

State of Maine



Handbook for Hazardous Waste Generators



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Introduction to Hazardous Waste

In 1976, the United States Congress enacted the Resource Conservation and Recovery Act (RCRA) to protect public health and the environment from improper management of hazardous waste. This Act directed the U.S. Environmental Protection Agency (EPA) to issue federal regulations for the safe management of hazardous wastes. The federal regulations pursuant to RCRA are in the Code of Federal Regulations (CFR) Title 40, Parts 260 through 270.

The State of Maine has authorization to implement its own RCRA program at the state level. Maine's RCRA rules can be found in the "Hazardous Waste Management Rules", which in some cases are stricter than the federal regulations. The State rules are in Chapters 850 to 857. This handbook is a summary of the hazardous waste generator requirements. It is not meant to replace State or Federal Regulations. The "Hazardous Waste Management Rules" include the complete requirements for generators as well as the requirements for hazardous waste transporters and facilities that treat, store or dispose of the hazardous waste. If you would like a copy of the "Hazardous Waste Management Rules" please call (207) 287-7688, or make a written request to:

Maine Department of Environmental Protection
Bureau of Remediation and Waste Management
17 State House Station
Augusta, Maine 04333-0017

The Rules and this Handbook are also available on the internet through the DEP Web page at <http://www.maine.gov/dep/waste/hazardouswaste/index.html>

Please note: Hazardous Waste generators are regulated in the State of Maine regardless of the volume of waste they generate. However, there are fewer waste management requirements if a site generates or stores a small volume of hazardous waste.

Purpose

The purpose of this handbook is to provide information to those in business, industry, and institutions who may be generators of hazardous waste and to inform them of their responsibilities for proper hazardous waste management.

This handbook will help you determine:

- if you generate hazardous waste;
- if your wastes are regulated under Maine law;
- if you are a small quantity generator or a fully regulated generator;
- how to manage your hazardous waste;
- how to manifest your hazardous waste;
- how to dispose of your hazardous waste properly;

Who generates hazardous waste and how?

Hazardous waste can be generated by industrial companies, laboratories, recyclers, hospitals, family-owned businesses, veterinarians, schools, and any other type of facility, excluding households. Hazardous waste can be discarded paints, spent solvents, contaminated waste oil, cleaning compounds, by-products of manufacturing, products with an expired shelf life, discontinued supplies, and materials damaged during shipping. The following list contains some common examples of activities that generate hazardous waste.

- painting and refinishing
- printing and clean-up activities
- solvent use
- dry cleaning
- electroplating & metal finishing
- x-ray and photo developing
- repair and maintenance of motor vehicles
- plastics or fiberglass manufacturing or molding
- boat building
- laboratory work
- pulp and paper manufacturing

How do I determine if I generate Hazardous Waste?

All generators of hazardous wastes are required to identify their wastes and determine whether they are hazardous. Waste may be determined to be hazardous because it exhibits a hazardous **characteristic**, or because it is a **listed** waste. The full details and exclusions are itemized in the “Hazardous Waste Management Rules” (the “Rules”, Chapter 850). For example, household waste is exempt from the hazardous waste management requirements.

Does my waste exhibit a hazardous characteristic?

If your waste exhibits any of the following four (4) characteristics, it is a hazardous waste:

1. **Ignitability** - *waste code D001*
The waste is a liquid and has a flash point of less than 140°F, or
The waste is an ignitable compressed gas, or
The waste is an oxidizer
Examples are solvents and paint thinners
2. **Corrosivity** - *waste code D002*
The waste is an aqueous liquid with a pH less than or equal to 2.0, or
greater than or equal to 12.5
Examples are acids and caustics
3. **Reactivity** - *waste code D003*
The waste is reactive with water, shock, heat, pressure, or
The waste reacts to give off toxic gases, or
The waste is unstable and reacts rapidly or explosively
Examples are peroxides, cyanides, perchlorates
4. **Toxicity Characteristic Leaching Procedure (TCLP)** -
waste codes D004-D043
This category includes wastes that leach more than a specified amount
of heavy metals (arsenic, barium, cadmium, chromium, lead, mercury,
selenium, and silver), one of six (6) pesticides, or certain organic
compounds. An example is lead paint chips that leach more than 5.0
mg/l of lead under specific laboratory conditions.

Is my waste listed as a hazardous waste?

Your wastes may be listed as hazardous wastes. There are five (5) categories of listed hazardous waste.

1. **Non-specific sources** - *waste codes F001-F028*
Wastes in this category include halogenated and non-halogenated solvents, electroplating wastewater treatment sludges, spent plating solutions, and many others. Examples are trichloroethylene, xylene, methyl ethyl ketone, benzene, acetone, toluene, methylene chloride, and 1, 1, 1-trichloroethane.
2. **Specific sources** - *wastes codes K001-K087*
Wastes in this category are from specific listed processes. An example is the bottom sludge from wastewater treatment from wood preserving processes that use creosote and/or pentachlorophenol.
3. **Commercial chemical products, intermediates or off-specification products** - There are two (2) sources:
 - A. **Acute wastes** - *waste codes P001-P158*
Examples of these acute wastes are copper cyanide, chlorine, and epinephrine. Please note that due to the **acutely** hazardous nature of these "P" wastes, there are different limits on how much can be generated or stored. Please see page 8 for details.
 - B. **Non-acute wastes** - *waste codes U001-U359*
Examples of these wastes are phenol, ethanol, and naphthalene.
4. **Polychlorinated biphenyls (PCBs)** - *waste code M002*
Maine regulates PCBs as hazardous wastes if the concentration is greater than 50 parts per million (ppm). Refer to the Rules, Chapter 850.3(C)(2)(b) and 40 CFR, Part 761.3 for additional information. PCBs have been identified in dielectric fluids, waste oils, and transformers.

