

# TRAINING / COMPLIANCE MANUAL

## FOR COMPLIANCE WITH

### THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) /

### HAZARDOUS WASTE REGULATIONS

Company Name \_\_\_\_\_

Street Address \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Zip \_\_\_\_\_

Mailing Address \_\_\_\_\_

Mailing Address City \_\_\_\_\_

Mailing Address State \_\_\_\_\_

Mailing Address Zip \_\_\_\_\_

Contact Person  
(Environmental Information) \_\_\_\_\_

EPA Identification Number \_\_\_\_\_

Completed on (date) \_\_\_\_\_

Revised on (date) \_\_\_\_\_

**The information contained in this handbook is an overview of the hazardous waste management program in Kansas. The state and federal regulations should be consulted for more detailed information. Electronic copies of the federal and state regulations may be found at the following websites:**

**Federal Regulations:**

[http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=3e724f26b35020fb9f97705176208721&c=ecfr&tpl=/ecfrbrowse/Title40/40cfrv25\\_02.tpl](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=3e724f26b35020fb9f97705176208721&c=ecfr&tpl=/ecfrbrowse/Title40/40cfrv25_02.tpl)

**Kansas Regulations at the KDHE website:**

<http://www.kdheks.gov/waste/>

**The KDHE website also has policies, technical guidance documents, and other compliance tools available.**

**This document was last revised by KDHE on April 16, 2014.**

## 1.0 INTRODUCTION

This manual is designed to help Conditionally Exempt Small Quantity Generators (CESQGs), Kansas Small Quantity Generators (KSQGs) and Small Quantity Generators (SQGs) of hazardous waste remain in compliance with the state and federal hazardous waste regulations. When completed, this manual can be used as a guide to train employees on the specific types of hazardous waste generated at a facility and on the specific requirements to which that facility is subject.

A representative of the facility should first fill in all the “blanks” in this document to make it specific to their facility. This will include completing Attachments B, C, and D as described in the following sections. This will enable the facility to determine their hazardous waste generator classification (CESQG, KSQG, SQG, or Large Quantity Generator (LQG)). It will also identify the areas of the facility where hazardous waste is being generated and managed and who at the facility is responsible for the management of that waste. The employees that are responsible for the management of hazardous waste (i.e., labeling, dating, closing, inspecting, moving, etc.) should all be trained so that they are familiar with proper waste handling and emergency procedures relevant to their specific job duties.

In general, employees responsible for managing hazardous waste should be trained in the following areas, depending on an employee’s duties (Attachment A provides a checklist that can be used to document training):

- Hazardous Waste Generator Classifications (CESQG, KSQG, SQG, LQG)
- KDHE notification of hazardous waste activity
- Identification of hazardous waste (hazardous waste determination)
- Emergency response (fire, spills, etc.)
- Ensure that emergency preparedness requirements are met (Arrangements are made with local emergency response agencies including fire, police, and hospitals)
- Recordkeeping
- Container management
  - Labeling containers “Hazardous Waste”
  - Properly closing hazardous waste containers
  - Marking storage containers with the accumulation start date
  - Inspecting hazardous waste storage areas to ensure that containers are in good condition, properly labeled and closed, have proper aisle space and that incompatible wastes are not stored together.
  - Properly documenting hazardous waste storage area inspections
  - Ensuring that satellite accumulation containers are properly managed

## **2.0 BRIEF HISTORY OF HAZARDOUS WASTE REGULATION**

The Resource Conservation & Recovery Act (RCRA) was passed in 1976. As a result of this act, the U.S. Environmental Protection Agency (EPA) was tasked to create and implement regulations for the management of hazardous waste. RCRA regulates hazardous waste from the point inside a facility where it is generated to its final disposal location (cradle to grave). Kansas is authorized by EPA to regulate the management of hazardous waste generated, transported, treated, and/or disposed in Kansas. Kansas made significant revisions to the regulations in 2011.

