

# Hazardous Waste 101

#### M-B1

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27th California Unified Program Annual Training Conference March 24-27, 2025

# Today We Will Cover...



- An Introduction to Hazardous Waste
- Generator Status
- Facility ID Numbers
- Container/Tank Standards
- Labeling Standards
- Shipping Paperwork
- Biennial Reports
- Contingency Plan Requirements
- Employee Training

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# DISCLAIMER

The information provided in this training is not intended as a substitute for applicable laws and regulations.

The information contained in this training is based upon the statutes and regulations in effect as of the date of the training.

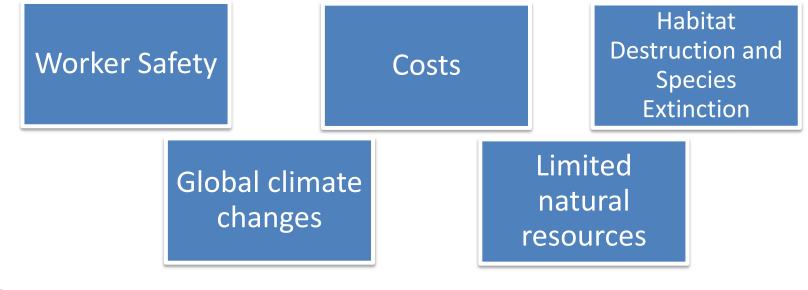
Interested parties are advised to keep apprised of subsequent changes to relevant statutes and regulations.



# **Hazardous Waste Sources**



# What Are The Dangers Of Improper Disposal Or Handling Of Hazardous Wastes?



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# How Can We Control/Prevent Pollution?

Established standards by environmental laws and regulations. Issue permits, conduct inspections, and take appropriate enforcement.

Provide training and outreach program.

Recognize good performers.

Encourage pollution prevention and other source reduction approaches.

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## Who Regulates Hazardous Waste?

- U.S. EPA
  - Resource Conservation and Recovery Act (RCRA)
    - » Title 40, Code of Federal Regulations
- Cal/EPA, Dept. of Toxic Substances Control (DTSC)
  - Hazardous Waste Control Law
    - » Health & Safety Code and Title 22, Cal. Code Regs
- Certified Unified Program Agencies, or "CUPAs"
  - Certified Unified Program Agencies



### Federal Or State Requirements - Which Do I Use?

- California is a federally "authorized" state.
- <u>Most</u> newly adopted federal regulations do not apply in California until the state adopts them.
- DTSC can enforce federal regulations under our authorization until California adopts them [HSC 25159.5(b)].



# California Code of Regulations (CCR) Title 22 Division 4.5 : Contents

- Chapter 10 Scope and Definitions
- Chapter 11 Identification and Listing of Hazardous Wastes
- Chapter 12 Generator Requirements
- Chapter 13 Transportation Requirements
- Chapter 14 Requirements for Permitted Facilities
- Chapter 15 Requirements for Interim Status Facilities
- Chapter 16 Requirements for Recyclable Wastes
- Chapter 18 Land Disposal Restrictions
- Chapter 23 Universal Waste Management

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# **Generator Status**



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### Is It a Waste? 22 CCR 66261.1



### Discarded

Relinquished

Recycled

#### Inherently Waste-Like



Poses threat to health or the environment and is:



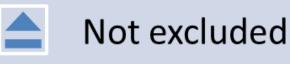
Mislabeled/inadequately labeled



In deteriorated or damaged containers

# Is It a Hazardous Waste? 22 CCR 66261.1

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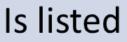


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Exhibits characteristics

Ignitable, Toxic, Corrosive and/or Reactive







### Contains a listed waste



### Exclusions vs. Exemptions

**Exclusion**: If you meet the criteria, what you are handling is no longer a hazardous waste. **Exemption**: If you meet the criteria, what you are handling still is a hazardous waste but has a special way of handling.



# Hazardous Waste Determination T22 CCR §66262.11

- The information a hazardous waste generator may use to classify their waste falls into two categories:
  - Analytical testing data by an accredited lab
  - Generator knowledge of materials and processes used
  - A combination of both
- Make sure that there is waste determination (preferably written) for each potential waste

Only RCRA waste is counted towards a generator's federal status.

