

Why a Generator Would Want Universal Waste Regulations to Apply to their Facility

A visual comparative

(with some lingo) :

Large Quantity Generator (LQG)---→

Small Quantity Generator (SQG)

←---Conditionally Exempt Small
Quantity Generator (CESQG)

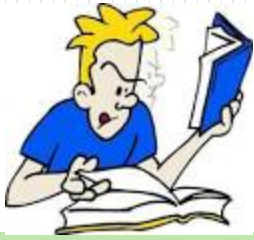




RCRA Regulations you MUST comply with -

Section 22a-449(c)-102(a)(1), (2)(A) and (B) of the Regulations of Connecticut State Agencies (RCSA), incorporating 40 CFR 262.11 Hazardous Waste Determination.

A person who generates a solid waste, as defined in 40 CFR 261.2, must at least once during each twelve (12) month period or whenever a process generating a waste changes determine if that waste is a hazardous waste:



Hazardous Waste Determinations continued

(a) 40 CFR 261.4 Is the waste excluded?



(b) Subpart D of 40 CFR 261 Is the waste listed?
("P" and "U" listed wastes)





Hazardous Waste Determinations continued

(c) Subpart C of 40 CFR 261 Is the waste characteristic?
Ignitable, corrosive, reactive, and/or toxic (“D” codes)

(1) Testing the waste.



(2) Applying knowledge of material or process from which it was generated provided the generator is able to demonstrate clearly how he applied knowledge of the waste.

Hazardous Waste Determinations continued

(d) 40 CFR 262.11(d)

If the waste is hazardous, the generator must refer to parts 261, 264, 265, 266, 268 and 273 of this chapter and section 22a-449(c)-113(d) of the RCSA for possible exclusions or restrictions pertaining to the management of the specific waste.

Waste characterization is a topic unto itself!



EPA Identification Numbers

**Section 22a-449(c)-102(a)(1) of the RCSA, incorporating
40 CFR 262.12 EPA Identification Numbers.**

A generator must not treat, store, dispose of, transport, or offer for transportation, hazardous waste without having received an EPA ID number from the Commissioner of Energy and Environmental Protection.



Hazardous Waste Manifest



Section 22a-449(c)-102(a)(1) and (2)(C) of the RCSA, incorporating 40 CFR 262.20 General requirements.

A generator who transports, or offers for transport a hazardous waste for off-site treatment, storage, or disposal must prepare a manifest.

Hazardous Waste Manifest continued

The image shows a sample of a hazardous waste manifest form, which is a document used to track hazardous waste from the generator to the transporter and finally to the treatment, storage, and disposal facility (TSDF). The form is titled 'Hazardous Waste Manifest' and includes sections for 'Generator Information', 'Transporter Information', and 'Manifest Details'. A large, semi-transparent 'VOID' watermark is overlaid on the form, indicating that it is a sample and not a valid document. The form includes fields for the generator's name, address, and contact information, as well as the transporter's name, address, and contact information. It also includes a table for listing hazardous waste materials, with columns for quantity, hazard codes, and other details. The form is numbered 'Form No. 3080-108' and includes a date '12/15/00'.

Section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.23 Use of the manifest.

(a) The generator, (not the transporter) must:

- (1) Sign the manifest certification by hand; and
- (2) Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest; and
- (3) Retain one copy, in accordance with 40 CFR 262.40(a).



Hazardous Waste Manifest continued

(b) The generator must give the transporter the remaining copies of the manifest.

Please note, generators located in Connecticut must make a legible photocopy of the top page of the completed manifest and send it, postmarked within seven (7) days of the shipping date, to the Department at the following address:

Hazardous Waste Manifest Program
Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127



Waste Minimization Program is required for LQG and SQG

40 CFR 262.27 Waste minimization certification.

A generator who initiates a shipment of hazardous waste must certify to one of the following statements in Item 15 of the uniform hazardous waste manifest:

(a) “I am a large quantity generator. I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;” or

(b) “I am a small quantity generator. I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.”

Waste Minimization Program is not Required for Universal Waste

That was





Subpart C—Pre-Transport Requirements

DOT Rules Always Apply



Section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.30 Packaging.

