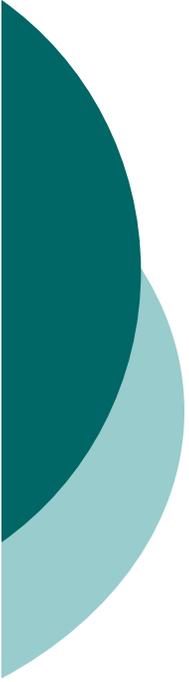


SEMCOG and DNRE present

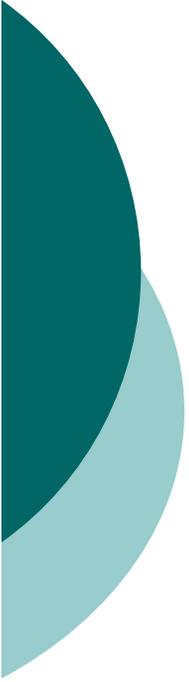
**Southeast Michigan Environmental Conference:
Environmental Regulations Affecting Municipalities**

**Christine Grossman
Compliance Assistance Specialist
Waste Regulations
grossmanc@michigan.gov
517-373-0590**



What Will Session 2 Cover?

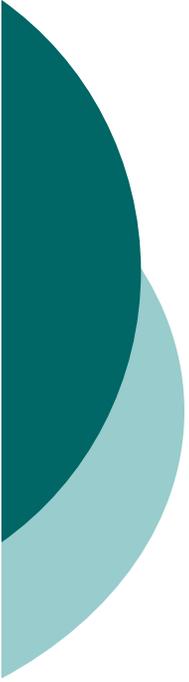
- Generator Requirements for:
 - Notification
 - Accumulation
 - Manifesting



Notification of Regulated Waste Activity

(Rule 303 and Section 12103)

- Requires submittal of completed Site Identification Form (EQP 5150)
- Requires payment of a \$50 user charge for new/initial or subsequent/updated owner/operator notifications
- Notifies DNRE & EPA of:
 - site owner/operator
 - site contact
 - site waste activity



Notification of Regulated Waste Activity

(Rule 303 and Section 12103)

- Results in issuance of a ***Site (aka. EPA) Identification Number***
- Submittal of Site Identification Form required for:
 - **SQGs & LQGs**
 - **CESQGs manifesting LIW;**
 - **transportation of hazardous waste and/or LIW**
 - **used oil collection & processing**
 - **large quantity universal waste handlers**
 - **generators of ≥ 100 PPM PCB wastes**



Notification of Regulated Waste Activity

(Rule 303 and Section 12103)

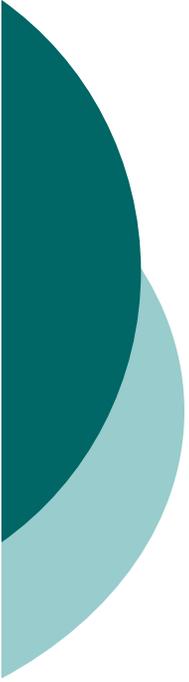
- Subsequent/updated notification filed for changes in site waste activity (e.g. change in generator classification/status)
- Request pre-populated Site Identification Form for subsequent/updated notifications from Lansing Manifest Unit at 517-335-2690



Notification of Regulated Waste Activity

(Rule 303 and Section 12103)

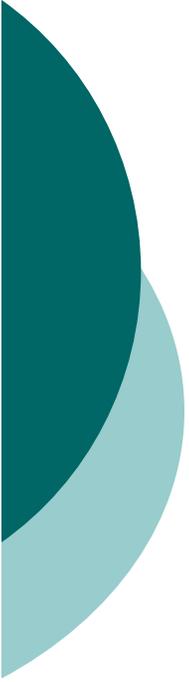
- Expedite form processing by faxing notification & paying on-line with credit card
- Liquid industrial waste generators who are not required to manifest wastes are not required to notify



Accumulation Requirements for All Generators

(Satellite, CESQG, SQG, and LQG)

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



Accumulation Requirements for All Generators

(Satellite, CESQG, SQG, and LQG)

- Container or tank accumulation only
- Containers/tanks must be compatible with the wastes, 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