Still confused if your waste is a hazardous waste?

There are several places you may obtain information about a waste you have accumulated at your site:

1. Look at the label for product name, ingredient list, manufacturer, and warnings.
2. Inquire with your supplier.
3. Contact the manufacturer.
4. Read the Material Safety Data Sheet (MSDS).
5. Consult the Farm Chemicals Handbook.
6. Compare the product information with the characteristics and lists in Chapter 850 of the “Hazardous Waste Management Rules”.
7. Have a sample of the waste analyzed by a laboratory.
8. Contact the Maine DEP – Bureau of Remediation and Waste Management at (207) 287-7688.

If you find a waste at your site that has no product information (perhaps a label is unreadable), your only alternative is to have a commercial testing laboratory sample and analyze your waste. You should ask the lab to perform only those tests needed to determine whether the waste is hazardous, and any tests required by your licensed waste disposal facility prior to their acceptance of the waste. You can reduce your analytical costs by providing the laboratory with as much information as possible about the waste. The laboratory you choose must use EPA approved methods to analyze the waste. Be sure to select a lab that is familiar with and competent in the use of EPA methods.

Am I an SQG, an SQG Plus, or a LQG Generator?

Small Quantity Generator (SQG)-

An SQG **generates** less than 100 kilograms of hazardous waste* per calendar month. 100 kilograms (kg) = 220 pounds (approximately 27 gallons or ½ of a 55-gallon drum, based on the weight of water);

AND

Accumulates a total of no more than 55 gallons (1 drum) of hazardous waste* on site at any one time.

SQGs have the fewest regulatory requirements (see page 9).

SQG Plus (1 to 3 drums)-

An SQG plus **generates** less than 100 kilograms of hazardous waste* per calendar month (approximately 27 gallons based on the weight of water);

AND

Accumulates one to three drums, but no more than 600 kilograms (1320 pounds) of hazardous waste* on site at any one time.

SQG Pluses have extra regulatory requirements in addition to those that SQGs must comply with (see page 10).

Large Quantity Generators (LQG)-

Generates 100 kg or more per calendar month;

OR

Accumulates more than 600 kg of hazardous waste* on site at any one time.

Large Quantity Generators have the most regulatory requirements. See pages 11 to 16

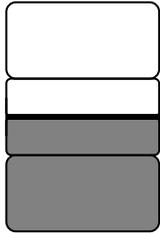
**Please see page 8 for acute hazardous waste (P listed) exceptions*

Which category am I in?

You must add up all of the hazardous waste you generate and/or accumulate at your site. (See page 8 for acute hazardous waste amounts.)

Monthly Generation Rate

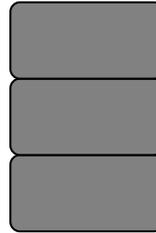
SQG- $\leq 1/2$ drum



And

On Site Accumulation

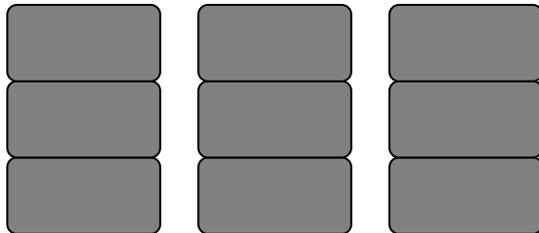
Up to 1 drum
180 day storage limit



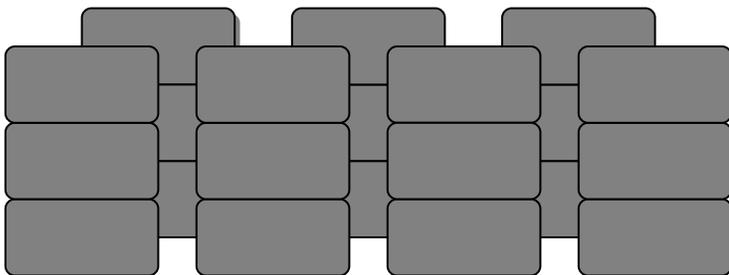
SQG Plus- $\leq 1/2$ drum And



Up to 3 drums, storage limited to
180 days after each is full



LQG- $>1/2$ drum



Or more than 3 drums or 1320 lbs,
(provided there is sufficient storage
capacity,) storage limited to 90 days
after the container's accumulation
start date

Acute Hazardous Waste P001- P158

Not many companies in Maine generate or store acute hazardous waste. If you do, and you want to maintain status as an SGQ, you must abide by the following generation and storage limits:

You must not **generate** more than one (1) kg of acute hazardous waste per calendar month; And

You must not **accumulate** more than one (1) kg of acute hazardous waste at any time; And

You must comply with all of the requirements of the Rules, Chapter 850.3(A)(5)(c)

One (1) kg is approximately equal to two (2) pounds or a quart of liquid. The volume will vary depending upon the density of the waste.

