

# Hazardous Waste Management

## The Small Quantity Generator

Information presented in this fact sheet is intended to provide a general understanding of the regulatory requirements governing small quantity generators of hazardous waste. This information is not intended to replace, limit, or expand upon the complete regulatory requirements found in Division 14 of the ADEM Administrative Code.

### WHAT IS A SMALL QUANTITY GENERATOR?

Generators of hazardous waste are divided into three categories based upon the quantity of hazardous waste generated. See ADEM's fact sheet, *Hazardous Waste: The Basics*, for additional general information regarding generators of hazardous waste. If you produce more than 220 pounds, but less than 2,200 pounds, of hazardous waste and no more than 2.2 pounds of acute hazardous waste in a calendar month, you are a **Small Quantity Generator (SQG)** for that month. The requirements that apply to you as a SQG are found in ADEM Admin. Code ch. 335-14-3 and, by reference, parts of ADEM Admin. Code ch. 335-14-6.

#### TIP

26 gallons (about half of a 55-gallon drum) of hazardous waste with a density similar to water weighs about 220 pounds.

### WHAT IS A HAZARDOUS WASTE DETERMINATION?

You are required to determine whether the waste you generate is hazardous waste. For details on how to make this determination, refer to ADEM Admin. Code r. 335-14-3-.01(2), as well as ADEM's fact sheet, *Hazardous Waste Determination*.

### SHOULD I HAVE AN EPA IDENTIFICATION NUMBER?

If you are an SQG, you must notify the Department and request an EPA Identification Number using ADEM Form 8700-12, *Notification of Regulated Waste Activity*. You will be required to submit an annual re-notification using the same form. Consult the "specified month schedule" found at ADEM Admin. Code r. 335-14-1-.02(1)(a) to determine when your annual notifications are due.

#### TIP

If your generator category changes from month to month, you should notify as the larger category and follow all applicable requirements of the larger category to ensure you are always in compliance.

### WHAT IS SATELLITE ACCUMULATION?

You may accumulate small quantities of waste (up to 55 gallons of hazardous waste and/or either one quart of liquid acute hazardous waste or 2.2 pounds of solid acute hazardous waste) in containers at or near any point where waste is initially generated. These "satellite" containers must be in good condition, made of or lined with materials that are compatible with the waste, kept closed except when adding or removing waste, and marked with the words "Hazardous Waste" and an indication of the hazards of the contents (see the ADEM fact sheet, *Satellite Accumulation Fact Sheet*, for additional information). Ensure all satellite accumulation areas are included in your emergency and contingency planning.

### WHAT ARE MY TIME AND QUANTITY ACCUMULATION LIMITS?

You may accumulate hazardous waste on-site for up to 180 days without a permit or without having interim status. This time limit is extended to 270 days if your waste must be transported 200 miles or more for off-site treatment, storage, or disposal. Both the 180-day and 270-day limits may be extended up to 30 days due to unforeseen, temporary, and uncontrollable circumstances, at the discretion of ADEM on a case-by-case basis. In any event, the total quantity of hazardous waste accumulating on-site must never exceed 13,200 pounds of hazardous waste or 2.2 pounds of acute hazardous waste.

### IN WHAT KINDS OF UNITS MAY I ACCUMULATE HAZARDOUS WASTE?

You may accumulate your hazardous waste in containers, tanks, containment buildings, or on drip pads. If you accumulate hazardous waste on drip pads or in containment buildings, refer to ADEM Admin. Code rs. 335-14-6-.23 and 335-14-6-.30 for specific requirements regarding these specialized units.

### CONTAINER REQUIREMENTS

- Use containers that are in good condition.
- Keep containers closed, except when adding or removing waste.
- Label each container with the words "Hazardous Waste", an indication of the hazards of the contents, and the appropriate EPA hazardous waste number(s).
- Inspect the area where containers are stored, at least weekly, looking for leaks or deterioration.
- Place only compatible materials in the same container.
- Separate containers of incompatible waste and materials by means of a dike, berm, wall, or other device.
- Mark each container with the accumulation start date.
- Handle and store containers in a manner that will prevent leaks.
- Place only waste that is compatible with the previous contents in an unwashed container.
- Use containers that are made of or lined with materials that are compatible with the waste.
- Stack containers larger than 30-gallon capacity no more than two high.