Before transporting hazardous waste or offering hazardous waste for transportation off-site, a generator must package the waste in accordance with the applicable Department of Transportation regulations on packaging under 49 CFR parts 173, 178, and 179.

Section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.31 Labeling.

Before transporting or offering hazardous waste for transportation off-site, a generator must label each package in accordance with the applicable Department of Transportation regulations on hazardous materials under 49 CFR part 172.



Subpart C

Pre-Transport Requirements continued

Section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.32 Marking.

- (a) Before transporting or offering hazardous waste for transportation off-site, a generator must mark each package of hazardous waste in accordance with the applicable DOT regulations on hazardous materials under 49 CFR part 172;
- (b) Before transporting hazardous waste or offering hazardous waste for transportation off-site, a generator must mark each container of 110 gallons or less used in such transportation with the following words and information in accordance with the requirements of 49 CFR 172.304:

HAZARDOUS WASTE—Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address _____.

Generator's EPA ID Number _____.

Manifest Tracking Number _____.





Generators

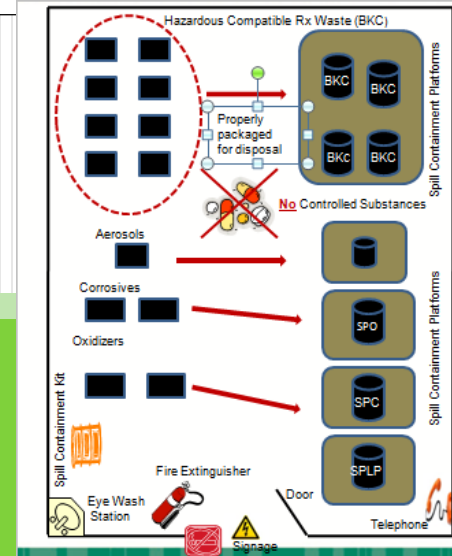
Section 22a-449(c)-102(b)(1) of the RCSA.

A generator shall not offer his hazardous waste to a transporter who does not have a current valid transporter permit issued by the commissioner pursuant to section 22a-449(c)-11 of the RCSA or section 22a-454 of the Connecticut General Statutes (“CGS”).





Accumulation time



Section 22a-449(c)-102(a)(1) and (2)(E), (J) and (K) of the RCSA, incorporating 40 CFR 262.34 Accumulation time.

(a) ...a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that

(1) The waste is placed in containers and the generator complies with the applicable requirements of subparts I, ...40 CFR 264.35 and 40 CFR 264.175;

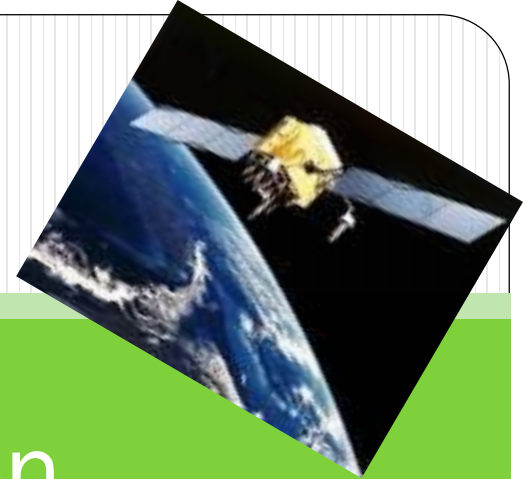


Accumulation Time continued



- (2) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;
- (3) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, “Hazardous Waste” and other words that identify the contents of each container or tank such as “flammable”, “acid”, “alkaline”, “cyanide”, “reactive”, “explosive”, “halogenated solvent” or the chemical name; and
- (4) The generator complies with the requirements for owners or operators in subparts C and D in 40 CFR part 265, with 40 CFR 265.16, 265.17, 265.111, 265.113(a), (b) and (c), 265.114 (closure requirements) and 268.7(a)(5).





Satellite Accumulation

Section 22a-449(c)-102(a)(1), (2)(M) and (N) of the RCSA, incorporating 40 CFR 262.34(c).