Management Requirements for SQGs

The following requirements must be met by each SQG that stores a total of 55 gallons or less of hazardous waste:

1. Determine which of your wastes are hazardous
For more information, see page 11, paragraph #1 of this handbook
2. Store hazardous wastes in containers of 55-gallon size or less
See the Rules, Chapter 850.3(A)(5)(d)(ii)
3. Label each container "Hazardous Waste"
See page 11, paragraph #2 of this handbook
4. Label each container with the date you first deposit waste in it, and with the date the container becomes full
See the Rules, Chapter 850.3(A)(5)(d)(ii)
5. Ship each full container off site within 180 days of filling
See the Rules, Chapter 850.3(A)(5)(d)(vi)
6. Use a hazardous waste manifest form
See page 11, paragraph #5, and page 18 of this handbook
7. Use a hazardous waste transporter, licensed by the state of Maine
See page 12, paragraph #6 of this handbook
8. Send waste to a licensed, authorized hazardous waste facility
See page 12, paragraph #7 of this handbook
9. Report **all** hazardous waste & hazardous matter discharges to the DEP
See page 12, paragraph #8 of this handbook
10. Do not treat hazardous waste unless licensed to do so
See page 12, paragraph #9 of this handbook

Note: SQG in this category may use Maine's generic generator ID#, **MEX02000000** on manifests, and need not obtain their own generator EPA ID#. However, if a site already has been previously assigned a site-specific generator EPA ID# number, then it must be used instead of the generic number. For more information, see page 12, paragraph #10 of this handbook, and box 1 on Appendix C.

SQG Plus (1 to 3 drums)

A small quantity generator may *elect* to store up to 600 kg (about 3 drums) of waste, if they follow the 10 steps on page 9 of this handbook, plus:

11. Obtain an U.S. EPA Hazardous Waste Generator Identification Number
For more information, see page 12, paragraph #10 of this handbook
12. Label & package hazardous waste containers in accordance with DOT requirements before shipping
See page 13, paragraph #11 of this handbook
13. Inspect containers of hazardous waste weekly and keep a log
See page 13, paragraph #12 of this handbook
14. Store ignitable and reactive waste 50 feet from the property line
See page 13, paragraph #13 of this handbook
15. Store incompatible hazardous wastes separately
See page 13, paragraph #14 of this handbook
16. Store in containers which are free of rust, dents, bulges, leaks or other damage, and compatible with the waste stored in them
See page 14, paragraph #15 of this handbook
17. Keep containers closed except when adding or removing waste
See page 14, paragraph #16 of this handbook
18. Store all waste on a firm working surface, impervious to leaks
See page 14, paragraph #17 of this handbook
19. Provide secondary containment sufficient to contain all leaks
See page 14, paragraph #18 of this handbook
20. Follow appropriate closure procedures when hazardous waste generation activities cease
See page 14, paragraph 19 of this handbook

Management Requirements for Large Quantity Generators

The hazardous waste management requirements for generators are listed below. Where needed, more information is provided and the applicable regulations, rules or statute is referenced.

1. Determine if the wastes are hazardous--
Waste definition was covered earlier in this handbook. For more details see Chapter 850 of the Hazardous Waste Management Rules (the Rules).
2. Label each container with the words "Hazardous Waste"--
You may purchase labels or mark containers by hand. Labeling must be clearly readable. See the Rules, Chapter 851.8(B)(3).
3. Label each container with the date you first put hazardous waste in it -
This is called the accumulation start date (ASD). The hazardous waste must be transported off site within 90 days of the ASD. (There is an exception for Satellite Accumulation Areas, see page 17) See the Rules, Chapter 851.8(B)(3). For the SAA exception, see the note in the Rules, Chapter 851.8(C).
4. Ship each container within 90 days of the accumulation start date--
This is very important. If you store hazardous waste for more than 90 days, you must contact the DEP for an extension or to apply to become a hazardous waste storage facility. See the Rules, Chapter 851.8(B). For accumulation start dates at Satellite Accumulation Areas, see page 17 of this handbook.
5. Use a hazardous waste manifest form--
This requirement will be covered in the next section beginning on page 18. Manifesting requirements are covered in the Rules, Chapter 857.
6. Use a licensed hazardous waste transporter--
A list of currently licensed hazardous waste transporters may be obtained by calling the DEP at (207) 287-7688, or on the DEP web page. See the Rules, Chapter 851.7(A).
7. Send waste to a licensed, authorized facility--
Hazardous waste facilities are licensed to receive only specific types of waste. You may discuss your waste stream with the facility, your transporter, and the DEP. It is your responsibility to investigate any facility you send hazardous waste to, so as to be certain they are authorized to handle your waste type. See the Rules, Chapter 851.7(B).

