



# Notification, Accumulation, and Manifesting

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## Waste Session 2

- Notification
- Accumulation
- Manifesting

## Notification, Site/U.S. Environmental Protection Agency (U.S. EPA) Identification Number (MAC R 299.9303,<sup>1</sup> MAC R 299.9402, MCL 324.12103,<sup>2</sup> and MCL 324.12112)

- Results in issuance of a Site (aka. EPA) Identification Number
- Submittal of Site Identification Form required for:
  - small quantity generators (SQGs) & large quantity generators (LQGs)
  - conditionally exempt small quantity generators (CESQGs) manifesting liquid industrial waste (LIW)
  - transportation of hazardous waste and/or LIW
  - used oil collection & processing
  - large quantity universal waste handlers
  - generators of ≥100 PPM polychlorinated biphenyl (PCB) wastes
- Subsequent/updated notification filed for changes in site waste activity (e.g. change in generator classification/status)

- Request pre-populated Site Identification Form for subsequent/updated notifications from Manifest Tracking and Data Management Unit at 517-335-2690
- Expedite form processing by faxing notification & paying on-line with credit card
- Liquid industrial waste generators who are not required to manifest wastes are not required to notify
- See Hazardous Waste Site Notification information at [www.michigan.gov/dnre](http://www.michigan.gov/dnre), “Waste,” “Hazardous and Liquid Industrial Waste,” “Hazardous Waste and Liquid Industrial Waste Management”

## Requirements - All Generators or CESQG, SQG, and LQGs (MAC R 299.9302, MAC R 299.9303, MAC R 299.9306, and MAC R 299.9307)

- Characterize wastes and maintain records for 3 years from last off-site shipment or on-site treatment and/or disposal
- Obtain and utilize Site ID Number if LQG, SQG, or CESQG manifesting waste for disposal
- Keep records of all hazardous waste generated, treated and/or disposed on-site
- Keep records of hazardous waste generated monthly to verify generator status/classification
- Container or tank accumulation only

<sup>1</sup> MAC is the “Michigan Administrative Code” reference for the rule, so MAC R 299.9303 is Rule 303 of the Part 111 Rules.

<sup>2</sup> MCL is the “Michigan Compiled Law” reference for the statute, so MCL 324.12103 is Section 12103 of Part 121.

- Containers/tanks must be compatible with the waste, closed, and in good condition
- Protect waste from weather, physical damage fire, and vandals
- Accumulation conducted to prevent escape of wastes/waste constituents to air, water, sewers or the ground

**CESQG Exemption Records (MAC R 299.9205)**

- Waste characterizations
- Monthly waste volumes (show generate < 220 lbs per month)
- Manifests and/or disposal receipts/logs showing proper disposal of CESQG wastes under Parts 31, 121, 115
- See [Department of Natural Resources and Environment \(DNRE\) Publication Center CESQG Guidance](#)

**CESQG Exemption Requirements (MAC R 299.9205)**

- Must get Site/EPA ID number to manifest liquids, solids exempt
- Must generate < 220 lbs/mo
- No accumulation time limit
- Maximum volume < 2200 lbs
- CESQGs ≥ 2200 lbs are SQG
- No user fees

**CESQG Disposal Options (MAC R 299.9205)**

- [Licensed Hazardous Waste Facility](#)
- [Licensed Solid Waste Facility](#) (solids only, no liquids)
- Facility that will [recycle](#) or arrange for recycling
- Off-site or on-site WWTP if in compliance with pre-treatment rules

**Accumulation Requirements, Additional SQG & LQG (MAC R 299.9306 and MAC R 299.9308)**

- Date and Label Containers
- 90/180 day accumulation limit (LQG/SQG)
- Subpart AA, BB, [CC](#) (LQG)
- Provide [secondary containment](#) (LQG/SQG > 2200 lbs)
- Provide proper [training](#)
- Prepare [emergency response plans](#)
- Conduct frequent [inspections](#)
- Use [licensed hazardous waste disposal sites](#)
- Follow preparedness and prevention rules
- File a [Biennial Report](#) every 2 years (LQG)
- Label containers with accumulation date, hazardous waste codes and words “Hazardous Waste.”
- Accumulation area must have adequate space or aisle width to properly inspect containers and for access by emergency personnel
- All labels must be visible for inspections
- See DNRE Publication Center [SQG Guidance](#) and Hazardous Waste Program Inspection Form [EQP 5163](#)