Containers must be in good condition and compatible with the waste



**Note
corrosive
label**



**Drums must
be compatible
with the waste!**

**Excessive
corrosion
and rust**

**Incompatible
corrosives in
leaking steel
drums**



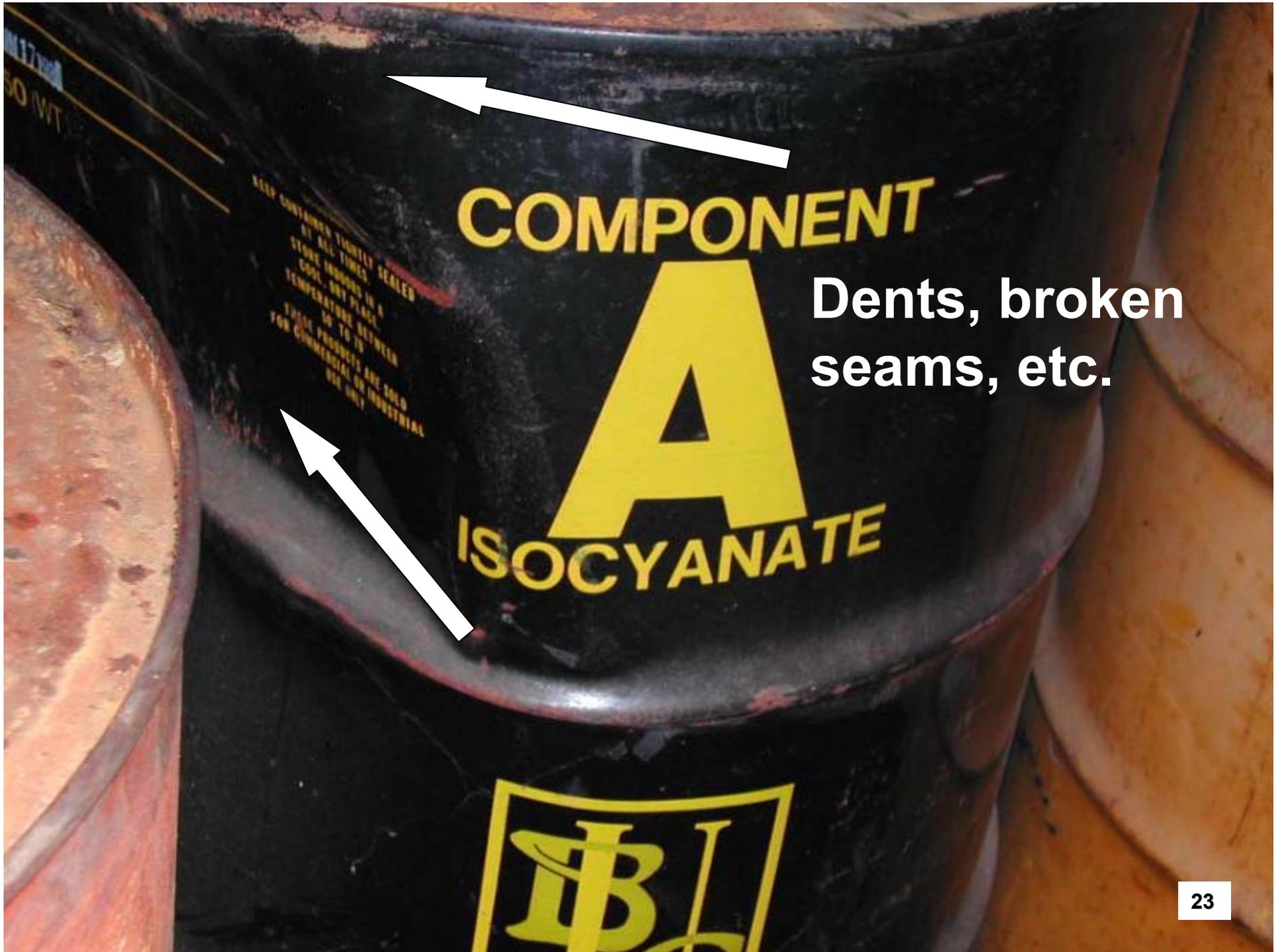
**Note
corrosive
label**

2007/11/14 20

Excessive rust







Dents, broken seams, etc.

Containers cannot be exposed to weather or vandals



Compromised fencing provides access to vandals



Containers cannot be exposed to weather or vandals



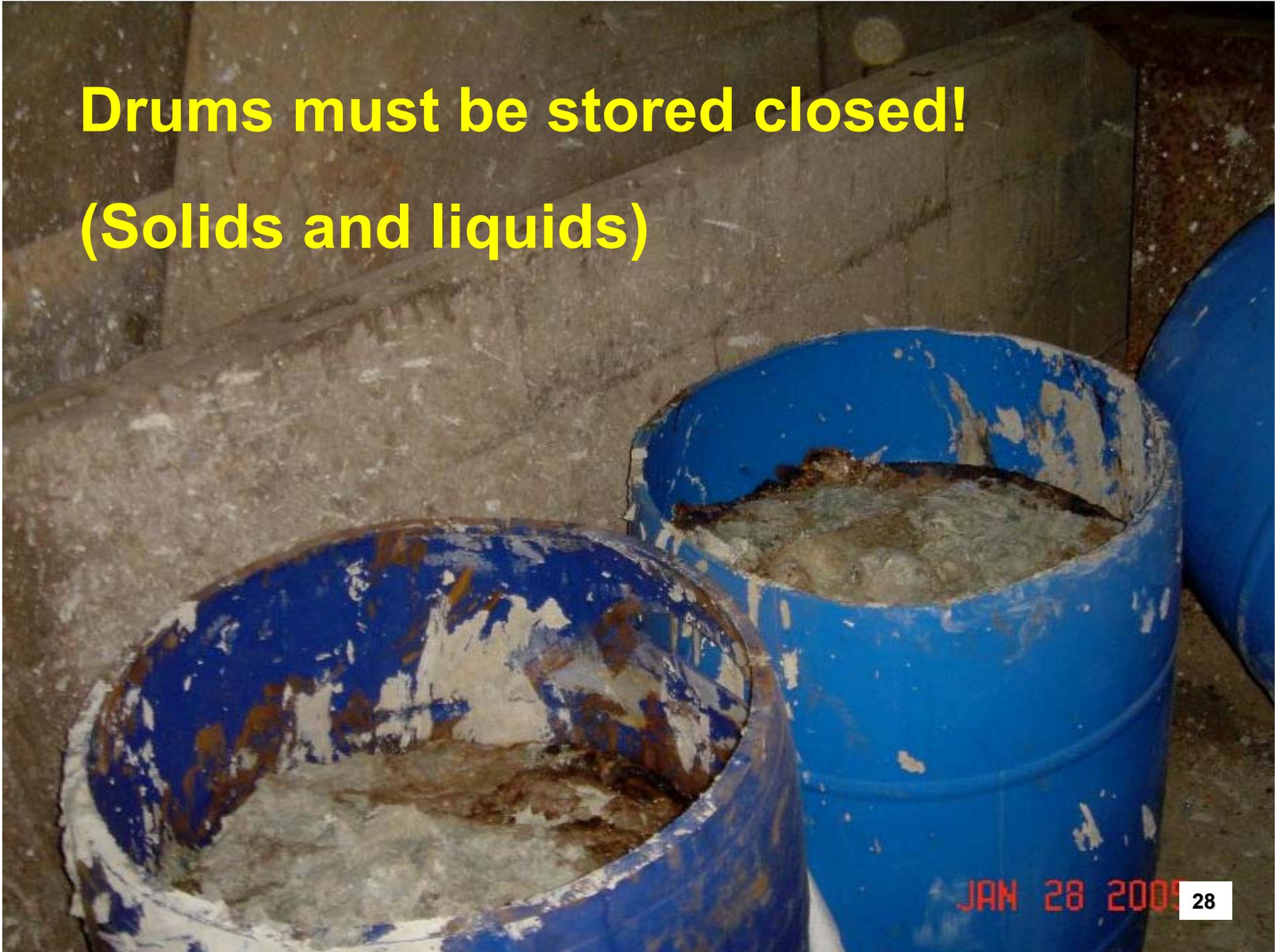
Good labeling
Good containers
Closed containers