8. Immediately report all hazardous waste and hazardous matter discharges to DEP--
Any time hazardous waste or matter leaks, spills or discharges from its primary container, it must be reported to the State Police at 1-800-452-4664. They will in turn notify the DEP. In addition, a written report must be sent to the DEP for each spill. The written report is required in 15 days in the case of a hazardous waste spill, and within 30 days for a hazardous matter spill. These requirements are covered in 40 CFR 264.56(j), the Maine Revised Statute Annotated (M.R.S.A.), Title 38, Section 1318-B(1) and in the Hazardous Matter Rules, Chapter 801.3(A). An example of a Spill Report Form can be found in Appendix D. Federal Reportable Quantities do not apply to spill reporting in Maine unless a Spill Prevention Control & Clean-up Plan (SPCC) has been filed with the Department.
9. Do not treat hazardous waste unless licensed to do so--
No company is allowed to treat waste on site without a license. Typical forms of treatment might include compaction, recovering silver, distilling, recycling, burning, or filtering. If you think you may be treating hazardous waste, please call DEP to inquire if a license is required, at (207) 287-7688. Evaporation of hazardous waste is prohibited.
10. Obtain a U.S. Hazardous Waste generator identification number--
Small quantity generators who accumulate no more than 55 gallons of hazardous waste may use Maine's generic generator number, MEX020000000. All other generators must apply for their own site specific generator number. The multi-page application form is called an EPA form 8700-12 (Site Identification Form). The notification package includes instructions and may be obtained from the DEP web page: <http://www.maine.gov/dep/waste/hazardouswaste/index.html> or from the DEP at the address given below:

Dept. of Environmental Protection Bureau of Remediation and
Waste Management
17 State House Station
Augusta, Maine 04333
Or call (207) 287-7688

11. Label and package hazardous waste containers in accordance with DOT requirements before shipping--
Before your hazardous waste is transported off-site, it must be properly described, classed, packaged, marked and labeled, and be in proper condition. Your licensed hazardous waste transporter can be of help to assure that your waste is ready to be shipped. For specific details, see the Rules, Chapter 851.8(A) and Title 49 of the CFR, Parts 100-199.

Please note that for state-only hazardous wastes, if they also are not DOT regulated hazardous materials, the requirements of 49 CFR 172.304 do not apply. Thus for any such wastes, instead of following the marking requirement specified in this section, generators should instead mark each container as follows:

State of Maine Hazardous Waste - - State Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the Maine Department of Environmental Protection (1-800-482-0777).

Generator's Name & Address _____

Manifest Document Number _____

12. Inspect containers of hazardous waste weekly and keep a log of the inspection--
Each location where hazardous waste is stored must be inspected weekly. The inspections must be noted in a log, containing the inspector's name or initials, the date and time of inspection, and the results of the inspection including the results of tank, valve, and pipe testing (if applicable). The inspector should verify that no containers of waste are rusting, bulging or leaking, and that there is sufficient aisle space between containers to allow for inspection and remediation. These logs must be kept on site for at least one year. Inspections may be your best way to verify that your storage practices meet all of the hazardous waste management requirements. There are examples of inspection checklists in Appendix A of this handbook. See also, the Rules, Chapter 851.9(C) and 13(D).
13. Store ignitable/reactive waste 50 feet from the property line--
Ignitable (D001) and Reactive (D003) wastes must be stored on your property at least 50 feet from the property line. See the Rules, Chapter 851.8(B)(2) and 40 CFR 265.176.
14. Store incompatible hazardous waste separately--
Some types of waste are not compatible with one another and may burn, explode, or react if mixed. Extra effort must be made to keep these wastes isolated from one another in the event of leakage from their containers. Berms, dikes, fire cabinets, and separate storage areas are examples of ways to keep these materials apart. See the Rules, Chapter 851.13(C)(6) and 40 CFR 265.177(c).

15. Store in containers which are free of rust, dents, bulges, leaks or other damage, and compatible with the waste stored in them.--
Hazardous waste may not be stored in any container which is rusted, bulging or leaking. See the Rules, Chapter 851.13C(3). Additionally, the tanks and containers used to store hazardous waste must be compatible with the waste stored in them. For example, strong acid waste should not be stored in certain metal drums. Over time the acid may corrode the metal and cause the drum to leak. See the Rules, Chapter 851.13(C)(4), Chapter 851.8(B)(2), 40 CFR 265.172, and 40 CFR 265.177 regarding incompatible containers and wastes.
16. Keep hazardous waste containers closed--
All containers of hazardous waste must be securely closed except while waste is being added to, or removed from the container. See the Rules, Chapter 851.8(B)(2) and 40 CFR 265.173.
17. Store all waste on a firm working surface, impervious to leaks--
Hazardous waste containers should be stored on a leak-proof surface. Concrete and black top floors should be checked for cracks or other routes where spills could leak out. Flooring may be sealed with an epoxy that is resistant to the chemicals stored on it. Dirt, gravel, sand or slatted wood flooring are not adequate to contain waste. See the Rules, Chapter 851.13(B)(1).
18. Provide secondary containment sufficient to contain all leaks--
Each location where hazardous waste is stored must provide a containment and collection system designed to collect all waste that may spill from the stored containers. The containment must be designed to hold 20% of all the waste in storage, or 110% of the largest container in storage, whichever is the greater amount. See the Rules, Chapter 851.13(B)(2).
19. Provide certified closure, as required, when generation activity ceases--
A generator who plans to cease generation of hazardous waste (or move or vacate a property) must notify the DEP 45 days prior to closure. Closure procedure requires cleaning the site of any hazardous waste or residues. An independent professional engineer and a company representative must both certify that the site is free of contamination. For complete closure requirements, see the Rules, Chapter 851.11.
20. Allow 36" access aisles to container for inspection & remediation--
Hazardous waste containers must be stored in a manner which allows for the movement of people and equipment between them for the purposes of inspection and remedial action. Containers may be stacked in the storage area, within certain limitations. Containers larger than 10 gallons may not be stacked more than two (2) high. If they are stored next to a wall, or other structure, they may only be stored one row deep. If they are stored in the middle of a storage area, they may be in rows up to four (4) wide. See the Rules, Chapter 851.13(C)(7).