**Satellite Accumulation Containers (MAC R 299.9306)**

- Label when filled or total volume exceeds 55 gallons (1 quart for acute wastes) with accumulation date



- Container must be at, or near, point of generation and under operator control
- Label at start of filling with “HAZARDOUS WASTE” AND waste code number OR chemical name
- Move container to accumulation area within 3 days of accumulation date
- Fill date = accumulation date
- See [Op Memo 111-2](#) for more information

### Secondary Containment (MAC R 299.9306)

- **Containers:** Containment must have capacity to contain 100% of the largest container OR 10% of the total volume stored, whichever is greater (free liquids)
- **Tanks:** Containment must have capacity to contain 100% of the largest tank PLUS an amount greater than or equal to a 25 year 24 hour rainfall event (if located outside)
- **Container Containment Construction:**
  - LIQUIDS - Base free of cracks, impervious coating, sealed joints, with base sloped or elevated containers and adequate squirt protection;
  - SOLIDS - Sloped area and elevated containers
- Prevent run-on
- Required of all LQGs
- Required of SQGs & CESQG storing > 2200 lbs
- Remove spills/leaks/rain in timely manner
- See DNRE Publication Center [Guide to Secondary Containment](#)



### Tank Requirements (MAC R 299.9306)

- Structural integrity testing required
- Applies to both aboveground and underground
- Labeled “Hazardous Waste” and meet fire Code (NFPA 704)
- Containment and leak detection required
- Tanks must be certified by an independent professional engineer
- See tank inspection checklist for large quantity ([EQP 5188](#)) and small quantity generators ([EQP 5162](#)) available at [www.michigan.gov/dnre](http://www.michigan.gov/dnre) after selecting “Waste,” “Hazardous Waste and Liquid Industrial Waste,” “Hazardous and Liquid Industrial Waste Management,” and “Hazardous Waste Program Inspection Forms”

### Inspection Requirements (MAC R 299.9306)

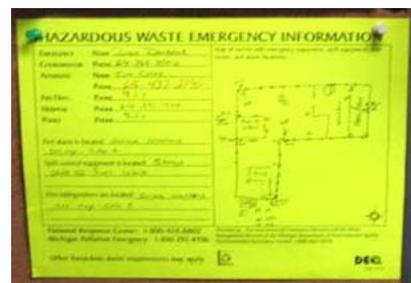
- Weekly for Container Accumulation Areas (SQG and LQG)
- Daily for SQG and LQG Tank Systems
- Logs required for all LQG Inspections
- No Log Required for SQG Inspections
- See DNRE Publication Center [Weekly Maintenance Checklist](#)

### CESQG Contingency Planning and Training (MAC R 299.9205)

No specific requirements

### SQG Contingency Planning and Training (MAC R 299.9306)

- Informal training
- Written training records not required
- No stipulated review period
- Must have emergency coordinator



- Post CURRENT emergency information by phones
- Send facility diagram or discuss facility layout, road access, evacuation routes with response agencies
- Ensure emergency coordinator is on premises or on-call nearby
- See DNRE Publication Center SQG Emergency Posting Form

**LQG [Contingency Planning & Training](#) (MAC R 299.9306)**

- Annual training for employees
- Written training program
- Keep written training records for 3 years for each employee handling hazardous waste
- Must address potential emergencies & DNRE notification of releases
- Training should include a review of contingency plan
- See DNRE Publication Center [LQG Contingency Guidance](#)
- Must have site specific hazardous waste component when given with other required training (Right-to-Know, DOT, etc.)
- CURRENT & complete written contingency plan on-site
- Copies must be distributed to fire dept, police, hospitals
- Must be reviewed annually for needed changes

**SQGs & LQGs Preparedness and Prevention (40 CFR, Part 265, Subpart C) (MAC R 299.9306)**

- Proper emergency equipment must be available:
  - Communication devices (phones, radios, PA)
  - Portable fire extinguishers/fire control equipment
  - Spill control equipment (absorbents, containers, spill kits)
  - Water for fire control in sufficient volumes
  - Must be tested/maintained as necessary
- Personnel must have immediate access to internal alarm system/communication device (seconds, not minutes)
- Must maintain sufficient aisle space in hazardous waste handling areas to ensure access of emergency equipment & personnel
- Make arrangements with local authorities in case of emergency
  - Fire department tours and tours by Local Emergency Planning Committee ([LEPC](#))
  - Copies of contingency plan to police, hospitals, and fire department
  - Document visits, agreements, etc.