(c)(1) A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in 40 CFR 261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the waste, with or without a permit or interim status and without complying with paragraph (a) of this section provided he:

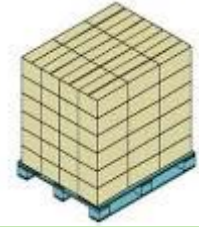
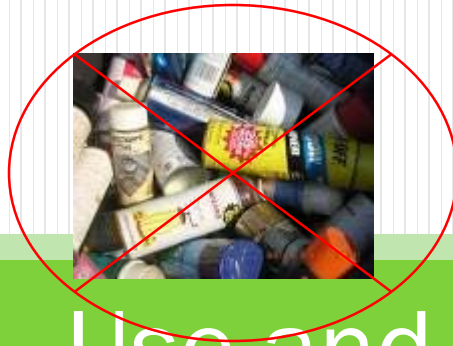


Satellite Accumulation continued



(i) Complies with 40 CFR 265.31, 265.171, 265.172, 265.173 and 265.177; and

(ii) Marks his containers with the words “Hazardous Waste”. Each container shall also be marked with other words that identify the contents of such container such as “flammable”, “acid”, “alkaline”, “cyanide”, “reactive”, “explosive”, “halogenated solvent” or the chemical name. Notwithstanding the foregoing, if a generator determines that marking or labeling the identity of the contents of a container with a capacity of less than one gallon is not feasible, in lieu of marking or labeling each such container, a generator shall mark or label the locker, rack or other device used to hold or accumulate any such container with words that identify the contents of each such container such as “flammable”, “acid”, “alkaline”, “cyanide”, “reactive”, “explosive”, “halogenated solvent” or the chemical name.



Subpart I – Use and Management of Containers



Section 22a-449(c)-105(a)(1) of the RCSA, incorporating 40 CFR 265.170 Applicability.

The regulations in this subpart apply to owners and operators of all hazardous waste facilities that store containers of hazardous waste....

Section 22a-449(c)-105(a)(1) of the RCSA, incorporating 40 CFR 265.171 Condition of Containers.

If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this part.

Subpart I – Use and Management of Containers continued



Section 22a-449(c)-105(a)(1) of the RCSA, incorporating 40 CFR 265.172 Compatibility of the waste with the container.

The owner or operator must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.



Subpart I – Use and Management of Containers continued

Section 22a-449(c)-105(a)(1) of the RCSA, incorporating 40 CFR 265.173 Management of containers.

- (a) A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

- (b) A container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.



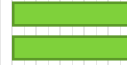
Subpart I – Use and Management of Containers continued

Section 22a-449(c)-105(a)(1) of the RCSA, incorporating 40 CFR 265.174 Inspections.

The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

Section 22a-449(c)-105(a)(1) of the RCSA, incorporating 40 CFR 265.176 Special requirements for ignitable or reactive waste.

Containers holding ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility's property line.



Subpart I – Use and Management of Containers continued

Section 22a-449(c)-105(a)(1) of the RCSA, incorporating 40 CFR 265.177 Special requirements for incompatible wastes.

- (a) Incompatible wastes, or incompatible wastes and materials, (see appendix V for examples) must not be placed in the same container, unless 40 CFR 265.17(b) is complied with.
- (b) Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material (see appendix V for examples), unless 40 CFR 265.17(b) is complied with.
- (c) A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.



Containment

Section 22a-449(c)-104(a)(1) of the RCSA, incorporating 40 CFR 264.175 Containment.

(a) Container storage areas must have a containment system that is designed and operated in accordance with paragraph (b) of this section, except as otherwise provided by paragraph (c) of this section.

(b) A containment system must be designed and operated as follows:

(1) A base must underly the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed;



Containment continued

(2) The base must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids;

(3) The containment system must have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids need not be considered in this determination;

(4) Run-on into the containment system must be prevented unless the collection system has sufficient excess capacity in addition to that required in paragraph (b)(3) of this section to contain any run-on which might enter the system; and



Containment continued

(5) Spilled or leaked waste and accumulated precipitation must be removed from the sump or collection area in as timely a manner as is necessary to prevent overflow of the collection system.