## **3.0 HAZARDOUS WASTE MANAGEMENT IN KANSAS**

Kansas regulates hazardous waste at a lower quantity than EPA, which means that Kansas has more stringent requirements. In Kansas there are currently four generator classifications:

- Conditionally Exempt Small Quantity Generator (CESQG)
  - Generates less than 55 pounds of hazardous waste in a single month.
  - Never accumulates 2,200 pounds or more of hazardous waste.
    - Accumulating 2,200 pounds or more would cause the generator to be regulated as a SQG.
  - Generates less than 2.2 pounds of acutely hazardous waste in a single month.
  - Never accumulates 2.2 pounds or more of acutely hazardous waste.
    - Accumulating 2.2 pounds or more of acutely hazardous waste would cause the generator to be regulated as a LQG.
- Kansas Small Quantity Generator (KSQG)
  - Generates 55 pounds or more, but no more than 220 pounds of hazardous waste in a single month.
  - Never accumulates 2,200 pounds or more of hazardous waste.
    - Accumulating 2,200 or more pounds would cause the generator to be regulated as a SQG.
  - Generates less than 2.2 pounds of acutely hazardous waste in a single month.
  - Never accumulates 2.2 pounds or more of acutely hazardous waste.
    - Accumulating 2.2 pounds or more of acutely hazardous waste would cause the generator to be regulated as a LQG.
- Small Quantity Generator (SQG)
  - Generates more than 220 pounds or more, but less than 2,200 pounds of hazardous waste in a single month.
  - Never accumulates more than 13,200 pounds of hazardous waste.
    - Accumulating more than 13,200 pounds would cause the generator to be regulated as a treatment, storage, and/or disposal facility (TSDF).
  - Generates less than 2.2 pounds of acutely hazardous waste in a single month.
  - Never accumulates 2.2 pounds or more of acutely hazardous waste.
    - Accumulating 2.2 pounds or more of acutely hazardous waste would cause the generator to be regulated as a LQG.
  - Accumulates waste on-site for less than 180 days, or 270 days if shipping waste more than 200 miles.

- LQG Generator (LQG)
  - Generates 2,200 pounds or more of hazardous waste in a single month.
  - Generates 2.2 pounds or more of acutely hazardous waste in a single month.
  - Accumulates 2.2 pounds or more of acutely hazardous waste.
  - Accumulates waste on-site for less than 90 days.

RCRA puts the responsibility for proper management of hazardous waste on the generator. It is the generator's responsibility to ensure that the waste is properly managed from the point of generation to final disposal. A generator cannot release itself from liability for the waste simply by hiring a contractor. It is therefore imperative that each generator understand the responsibilities associated with generating hazardous waste. This manual is a guide to help ensure that hazardous waste is properly managed at the facility at all times.

#### **4.0 STEPS TOWARDS COMPLIANCE**

The following steps should be followed to properly manage hazardous waste:

- Step 1 This step will help identify all of the waste streams generated at the facility, and determine which ones are hazardous. Start by completing the "Industrial Waste Inventory Form" included in Attachment B for each waste stream. Technical Guidance Document (TGD) HW-2011-G1: Hazardous Waste Determinations and Documentation is also available on the KDHE website and provides more information on conducting a hazardous waste determination. This TGD also includes a form that would also work for documenting the hazardous waste determination for each waste stream.
- Step 2 Add up the number of pounds of hazardous waste generated per month (Questions 4 and 5 in Attachment B). Please note that averages cannot be used; the maximum monthly generation rate should be used.
- Step 3 Determine your generator status by comparing the total amount of hazardous waste generated per month to the generator classifications listed in Section 3.0.
- Step 4 Review the regulatory requirements for each generator classification as described in the following sections of the manual.
  - CESQG Requirements – Section 5.1
  - KSQG Requirements – Section 5.2
  - SQG Requirements – Section 5.3
  - LQG Requirements – Section 5.4
- Step 5 Ensure that the facility is in compliance with the regulatory requirements for its generator classification.
- Step 6 Review this completed manual each year with applicable employees to ensure that training requirements are met for KSQGs and SQGs. Don't forget to document the training using the form found in Attachment A, "Hazardous Waste Management Training Documentation". Note that not all topics are applicable for all employees. Employees only need to be trained on their individual hazardous waste management duties.

## **5.0 GENERATOR REQUIREMENTS**

Electronic copies of the Kansas hazardous waste regulations can be found in the Kansas Administrative Regulations (K.A.R.) and may be downloaded from the KDHE Bureau of Waste Management website. The address for this website can be found on the front of this document.

### **5.1 Conditionally Exempt Small Quantity Generator (CESQG) Requirements**

CESQGs must make a hazardous waste determination on each waste stream generated at their facility. KDHE has a technical guidance document to assist you in making and documenting your hazardous waste determination. The technical guidance document can be found at the web address found on the cover of this document.

All CESQGs must ensure that their waste is properly disposed or recycled. If a CESQG accumulates less than 55 pounds of hazardous waste on-site, then they may dispose of their waste through one of the following options:

- A household hazardous waste (HHW) facility that is permitted by the secretary of KDHE and follows all associated regulations and policies.
- Through a hazardous waste contractor taking the waste to a permitted hazardous waste treatment, storage, or disposal facility.
- A municipal solid waste landfill (liquids must be solidified before disposal).