## TANK REQUIREMENTS

- Label each tank with the words "Hazardous Waste", an indication of the hazards of the contents, and the appropriate EPA hazardous waste number(s).
- Inspect, at least daily, discharge control equipment, monitoring equipment data, and waste levels (uncovered tanks). Inspect, at least weekly, construction materials of the tank and discharge confinement structures looking for corrosion, erosion, or leaks.
- Comply with the buffer zone requirements of the National Fire Protection Association for ignitable or reactive waste.
- Maintain at least 2 feet of freeboard in uncovered tanks.
- Place only waste that is compatible with the previous contents in an unwashed tank.
- Be able to document that each tank is emptied within 180 days.
- Accumulate only waste that will not cause the tank or inner liner to rupture, leak, corrode, or otherwise fail.
- Accumulate hazardous waste in a way that avoids the potential to produce extreme heat or pressure, fire or explosion, or violent reaction, uncontrolled toxic or flammable mists, fumes, dusts, or gases, damage to the structural integrity of the tank, or other threats to human health or the environment.
- Protect ignitable or reactive waste from any material or conditions that may cause the waste to ignite or react.
- Place only compatible materials in the same tank.
- Equip continuously-fed tanks with a means to stop the inflow.
- Remove all hazardous waste from tanks, discharge control equipment, and discharge confinement structures upon closure.

## HOW SHOULD I PREPARE FOR EMERGENCIES?

If you accumulate hazardous waste on-site, you must operate in a way that minimizes the possibility of fire, explosion, or any unpermitted release of hazardous constituents to the environment. Also, you must be prepared to take appropriate actions in response to emergency situations at your site. To meet these requirements you must:

- Provide an internal alarm or emergency communication system that is accessible to employees who handle hazardous waste;
- Provide an external communication device capable of summoning local emergency assistance;
- Maintain the necessary emergency response equipment (e.g., fire extinguishers, spill control equipment);
- Maintain adequate aisle space to facilitate effective and timely emergency response; and
- Attempt to make arrangements with local police, fire departments, emergency response teams, and hospitals to familiarize them with your site and the properties of hazardous waste handled there.

In addition, you are required to:

- Ensure that at least one employee is available at all times, either on-site or on call, to act as emergency coordinator;
- Post information next to the telephone regarding the emergency coordinator, the location of emergency response equipment, and how to contact the fire department; and
- Ensure that all employees are trained in proper waste handling and emergency procedures as appropriate for their job duties.

The emergency coordinator must respond to emergencies by taking appropriate immediate control measures; contacting appropriate response authorities; and notifying the National Response Center (800-424-8802, 24 hours per day) if required under ADEM Admin. Code r. 335-14-3-.01(6)(b)9.(iv)c.

## WHAT SHOULD I DO WHEN SHIPPING WASTE OFF-SITE?

### Pre-Transport Requirements

You may prepare your waste for shipment off-site or you may rely on a transporter to do so. In either case, you must ensure that the waste you ship off-site is properly prepared for shipment before leaving your site. This includes proper packaging, labeling, marking, and placarding of waste shipments to meet the requirements of ADEM Admin. Code 335-14-3-.03(3) and the United States Department of Transportation regulations in 49 CFR Parts 172 to 179, where applicable.

#### TIP

*Although a permitted transporter ships your waste, **YOU** are responsible for ensuring that the transporter and the facility that accepts your waste manage your waste properly.*

### Hazardous Waste Manifest Forms

Before your waste can be shipped off-site, you must prepare a hazardous waste manifest (using either an EPA Form 8700-22 or an electronic manifest), which will accompany the shipment of waste. Hazardous waste manifest forms may be obtained from any registered source that has received approval from the EPA to print the manifest (e.g., commercial printer, hazardous waste treatment, storage, or disposal facility, hazardous waste broker). A list of approved sources can be found on EPA's website (<https://www.epa.gov/hwgenerators/approved-registered-printers-epas-manifest-registry>).