(c) Storage areas that store containers holding only wastes that do not contain free liquids need not have a containment system defined by paragraph (b) of this section, ... or provided that:

(1) The storage area is sloped or is otherwise designed and operated to drain and remove liquid resulting from precipitation, or

(2) The containers are elevated or are otherwise protected from contact with accumulated liquid.



Inspections

Section 22a-449(c)-105(a)(1) and (2)(g) of the RCSA, incorporating
40 CFR 265.15 Inspections.

(a) The owner or operator must inspect his facility for malfunctions and deterioration, operator errors, and discharges which may be causing--or may lead to:

- (1) Release of hazardous waste constituents to the environment or
- (2) a threat to human health. The owner or operator must conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.

No.	Item	Remarks	No. of times	Status		Remarks
				Inspected	Not Inspected	
1	1000	1000	1000	1000	1000	
2	1000	1000	1000	1000	1000	
3	1000	1000	1000	1000	1000	
4	1000	1000	1000	1000	1000	
5	1000	1000	1000	1000	1000	
6	1000	1000	1000	1000	1000	
7	1000	1000	1000	1000	1000	
8	1000	1000	1000	1000	1000	
9	1000	1000	1000	1000	1000	
10	1000	1000	1000	1000	1000	
11	1000	1000	1000	1000	1000	
12	1000	1000	1000	1000	1000	
13	1000	1000	1000	1000	1000	
14	1000	1000	1000	1000	1000	
15	1000	1000	1000	1000	1000	
16	1000	1000	1000	1000	1000	
17	1000	1000	1000	1000	1000	
18	1000	1000	1000	1000	1000	
19	1000	1000	1000	1000	1000	
20	1000	1000	1000	1000	1000	

Inspections

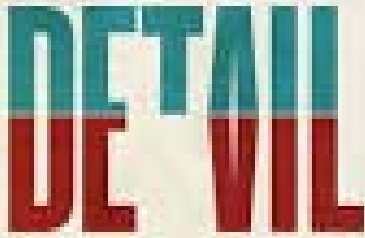
(b)(1) The owner or operator must develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards.



Inspections continued

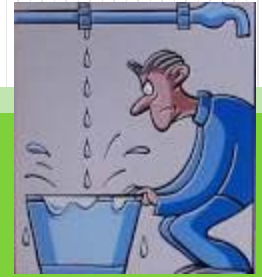
(2) He must keep this schedule at the facility.

(3) The schedule must identify the types of problems (e.g., malfunctions or deterioration) which are to be looked for during the inspection (e.g., inoperative sump pump, leaking fitting, eroding dike, leaking container, etc.).

The word "DETAIL" is written in a bold, blocky font. The top half of the letters is teal, and the bottom half is red. The letters are set against a light beige background.

Inspections continued

(4) The frequency of inspection may vary for the items on the schedule. However, the frequency should be based on the rate of deterioration of the equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or any operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use and emergency equipment designated in the contingency plan shall be inspected at least once each calendar month to ensure that such equipment is in the proper location and available for use as specified in the contingency plan. The owner or operator of a facility not required to have a contingency plan shall develop a specific list of emergency equipment, including its locations and availability for use, to be included in the schedule for inspection and such equipment shall be inspected at least once each calendar month. Satellite accumulation areas are not subject to the monthly requirement stated herein.. At a minimum, the inspection schedule must include the items and frequencies called for in 40 CFR 265.174, 265.193, 265.195, 265.226, 265.260, 265.278, 265.304, 265.347, 265.377, 265.403, 265.1033, 265.1052, 265.1053, 265.1058, and 265.1084 through 265.1090 of this part, where applicable.



Inspections continued

(c) The owner or operator must remedy any deterioration or malfunction of equipment or structures which the inspection reveals on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action must be taken immediately.

(d) The owner or operator must record inspections in an inspection log or summary. He must keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.



40 CFR 265.16 and subpart C in 40 CFR part 265

§265.16 Personnel training.

(Section 22a-449(c)-105(a)(1) of the RCRA, incorporating...)

