific* sources such as spent solvents or wastewater treatment sludges from electroplating.
 - Common materials that will result in F-listed wastes are those that contain methylene chloride, methyl ethyl ketone, xylene, acetone, or toluene.
- **K listed hazardous wastes** are wastes from a *specific* source. For example, spent pickle liquor generated by steel finishing operations at facilities within the iron and steel industry (SIC codes 331 and 332) is listed as K062.
- **P and U listed wastes** are off-specification or discarded commercial chemical products or any residue remaining in a container that held commercial chemical products in the P or U listing, unless the container is empty as defined in 40 CFR section 261.7(b). Also, any residue or contaminated media resulting from the cleanup of a spill of a commercial chemical product in the P or U listing.
 - Common U-listed commercial chemical products include: Acetone (U002), Formaldehyde (U122), Naphthalene (U165) and Toluene (U220).
 - Common P-listed commercial chemical products include: Warfarin (P001), Copper cyanide (P029) and Epinephrine (P042).

How Do You Determine if You are Generating a Hazardous Waste?

- Review 40 CFR Part 261 of the Federal Hazardous Waste Regulations. Part 261 describes the listing and the identification of hazardous wastes.
- Apply knowledge of your process and use Safety Data Sheets (SDS), formerly Material Safety Data Sheets (MSDS), for information regarding the products you use at your facility.

Be aware that the Safety Data Sheets may not provide all the information that you need to make a hazardous waste determination. In most instances OSHA only requires that the SDS list ingredients that are health hazards if they are 1% or more of the material's composition (1% = 10,000 parts per million). Therefore, some ingredients in a product that may be a hazardous waste when disposed may not be listed on the Safety Data Sheet if they are included in the product at amounts less than 1%. Since it is your responsibility to ensure all your hazardous wastes are managed and disposed of properly, it is wise to send samples to an environmental analytical lab that is familiar with the methods of analysis for hazardous waste, so you can make an accurate hazardous waste determination.

- Call the Land Protection Division for customer assistance at (405) 702-5100.
- Visit <http://www.deq.state.ok.us/LPDnew/HW/SQGselfcert.html> for user-friendly reference documents.

Typical Hazardous Waste Streams Produced by Small Quantity Generators

Building Cleaning and Maintenance

Acids/Bases, Solvents

Chemical Manufacturers

Acids/Bases, Cyanide Wastes, Heavy Metals/Inorganics, Ignitable Wastes, Reactives, Solvents

Cleaning Agents and Cosmetics

Acids/Bases, Heavy Metals/Inorganics, Ignitable Wastes, Pesticides, Solvents

Construction

Acids/Bases, Ignitable Wastes, Solvents

Dry Cleaner Operations

Dry Cleaning Filters, Muck, Solvents, Lint, Separator Water

Educational and Vocational Shops

Acids/Bases, Ignitable Wastes, Pesticides, Reactives, Batteries, Solvents

Equipment Repair

Acids/Bases, Ignitable Wastes, Lead Acid Batteries, Solvents

Formulators

Acids/Bases, Cyanide Wastes, Heavy Metals/Inorganics, Ignitable Wastes, Pesticides, Reactives, Solvents

Funeral Services

Solvents (formaldehyde)

Furniture/Wood Manufacturing and Refinishing

Ignitable Wastes, Solvents

Health Care Providers and Veterinarians

Expired & Unused P or U-listed pharmaceuticals, P-listed empty containers, pharmaceuticals containing mercury or silver, Ignitable, Corrosive, Toxic and/or Reactive Hazardous Waste

Laboratories

Acids/Bases, Heavy Metals/Inorganics, Ignitable Wastes, Reactives, Solvents

Metal Manufacturing

Acids/Bases, Cyanide Wastes, Heavy Metals/Inorganics, Ignitable Wastes, Reactives, Solvents, Spent Plating Wastes

Motor Freight Terminals and Railroad

Acids/Bases, Transportation, Heavy Metals/Inorganics, Ignitable Wastes, Lead Acid Batteries, Solvents

Other Manufacturing (Textiles, Plastics, Leather)

Heavy Metals/Inorganics, Solvents

Pesticide End Users and Application

Heavy Metals/Inorganics, Pesticides, Solvents

Publishing and Printing Industries

Acids/Bases, Heavy Metals/Inorganics, Spent Ignitable Blanket Washes, Ink Sludges, Spent Plating Wastes, Solvents