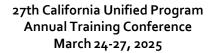


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### **Generator Category Determination**

22 CCR 66262.13

Generators	<b>Acute</b> Hazardous Waste	<b>Extremely</b> Hazardous Waste	<b>Non-Acute</b> Hazardous Waste	
LQG	> 1 kg	Any amount	Any amount	
LQG	Any amount	> 1 kg	Any amount	
LQG	Any amount	Any amount	≥ 1,000 kg	
SQG	≤ 1 kg	≤1 kg	< 1,000 kg	
VSQG	≤ 1 kg		≤ 100 kg	





# Waste Counting

- Not all wastes count towards generator status
- Excluded recyclable materials (i.e. reused onsite as a replacement for a commercial product in manufacturing) are not usually counted as waste
- Silver, that once recovered from photo-processing solutions is being sent for reclamation, is never counted..



## Waste Counting, cont.

- For the purposes of determining LQG, SQG or VSQG status, most other hazardous wastes are counted.
  - This includes wastes that are generated and then treated onsite under a Tiered Permitting authorization.
- Each month determined on its own •
  - If an SQG Jan-Nov, that waste can stay up to 180 days.
  - Generate lots of waste in December with house cleaning, that waste must be sent off in 90 days.



State and Federal Hazardous Waste ID Numbers



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# Which ID Number Do You Need?

Federal ID Number	State ID Number
Generate more than 100kg of non-acute RCRA Hazardous Waste per month (Federal SQG) Generate more than 1 kg of acute RCRA hazardous waste per month	Any amount of non-RCRA Hazardous Waste per month Less than 100 kg of non-acute RCRA hazardous waste per month Less than 1 kg of acute RCRA hazardous waste per month

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# How to Apply for the Federal ID Number

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- Fill out US EPA form 8700-12
  - Recommend filling out electronically on <u>myRCRAInfo</u>
  - If filled out and submitted by mail, submit to DTSC

# How About State ID Numbers?

- Fill out and submit DTSC Form 1358
  - Will need to apply for a new
     State ID Number if there is a change in location or business owner
  - Will need to inactivate if you generate above VSQG quantities of RCRA Hazardous Waste

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# RCRAInfo

- Electronic system used to consolidate and track information about the hazardous waste world in the USA
- Various tools and functions such as manifest submittal, ID applications, report submittals

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#### **RCRAInfo Sign In**

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RCRAInfo is EPA's comprehensive information system providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976, the Hazardous and Solid Waste Amendments (HSWA) of 1984, and the Hazardous Waste Electronic Manifest Establishment Act of 2012. The system is used to track information provided by the regulated community concerning the generation, shipment, treatment, and disposal of hazardous wastes, as well as significant milestones of State/EPA activity supporting program planning, implementation, and accomplishment reporting. States may use RCRAInfo for some or all aspects of program implementation support, or may use their own system which transmits required data to EPA.

User ID	
C	ontinue
Register	Forgot User ID?



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# A Large Quantity Generator (LQG) is a Generator who...



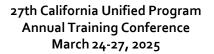
A) Generates 1,000 kg or more of non-acute HW per month.



B) Cannot generate more than 1 kg of acute HW per month.



C) Produces more than 100 kW of electricity.



# Accumulation Time Limits



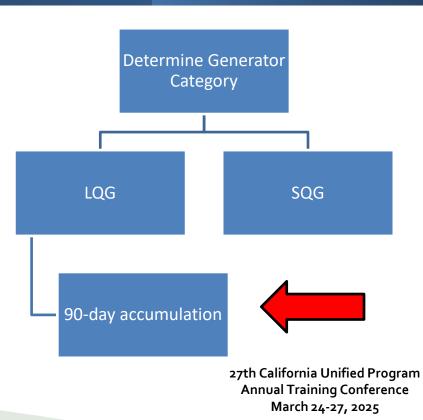
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Accumulation Time Limit Overview

- Large Quantity or Small Quantity Generator?
  - What's the difference?
- Different rules for satellite accumulation.
- No exemptions for episodic generation.