Subpart C—Preparedness and Prevention

§265.30 Applicability.

§265.31 Maintenance and operation of facility.

§265.32 Required equipment.

§265.33 Testing and maintenance of equipment.

§265.34 Access to communications or alarm system.

§265.35 Required aisle space.

§265.36 [Reserved]





10 DAY IN TRANSIT STORAGE FACILITY
PREPAREDNESS, PREVENTION
AND
CONTINGENCY PLAN
of
Stericycle Specialty Waste Solutions, Inc.
4300 Pottsville Pike
Reading, Berks County, PA 19605

Arrangements with Local Authorities



§265.37 Arrangements with local authorities.

(a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;

(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.



Subpart D in 40 CFR part 265

Subpart D—Contingency Plan and Emergency Procedures

§265.50 Applicability.

§265.51 Purpose and implementation of contingency plan.

§265.52 Content of contingency plan.

§265.53 Copies of contingency plan.

§265.54 Amendment of contingency plan.

§265.55 Emergency coordinator.

§265.56 Emergency procedures.





Acute Hazardous Waste

Section 22a-449(c)-105(a)(1) of the RCSA, incorporating 40 CFR 261.5(e).

If a generator generates acute hazardous waste in a calendar month in quantities greater than set forth below, all quantities of that acute hazardous waste are subject to full regulation under parts 262 through 266, 268, and parts 270 and 124 of this chapter, and the notification requirements of section 3010 of RCRA:



of



in



Acute Hazardous Waste continued



- (1) A total of one kilogram of acute hazardous wastes listed in 40 CFR 261.31, 40 CFR 261.32, or 40 CFR 261.33(e).
- (2) A total of 100 kilograms of any residue or contaminated soil, waste, or other debris resulting from the clean-up of a spill, into or on any land or water, of any acute hazardous wastes listed in 40 CFR 261.31, 40 CFR 261.32, or 40 CFR 261.33(e).



Many Pharmaceuticals are Listed in 40 CFR 261.31 or 40 CFR 261.33(e) Making Most Pharmacies an LQG

**Section 22a-449(c)-105(a)(2)(L) of the RCSA, incorporating
40 CFR 262.34 Accumulation time.**

(b) Except as provided for in 40 CFR 262.34(d),(e), (g), (h) and (i), a generator of 1,000 kilograms or greater of hazardous waste in a calendar month, or greater than **1 kg** of acute hazardous waste listed in 40 CFR 261.31 or 40 CFR 261.33(e) in a calendar month, who accumulates hazardous waste or acute hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of 40 CFR parts 264, 265, and the permit requirements of 40 CFR 270 unless he has been granted an extension... **THIS IS IMPORTANT TO REMEMBER!**



A Pharmacy can Quickly Accumulate 1 kg or 2.2 lbs of any Combination of “P-listed” Pharmaceuticals in a Calendar Month

P001 Warfarin and salts (>0.3%)

[Jantoven®, Coumadin®, etc.]

P012 Arsenic Trioxide

P018 Brucine

P042 Epinephrine and salts

P075 Nicotine

P081 Nitroglycerine (R)

P108 Strychnine and salts

P188 Physostigmine Salicylate



0

Universal Waste Pharmaceuticals Would Not Count Towards Generator Status



That was very easy!



Small Quantity Generator

Section 22a-449(c)-100(c)(28) of the RCSA Definition.

"Small quantity generator" means a generator who in a calendar month generates more than 100 but less than 1000 kgs of hazardous waste in that calendar month, provided that such waste does not include more than:

(A) a total of one kg of acute hazardous wastes listed in 40 CFR 261.31, 261.32 or 261.33(e); or

(B) a total of 100 kgs of any residue or contaminated soil, waste, or other debris resulting from the clean-up of a spill, into or on any land or water, of any acute hazardous wastes listed in 40 CFR 261.31, 261.32, or 261.33(e), provided that there is no more than a total of one kilogram of acute hazardous waste contained in that residue, soil, waste or debris.



