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## LARGE QUANTITY GENERATOR (LQG) OF HAZARDOUS WASTE

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40 CFR Part 262

### Do these regulations apply to my operation?

If your facility generates more than 2,200 pounds of hazardous waste in any calendar month or stores more than 13,200 pounds of hazardous waste on-site at any time. Facilities generating and storing less than these limits are subject to either the Small Quantity Generator (SQG) or Conditionally Exempt Small Quantity Generator (CESQG) regulations.

### General Requirements

All waste generators must, at a minimum:

- Accurately characterize each facility waste as hazardous or non-hazardous.
- Maintain an inventory documenting the facility's monthly hazardous waste generation rate and the amount of hazardous waste stored on-site.
- Manage hazardous wastes in compliance with applicable on- and off-site federal regulations.

### What are the benefits of proper management of hazardous waste?

Hazardous waste regulations were established to minimize human and environmental exposure to hazardous substances. The Environmental Protection Agency (EPA) has written a comprehensive set of regulations that govern the management of hazardous waste from the point of generation to disposal. They also incorporate a record keeping/reporting/tracking system to verify and document that the waste is, in fact, managed appropriately. Finally, compliance with hazardous waste regulations is an enforceable law. Noncompliance can result in fines of up to \$37,500 per day for each violation.

### LQG Regulatory Requirements

In addition to the general requirements listed previously, LQGs must also comply with the following:

#### EPA IDENTIFICATION NUMBER

LQGs must obtain an EPA Hazardous Waste Generator Identification Number. This number is used to identify the facility and the hazardous waste activities occurring there. It is also required on all waste shipping papers. An ID number is obtained by completing the form enclosed in EPA's "Notification of Hazardous Waste Activity" booklet (EPA Form 8700-12).

## WASTE GENERATION, ACCUMULATION, AND STORAGE

- Hazardous waste storage containers must remain sealed except during the addition or removal of waste.
- Hazardous waste storage containers must be clearly labeled “Hazardous Waste,” with an indication of the hazards associated with the waste (i.e., ignitable, corrosive, toxic, etc.) and with the accumulation start date.
- Up to 55 gallons of hazardous waste may be accumulated at the point of generation and under the supervision of the individual generating the waste for an indefinite period of time. The container must be labeled “Satellite Accumulation.” When 55 gallons has accumulated, the satellite accumulation container must be moved to a permanent hazardous waste storage area within 3 days and relabeled “Hazardous Waste.”
- Hazardous waste containers must be marked with the date they first received waste or the date when moved from the satellite accumulation area to the permanent hazardous waste storage area.
- The permanent hazardous waste storage area must be inspected weekly for leaking containers and proper container labeling and dating. This is done to assure the containers are sealed and to maintain adequate access to all containers. Weekly inspections should be documented in a logbook that is maintained on-site.
- Hazardous waste may not be stored on-site for more than 90 days.

## PREPARATION FOR OFF-SITE TRANSPORTATION

Hazardous waste storage containers must be packaged, labeled, and marked according to the Department of Transportation’s (DOT) hazardous materials transport regulations. This includes the following information on each container:

- HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.
- Generator’s Name and Address
- Manifest Document Number
- Commercially available labels can be used.
- The generator must assure the hazardous waste transport vehicle is affixed with the appropriate DOT placards.

## SHIPPING PAPERS

- All shipments of hazardous waste must be accompanied by a Uniform Hazardous Waste Manifest. The manifest is a multiple copy form that must be signed by the generator, transporter, and disposal facility personnel. Each entity should keep its respective copy of the form. The original copy of the manifest must be returned to the generator by the disposal facility within 45 days.
- Both the generator and original copy of the manifest must be filed on-site and be readily available for inspection for at least three years.
- For waste subject to Land Ban restrictions, a Land Disposal Restriction Notification (LDR) form must accompany the hazardous waste manifest. The transporter/disposal facility will assist in determining if a LDR is required. If so, a copy must remain on-site and be readily available for inspection for at least three years.

## PREPAREDNESS AND PREVENTION

- Hazardous waste storage areas must be maintained and operated to minimize the possibility of fire, explosion, or release of hazardous waste.
- Hazardous waste storage areas must be equipped with or provide immediate access to the following:
  - » Internal communications or alarm system;
  - » A telephone to summon emergency assistance from local authorities;
  - » Fire extinguisher and control equipment;
  - » Spill control equipment; and
  - » Water to supply hoses or sprinkler systems.
- All equipment must be tested and maintained to assure proper operation.
- When hazardous waste is handled, all personnel involved must have immediate access to an internal alarm or emergency communication device.
- If just one employee is present, he or she must have immediate access to a device capable of summoning external assistance.
- Aisle space must be maintained to allow for fire protection and spill control in an emergency. 3-5 feet is recommended.
- The generator must familiarize local police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes. An example letter to assist in preparing this notification is attached. Where authorities decline to enter into arrangements, documentation of the attempt to make arrangements (e.g., certified letter requesting arrangements) must be kept on file.