No weather protection!
Accessible to vandals!
No containment!

**Container must
be stored to prevent
physical damage**

**Unsafe pallets
Stacked too high
Inadequate aisle space**

Drums must be stored closed!
(Solids and liquids)





Best option is to close containers manually!



Drum bung in place

04/26/2006

Funnel must allow for closure of the container to prevent emissions and spillage



Notice the splashing on wall



Funnel is removed

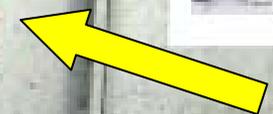
Bung is replaced



**Notice the
valve?**

**If kept closed,
it would be
OK.**

349



Lidded funnel



Ball valve must be closed





**Accumulation must prevent the escape
of waste to the environment**

2007/11/14



CESQG Exemption Records

(Section 11138 & Rules 205, 302 & 307)

Records required to be maintained for 3 years to verify the CESQG exemption:

- 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

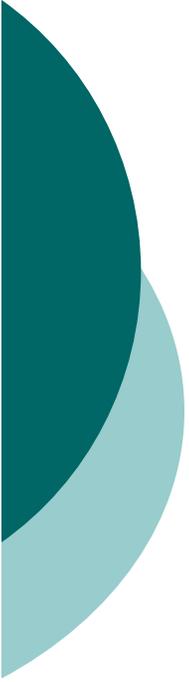
See DNRE Publication
Center CESQG Guidance



CESQG Exemption Requirements (0 - < 220 lbs/mo)

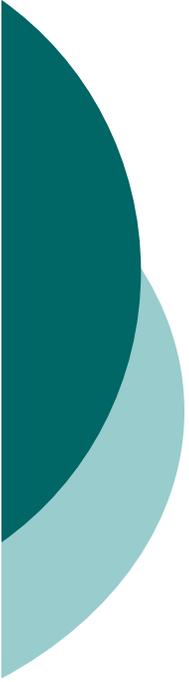
- Must get Site/EPA ID number to manifest liquids, solids exempt
- Must generate < 220 lbs/mo
- No accumulation time limit
- Maximum volume < 2200 lbs
- CESQG's \geq 2200 lbs are SQG
- No user fees

**DO NOT
EXCEED!!**



CESQG Disposal Options (0 - < 220 lbs/mo)

- 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 with if in compliance with pre-treatment rules



Additional SQG & LQG Accumulation Requirements

**See DNRE Publication
Center SQG Guidance**

- 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 HW disposal sites
- Follow preparedness and prevention rules
- File a Biennial Report every 2 years (LQG)



Hazardous Waste Accumulation Label

HAZARDOUS WASTE

ACCUMULATION

START DATE

CONTENTS

09/05

FOODS

HANDLE WITH CARE!

CONTAINS HAZARDOUS OR TOXIC WASTES

BRADY SIGNMAF

Date by day,
not month
(mm/dd/year)

Hazardous Waste Shipping Label



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 INFORMATION:

NAME: ROCKWELL TRUCK PHONE: 8163049431

ADDRESS: 1770 PLAINFIELD N.E. CITY: GRAND RAPIDS STATE: MI ZIP: 49508

EPA ID NO. / MANIFEST DOCUMENT NO. R10072592601 /

ACCUMULATION START DATE: 1/15/06 EPA WASTE NO.: P003

NO WASTE-PAINT RELATED MATERIALS UNLESS:
(F003) (F005) (U001) (U035) PG 11

DO NOT PROPERLY IDENTIFY NAME AND USE OR NA NO. WITH PREFIX.
HANDLE WITH CARE!
STYLE CPWH

Hazardous Waste Shipping Labels

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 NAME _____ EPA # _____

ADDRESS _____ CITY _____ STATE _____ ZIP _____

EPA/DOT SHIPPING DESCRIPTION
 (PROPER SHIPPING NAME — UN/NA NO. — CONSTITUENTS OR EPA WASTE CODE/CHARACTERISTIC)

DATE OF FINAL ACCUMULATION _____	SATELLITE ACCUMULATION _____	EMERGENCY RESPONSE GUIDE # _____	REPORTABLE QUANTITY "RC" IN POUNDS _____ LBS.
----------------------------------	------------------------------	----------------------------------	---

WHEN HANDLING OR DURING ROUTINE OR EMERGENCY EXPOSURE TO THE HAZARDOUS WASTE IN THIS CONTAINER, USE THE SAFETY EQUIPMENT CHECKED BELOW.