If a CESQG accumulates 55 pounds or more (NOT GALLONS) of hazardous waste on-site, then they must ensure that the waste is managed as follows:

- Each container is labeled “Hazardous Waste.”
- Each container has an accumulation start date marked on it.
- Each container is in good condition.
- Each container is compatible with the contents of the container.
- Each container is closed except when adding or removing waste.
- Monthly inspections are conducted and documented as follows:
  - Date of the inspection;
  - Time of the inspection;
  - Name of the inspector;
  - Notation of the observations made;
  - Date and nature of any repairs or other remedial actions.

The monthly inspection logs must be kept for a minimum of 3 years. An example of an inspection log can be found in Attachment E.

Each CESQG accumulating 55 pounds or more of hazardous waste on-site at any time must use one of the following disposal options:

- Disposal at an HHW facility that is permitted by the secretary of KDHE and follows all associated regulations and policies.

- All applicable DOT requirements must be followed. Contact the Federal Motor Carrier Safety Administration (FMCSA) at (785) 271-1260 for questions about DOT requirements.
- Disposal at a permitted treatment, storage, or disposal facility (TSDF).
  - The hazardous waste must be transported by a transporter that has an EPA ID number and is registered with KDHE.
  - A Uniform Hazardous Waste Manifest must be used.
  - All applicable DOT requirements must be followed.

## **5.2 Kansas Small Quantity Generator (KSQG) Requirements**

Each KSQG is subject to all of the following requirements.

### **5.2.1 EPA Identification Number**

Each KSQG shall notify the Kansas Department of Health and Environment (KDHE) of their hazardous waste activity and obtain an EPA Identification Number from KDHE. This is a 12-digit number assigned to the physical location of that facility. The notification is done using a form available on the following KDHE Bureau of Waste Management (BWM) website (the address for the website can be found on the cover of this document).

If the information on the form changes, the facility must submit an updated form to KDHE BWM within 60 days of the change(s).

The EPA Identification Number stays with that physical location, even if the facility moves to a new address. If the facility moves to a new address, the facility is required to submit a new notification form to KDHE and obtain a new number.

### **5.2.2 Waste Determination**

All KSQGs must make a hazardous waste determination on each industrial waste stream generated at their facility. The results of that waste determination must be kept for 3 years from the time the last shipment of that waste was shipped off-site. KDHE has a technical guidance document to assist you in making and documenting your hazardous waste determination. The technical guidance document can be found at the web address found on the cover of this document.

### **5.2.3 Training**

Each employee of a KSQG is required to be thoroughly familiar with proper waste handling and emergency procedures that are relevant to their job responsibilities during normal facility operations and emergencies. Attachment A contains an example of a form that can be used to document training that each employee has received. Not all topics will be relevant for all employees. An employee only needs to be trained on their individual hazardous waste management duties.

Employees must be trained within 6 months of hire or transferring to a new position, and they must receive annual training after that.

#### **5.2.4 Emergency Coordinator and Response**

The following emergency information must be posted next to at least one telephone that is accessible, with little or no delay, by employees during an emergency:

- Name and telephone number of the emergency coordinator;
- Location of fire extinguishers and spill-control material, and if present, fire alarms; and
- Telephone number of the fire department (911 is acceptable) unless the facility has a direct alarm.

An example of a form that can be used can be found in Attachment C.

The emergency coordinator or designee must be prepared to respond to any emergency that arises as follows:

- In the event of a fire, the emergency coordinator or designee shall call the fire department or attempt to extinguish the fire using a fire extinguisher.
- In the event of a spill, the emergency coordinator or designee shall contain the flow of hazardous waste to the extent possible and, as soon as practicable, clean up the hazardous waste and any contaminated materials or soil.
- In the event of a fire, explosion, or other release that could threaten human health outside the facility, or when it appears that a spill has reached surface water, the emergency coordinator shall immediately notify the national response center using the 24-hour toll-free number 800-424-8802, and shall include the following information:
  - Name, address and U.S. EPA ID Number (front of this document);
  - Quantity and type of hazardous waste involved in the incident;
  - Extent of any injuries;
  - Estimated quantity and disposition of recovered materials, if any.

#### **5.2.5 Recordkeeping**

The following records must be kept by each KSQG and must be available for review during an inspection:

- Waste determination documentation – must be kept for three years from the date of the last shipment of that waste.
- Signed copy of the hazardous waste manifests – must be kept for three years.
- Copy of each manifest exception report – must be kept for three years.
- Inspection Logs – must be kept for three years.
- Training documentation – must be kept for three years.