## Contingency Requirements

- A written Contingency Plan, containing the following items, must be kept on file at the facility:
  - » Emergency procedures used in response to fires, explosions, or release of hazardous waste.
  - » Description of arrangements made with local police, fire department, hospital, and emergency response teams for coordinating emergency service.
  - » Names, addresses, and phone numbers (office and home) of all designated emergency coordinators.
  - » A list of all emergency equipment at the facility, including the location and physical description of the item, and a brief outline of its capabilities.
- An evacuation plan for facility personnel, describing evacuation signals, routes, and alternative routes.
- Copies of the Contingency Plan must be submitted to local police, fire departments, hospitals, and emergency response teams that may provide emergency services.
- The Contingency Plan must be reviewed and amended immediately when significant features, such as regulations, facility characteristics, or emergency equipment, change.
- At all times, there must be at least one employee available, or on call, with the responsibility for coordinating all emergency response measures (emergency coordinator).

- The following information must be posted at the telephone closest to the hazardous waste storage area:
  - » Name and telephone number of emergency coordinator(s);
  - » Location of fire extinguishers, spill control material, and fire alarm; and
  - » Telephone number of the fire department.
- All employees involved in waste handling and management must be thoroughly familiar with proper waste handling and emergency procedures (Records of training should be kept on file).
- The emergency coordinator must respond appropriately to emergencies as follows:
  - » Activate internal facility alarms or communication systems.
  - » Notify appropriate state or local agencies.
  - » Identify the character, source, amount, and extent of any hazardous releases.
  - » Notify local authorities if evacuation of local areas is advisable.
  - » Notify the National Response Center (800/424-8802) and the Iowa Department of Natural Resources (515/281-8694) if the release threatens human health or the environment, or is above the reportable quantity (RQ) for the chemical/waste released.
  - » Take measures to ensure that fires, explosions, and releases do not recur or spread.
  - » Provide proper storage and disposal of recovered waste and contaminated materials.
- Clean and ready emergency equipment prior to resumption of facility operations.
- The EPA Regional office, state DNR, and local authorities must be notified that all emergency procedures have been completed before operations in the affected area can resume.
- Within 15 days after an incident, a written report must be submitted to EPA Region VII providing the following information:
  - » Name, address, and telephone number of the owner or operator;
  - » Name, address, and telephone number of the facility;
  - » Date, time, and type of incident;
  - » Name and quantity of materials involved;
  - » Extent of injures;
  - » An assessment of how hazardous it is to human health or the environment; and
  - » Estimated quantity and disposition of recovered material.

## Training

- Facility personnel must complete training (classroom or on-the-job) that includes:
  - » Procedures for using, inspecting, repairing, and replacing facility emergency equipment;
  - » Communication or alarm systems;
  - » Response to fires or explosions;
  - » Response to groundwater contamination; and
- Shutdown of operations.
- Training must be completed within six months after employment.
- An annual review of training must be conducted.
- Training records must be maintained including the following information:
  - » Job title and name of each employee whose position involves management or reasonable contact with hazardous waste;
  - » Written job description;
  - » Written description of type and amount of introductory and continuing training; and
  - » Records documenting the training has been given.

## RECORD KEEPING

- Generator and original copies of hazardous waste disposal manifests must be maintained for at least three years.
- Land Disposal Restriction Notification forms must be maintained for five years.
- Laboratory data documenting hazardous/non-hazardous waste determinations must be kept for three years from the date that the waste was last sent to treatment, storage, or disposal.
- Documentation of hazardous waste storage area inspections, employee training, emergency agency notification, etc., must be maintained on-site and be readily available for inspection.
- A Biennial Report must be submitted to the EPA every even-numbered year.

# Notification of Large Quantity Waste Generation Activity

## Example Letter

Date:

To: (Specific Individual (i.e., Fire Chief, Police Captain, and Hospital Administrator by name)).

From: (Company and contact name)

Re: **Notification of Large Quantity Waste Generation Activity.**

**Company name** generates large quantities (greater than 1,000 kg/month) of hazardous waste, which is accumulated up to 90 days before being collected by an authorized transporter. Wastes generated and stored include **type of waste(s)**.

This waste is collected and stored in our **location of storage area**, which is located at **address** (see drawing). The maximum amount stored at any one time is less than **number gallons**.

Material Safety Data Sheets for the **original materials** are enclosed. Fire and health risks from the used material are expected to be similar to that of the original material.

This letter is sent in order to fulfill 40 CFR Part 262.34 (a)(1) of the Federal Hazardous Waste Regulations.

Sincerely,

**Authorized Personnel**

Enclosure

*Note: Send letter by certified mail so a return receipt can document that the letter was received.*

*The facility drawing should show storage areas, entrances and roads inside the facility and places where personnel are normally working.*