<input type="checkbox"/> Hard Hat <input type="checkbox"/> Safety Glasses <input type="checkbox"/> Safety Goggles <input type="checkbox"/> Full Face Shield <input type="checkbox"/> Protective Gloves <input type="checkbox"/> Splash Apron <input type="checkbox"/> Protective Boots	<input type="checkbox"/> Respiratory Protection <input type="checkbox"/> Air-Purifying Respirator Type _____ <input type="checkbox"/> Fully Encapsulated Suit <input type="checkbox"/> Atmosphere Supplying Respirator Type _____
--	--

ACCEPTANCE AT TSD? _____

MANIFEST DOCUMENT # _____

IN THE EVENT OF A SPILL OF THIS HAZARDOUS WASTE, CONTACT THE U.S. COAST GUARD NATIONAL RESPONSE CENTER AT 800-424-8802 FOR INFORMATION AND ASSISTANCE AND THE 911 EMERGENCY PHONE OR THE LOCAL OPERATOR IN THE COMMUNITY WHERE SPILL TOOK PLACE.

© 1994 HAZARDOUS MATERIALS PUBLISHING CO. • (610) 683-6721 • KUTZTOWN, PA 19530



Satellite Containers

(Rule 306(2))

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



Satellite Containers

(Rule 306(2))

- Move container to accumulation area within 3 days of accumulation date



- Fill date = accumulation date
- See Op Memo 111-2 for more information

Satellite Label Example

Orion Assembly
4555 Giddings Rd.
Orion, MI 48359
MID000718544

**HAZARDOUS WASTE
FLAMMABLE
SOLVENT RAGS**

EPA Waste Code: D001

Date Drum is Full: _____ Container Number **8468**

In Case of Emergency Call Plant Security 5252
For Waste Pick Up Call 5926

751-6813 (0799)

SOLVENT RAGS Container Number **8468**

Waste Site Number: _____

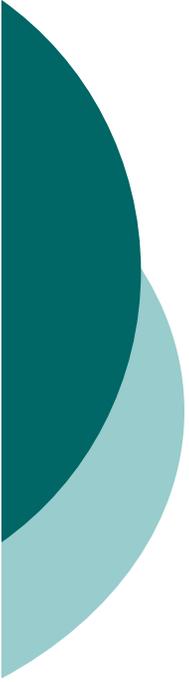
Secondary Containment

- **Containers:** 100% of the largest container OR 10% of the total volume stored, whichever is greater (free liquids)



- **Tanks:** 100% of the largest tank PLUS an amount greater than or equal to a 25 year 24 hour rainfall event (if located outside)

See DNRE Publication
Center Guide to
Secondary Containment



Secondary Containment

- **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 and remove spills/leaks/rain in timely manner
- Required of all LQGs
- Required of SQGs & CESQG storing > 2200 lbs

**Lacking or
inadequate
resistant coating
& cracked
surfaces**



= non-compliant



Poor joint seals or no coatings can cause major problems!

Non-functional containment





Fabricated sides

Sloping ramp saves backs and reduces spills when moving materials in & out of containment area



Spill pallets OK for solids or single containers, but do NOT provide squirt protection for liquids

- 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



**Good
aisle
space**

Precipitation must be removed in a timely manner from containment



How can drums be checked for leaks if buried in snow?

Don't stack more than 2 drums high



**Leaning drum
is a safety
issue!**

Good containment and weather protection



Option for 1 – 2 containers

Locked storage



Good idea for more containers



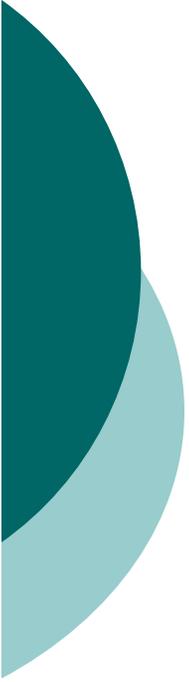
**Metal building
with built-in
containment**



**Defective tank
containment
due to fracture
in wall**

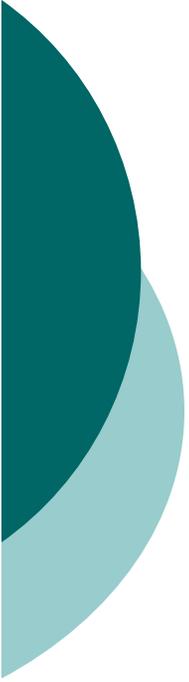


Note floor drain



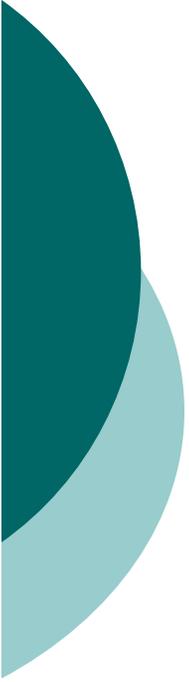
Tank Requirements

- Requirements depend when tank began operating: “New” vs “Existing”
- Aboveground vs Underground
- Labeled “Hazardous Waste” and meet fire Code (NFPA 704)