## LQG Accumulation Times 22 CCR 66262.17

- 90-days from the date of initial accumulation.
  - The date HW is added to the tank or container
- No volume limit
- Count both RCRA and non-RCRA waste

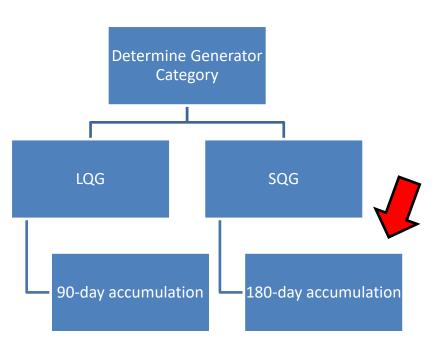


# Small Quantity Generators 22 CCR 66262.16

- **<u>180-day</u>** accumulation limit
- <u>Generate</u> less than 1,000 kilograms (about 2,200 pounds or 270 gallons) of waste in any month, and
- <u>Accumulate</u> no more than 6,000 kilograms of all wastes on-site <u>at</u> <u>any time.</u>

## SQG Accumulation Times 22 CCR 66262.16

- 180 days from the date of initial accumulation
  - The date HW is added to the tank or container
- Volume limit
  - 6,000 kg
- Count both RCRA and non-RCRA waste



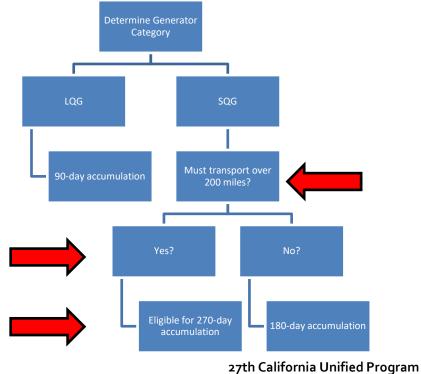


## SQG Accumulation Times 22 CCR 66262.16

#### Transporting Waste Over 200 Miles 22 CCR 66262.16(c)

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 Allows SQGs to accumulate waste for 270 days if they MUST have HW transported more than 200 miles



### SQG Accumulation Times 22 CCR 66262.16(g)

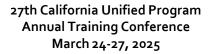
- If you generate no more than 100 kg (220 lbs) of HW in any month, then your 180-day storage period begins when you first reach 100 kg HW onsite.
  - However, if generating more than 100 kg during any month this does not apply.



## Satellite Accumulation 22 CCR 66262.15

Allows storage of small amounts of HW up to 1 year. More than one satellite accumulation area can be used regardless of generator status as long as:

- HW is stored at **initial point of generation**
- Under the control of operator of the process
- **55-gallon max** (or 1 quart if extremely HW) per process
- Stored in containers/drums (not tanks) & have a full HW label
- Move the container within 3 days of reaching 55 gallons





- Within 3 days after reaching maximum storage quantity, a new accumulation date must be marked on the container.
- HW must be removed offsite within the specified accumulation time limit (90/180/270 days) from the date the 55-gal is reached.

#### HAZARDOUS WASTE SATELLITE ACCUMULATION

				PHYSICAL FORM
ADDRESS	F	Solid		
CITY	STATE		ZIP	Liquid
EPA ID#	COMPOSITION:		%	HAZARD CLASS
۸)	No abbreviations or chemical formulas)			Flammable
				Corrosive
				Toxic/Poison
				Reactive
SATELLITE ACCU	JMULATION START DATE:	1 1		
	E ROOM START DATE:		Loc./Lab:	
HCL (800) 421-6710	On-site accumulation time shall not excee	o one year-	- 22 CCR 66262.34(e)(1)(I	3) SHL-0038-VN-0035

### Unique Waste Accumulation Times

#### The most common:

- Universal Waste (22 CCR 66273.35)
  - One year accumulation limit
- Drained Used Oil Filters (22 CCR 66266.130)
  - 1 year accumulation, if storing < 1 ton</p>
  - 180-days, if storing ≥ 1 ton
- Lead Acid Automotive Batteries (22 CCR 66266.81)
  - 1 year accumulation, if storing  $\leq$  1 ton
  - 180 days, if storing > 1 ton





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# Container & Tank Standards



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### Tanks vs. Containers

"Tank"

### 22 CCR 66260.10 definitions

"Container"

#### A stationary device, designed to contain an accumulation of hazardous waste which is constructed primarily of nonearthen materials (e.g., wood, concrete, steel, plastic) which provides structural support.