Vehicle Maintenance

Acids/Bases, Heavy Metals/Inorganics, Ignitable Wastes, Lead Acid Batteries, Solvents

Wood Preserving

Preserving Agents

Typical Hazardous Waste Streams and their associated EPA Hazardous Waste Codes

Acids/Bases:

Acids, bases or mixtures having a pH less than or equal to 2 or greater than or equal to 12.5, or liquids that corrode steel at a rate greater than 0.25 inches per year, are considered to be corrosive (for a complete description of corrosive wastes, see 40 CFR section 261.22, Characteristic of Corrosivity). All corrosive materials and solutions have EPA Hazardous Waste Code D002. The following are some examples of the more commonly used corrosives:

Typical Corrosive Waste Streams (D002 Waste Code)

- | | | |
|----------------------|---------------------|-----------------------|
| ▪ Acetic Acid | ▪ Hydrochloric Acid | ▪ Perchloric Acid |
| ▪ Ammonium Hydroxide | ▪ Hydrofluoric Acid | ▪ Phosphoric Acid |
| ▪ Chromic Acid | ▪ Nitric Acid | ▪ Potassium Hydroxide |
| ▪ Hydrobromic Acid | ▪ Sulfuric Acid | ▪ Sodium Hydroxide |

Dry Cleaning Filtration Residues:

Perchloroethylene (perc) distillation residues and spent cartridge filters containing perc are hazardous waste and have EPA Hazardous Waste Code F002 and D039. Distillation residues containing petroleum solvents with a flash point less than 140°F are also considered hazardous and have an EPA Hazardous Waste Code D001.

Heavy Metals/Inorganics:

Heavy metals and other inorganic waste materials exhibit the characteristic of toxicity and are considered hazardous waste if the sample of the waste fails the Toxicity Characteristic Leaching Procedure (TCLP) method 1311. See 40 CFR section 261.24 for the complete description of the Toxicity Characteristic. The complete list of contaminants that have a Toxicity Characteristic (Hazardous Waste code D004-D043) is found in Table 1 at 40 CFR section 261.24. Wastes that carry a D code may include dusts, solutions, wastewater treatment sludges, paint wastes, waste inks, and other such materials that contain heavy metals/inorganics. The following are some examples of the TCLP toxic hazardous wastes metals:

Heavy Metals/Inorganics Waste Streams

- | | | |
|------------------|-------------------|-------------------|
| ▪ Arsenic (D004) | ▪ Chromium (D007) | ▪ Selenium (D010) |
| ▪ Barium (D005) | ▪ Lead (D008) | ▪ Silver (D011) |
| ▪ Cadmium (D006) | ▪ Mercury (D009) | |

Ignitable Wastes:

Ignitable wastes include any flammable liquids that have a flashpoint less than 140°F and ignitable compressed gases (for a complete description of ignitable wastes, see 40 CFR section 261.21, Characteristic of Ignitability). Examples are spent solvents (see also the solvent section), solvent still bottoms, ignitable paint wastes (paint removers, brush cleaners and stripping agents), adhesives (epoxies, rubber cements and marine glues) and waste inks containing flammable solvents. All ignitable wastes have EPA Hazardous Waste Code D001. Some ignitable wastes are also F-listed hazardous wastes. Some commonly used ignitable compounds are:

Ignitable Waste Streams (all D001)

- | | | |
|-------------------|-----------------------|--------------------------|
| ▪ Acetone | ▪ Ethyl Acetate | ▪ Methyl Isobutyl Ketone |
| ▪ Benzene | ▪ Ethylbenzene | ▪ Petroleum Distillates |
| ▪ n-Butyl Alcohol | ▪ Ethyl Ether | ▪ Toluene |
| ▪ Chlorobenzene | ▪ Ethylene Dichloride | ▪ Xylene |
| ▪ Cyclohexanone | ▪ Methanol | |

Lead Acid Batteries:

Used lead acid batteries should only be reported on the notification form if they are *not* recycled and are instead sent for disposal. Used lead acid batteries that are recycled do not need to be counted in determining the quantity of hazardous waste that you generate per month, nor do they require a hazardous waste manifest when shipped off-site if they are destined for recycling.