SQG Requirements continued

Section 22a-449(c)-102(1)(a) and (2)(O) and (P) of the RCSA, incorporating 40 CFR 262.34(d)

(d) A generator who generates greater than 100 kgs but less than 1000 kgs of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that:

- (1) The quantity of waste accumulated on-site never exceeds 1000 kgs;
- (2) The generator complies with the requirements of subpart I of part 265 of this chapter, except for 40 CFR 265.176 and 265.178;
- (3) The generator complies with the requirements of 40 CFR 265.201 in subpart J of part 265;
- (4) The generator complies with the requirements of paragraphs (a)(2) and (a)(3) of this section, the requirements of subpart C of part 265, the requirements of 40 CFR 268.7(a)(5); and



SQG Requirements continued

(5) The generator complies with the following requirements:

(i) At all times there must be at least one employee either on the premises or on call (*i.e.*, available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in paragraph (d)(5)(iv) of this section. This employee is the emergency coordinator.

(ii) The generator must post the following information next to the telephone:

- (A) The name and telephone number of the emergency coordinator;
- (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and
- (C) The telephone number of the fire department, unless the facility has a direct alarm.



SQG Requirements continued

(iii) The generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies;

(iv) The emergency coordinator or his designee must respond to any emergencies that arise. The applicable responses are as follows:

(A) In the event of a fire, call the fire department or attempt to extinguish it using a fire extinguisher;

(B) In the event of a spill, contain the flow of hazardous waste to the extent possible, and as soon as is practicable, clean up the hazardous waste and any contaminated materials or soil;



SQG Requirements continued

(C) In the event of a fire, explosion, or other release which could threaten human health outside the facility or when the generator has knowledge that a spill has reached surface water, the generator must immediately notify the National Response Center (using their 24-hour toll free number 800/424-8802). Any release that has been reported to the National Response Center shall still be reported separately to the commissioner using the 24-hour emergency spill response telephone number at (860) 424-3338 or, if that number is unavailable, at (860) 424-3333. In addition to this oral notification, the generator shall comply with all other applicable reporting or notification requirements regarding the release, including but not limited to, reporting required by section 22a-450 of the CGS. The report must include the following information:

- (1) The name, address, and U.S. EPA Identification Number of the generator;
- (2) Date, time, and type of incident (e.g., spill or fire);
- (3) Quantity and type of hazardous waste involved in the incident;
- (4) Extent of injuries, if any; and
- (5) Estimated quantity and disposition of recovered materials, if any.



SQG Requirements continued

Section 22a-449(c)-102(c) of the RCSA.

(In case we haven't covered it already.)

A small quantity generator as defined in section 22a-449(c)-100(c)(28) of the RCSA shall:

- (1) not accumulate hazardous waste in anything other than a tank or container;
- (2) not operate uncovered tanks;
- (3) comply with the following requirements in 40 CFR 262: 262.11-12, Subpart B, 262.30 to 33, inclusive, 262.34(c) to (f), inclusive, 262.44 and Subparts E, F and G; and
- (4) comply with 40 CFR 264.175, 40 CFR 265.111, 40 CFR 265.113(a), (b) and (c), 40 CFR 265.114 and subsection (b) of this section.

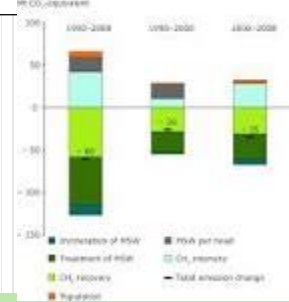


Recordkeeping Requirements

Section 22a-449(c)-102(a)(1) of the RCSA, incorporating 40 CFR 262.40 Recordkeeping.

- (a) A generator must keep a copy of each manifest signed in accordance with 40 CFR 262.23(a) for three (3) years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three (3) years from the date the waste was accepted by the initial transporter.

- (b) A generator must keep a copy of each Biennial Report and Exception Report for a period of at least three (3) years from the due date of the report.



Recordkeeping Requirements continued

(c) A generator must keep records of any test results, waste analyses, or other determinations made in accordance with 40 CFR 262.11 for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal.

(d) The periods or retention referred to in this section are extended automatically during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator.



Biennial Reporting

Section 22a-449(c)-102(a)(1) and (2)(AA) of the RCSA, incorporating 40 CFR 262.41 Biennial Report.