#### **5.2.6 Container Management**

Any container holding hazardous waste must meet the following requirements:

- Labeled with the words “Hazardous Waste”
- Closed except when adding or removing waste
- Good condition (no severe dents, rusting, holes, etc.)
- Compatible with the waste it is holding.

Additional requirements must be met depending if the container is a satellite accumulation container or a storage container. It is recommended that an inventory be kept of all locations where hazardous waste is accumulated, including both satellite and storage locations. An example inventory form, along with a blank form, can be found in Attachment D.

#### **5.2.6.1 Satellite Accumulation Container**

If a container meets **all** of the following criteria, it can be managed as a satellite accumulation container:

- One container (not multiple containers) of each type of hazardous waste up to 55 gallons.
- Located at or near the point of generation.
- Under the control of the operator of the process generating the waste.

Satellite containers must be managed as described in section 5.2.6, and must additionally have the accumulation start date marked on them as soon as the container becomes full or no longer meets the definition of a satellite container. A container would stop meeting the definition of a satellite in the following two examples:

1. If the process generating the waste shuts down; and
2. A second container is added at that location for the same waste stream.

Once a container becomes full, or otherwise no longer meets the definition of satellite, it must be moved to the hazardous waste storage area within three calendar days, **or** must be managed as a storage container at its present location within three calendar days.

#### **5.2.6.2 Storage Container**

Each hazardous waste storage container must be managed as described in section 5.2.6, and must additionally be managed as follows:

- Marked with the accumulation start date.
- A dike, berm, wall, or other means separates containers of waste incompatible with other containers stored nearby.
- Conduct and document monthly inspections.

Monthly inspections of the hazardous waste storage area must be documented in a log or summary that includes all of the following:

- Date of the inspection.
- Time of the inspection.
- Name of the inspector.
- Notation of the observations made.
- Date and nature of any repairs or other remedial actions.

An example of an inspection log can be found in Attachment E.

There is no storage time limit for a CESQGs and KSQGs. However, neither a CESQG nor a KSQG can accumulate 2,200 pounds or more of hazardous waste on-site. If 2,200 pounds or more of hazardous waste is accumulated on-site, they become a SQG.

### **5.2.7 Emergency Preparedness and Prevention Requirements**

KSQGs must maintain adequate aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operations in an emergency (unless aisle space is not needed for any of these purposes).

When hazardous waste is being handled, KSQGs must provide personnel with immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee (unless such a device is not required based on the types of wastes generated).

As appropriate, KSQGs must make arrangements with local emergency response agencies to respond to specific hazardous waste emergencies at their facility. These agencies include police, fire, and hospitals. Each agency must be made aware of the types of hazardous waste managed at the facility.

### **5.2.8 Waste Disposal Options**

Each KSQG must use one of the following disposal options:

- Disposal at an HHW facility that is permitted by the secretary of KDHE and follows all associated regulations and policies.
  - All applicable DOT requirements must be followed. Contact the Federal Motor Carrier Safety Administration (FMCSA) at (785) 271-1260 for questions about DOT requirements.
- Disposal at a permitted treatment, storage, or disposal facility (TSDF).
  - The hazardous waste must be transported by a transporter that has an EPA ID number and is registered with KDHE.
  - A Uniform Hazardous Waste Manifest must be used.
  - All applicable DOT requirements must be followed.

### **5.3 Small Quantity Generator (SQG) Requirements**

Each SQG is subject to all of the KSQG requirements found in Sections 5.2.1 through 5.2.7, with the following exception. SQGs must meet all storage container requirements found in Section 5.2.6.2, but must conduct weekly inspections instead of monthly.

Additionally, SQGs must not store hazardous waste on-site for more than 180 days, or 270 days if they are shipping their waste over 200 miles (accumulation time limit). Exceeding the 180-day time limit or the on-site accumulation limit of less than 13,200 pounds (previously mentioned in Section 3.0) at any time will cause the SQG to become subject to permitting requirements of a TSDF.

SQGs must dispose of their hazardous waste at a permitted TSDF as follows:

- The hazardous waste must be transported by a transporter that has an EPA ID number and is registered with KDHE.
- A Uniform Hazardous Waste Manifest must be used.

- A Land Disposal Restriction (LDR) form must be included with the initial shipment of each waste to each TSDF.
- All applicable DOT requirements must be followed.