Batteries Waste Stream Codes if not sent for recycling

- Lead Acid Batteries (D008, D002)
- Lead Dross (D008)
- Spent Acids (D002)

Organic Wastes:

Organic wastes exhibit the characteristic of toxicity and are considered hazardous waste if the sample of the waste fails the Toxicity Characteristic Leaching Procedure (TCLP) method 1311. See 40 CFR section 261.24 for the complete description of the Toxicity Characteristic. The complete list of contaminants that have a Toxicity Characteristic (Hazardous Waste code D004-D043) are found in Table 1 at 40 CFR section 261.24. The following are some examples of the TCLP toxic hazardous waste organics:

Organic Waste Streams:

- Benzene (D018)
- Gasoline (D001, D018)
- Methyl Ethyl Ketone (D035)
- Perchloroethylene (D039)

Pesticides:

Pesticides, pesticide residues, washing and rinsing solutions and dips that contain constituent concentrations at or above Toxicity Characteristic regulatory levels (40 CFR section 261.24) are hazardous waste. For a more complete listing, see 40 CFR section 261.32-33 for specific listed pesticides, discarded commercial chemical products and other wastes, wastewaters, sludges and by-products from pesticide production. (Note that while many of these pesticides are no longer in common use, they are included here for those cases where they may be found in storage.)

Pesticide Waste Stream Waste Codes

- | | | |
|---|--|--|
| ▪ Aldicarb (P070) | ▪ Dimethylcarbamoyl Chloride (U097) | ▪ Monosodium Methanearsonate (D004) |
| ▪ Aldrin (P004) | ▪ Dinitroresol (P047) | ▪ Nicotine (P075) |
| ▪ Amitrole (U011) | ▪ Dinoseb (P020) | ▪ Parathion (P089) |
| ▪ Arsenic Pentoxide (P011) | ▪ Disodium Monomethane arsonate (D004) | ▪ Pentachloronitrobenzene (U185) |
| ▪ Arsenic Trioxide (P012) | ▪ Disulfoton (P039) | ▪ Pentachlorophenol (U242) |
| ▪ Cacodylic Acid (U136) | ▪ Endosulfan (P050) | ▪ Phenylmercuric Acetate (D009) |
| ▪ Carbamic Acid, Methylnitroso-Ethyl Ester (U178) | ▪ Endrin (P051) | ▪ Phorate (P094) |
| ▪ Chlordane (U036) | ▪ Ethylmercuric Chloride (D009) | ▪ Strychnine P108 |
| ▪ Copper Cyanides (P029) | ▪ Famphur (P097) | ▪ 2,4,5-Trichlorophenoxy Acetic Acid (U232) |
| ▪ 1,2-Dibromo-3-Chloropropane (U066) | ▪ Nephachlor (P059) | ▪ 2-(2,4,5-Trichlorophenoxy)-Propionic Acid (U233) |
| ▪ 1,2-Dichloropropane (U083) | ▪ Hexachlorobenzene (U127) | ▪ Thallium Sulfate (P115) |
| ▪ 1,3-Dichloropropene (U084) | ▪ Kepone (U142) | ▪ Thiram (U244) |
| ▪ 2,4-Dichlorophenoxy Acetic Acid (U240) | ▪ Lindane (U129) | ▪ Toxaphene (P123) |
| ▪ DDT (U061) | ▪ 2-Methoxy Mercuric Chloride (D009) | ▪ Warfarin (U248) |
| ▪ Dieldrin (P037) | ▪ Methoxychlor (D014) | |
| ▪ Dimethoate (P044) | ▪ Methyl Parathion (P071) | |

Solvents:

Spent solvents, solvent still bottoms, or mixtures containing solvents are often hazardous. This includes solvents used in degreasing and paint gun cleaning and distillation residues from reclamation. The following are some commonly used hazardous solvents (see also Ignitable Wastes for other hazardous solvents and 40 CFR section 261.31 for other listed hazardous waste solvents):