Any device that is open or closed, and **portable** in which a material can be stored, handled, treated, transported, recycled or disposed of.

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# Tanks vs. Containers – What Do They Look Like?



#### **Containers**







## Container Management For Both LQG and SQGs

- In good condition (no leaks, structural defects, or severe rusting)
- **Compatible** with the waste they contain
- Closed, except when adding or removing waste
  - What does "closed" mean?
  - See: EPA Guidance RO 14826



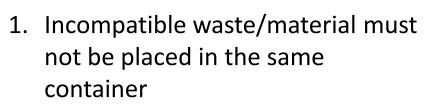


## Container Management (Cont.)

- Opened, handled, transferred and stored in a way that will **not cause them to rupture or leak**
- Must leave aisle spacing for unimpeded access to containers
- Separated from other incompatible wastes or materials (e.g. using a dike, berm, wall, or other device)
- Inspected at least weekly for potential leaks or deterioration



Closer Look at Incompatible Wastes in Containers



- Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste/material
- A container holding an incompatible waste/material must be separated from the other materials or wastes by any practical means (e.g. a dike, berm, wall, etc.)



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Incompatible Hazardous Waste Segregation

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Container Management at LQGs 22 CCR 66262.17

In addition, LQGs must:

- Keep ignitable & reactive HW
   50 feet from property line
- Prevent ignition/reaction sources and post "no smoking" signs
- Have air emission controls

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#### **EMPTY CONTAINERS**

22 CCR section 66261.7

- "California Empty"
  - All pourable/non-pourable material removed
  - If extremely hazardous, triplerinsed
- Empty containers < 5 gallons, may be landfilled
- Empty containers > 5 gallons, must be marked as empty and reclaimed, reconditioned, or returned to supplier within 1 year



#### Tanks & Tank Systems

"Tank system" means a hazardous waste transfer, storage or treatment tanks and its associated ancillary equipment and containment system.



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Tank	SQG Tanks	LQG Tanks
Management	Uncovered Tanks -> 2 ft freeboard	<ul><li>Spill and Overflow Prevention</li><li>Including 2 ft freeboard</li></ul>
40 CFR 262.16(b)(3) 22 CCR 66262.16(b)(3) 22 CCR 66262.17(a)(2)	Continuous Flow requires a cutoff system or by-pass	<ul> <li>Secondary Containment Required</li> <li>Double walled, vault, external liner (berm), etc.</li> </ul>
	<ul> <li>Daily Tank Inspections</li> <li>Discharge control equipment (e.g., waste feed cutoff systems, etc.), monitoring equipment, tank levels</li> </ul>	<ul> <li>Certified by Professional Engineer</li> <li>Civil, Structural, or Geotechnical PE</li> <li>Re-certified every 5 years or the remaining estimated service life</li> </ul>
	<ul> <li>Weekly Inspections</li> <li>corrosion/leaks in tank and secondary containment (if present)</li> </ul>	Daily Tank Inspections (documented)
		Air Emission Requirements
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## Labeling Standards



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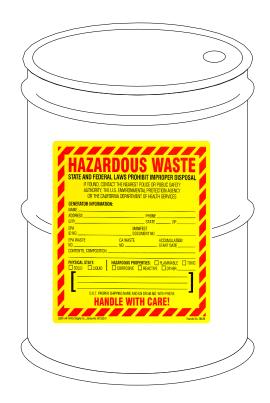
#### Stick to it! (Labeling)

Label HW Tanks & Containers

Label must be attached to the tank or container

Where should the label be placed? Should the label go on the side or top?

• Answer: The label should be visible for inspection and facing outwards.