### Manifesting Requirements

When shipping your hazardous waste off-site, you must:

- Use a Uniform Hazardous Waste Manifest (EPA Form 8700-22) or the electronic equivalent;
- Complete the "Generator" portion of the manifest;
- Obtain a signed and dated copy of the manifest from the transporter before the shipment leaves your site and give the remaining copies to the transporter;
- Assist with resolving any discrepancy identified by the designated facility between the waste shipment and the information recorded on the manifest; and

#### TIP

*To protect the environment and reduce your regulatory requirements, minimize the amount of waste you generate.*

- If you do not receive the signed manifest copy from the designated facility within 60 days of shipment, submit a legible copy of the manifest to ADEM, along with an indication that you have not received confirmation of waste delivery.

A manifest is not required if the waste is being reclaimed under a contractual agreement and the following conditions are met:

- The type of waste and frequency of shipments are specified in the agreement;
- The vehicle used to transport the material to and from the recycling facility is owned and operated by the reclaimer; and
- You maintain a copy of the agreement on-site for at least three years after its termination or expiration.

Also, a manifest is not required to transport hazardous waste on a public or private right-of-way within or along the border of contiguous property under the control of the same person, even if the property is divided by a public or private right-of-way.

See ADEM Admin. Code rs. 335-14-3-.02(4)(c) and 335-14-3-.02(4)(d) for the special manifest requirements for water and rail shipments.

### WHAT RECORDS AM I REQUIRED TO KEEP?

Keep the following records on-site for at least three years (check the specific rules for exceptions):

- Records of any test results, waste analyses, or other waste determinations
- Hazardous waste storage area inspection logs
- Hazardous waste tank inspection logs
- Each manifest signed by the initial transporter (or until you receive a signed copy from the designated facility)
- Each signed manifest from the designated facility
- Training records

### ARE THERE ANY SPECIAL REQUIREMENTS REGARDING DISPOSAL OF MY WASTE?

If your hazardous waste will be disposed in a land-based unit, you are subject to the Land Disposal Restrictions (LDR) program in ADEM Admin. Code chapter 335-14-9. The LDR program requires that a hazardous waste meet specified hazardous constituent levels or that it be treated using a specified treatment technology prior to being disposed on the land. If your waste does not meet the applicable standard without treatment, you must ensure that the waste is treated to meet the standard prior to disposal. You also must comply with LDR requirements for tracking and recordkeeping, including signing the appropriate certification or notification to send along with the first shipment of waste to the treatment, storage, or disposal facility.

In addition to the LDR program, all waste destined for disposal in a commercial hazardous waste disposal facility located in the State of Alabama must have prior approval for disposal from ADEM in accordance with ADEM Admin. Code r. 335-14-3-.08.

### WHAT ABOUT INTERNATIONAL SHIPMENTS?

If you export waste out of or import waste into the United States, you must comply with the additional requirements found in ADEM Admin. Code r 335-14-3-.09.

### WHERE CAN I GET ADDITIONAL INFORMATION?

ADEM Administrative Code Division 14 (<http://www.adem.alabama.gov/alEnviroRegLaws/files/Division14.pdf>)

ADEM Guidance (<http://www.adem.state.al.us/programs/land/guidanceReports.cnt>)

<i>Hazardous Waste Determination</i>	<i>Hazardous Waste: The Basics</i>
<i>Waste Disposal Approvals</i>	<i>Satellite Accumulation Fact Sheet</i>
<i>Hazardous Waste Generator Treatment Methods</i>	<i>Small Quantity Generator Handbook</i>



### Telephone:

ADEM Ombudsman •••••••••• 800-533-ADEM (2336)  
Hazardous Waste Compliance Inspectors •• 334-270-5637



### External Links:

EPA's Homepage (<http://www.epa.gov>)  
Approved Registered Printers of Hazardous Waste Manifests  
(<https://www.epa.gov/hwgenerators/approved-registered-printers-epas-manifest-registry>)