21. Store waste in a secure area to prevent entry by unauthorized people-- Hazardous waste storage areas must be kept secure (for example, behind a locked door or fence) to prevent entry to the area by unknowing and/or unauthorized people. These requirements may be found in more detail in the Rules, Chapter 851.13(C)(7)(i) and 40 CFR 264.14.
22. Post a sign reading “Danger- Unauthorized Personnel Keep Out”-- This warning sign is required in 40 CFR 264.14.
23. Internally inspect hazardous waste tanks and valves yearly and have hazardous waste pipelines and valves pressure tested yearly-- See the Rules, Chapter 851.13(C)(2).
24. Provide personnel training upon hire and thereafter refresh annually-- Each person who handles or manages hazardous waste at your facility must be trained within six (6) months of hire, and then yearly, to perform their duties in a way that ensures your company will be in compliance. The training must teach each employee to perform the hazardous waste management procedures relevant to their position. This training should familiarize employees with the Hazardous Waste Contingency Plan and must document the following:
 - The employee’s name and job title
 - A job description for each job title
 - The type and amount of training required for that job
 - The dates that training was received by each employee
 - A basic course description or outline that the employee was trained to respond to emergencies at the company.All of these training requirements are federal standards referenced in Chapter 851.8(B)(5) and may be read in 40 CFR 264.16.
25. Develop a Hazardous Waste Contingency Plan-- The purpose of a Contingency Plan is to prepare for a hazardous waste-related emergency, such as a spill, fire or explosion, so that employees and local authorities can respond effectively to such emergencies. There are four (4) elements to a hazardous waste contingency plan. Each plan must include evacuation procedures, an emergency coordinator (EC) list, emergency procedures, and an emergency equipment list. There is a Hazardous Waste Contingency Plan Deficiency List in Appendix B which outlines all of the elements of a complete contingency plan. Also see 40 CFR 264.51 through 264.56.

26. Request mutual aid agreements from community support organizations--
You must attempt to enter into mutual aid agreements with the local fire department, police department, hospital, and hazardous waste contractor. You must send each party a copy of your Contingency Plan to familiarize them with your facility, the types of hazardous wastes you have on site and the types of problems or injuries that may result. The mutual aid agreement should specify each organization's duties in the event of an unplanned release. Mutual aid agreements must be updated annually, and any refusals to enter into an agreement must be documented. This is normally done by sending a request via certified mail, with a return receipt. See the Rules, Chapter 851.13(C)(7)(c)(ii) and 40 CFR 264.37.

27. File an annual report with the DEP by March 1--
The DEP will provide an annual Hazardous Waste Report form and instructions to each company. This must be filled out and returned to the DEP no later than March 1 of each year, for the previous calendar year's hazardous waste activity. If you need a form, call the DEP at (207) 287-7688. See the Rules, Chapter 851.9(E) and 9(F). Annual Hazardous Waste Reports must be maintained on a site for at least ten (10) years. See the Rules, Chapter 851.9(B).

Management Requirements for a Satellite Accumulation Area (SAA)

Satellite Accumulation Areas (SAAs) are places on the work floor (in the production area) where hazardous waste is allowed to accumulate if the following nine (9) requirements are met. SAAs are an optional waste management practice described in the Rules, Chapter 851.8(C).

1. The SAA must be at the point of hazardous waste generation **and** under the control of an operator
2. No more than 55 gallons of each waste type shall be collected at an SAA
3. Each container must be marked with the date it becomes full, and either transported off site or moved to a hazardous waste storage area within 72 hours.
4. Each container must be labeled as “Hazardous Waste”.
For more information see page 11, paragraph #2 of this handbook
5. Each SAA must be inspected weekly and an inspection log must be maintained
See page 13, paragraph #12 of this handbook
6. Ignitable/reactive waste must be stored 50 feet from the property line
See page 13, paragraph #13 of this handbook
7. Each container must be free of rust, dents or other damage
See page 14, paragraph #16 of this handbook
8. Each container must be closed except while adding or removing waste
See page 14, paragraph #17 of this handbook
9. Containers must be on a firm working surface, impervious to spills, and constructed to prevent spillage from leaving the area. The working surface or area must not have floor drains or other escape routes that a spill could reach.
See page 14, paragraph #17 of this handbook

Manifesting Hazardous Waste

The federal Uniform Hazardous Waste Manifest is a specific shipping document that must accompany all hazardous waste shipments. It is the generator's responsibility to ensure that the manifest is filled out completely and correctly. The manifest must be filled out before the waste leaves the site of generation and it must accompany the hazardous waste during shipment. Every person who handles the waste, including generator, transporter and designated facility/ receiving facility identifies themselves and dates and signs the manifest form. The manifest system tracks the hazardous waste "from cradle to grave."

As of June 30, 2018, the Uniform Hazardous Waste Manifest is available in either a paper form or as an electronic **e-Manifest** as part of the EPA's RCRA e-Manifest System.