## Labeling Requirements

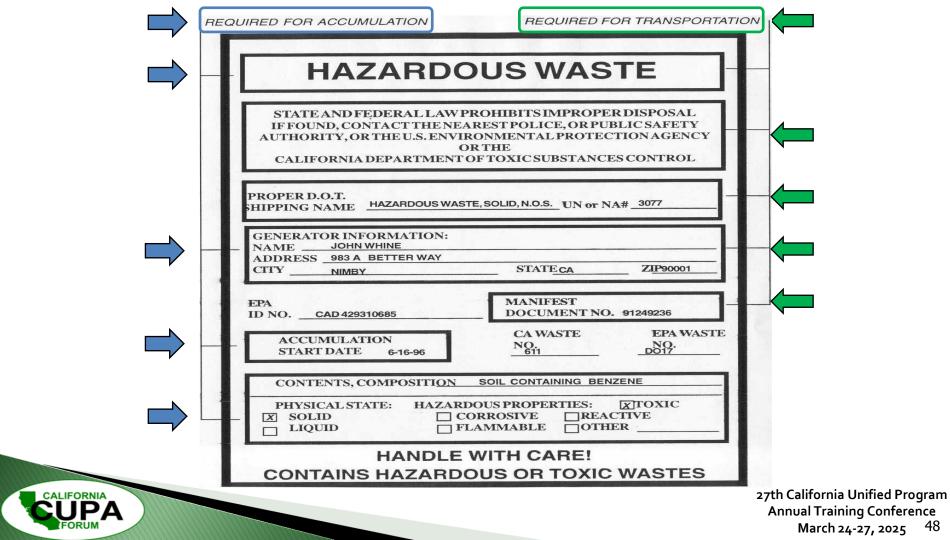
The **generator** shall **mark or label** its containers and tanks with the following:

- 1. The words "Hazardous Waste";
- The composition and physical state of the wastes;
- 3. An indication of the hazards of the contents
- The name and address of the person generating the waste;
- 5. The date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container



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### **Special Labels**

### **Used Oil Filters**

 "Drained Used Oil Filters" + accumulation date

#### **Universal Wastes**

- "Universal Waste" -Type of UW
- Ex: "Universal Waste – Lamps"

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#### **Special Labels - Examples**



## UNIVERSAL WASTE

SHIPPER	
ADDRESS	
CITY, STATE, ZIP _	
CONTENTS	
ACCUMULATION	START DATE

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# What is the Accumulation Time Limit for an LQG?

- A) 30 days
- B) 90 days
- C) 180 days
- D) 1 year





# **BREAKTIME!**



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## Shipping Paperwork: Manifest, Consolidated Manifest, Bill of Lading



### The Haz Waste Manifest 22 CCR 66262.23

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- Used for shipping most waste not eligible for consolidated manifest
- You end up with 2 copies
  - "Generator Initial" (proof of shipment)
  - "Designated Facility to Generator" (proof of receipt)
- Suggest stapling together once you get the "designated facility to generator" copy
- You need to make a legible copy of "Generator Initial" copy and send to DTSC

## Uniform Hazardous Waste Manifest

- ✓ Generator EPA ID Number
- ✓ Page Numbers (all pages)
- Emergency Response Telephone #
- ✓ Manifest Tracking Number
- ✓ HW Shipping Descriptions
- ✓ HW Quantity & Type of Containers
- ✓ HW Total Quantity
- ✓ HW Unit of Measurement
- ✓ HW Waste Codes
- ✓ Generator / Transporter Info & EPA #s
- Signatures / Dates by Generator & Transporter

1	emported 1 Company Name						0.5.0%2	Number	_		-
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	importer 2 Company Name		4	_		_	U.S. IPA D	Nation			
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## Generator -Mailing Addresses

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For ALL shipments mail legible copy to: DTSC Generator Manifests P.O. Box 400 Sacramento, CA 95812-0400

For rejected shipments mail either top or second copy to:
DTSC Facility Manifests
P.O. Box 3000
Sacramento, CA 95812-3000



## Transporter Rules

22 CCR 66263.10 et seq



- Transporter must be registered by DTSC to transport HW and DOT and CHP for hazardous materials, generally.
- Transporter must be trained in DOT rules, including packaging and placards, as appropriate. (49 CFR 172.704)
- Generator may self-transport 5 gallons or 50 pounds to an authorized facility, without registration.



After Sending the Waste... 22 CCR 66262.42

 Must contact the transporter and/or TSDF if you do not receive the signed manifest back within 35 days of when it was accepted by the transporter.