#### **5.4 Large Quantity Generator (LQG) Requirements**

Each LQG is subject to all of the KSQG requirements found in Sections 5.2.1 through 5.2.7, with the following exception. LQGs must meet all storage container requirements found in Section 5.2.6.2, but must conduct weekly inspections instead of monthly.

Additional requirements for training, emergency preparedness, and storage time limits also apply to LQG generators. In brief, these requirements include extensive training for employees, a written contingency plan, and a 90-day time limit for storage of hazardous waste (from the accumulation start date). More detailed information may be found in the Kansas Administrative Regulations. This manual is not designed to fulfill the requirements of a LQG.

**ATTACHMENT A**

**HAZARDOUS WASTE MANAGEMENT TRAINING DOCUMENTATION**

**Employee Name:** \_\_\_\_\_  
**Employee Title/Position:** \_\_\_\_\_  
**Waste or area for which employee responsible:** \_\_\_\_\_

<b>Description of Training</b>	<b>Date</b>	<b>Initials</b>
Hazardous Waste Generator Classifications		
KDHE notification of hazardous waste activity		
Identification of hazardous waste (hazardous waste determination)		
Emergency response (fire, spills, etc.)		
Ensure that emergency preparedness requirements are met (Arrangements are made with local emergency response agencies including fire, police, and hospitals)		
Recordkeeping		
Container management		
Labeling containers "Hazardous Waste"		
Properly closing hazardous waste containers		
Marking storage containers with the accumulation start date		
Inspecting hazardous waste storage areas to ensure that containers are in good condition, properly labeled and closed, have proper aisle space and that incompatible wastes are not stored together.		
Properly documenting hazardous waste storage area inspections		
Ensuring that satellite accumulation containers are properly managed		

**ATTACHMENT B**

**INDUSTRIAL WASTE INVENTORY FORM**

1. Waste stream name \_\_\_\_\_
2. Name or description of the process generating the waste \_\_\_\_\_
3. List each point of generation for this waste (each place where this waste is generated) \_\_\_\_\_
4. How many pounds of this waste are generated per month? \_\_\_\_\_
5. Is this a hazardous waste or a non-hazardous waste? \_\_\_\_\_
6. How was the determination made? [Attach all supporting MSDS sheets and analytical data.] \_\_\_\_\_

**If this is a non-hazardous waste, stop here.**

- 
7. If this waste is hazardous, list the waste codes. \_\_\_\_\_
  8. List the location of all satellite accumulation containers for this waste. \_\_\_\_\_
  9. List the person responsible for managing each satellite location. \_\_\_\_\_
  10. List all storage locations for this waste. \_\_\_\_\_
  11. List the person responsible for managing each storage location. \_\_\_\_\_
  12. Who conducts the weekly or monthly inspections of each storage location? \_\_\_\_\_
  13. Who transports this waste from the site? \_\_\_\_\_
  14. Where is the final treatment/disposal location for this waste? \_\_\_\_\_
  15. List all other applicable information about this waste. \_\_\_\_\_

**ATTACHMENT C**

**HAZARDOUS WASTE EMERGENCY RESPONSE**

EMERGENCY COORDINATOR: \_\_\_\_\_

HOME PHONE NUMBER: \_\_\_\_\_

CELL PHONE NUMBER (Optional): \_\_\_\_\_

ALTERNATE EMERGENCY COORDINATOR: \_\_\_\_\_

HOME PHONE NUMBER: \_\_\_\_\_

CELL PHONE NUMBER (Optional): \_\_\_\_\_

FIRE DEPARTMENT PHONE NUMBER: \_\_\_\_\_

(unless there is a direct alarm)

EE

**EQUIPMENT LOCATION**  
**(A map showing the locations is sufficient)**

FIRE EXTINGUISHERS: \_\_\_\_\_

SPILL CONTROL: \_\_\_\_\_

FIRE ALARMS (if present): \_\_\_\_\_

EE

**RESPONSE ACTION**

**FIRE:** Call the Fire Department or extinguish the fire using an appropriate fire extinguisher.

**SPILL:** Contain the flow of hazardous waste. Clean up the hazardous waste and any contaminated materials or soil as soon as possible.

**FIRE, EXPLOSION, OR RELEASE, WHICH THREATENS HUMAN HEALTH OR SURFACE WATER:**

Notify the National Response Center with the following information:

- § Name, address, and U.S. EPA ID Number of generator
- § Date, time, and type of incident
- § Quantity and type of hazardous waste involved
- § Extent of any injuries
- § Estimated quantity and disposition of recovered materials

**NATIONAL RESPONSE CENTER 1-800-424-8802**

**KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT (785) 296-1679**