Tank Requirements

- Structural integrity testing required
- Containment and leak detection required
- New or repaired tanks must be certified by an independent professional engineer
- See inspection checklist available on Local Governments web page for more details



Inspection Requirements

- 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**

Contingency Planning and Training

CESQG

- No specific requirements

SQG

- 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

HAZARDOUS WASTE EMERGENCY INFORMATION

EMERGENCY	NAME _____	Map of facility with emergency equipment, spill equipment, exit routes, and alarm locations.
COORDINATOR	PHONE _____	
ALTERNATE	NAME _____	
	PHONE _____	
FIRE DEPT.	PHONE _____	
HOSPITAL	PHONE _____	
POLICE	PHONE _____	
Fire alarm is located: _____		
Spill control equipment is located: _____		
Fire extinguishers are located: _____		

National Response Center: 1-800-424-8802
Michigan Pollution Emergency: 1-800-292-4706

Other hazardous waste requirements may apply.

Provided by: The Environmental Assistance Division and the Waste Management Division of the Michigan Department of Environmental Quality
Environmental Assistance Center 1-800-662-9278

DEQ
EPA 3472

STATE OF CALIFORNIA
DEPARTMENT OF INDUSTRIAL RELATIONS
EMPLOYMENT DIVISION

Form No. 100
1-1-79

EMPLOYER'S INFORMATION

Name: _____
Address: _____
City: _____ State: _____ Zip: _____
Telephone: _____
Fax: _____

EMPLOYEE'S INFORMATION

Name: _____
Address: _____
City: _____ State: _____ Zip: _____
Telephone: _____
Fax: _____

Signature of Employer: _____
Signature of Employee: _____

See DNRE Publication Center
SQG Emergency Posting Form

HAZARDOUS WASTE EMERGENCY INFORMATION

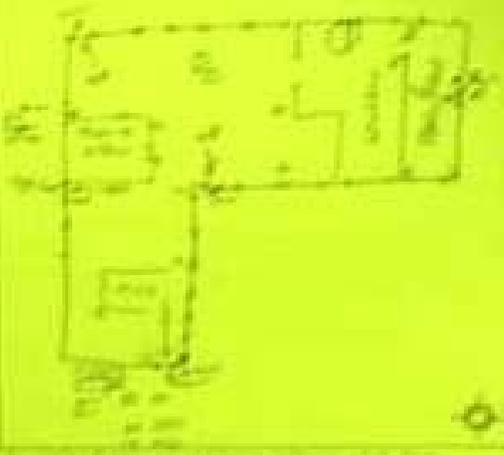
Emergency: Name: _____
 Classification: Name: _____
 Amount: Name: _____
 Facility: Name: _____
 Material: Name: _____
 Floor: Name: _____

For dates to be used: _____
 For current equipment to be used: _____
 For equipment to be used: _____

For dates to be used: _____
 For equipment to be used: _____

National Response Center: 1-800-424-6802
 Multiple Release Emergency: 1-800-271-4746

DEQ

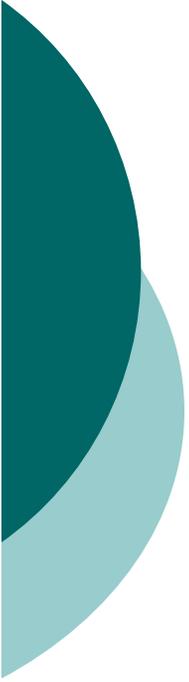



SQGs & LQGs

Preparedness and Prevention

(40 CFR, Part 265, Subpart C)

- 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)

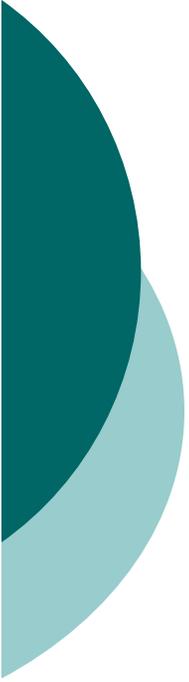


SQGs & LQGs

Preparedness and Prevention

(40 CFR, Part 265, Subpart C)

- Must maintain sufficient aisle space in HW handling areas to ensure access of emergency equipment & personnel
- Make arrangements with local authorities in case of emergency
 - **Fire department tours and tours by LEPC**
 - **Copies of contingency plan to police, hospitals, and fire department**
 - **Document visits, agreements, etc.**



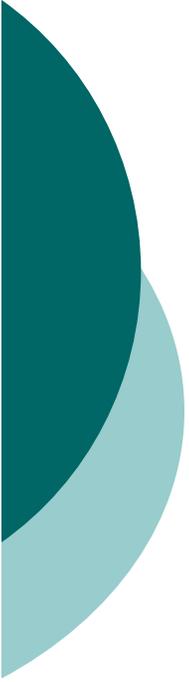
Manifests

National Uniform Hazardous Waste Manifest must be used for:

- **Hazardous wastes from LQGs**
- **Hazardous wastes from SQGs**
- **Liquid HWs from CESQGs**
- **Non-hazardous liquid wastes from all generators required to manifest for disposal**
- **Wastes with ≥ 50 PPM PCBs**

Exceptions:

- **CESQG solid HW,**
- **Non-hazardous solid waste**
- **Consolidate manifest shipments (e.g. used oils, antifreeze, see Op Memo 121-3)**



Manifests

For information to order manifests or review on-line instructions to complete a manifest:

- Go to www.michigan.gov/dnre, select “Waste,” then “Uniform Manifest Information”