**National [Uniform Hazardous Waste Manifest](#) must be used for (MAC R 299.9105(m) and MCL 324.12102(a)):**

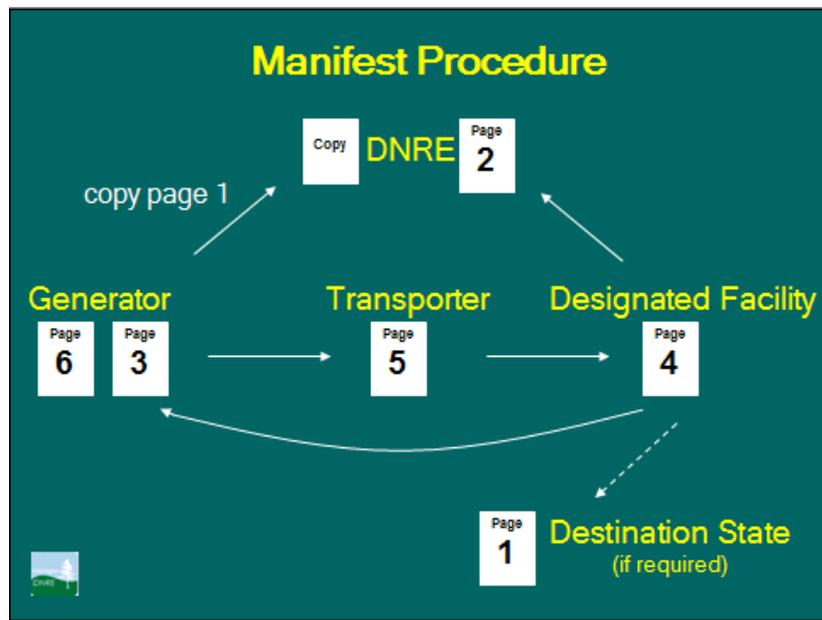
- Hazardous wastes from LQGs
- Hazardous wastes from SQGs
- Liquid hazardous waste from CESQGs
- Non-hazardous liquid wastes from all generators required to manifest for disposal
- Wastes with  $\geq 50$  PPM PCBs
- Exceptions:
  - CESQG solid hazardous waste
  - Non-hazardous solid waste
  - Consolidate manifest shipments (e.g. used oils, antifreeze, see Op Memo [121-3](#))

## Manifesting

For information to order manifests or review on-line instructions to complete a manifest go to [www.michigan.gov/dnre](http://www.michigan.gov/dnre), select "Waste," "Hazardous and Liquid Industrial Waste Transportation," then "[Uniform Manifest Information](#)"

**Manifest Procedure** (MAC R 299.9105(m), MAC R 299.9304, MAC R 299.9308, MAC R 299.9608, and MCL 324.12102(a)):

- Generator completes manifest and Transporter signs manifest at pick-up
- Generator sends COPY of Page 6 with Generator and Transporter signatures to DNRE by 10<sup>th</sup> day of month following shipment
- Transporter delivers shipment to TSD obtains signature from TSD and keeps Page 5
- TSD keeps Page 4
- TSD sends DNRE Page 2 & Destination State oversight agency Page 3 of TSD signed copies by the 10<sup>th</sup> day of the month following waste delivery
- TSD sends Generator Page 3 with TSD signature within 30 days of waste delivery
- When TSD signed copy is not received by Generator within 45 days of shipment, Generator must investigate and submit exception report detailing known waste disposition to DNRE
- See DNRE Publication Center [Manifest Tracking Log](#) for recordkeeping system for manifest tracking



## Need Help?

- Go to [www.michigan.gov/dnre](http://www.michigan.gov/dnre) and select "Waste"
- Contact the DNRE Environmental Assistance Center at 800-662-9278 (1-800-NO2-WASTE)
- Search the [DNRE Publication Center](#)
- Contact [DNRE district](#) waste inspection staff
- Contact [hazardous waste vendors](#)
- Contact waste consultants