Paper version of the Uniform Hazardous Waste Manifest

- This form is designated as EPA Form 8700-22 (Rev. 12-17) in the lower left corner of the form. The form is a 5-part form. (see Appendix C)
- Paper manifests may be purchased from any of the [EPA-approved Manifest Printers](#) listed on the EPA website. A licensed hazardous waste transporter may also provide a generator with the federal Uniform Hazardous Waste Manifest Form and can help with the preparation of the form. The instructions are on the back of each form. **Because the form is a 5-part form, it is necessary to press firmly or type, to ensure all copies are legible.**
- Prior to June 30, 2018, the paper version of the federal Uniform Hazardous Waste manifest was a 6-part form. Generators, transporters and hazardous waste facilities can continue to use the obsolete 6-part paper form if it is still available. If a user wishes to use the obsolete 6-part forms, they should undertake measures to minimize confusion in their use, such as applying a pre-printed adhesive label to the top copy with the accurate copy distribution language ("DESIGNATED FACILITY to EPA's e-MANIFEST SYSTEM").
- For paper manifests, if a generator is not registered in EPA's e-Manifest System, then a copy of the "Generator's Initial Copy" of the paper manifest must be submitted to the Maine DEP by the generator. The generator is responsible to make a photocopy of the manifest upon initiating a shipment and submit it to the Department within seven (7) days of the shipment, pursuant to the Hazardous Waste Management

Rules, [Chapter 857.7\(A\)\(5\)](#). The transporter may send copies of the manifest to the Department as a service to the generator.

- If a paper manifest is used, the generator should receive a fully executed “Designated Facility to Generator” copy of the manifest, signed by and sent from the Designated Facility, within 35 days of initial shipment. **The generator must retain this copy for at least 3 years.**
- If a generator does not receive a fully executed “Designated Facility to Generator” copy within 35 days of shipping the waste off- site, it must notify the DEP by calling (207) 287-7688. If the generator has not received a fully executed copy within 45 days of transport, it must send a written exception report to the DEP

[e-Manifest / link to EPA: Federal Uniform Hazardous Waste Manifest Form](#)

- e-Manifest: EPA has developed a national system, known as “e-Manifest”, for tracking hazardous waste shipments electronically. The e-Manifest system provides the option of using a paperless electronic manifest as part of the nation’s “cradle-to-grave” hazardous waste tracking requirement. As of June 30, 2018, e-Manifests may be used in lieu of the paper form.
- To use the e-Manifest, a generator must register with the EPA’s RCRA e-Manifest System. For more information on the e-Manifest System follow this link: <https://www.epa.gov/e-manifest>
- For e-manifests, if a Maine generator is registered in EPA’s RCRA e-Manifest System and documents its hazardous waste shipment electronically with an e-Manifest, then the generator does not need to mail a paper copy of the document to the Maine DEP.

Rejection Reports

If for any reason the Designated Facility rejects any part of the load, the generator must submit a Rejection Report to the DEP within twenty (20) days of the rejection. The report must include the following information:

- the Manifest Tracking Number (Item 4) from the original manifest
- the disposition of the rejected waste
- any changes in the information previously supplied on the original manifest

In Summary

As you can see, the amount of hazardous waste you generate or accumulate on site determines the amount of management you must provide for that waste. If it is possible to reduce, or even eliminate the amount of hazardous waste you generate or accumulate on site, you can save yourself time, energy and money.

Most companies find it helpful to start by looking at their purchasing practices to review how many hazardous products they bring on site and how, through the process, it becomes a waste. You may be able to modify the method of use or application and thereby reduce the amount of product used or wasted. There are opportunities to make changes throughout the process, to reduce, replace or eliminate the hazardous product. This not only reduces the amount of hazardous waste you generate, but may also reduce your cost of production. It may also reduce the amount of regulation you may be subject to by the Environmental Protection Agency, other DEP Bureaus, programs, local laws, ordinances and codes.

There are several ways you can achieve reductions or eliminations in your hazardous waste stream. Perhaps the most effective is to determine if it is essential that you use materials that will become hazardous waste. You may be able to modify your product or process to eliminate the need of generating hazardous waste. You may also have success in reducing your rate of hazardous waste generation by reviewing housekeeping procedures. You may find that some materials can be used more than once, or longer than is the current practice, before they need to be disposed of. These suggestions may reduce either the frequency or the volume of waste that needs to be transported off site.

Often it is possible to substitute a new, non-hazardous product into your process in place of a hazardous product. This is particularly effective with cleaners. Many companies are saving money while changing from hazardous cleaners (solvents) to non-hazardous cleaners.

APPENDIX A

WEEKLY INSPECTION CHECKLIST FOR
HAZARDOUS WASTE CONTAINER STORAGE AREAS

DATE: _____ TIME: _____

INSPECTOR: _____

OBSERVATION	YES	NO
ARE ANY CONTAINERS OF WASTE OPEN?		
DO ALL CONTAINERS HAVE A HAZARDOUS WASTE LABEL?		
DO YOU HAVE ACCESS TO EACH CONTAINER AND CAN YOU READ THE LABEL? (36" AISLE)		
WHAT DATE WAS 90 DAYS PRIOR TO TODAY'S INSPECTION DATE?		
IS EACH CONTAINER MARKED WITH THE DATE ACCUMULATION BEGAN, OR IF FROM A SATELLITE ACCUMULATION AREA, THE DATE THE CONTAINER BECAME FULL?		
IS THE DATE ON ANY CONTAINER MORE THAN 90 DAYS OLD?		
ARE CONTAINERS DENTED, BULGING, RUSTED OR LEAKING		
ARE ALL CONTAINERS ON A FIRM WORKING SURFACE?		
IS THERE SUFFICIENT CONTAINMENT TO HOLD 20% OF ALL WASTE OR 110% OF THE LARGEST CONTAINER?		
WAS THE STORAGE AREA LOCKED WHEN YOU ARRIVED?		
DOES THE STORAGE AREA HAVE SIGNS THAT READ "DANGER UNAUTHORIZED PERSONNEL KEEP OUT"?		
WAS LAST WEEK'S INSPECTION COMPLETED?		