(a) A generator who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must prepare and submit a single copy of a Biennial Report to the Regional Administrator by March 1 of each even numbered year. The Biennial Report must be submitted on EPA Form 8700-13A, must cover generator activities during the previous year, and must include the following information:

- (1) The EPA identification number, name, and address of the generator;
- (2) The calendar year covered by the report;

SITE NAME STERICYCLE SPECIALTY WASTE SOLUTIONS, 314-B LANDSTREET ROAD ORLANDO, FL 32824		2013 Hazardous Waste Report	
EPA ID NO: FLR000006353		GM FORM	WASTE GENERATION AND MANAGEMENT
Sec. 1 A. Waste Description FLAMMABLE, TOXIC PHARMACEUTICALS			
B. EPA Hazardous Waste Code(s) D001 D004 D005 D006 D007 D008 D009 D010 D011 D012 D013 D018 D022 D023 D024 D025 D026		C. State Hazardous Waste Code(s)	
D. Source Code G11 Management Method code for Source code G25	E. Form Code W219	F. Quantity Generated in 2013 UOM 1 Density 0.00 lb./gal.	G. Waste Identification Code X
F. Quantity Generated in 2013 1,271,176.00			
Sec. 2 Was any of this waste managed on-site? <input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> No (SKIP TO SEC. 3)			
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method code	Quantity treated, disposed, or recycled on-site in 2013	On-site Management Method code	Quantity treated, disposed, or recycled on-site in 2013
Sec. 3 A. Was any of this waste shipped off site in 2013 for treatment, disposal, or recycling? <input checked="" type="checkbox"/> Yes (CONTINUE TO ITEM B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped TXD000838896	C. Off-site Management Method code shipped to H040	D. Total quantity shipped in 2013 1,271,176.00

Biennial Reporting continued

(3) The EPA identification number, name, and address for each off-site treatment, storage, or disposal facility in the United States to which waste was shipped during the year;

(4) The name and EPA identification number of each transporter used during the reporting year for shipments to a treatment, storage or disposal facility within the United States;

(5) A description, EPA hazardous waste number (from 40 CFR part 261, subpart C or D), DOT hazard class, and quantity of each hazardous waste shipped off-site for shipments to a treatment, storage or disposal facility within the United States. This information must be listed by EPA identification number of each such off-site facility to which waste was shipped.



Biennial Reporting continued

(6) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated.

(7) A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984.

(8) The certification signed by the generator or authorized representative.

(9) Any other information which the commissioner specifies relating to the generator's activities.

(b) Any generator who treats, stores, or disposes of hazardous waste on-site must submit a biennial report covering those wastes in accordance with the provisions of 40 CFR parts 270, 264, 265, 266, and 267. Reporting for exports of hazardous waste is not required on the Biennial Report form. A separate annual report requirement is set forth at 40 CFR 262.56.



Exception Reports (missing manifests)

Section 22a-449(c)-102(a)(1) and (2)(BB) of the RCSA, incorporating 40 CFR 262.42 Exception reporting.

(a)(1) A generator of 1,000 kilograms or greater of hazardous waste in a calendar month, or greater than 1 kg of acute hazardous waste listed in 40 CFR 261.31 or 40 CFR 261.33(e) in a calendar month, who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste.

Proposed Universal Pharmaceutical Waste Rules

vs. RCRA



Generator Status

With Universal Pharmaceutical Waste (UPW)

Pharmacies	CESQGs
Grocery Stores	CESQGs
Big Box Stores	SQGs, some may still be LQGs
Hospitals	SQGs, some may still be LQGs
Veterinary Clinics	CESQGs

[Note – Generator status based upon pharmaceuticals alone.]



Generator Status

Without Universal Pharmaceutical Waste (UPW)

Pharmacies	LQGs
Grocery Stores	LQGs
Big Box Stores	LQGs
Hospitals	LQGs
Veterinary Clinics	LQGs



Waste Characterization Required?