## What Happens if a Generator S<u>till</u> Does Not Receive a Signed Copy from the TSDF?

# They must submit an Exception Report to DTSC!

## What to Do?

- Must be sent if no signed manifest is received within 45 days from acceptance by the transporter
- Must include:
  - 1. A legible copy of the manifest.
  - 2. A signed cover letter detailing the efforts taken to locate the hazardous waste and results of those efforts



## Bill of Lading & Consolidated Manifest

- Bill of Lading (BOL) like a manifest, not as detailed
- Consolidated Manifest- transporter picks up waste, leaves receipt for generator
  - Transporter will put their name as generator and transporter on actual manifest.

## **Bills of Lading**

#### Used for

- Universal Waste (§66273.39)
- Shop rags (HSC, §25144.6)
- Used oil and gasoline filters (headed to recycling) (§66266.130/§25250.22)
- Automotive Lead-Acid Batteries (§66266.81)
- Recyclable Materials (ERMs) (HSC, §25143.2(f))

#### No specific format



What is a Consolidated Manifest? Per HSC 25160.2

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•

•



A transporter operating under a consolidated manifest can pick up wastes from many generators and use only one consolidated manifest, per day, per driver.

Mostly for SQGs of non-RCRA HW

Must enter into an agreement with the transporter that the transporter will report that the waste has made it to an authorized facility.

*Must keep copies* of agreement for 3 years after contract expires and copies of shipping receipts for 3 years from date of shipment.

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Consolidated Manifest Records HSC, §25160.2

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- You get a receipt showing your name, your ID #, what you shipped, how much, and to where you shipped
- The transporter will still use a Hazardous Waste Manifest (i.e. the consolidated manifest).
- The transporter is listed as the generator on consolidated manifests and is responsible for distributing, tracking, and maintaining manifest records.

#### Consolidated Manifests Waste Streams HSC, §25160.2(c)(2)

The wastes streams listed below may be shipped on a consolidated manifest by the following facilities:

All facilities:

- Used Oil
- The contents of an oil/water separator

Only SQGs:

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- Solids contaminated with used oil
- Brake fluid
- Antifreeze
- Antifreeze sludge
- Parts cleaning solvents, including aqueous cleaning solvents
- Hydroxide sludge contaminated solely with metals from a wastewater treatment process

- "Paint-related" wastes
- Spent photographic solutions
- Dry cleaning solvents, including perchloroethylene, naphtha, and silicone-based solvents
- Filters, lint, and sludges contaminated with dry cleaning solvent
- Asbestos-containing materials
- Inks from the printing industry
- Chemicals and lab packs from K-12 schools
- Absorbents contaminated with other wastes listed above
- Filters from dispensing pumps for diesel and gasoline fuels
- Disabled vehicle wastes

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## The Biennial Report

40 CFR 262.41 22 CCR 66262.41



## Who must submit the Biennial Report?

- RCRA LQGs and RCRA TSDFs
  - Even if only for a month in odd number years!
- Must use U.S. FPA Form 8700-13A/B
- Can be completed and submitted through RCRAInfo

- When?
  - By March 1<sup>st</sup> of Even-**Numbered Years!**

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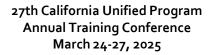
### What is Included?



- General information
  - EPA ID number, name and facility address.
  - EPA ID number, name and address for each TSDF in the US used.
  - Name and ID number of each transporter used during the previous year.
- Information on the waste generated during the previous year.
- Description of efforts to reduce volume and toxicity of waste generated
- Changes in volume and toxicity compared to previous years

## Quiz time! What must be included on the manifest?

- A. The Generator's EPA ID Number.
- B. The words "Universal Waste X".
- C. The accumulation start date.
- D. The home address of the signer.





Contingency Plan Requirements





## What is a Contingency Plan?

#### 22 CCR 66262.260-263 & 22 CCR 66265.50-56

## A plan to minimize hazards from fires, explosions or releases of hazardous waste.



## The Contingency Plan...

22 CCR 66262.261



SHALL DESCRIBE THE ACTIONS OF FACILITY PERSONNEL IN RESPONSE TO FIRES, EXPLOSIONS, ETC.

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DESCRIBES ARRANGEMENTS AGREED TO WITH LOCAL AUTHORITIES.