Solvent Waste Stream Waste Codes

- | | | |
|-----------------------------|---------------------------------|---|
| ▪ Acetone F003 | ▪ Isobutanol F005 | ▪ Petroleum Solvents (Flash Point less than 140°F) D001 |
| ▪ Benzene D001, D018 | ▪ Isopropanol D001 | ▪ Pyridine F005 |
| ▪ Carbon Disulfide F005 | ▪ Kerosene D001 | ▪ 1, 1, 1-Trichloroethane F001, F002 |
| ▪ Carbon Tetrachloride F001 | ▪ Methanol F003 | ▪ Perchloroethylene F001, F002 |
| ▪ Chlorobenzene F002 | ▪ Methyl Isobutyl Ketone F003 | ▪ Toluene D001, F005 |
| ▪ Cyclohexanone F003 | ▪ Methyl Ethyl Ketone F005 | ▪ Trichloroethylene F001, F002 |
| ▪ O-Dichlorobenzene F002 | ▪ Methylene Chloride F001, F002 | ▪ Trichlorotrifluoroethane F002 |
| ▪ Ethyl Acetate F003 | ▪ Mineral Spirits D001 | ▪ Xylene F003 |
| ▪ Ethylbenzene F003 | ▪ Naphtha D001 | |
| ▪ Ethyl Ether F003 | ▪ n-Butyl Alcohol F003 | |
| ▪ Ethylene Dichloride D001 | | |
| ▪ Ethanol D001 | | |
| ▪ Gasoline (D001, D018) | | |

Reactives:

Reactive wastes include reactive materials or mixtures which are unstable, react violently with or form explosive mixtures with water (or when exposed to pH conditions between 2 and 12.5 in the case of cyanide- or sulfide-bearing wastes); or are capable of detonation or explosive reaction when irritated or heated (for a complete description of reactive wastes, see 40 CFR section 261.23, Characteristic of Reactivity). All reactive wastes have EPA Hazardous Waste Code D003. The following materials are commonly considered to be reactive:

Reactive Waste Streams (all D003)

- Acetyl Chloride
- Chromic Acid
- Cyanides
- Organic Peroxides
- Perchlorates
- Permanganates
- Hypochlorites
- Sulfides

Spent Plating and Cyanide Wastes:

Spent plating wastes contain cleaning solutions and plating solutions with caustics, solvents, heavy metals and cyanides. Cyanide wastes may also be generated from heat treatment operations, pigment production and manufacturing of anti-caking agents. Plating wastes are generally Hazardous Waste Codes F006-F009. Heat treatment wastes are generally Hazardous Waste Codes F010-F012. See 40 CFR section 261.31 for a complete description of plating wastes.

Wood Preserving Agents:

Compounds or mixtures used in wood preserving, including the wastewater treatment sludge from wastewater treatment operations, are considered hazardous wastes. Bottom sediment sludges from the treatment of wastewater from wood preserving processes that use creosote or pentachlorophenol are hazardous and have EPA Hazardous Waste Code K001. In addition, wastewaters, process residuals, preservative drippage and spent formulations from certain wood preserving processes are also hazardous wastes and carry EPA Hazardous Waste Code F032, F034 or F035, depending on the contaminants they contain. Specific wood preserving components include:

Wood Preserving Waste Streams

- Chromated Copper Arsenate D004
- Creosote K001
- Pentachlorophenol K001

Appendix B

Example Weekly Inspection Log

Weekly Container Inspection Log Month _____ Year _____

Record any problems noted; document how they were corrected and the date of correction.
Attach extra sheets if necessary.

Date	___	___	___	___	Comments
Labeled "Hazardous Waste"					
Accumulation Start Date Marked					
Satellite Containers Checked-Moved & Marked if necessary					
Start Date <180/270 Days Ago					
Good Condition/Not Leaking					
Kept Closed					
Stored to Prevent Rupture/Leakage					
Waste Compatible With Container					
Incompatible Wastes Separated					
Adequate Aisle Space					
Less than 6,000 kg (~13,227 lbs) Stored at One Time					
Your Initials					

Appendix C

Summary Tables:

Generator Requirements
and
Storage Container Requirements

GENERATOR REQUIREMENT	GENERATOR CATEGORY		
	CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG)	SMALL QUANTITY GENERATOR (SQG)	LARGE QUANTITY GENERATOR (LQG)
Hazardous Waste Determination	Required through process knowledge or analysis (supporting documentation recommended)	Required through process knowledge or analysis (supporting documentation required)	Required through process knowledge or analysis (supporting documentation required)
Monthly Generation Rate	< 1 kg of acutely HW < 100 kg of HW	< 1 kg of acutely HW >100 kg but <1,000 kg of HW	> 1 kg of acutely HW >1,000 kg of HW
Maximum Accumulation	< 1 kg of acutely HW < 1,000 kg of HW	< 1 kg of acutely HW <6,000 kg of HW	No limit
Accumulation Time Period	No Time Limit	180 days (or 270 days if TSD facility is > 200 miles away) (30-day extension available)	90 days (30-day extension available)
EPA ID Number	Not required	Required	Required
Manifests & LDR	Not required (recommended)	Required	Required
Exception Reports	Not required (recommended)	Notify DEQ within 60 days & include a copy of the manifest	Contact handler within 35 days Report to DEQ within 45 days
Biennial Reports	Not required	Not required	Required (March 1 st of even numbered years)
Contingency Plan	Not required (recommended)	Basic Plan Required	Written Plan Required
Container Management	Not required (recommended)	Good Condition, Compatible with Waste, Labeled as Hazardous Waste, Aisle Space, Closed, Weekly Inspections & Accumulation Start Date <u>unless</u> at Satellite Accumulation Area	Good Condition, Compatible with Waste, Labeled as Hazardous Waste, Aisle Space, Closed, Weekly Inspections & Accumulation Start Date <u>unless</u> at Satellite Accumulation Area, Subpart AA,BB, & CC apply
Personnel Training	Not required (recommended)	Basic Training Required	Written Training Plan Required
Record Keeping	Disposal Receipts & Waste Analysis Records (recommended)	Manifests, LDR & Waste Analysis Records Training Records	Manifests, LDR & Waste Analysis Records, Training Records, Biennial Reports & Exception Reports

Requirements for Satellite Accumulation Units vs. 180-Day Container

Requirement	Satellite Accumulation	180-Day Container
Must be in good condition	Yes	Yes
Must be compatible with waste	Yes	Yes
Must be closed except when adding or removing waste	Yes	Yes
Inspection requirement	None	Weekly
Labeling requirement	“Hazardous Waste” or other description	“Hazardous Waste”
Dating requirement	When 55 gallons (or 1 quart for acute waste) is exceeded	When waste first goes into container or full satellite container is moved to storage area
Length of storage	Unlimited	180 days (or 270 days if TSD facility is > 200 miles away) (30-day extension)
Volume in storage	55 gallons or 1 quart for acute waste	13,227 lbs (6,000 kilograms)

Appendix D

Example Emergency Response and Spill Prevention Plan

Facility Name _____

Emergency Response & Spill Prevention Plan

Address _____

Anywhere, OK _____

Facility Phone ()-____-____

Background: (types of work and hazardous waste generated) _____

This spill plan is designed to address the requirements for hazardous wastes and materials that could become hazardous waste and should be updated if the hazardous inventory changes.

Spill Prevention:

The following are general guidelines for any hazardous materials/wastes stored or used at this facility.

General

1. Ensure all hazardous materials/wastes are properly labeled.
2. Store, dispense, use and/or manage hazardous materials/wastes in a way that prevents releases.
3. Provide secondary containment when storing hazardous materials/wastes in bulk quantities (≥ 55 gl).
4. Maintain good housekeeping practices for all hazardous materials/wastes at the facility.
5. Routine checks in the hazardous waste storage area to be performed by _____
6. Inspections of the hazardous wastes storage area should be logged with this plan.

Facility Specific Requirements (In addition to the general good housekeeping suggestions above, include any additional actions to be performed at this facility)

1. _____
2. _____

Spill Containment:

***ONLY PROPERLY TRAINED INDIVIDUALS WILL RESPOND TO SPILLS**

The general spill response procedure at this facility is to stop the source of the spill, contain any spilled material, and properly clean up the spill in a timely manner to prevent accidental injury, environmental degradation, or other damage.

Small spills will be contained by site personnel if they are able to do so without risking injury. Spill kits are located at the following location(s): _____

_____ (see attached site map).

Personnel will ensure that used spill cleanup materials are properly characterized before disposal.