Manifest Sections

Generator

International Transporter

Destination Facility

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	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number 000061119 FLE		
5. Generator's Name and Mailing Address Generator's Site Address (if different than mailing address)							
Generator's Phone:							
6. Transporter 1 Company Name				U.S. EPA ID Number			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address				U.S. EPA ID Number			
Facility's Phone:							
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 Wt./Vol.	13. Waste Codes	
1.							
2.							
3.							
4.							
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			Signature		Month	Day	Year
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit:							
Transporter signature (for exports only): Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name			Signature		Month	Day	Year
Transporter 2 Printed/Typed Name			Signature		Month	Day	Year
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
18b. Alternate Facility (or Generator) Manifest Reference Number: 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			Signature		Mo	80	Year

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
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number: **000061119 FLE**

5. Generator's Name and Mailing Address
Generator's Site Address (if different than mailing address)

Generator's Phone:
6. Transporter 1 Company Name U.S. EPA ID Number
7. Transporter 2 Company Name U.S. EPA ID Number
8. Designated Facility Name and Site Address U.S. EPA ID Number
Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
1.						
2.						
3.						
4.						

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 _____ Signature _____ Month _____ Day _____ Year _____

16. International Shipments Import to U.S. Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____
Transporter signature (for exports only): _____

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____
Transporter 2 Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____

18. Discrepancy
18a. Discrepancy Indication Space Quantity Type Residue Partial Rejection Full Rejection
18b. Alternate Facility (or Generator) Manifest Reference Number: _____ 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 _____ Signature _____ Month _____ Day _____ Year _____

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

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Common Manifest Errors

- #1 - Failure to keep reliable filing system
- Wrong waste codes
- Wrong volumes
- Failure to track manifest time limits
- Failure to send copy to DNRE