	UPW	LQG
Pharmacies	Yes	Yes
Grocery Stores	Yes	Yes
Big Box Stores	Yes	Yes
Hospitals	Yes	Yes
Veterinary Clinics	Yes	Yes



EPA ID Number Requirements

	UPW	LQG
Pharmacies	No	Yes
Grocery Stores	No	Yes
Big Box Stores	No	Yes
Hospitals	No	Yes
Veterinary Clinics	No	Yes



Hazardous Waste Manifest Required

	UPW	LQG
Pharmacies	No	Yes
Grocery Stores	No	Yes
Big Box Stores	No	Yes
Hospitals	No	Yes
Veterinary Clinics	No	Yes



Waste Minimization Program

	UPW	LQG
Pharmacies	A good idea	Yes
Grocery Stores	A good idea	Yes
Big Box Stores	A good idea	Yes
Hospitals	A good idea	Yes
Veterinary Clinics	A good idea	Yes



Personnel Training

	UPW	LQG
Pharmacies	Yes, duty specific	Yes
Grocery Stores	Yes, duty specific	Yes
Big Box Stores	Yes, duty specific	Yes
Hospitals	Yes, duty specific	Yes
Veterinary Clinics	Yes, duty specific	Yes



Required Equipment

- (a) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;
- (b) A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams;
- (c) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment; and
- (d) Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.

Pharmacies

UPW

LQG

BMP

Yes

Grocery Stores

BMP

Yes

Big Box Stores

BMP

Yes

Hospitals

BMP

Yes

Veterinary Clinics

BMP

Yes



40 CFR §265.37 Arrangements with local authorities.

	UPW	LQG
Pharmacies	No	Yes
Grocery Stores	No	Yes
Big Box Stores	No	Yes
Hospitals	No	Yes
Veterinary Clinics	No	Yes



Contingency Plan Requirement

	UPW	LQG
Pharmacies	A good idea	Yes
Grocery Stores	A good idea	Yes
Big Box Stores	A good idea	Yes
Hospitals	A good idea	Yes
Veterinary Clinics	A good idea	Yes



Record Keeping

UPW

LQG

Pharmacies	Yes, not as extensive	Yes
Grocery Stores	Yes, not as extensive	Yes
Big Box Stores	Yes, not as extensive	Yes
Hospitals	Yes, not as extensive	Yes
Veterinary Clinics	Yes, not as extensive	Yes



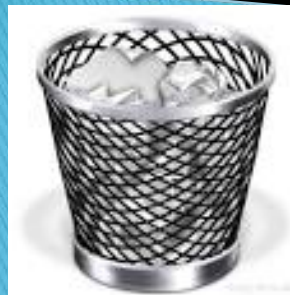
Biennial Report

	UPW	LQG
Pharmacies	No	Yes
Grocery Stores	No	Yes
Big Box Stores	No	Yes
Hospitals	No	Yes
Veterinary Clinics	No	Yes



Biennial Report Waste Minimization Program

	UPW	LQG
Pharmacies	No	Yes
Grocery Stores	No	Yes
Big Box Stores	No	Yes
Hospitals	No	Yes
Veterinary Clinics	No	Yes




Exception Reports

	UPW	LQG
Pharmacies	No	Yes
Grocery Stores	No	Yes
Big Box Stores	No	Yes
Hospitals	No	Yes
Veterinary Clinics	No	Yes




DEEP Required to Inspect

	UPW	LQG
Pharmacies	No	Yes
Grocery Stores	No	Yes
Big Box Stores	No	Yes
Hospitals	No	Yes
Veterinary Clinics	No	Yes



Connecticut Department of
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WASTE ENGINEERING & ENFORCEMENT DIVISION

NOTICE OF VIOLATION #WSWDH_____

Date Issued: _____

STATE OF CONNECTICUT
V.
Your Name Here

CONSENT ORDER # COWSWDH14_____

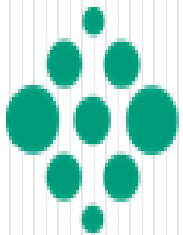
[YOUR NAME HERE]
[YOUR ADDRESS HERE]
[YOUR ZIP HERE], CT [Zip Code]

Prepared and presented by
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