Emergency Procedures:

- Immediately call **911** in the event of injury, fire or potential fire, or spill of a hazardous material/waste that gives rise to an emergency situation.
- All fire protection & spill prevention equipment will be properly maintained and tested to ensure proper operation.
- If evacuation is necessary, all personnel should proceed to the evacuation routes as noted in the attached facility map.
- If a spill has occurred, contact the following persons immediately:

_____ (Primary Emergency Coordinator) () -
_____ (Secondary Emergency Coordinator) () -
_____ (After Hours Emergency Contact) () -

- **In the event of a large spill, a properly trained employee should:**
 - Notify the primary and/or secondary contact from the list above. Continue your spill response. The primary contact at this time should assess additional notification requirements (i.e. notify City of OKC, DEQ, etc.)
 - Retrieve the spill kit from the closest location.
 - Assess the area for any immediate dangers to the health or safety of workers (i.e. a wrecked car on fire). If any dangers are present, move away from the area, **call 911**.
 - Assess the size of the leak and any immediate threat of the spill reaching the floor/storm drains or permeable surfaces in the area. If there is an immediate threat and there are no safety concerns, then attempt to block the spill from coming in contact with the floor/storm drain or permeable surface. If no drain covers are available, then try to use absorbent (kitty litter) and/or sock booms or rags to stop the spill from getting into the drains or to any permeable surfaces.
 - If there is no immediate threat to the floor/storm drains or permeable surfaces, or after controlling the spill, try to plug or stop the leak, if possible. If applicable, put on proper personal protective equipment (gloves, goggles, protective clothing, etc.) and plug the leak.
 - If the spill can be contained with absorbent booms, deploy them around the spill. Use the booms to direct the spill away from any immediate hazards (i.e. a wrecked car).
 - Once the spill has been contained and any immediate threat to storm drains or permeable surfaces has been minimized, contact the spill cleanup contractor (if applicable) and dispatch them to clean up the spill or commence spill cleanup procedures.

Emergency Contractor: Spill cleanup for large spills should be handled by the Spill Cleanup Contractor

Company Name _____ 24Hr Contact # _____

Spill Reporting:

Notify the following agencies if a hazardous material/waste has been released to soil, surface water, storm drains or the spill exceeds 25 gallons.

OK DEQ	(800) 522-0206
City of OKC	(xxx) xxx-xxxx
National Response Center (NRC)	(800) 424-8802

Plan Management:

The primary contact, or their designee, shall administer this plan and will be responsible for updating and including any required documentation.

Training:

All personnel that may respond to a spill, large or small, need to be properly trained on all emergency procedures and equipment. The facility will keep a log of trained personnel and update it as appropriate. Only properly trained personnel shall respond to a spill. If you are not trained and witness a spill, call or notify the primary and secondary contacts listed on page 2 of this plan.

Arrangements with Authorities:

The local fire department shall be familiarized with the facility layout, types of hazardous material/waste onsite, storage areas and evacuation routes as necessary. All communications or inspections with the fire department and any other emergency response entities will be documented and maintained.

Local Fire Department Contact: _____ (XXX) XXX-XXXX

The local hospital shall be notified in an attempt to familiarize them with potential injury or illness that could possibly result from this facility. These communications will be documented and maintained.

Local Hospital Contact: _____ (XXX) XXX-XXXX

Spill Tracking:

Spills should be tracked using a Spill Log. Include known or possible causes, areas affected, and effectiveness of the cleanup. Include a review of the cleanup contractor and their procedures. For small spills, it is sufficient to take measures to prevent a repeat occurrence.

Facility Inspections:

Routine inspections will be conducted daily during regular business hours on standard business days. Daily inspections will include a visual inspection of the hazardous materials/wastes containers and the area immediately adjacent to it for signs of a spill or leak. These inspections do not need to be logged unless a spill or leak is detected. Ideally, this inspection will be conducted by a manager or by regular employees.

Full inspections will be conducted weekly by the primary emergency coordinator or their designee and will include, at a minimum, those items included on the Weekly Inspection Log.

Example Spill Log

Date of Spill	Location of Spill & Possible Causes	Size of Spill (~ gallons)	Prevention Measures Taken?	Spill Kit Materials Reordered?	Was the Spill Kit Adequate? (List any deficiencies, i.e. missing equipment, etc.)

Site Map

(Location of fire extinguishers, spill kits, floor drains, storm drains, hazardous material/waste storage areas and evacuation routes.)