Manifest Procedure

Generator

Page

6

#

= page of manifest retained

Manifest Procedure

Generator
sends DNRE
copy by 10th
day of month
following
shipment



Generator

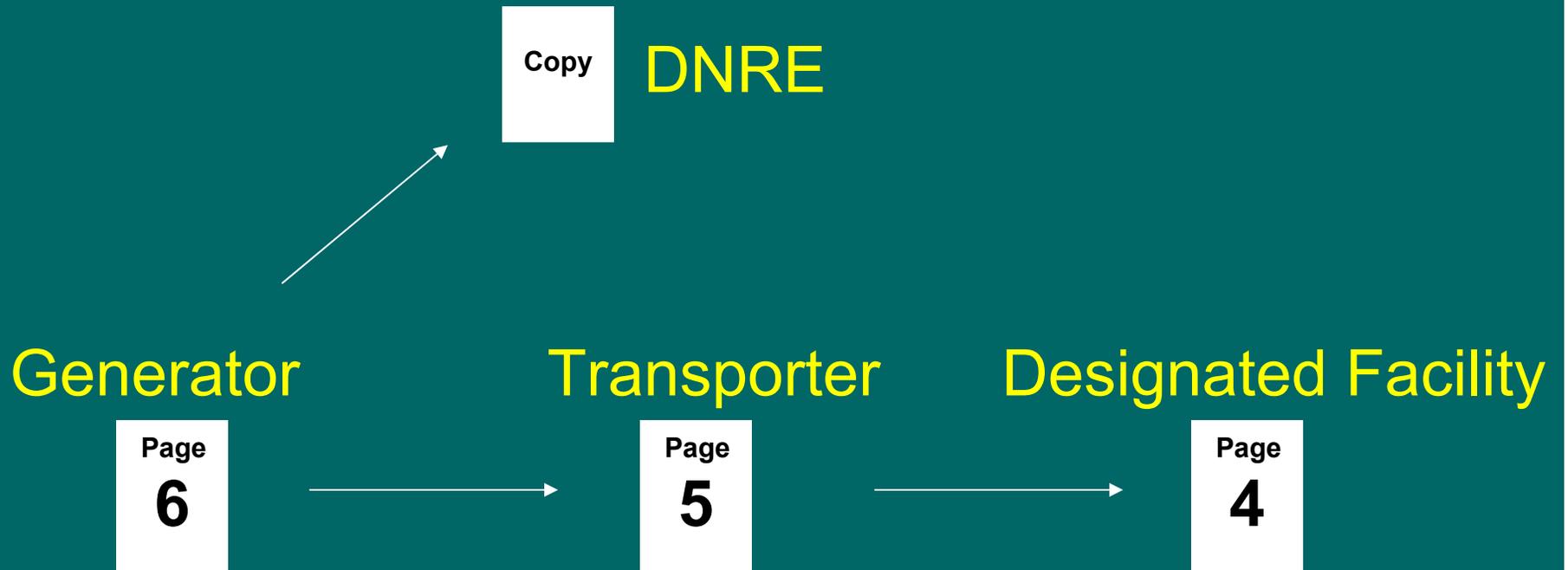


Transporter



= page of manifest retained

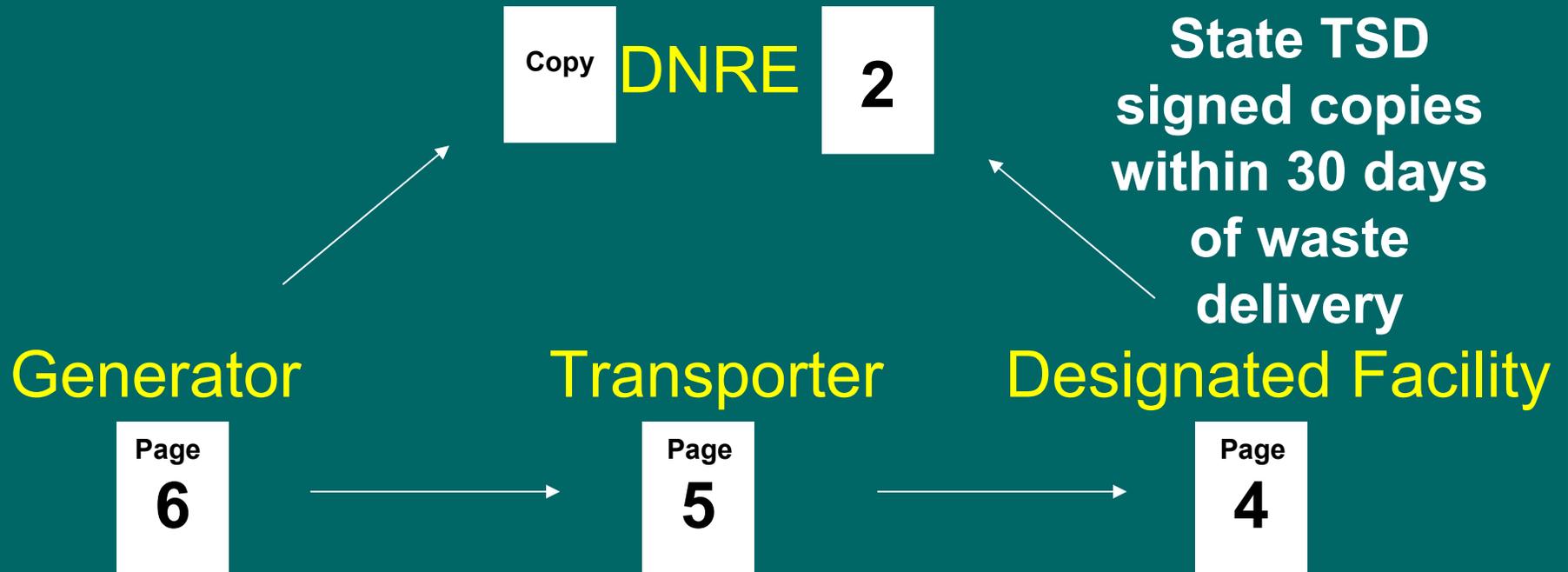
Manifest Procedure



= page of manifest retained

Manifest Procedure

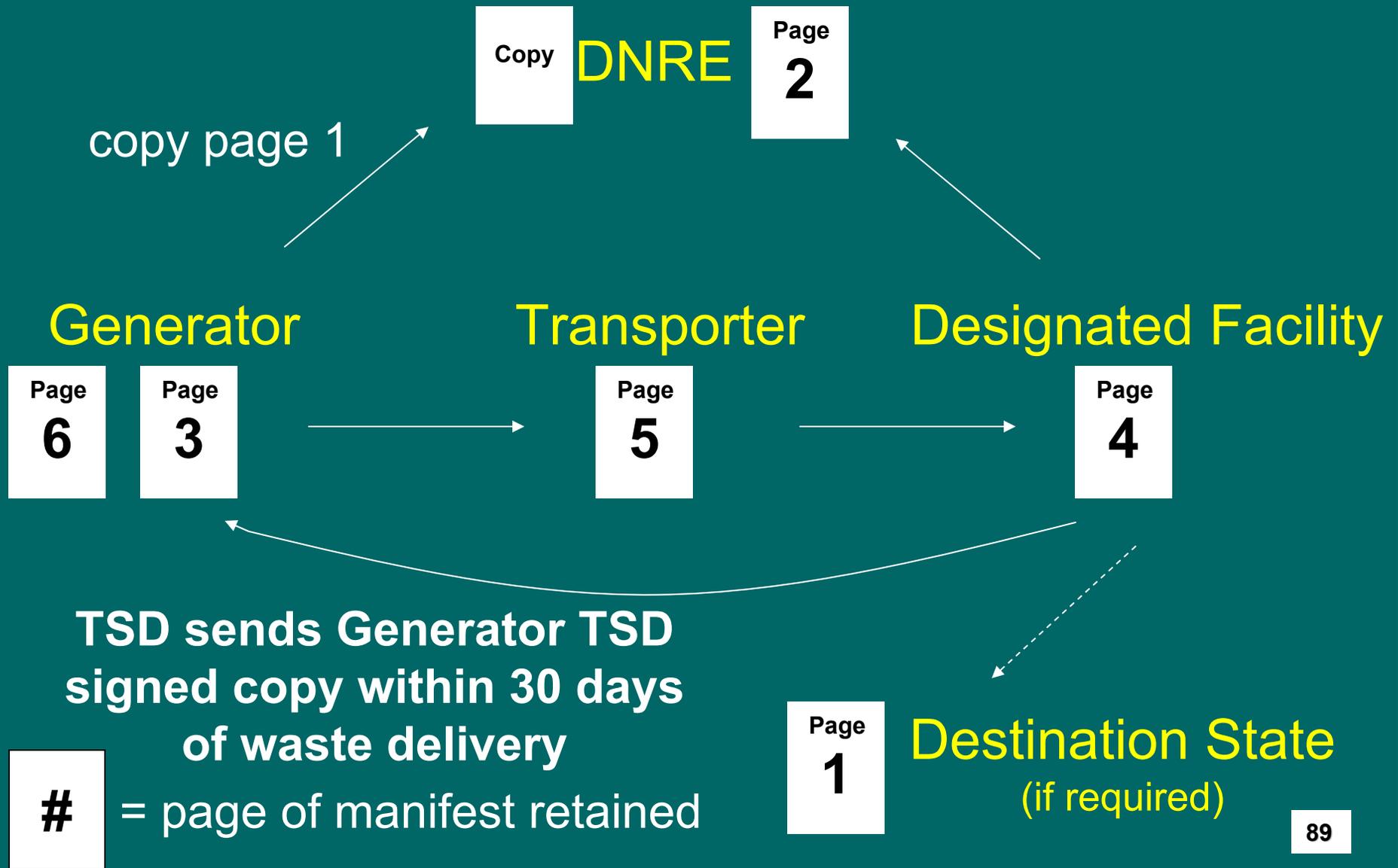
TSD sends
DNRE &
Destination
State TSD
signed copies
within 30 days
of waste
delivery