CAN BE BASED ON A SPILL PREVENTION, CONTROL AND COUNTERMEASURES (SPCC) PLAN. SHALL BE PROVIDED TO ALL LOCAL EMERGENCY RESPONDERS (66262.262(A))

#### What Should Be Included?

22 CCR 66262.261



Names, addresses, and emergency telephone numbers of all persons qualified to act as emergency coordinator



A list of all emergency equipment and the location and description of each item An evacuation plan for personnel

The current telephone number of the state Office of Emergency Services



When Should the Contingency Plan be Amended? 22 CCR 66262.263

- When applicable regulations are revised.
- When the plan fails.
- The facility changes in a way that increases the potential for fires, explosions, etc.
- Emergency Coordinators change
- Emergency equipment changes.

#### Is There Anything Else For the Contingency Plan?





GIR brought the Quick Reference Guide (QRG)!

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## What is the Quick Reference Guide?

A reference for first responders in the event of an emergency or release!

Must be developed by all new LQGs.

Existing LQGS must develop one when amending their contingency plan.



#### Elements of the QRG

- 1. Types/names of HW and associated hazards
- 2. Maximum amount of each HW
- 3. Identification of any HWs where exposure would require unique or special treatment
- 4. A map of the facility showing where HW are generated, accumulated and treated
- 5. A **street map** of the facility in relation to surrounding area
- 6. The locations of water supply (e.g. fire hydrant and its flow rate)
- 7. The identification of **onsite notification systems** (e.g., a fire alarm that rings offsite, smoke alarms)
- 8. The name of **emergency coordinator(s)** and 7/24-hour **emergency telephone number**

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### **Employee Training**



# What are the Training Requirements?

• Separate LQG and SQG requirements

LQG Training Requirements	SQG Training Requirements
22 CCR 66262.17(a)(7)	22 CCR 66262.16(b)(7)

Take Away: LQG's have more training requirements

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#### What is Required of LQGs? 22 CCR 66262.17(a)(7)

Personnel most complete training in how to perform their duties to ensure compliance with applicable laws and regulations and emergency response

• Must be completed within 6 months of hire or entering a new position

Personnel must take part in an annual review of initial training

The facility must maintain records detailing the training

They must maintain records detailing who has received training for three (3) years



#### Emergency Response



- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- Parameters for automatic waste feed cut-off systems;
- Communications or alarm systems;
- Response to fires or explosions;
- Response to groundwater contamination incidents;
- Shutdown of operations;
- Self-protection measures; and
- Accident prevention methods.

Further LQG Training Requirements

- Employees shall not work in unsupervised positions until they have completed the training
- Training must be directed by a person trained in hazardous waste management procedures
- Shall include instruction on hazardous waste management procedures (including contingency plan) relevant to their positions
- Every 24 months:
  - Training for all personnel: overview of the facility and operations
  - Function-specific job training related to hazardous waste management



#### What about SQGs?

22 CCR 66262.16(a)(7)(C)

#### **Basic Training:**

The small quantity generator shall ensure that all employees are thoroughly familiar with **proper waste handling and emergency procedures relevant to their responsibilities** during normal facility operations and emergencies

- No Training Records required\*
- No Frequency for Training/Refreshers\*
  - \*May be required by other laws or regulations



# Pop quiz! What should be included in the Contingency Plan?

A.) An evacuation plan for personnel.

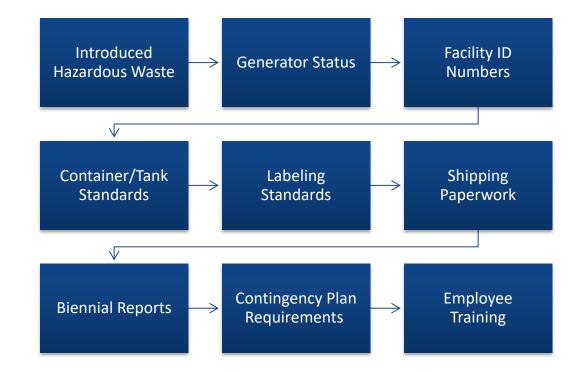
#### B.) Home addresses for all personnel.

C.) DTSC's emergency response email.



#### Today We Talked About...

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#### Resources

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- Department of Toxic Substances
   <u>Control website</u>
- <u>CUPA Training and Assistance Unit</u> webpage
- DTSC Generator Guidance
- <u>RCRAInfo</u>
- <u>Title 22 Divison 4.5 Regulations</u>
- DTSCGreen: DTSC's YouTube channel

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# **Any Questions?**

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