PROBLEMS:

REFERRAL TO:	
FOLLOW UP:	
ALL PROBLEMS CORRECTED ON (DATE)	(DATE)

APPENDIX A

WEEKLY CHECKLIST FOR HAZARDOUS WASTE
SATELLITE ACCUMULATION AREAS (SAAs)*

DATE: _____ TIME: _____

INSPECTOR: _____

OBSERVATION	YES	NO
ARE ANY CONTAINERS OF WASTE OPEN?		
DOES EACH CONTAINER HAVE A HAZARDOUS WASTE LABEL?		
ARE ANY CONTAINERS FULL?		
IS EACH FULL CONTAINER MARKED WITH THE DATE ON WHICH IT BECAME FULL?		
HAVE ANY CONTAINERS BEEN FULL FOR MORE THAN 72 HOURS?		
ARE ANY CONTAINERS DENTED, BULGING, RUSTED OR LEAKING?		
ARE ALL ON A FIRM WORKING SURFACE?		
IS THERE SUFFICIENT CONTAINMENT TO HOLD 20% OF ALL WASTE OR 110% OF THE LARGEST CONTAINER? (REQUIRED OF FLOOR DRAINS OR DOORS ARE NEARBY)		
HOW MANY CONTAINERS ARE AT THE SAA?		
ARE ANY CONTAINERS LARGER THAN A STANDARD 55-GALLON DRUM?		
DO ANY TWO (2) CONTAINERS HOLD THE SAME TYPE OF WASTE?		
WAS LAST WEEK'S INSPECTION COMPLETED?		

*BY DEFINITION, A SAA MUST BE AT THE LOCATION WHERE THE WASTE IS GENERATED AND IT MUST BE UNDER THE CONTROL OF THE OPERATOR(S), THE PERSON OR PEOPLE WHO GENERATE THAT WASTE.

PROBLEMS:

REFERRAL TO:	
FOLLOW UP:	
ALL PROBLEMS CORRECTED ON (DATE)	

**HAZARDOUS WASTE
CONTINGENCY PLAN DEFICIENCY LIST**

Company Name: _____

Contact Person: _____

Address: _____

Your Contingency Plan has been reviewed and found to be deficient. Below are listed all of the components of a complete Contingency Plan. The federal citations from the Code of Federal Regulations (40 CFR) are noted in the left margin for each Contingency Plan requirement. Those topics checked below must be included in your Contingency Plan before it is resubmitted to the Department of Environmental Protection for further review.

- 264.51(a) The purpose of a Hazardous Waste Contingency Plan is to minimize hazards to human health or the environment from an unplanned release of hazardous waste, such as a leak or fire. It is best to make your Contingency Plan specific to your facility. Start by identifying what hazardous wastes you have on site, in what volume, and where on the premises that waste is stored.
- 264.51(b) The provisions of the Plan must be carried out immediately whenever there is fire,
- 264.56(a) explosion or a release of hazardous waste.

I. Emergency Coordinator

- 264.52 It is the Emergency Coordinator's (EC) job to coordinate all emergency response efforts. The EC must be familiar with all aspects of your Contingency Plan,
- 264.55 facility operations, the location and characteristics of hazardous waste on site, the location of emergency equipment and the location of pertinent records. The EC must also have the authority to commit the resources needed to carry out the Contingency Plan. The primary EC must be listed first, followed by substitutes in the order they will assume responsibilities as alternates. Clearly indicate if an emergency coordinator is only for a particular shift or department. At all times there must be at least one employee on the premises, or on call and able to reach the facility quickly, to coordinate emergency response efforts.
- 264.52(d) A. The name of your emergency coordinator (EC) and substitutes
- B. The office and home addresses for each EC
- C. The office and home phone numbers for each EC
- 264.55 D. EC has authority to commit resources

II. Emergency Equipment

- 264.52(e) The contingency plan must include a list of **all emergency equipment** at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. **In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.**
- 264.32(a) ___ A. Describe the internal communication system or alarm system your facility uses to communicate emergency instructions to facility personnel (i.e. intercom system or siren alarm codes). Describe the equipment and its location.
- 264.32(b) ___ B. List and describe the communication equipment that is immediately available for hazardous waste handlers to summon emergency response (i.e. a telephone to call for an ambulance, or a two way radio to request assistance from the fire department). The communication system must be immediately accessible to personnel who pour, mix, spread, or otherwise handle hazardous waste. Describe the location of this equipment.
- 264.34 ___ C. If there is ever just one employee on the premises, that employee must have immediate access to a communication system capable of summoning external emergency assistance. Describe that equipment and its location.
- 264.32(c) ___ D. List the spill control equipment you have on site (i.e. absorbents, shovels, empty drums). After listing the equipment, describe where it is stored.
- 264.32(c) ___ E. List the fire control equipment you have on site (i.e. the type of fire extinguishers you keep in stock, and how often they are inspected). After listing each piece of equipment, describe its storage location.
- 264.32(c) ___ F. List the decontamination equipment you have on site (i.e. disposable gloves, neutralizing solution, and bottles of rinse water). After listing the equipment, describe its location.
- 264.32(d) ___ G. Describe the volume and pressure of the source of water you would use to fight a fire (i.e. automatic sprinkler system is tested annually by the fire department, or three 20 pound canisters of foam producing equipment are located in a shed on the south end of the hazardous waste storage building). List the equipment and describe its location.
- 264.33 ___ H. Include a statement that all communication systems or alarms, fire protection equipment, spill control equipment, and decontamination equipment are tested and maintained on a regular basis to assure their proper operation.