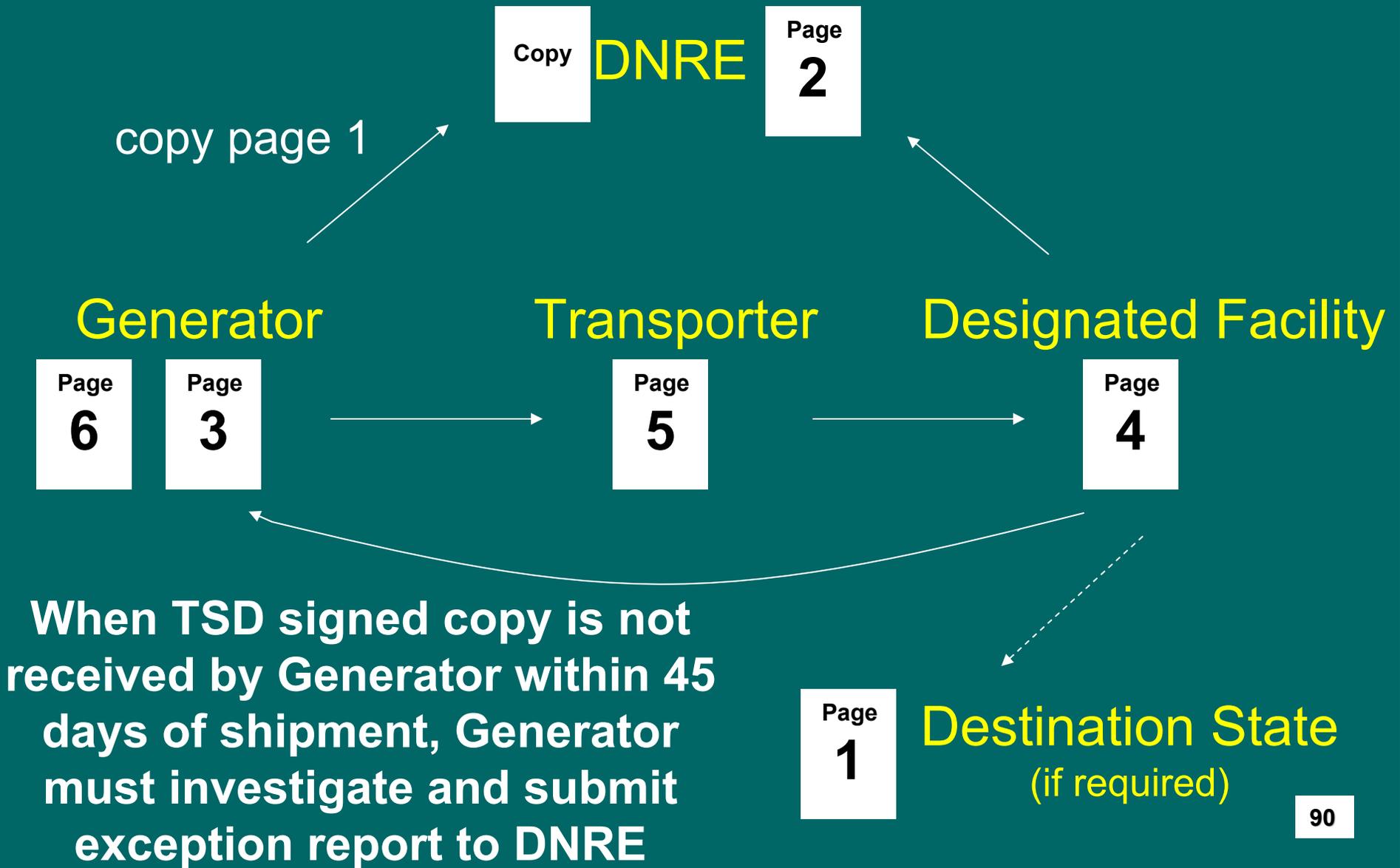
= page of manifest retained

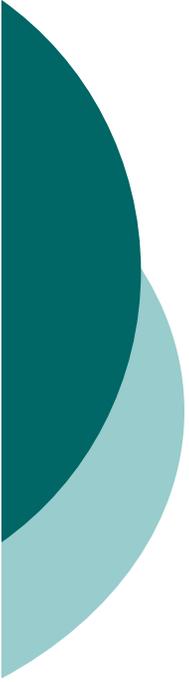
Page 1
Destination State
(if required)

Manifest Procedure



Manifest Procedure





Need Help?

- Go to www.michigan.gov/dnre, select “Key Environmental Topics,” “Environmental Assistance,” then “Local Government”
- Contact the DNRE EAC at 800-662-9278
- Search the DNRE Publication Center
- Contact DNRE district waste inspection staff
- Contact HW vendors
- Contact waste consultants