III. Emergency Procedures

Describe the actions to be taken by facility personnel in response to fire, explosion, or release of hazardous waste. (A release has occurred any time include the following, at a minimum:

- 264.52(d) ___ A. How to notify the EC of a release
- 264.56(b) ___ B. Characterize the nature and extent of the release
- ___ C. How to activate internal alarms or communication systems
- S1318-B (1) ___ D. Include procedures to immediately report releases of hazardous waste to the Department of Environmental Protection or the public safety authority (at 1-800-452-4664). NOTE: Federal Reportable Quantities (RQ) does not apply to spill reporting in Maine unless a Spill Prevention Control & Clean-up Plan (SPCC) has been filed with the Department.
- 264.56(e) ___ E. How to contain and collect released waste
- 264.56(g) ___ F. What to do with recovered waste and contaminated materials after the clean-up
- 265.56(j) ___ G. A written report must also be submitted to the Department within fifteen (15) days of the incident, including the following information:
 - 1. Name and telephone number of the reporter
 - 2. Name and address of facility
 - 3. Time and type of incident
 - 4. Name and quantity of materials released
 - 5. Injuries if any, and
 - 6. Possible hazards to human health or the environment

IV. Evacuation Plan

- 264.52(f) Prepare an evacuation plan for facility personnel including:
 - ___ A. Signals used to begin evacuation
 - ___ B. Evacuation routes
 - ___ C. Alternate evacuation routes

V. Aid Agreements

- 264.37(a) ___ A. Submit a copy of your Contingency Plan, with a cover letter to the local fire department, police department, nearby hospital, and emergency response contractors.
- 264.53(b) The cover letter must request that the agency provide support to your company in the case of fire, explosion or release of hazardous waste. A copy of your letter of request or the aid agreement must be included in your Contingency Plan. Your letter documents that assistance has been requested from each agency in the event that an agency does not respond or enter an aid agreement. The agreements must be renewed, in writing, annually or sooner if your Contingency Plan is amended.
- 264.37(b) ___ B. Include copies of the responses from the local fire department, police department, and hospital. If an agency declines to enter into such an arrangement, document their refusal. If you receive no response to your request

APPENDIX B

of support, document that a letter was sent to the agency. These Aid Agreements must be updated annually to keep your Contingency Plan current.

- 264.52(c) ___ C. The Contingency Plan must describe the arrangements agreed to by the local police department, fire department, and hospital (i.e. the fire department may agree to assist with evacuation, but refuse to fight fires in the hazardous waste storage area; the hospital may agree to treat only patients that have been previously decontaminated).
- 264.52(a) ___ D. An updated copy of your Contingency Plan must be kept at your facility.
- 264.54 ___ E. Your Contingency Plan must be amended if your facility permit is revised, or your Plan fails in an emergency, or your facility changes in design, construction, operation, or maintenance, or if the emergency coordinators change, or the emergency equipment list changes, or other circumstances change in a way that increases the chances of a fire, explosion, release, or changes the response necessary in an emergency.

Please print or type. 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		
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:							
GENERATOR	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 <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ 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		Month Day Year	

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete.

DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM

HAZARDOUS WASTE & HAZARDOUS MATERIAL
SPILL OR DISCHARGE REPORT FORM

All spills should be reported to the Department of Public Safety (State Police) immediately at 800-452-4664. Additionally, hazardous waste spills must be reported in writing to the DEP within 15 days. Hazardous material spills must be reported in writing to the DEP within 30 days. This form should be filled out by the spiller and returned to the DEP at the following address: Maine DEP, BRWM, Division of Response Services, 17 State House Station, Augusta, ME 04333 or addressed to the DEP Response Services Division staff person that responded on-scene or by telephone to the initial spill report call.

DATE & TIME OF CHEMICAL RELEASED: _____

NAME & ADDRESS OF COMPANY: _____

EXACT LOCATION OF SPILL: _____

CHEMICAL SPILLED: _____

AMOUNT: _____

CIRCUMSTANCES CAUSING RELEASE: _____

AMOUNT OF CHEMICAL RECOVERED: _____

METHOD OF RECOVERY: _____

METHOD & LOCATION OF DISPOSAL: _____

WERE THERE ANY PERSONAL INJURIES, HOSPITALIZATIONS OR DEATHS?

ACTIONS TAKEN TO PREVENT SIMILAR INCIDENT FROM RECURRING: _____

WAS THIS INCIDENT REPORTED IMMEDIATELY? DATE: _____ TIME: _____

CONTACT'S NAME: _____ PHONE# _____

REPORT PREPARED BY: _____ DATE: _____