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Hazardous Waste Management at Remote (SQG) Sites

General

In order to maintain a Small Quantity Generator (SQG) status as defined by the State of Maine Department of Environmental Protection (MDEP), remote sites must maintain their waste generation within certain regulated limits and meet all other regulatory requirements. The following guidance is established in accordance with the MDEP's Hazardous Waste Rules and other pertinent regulations applicable to the management and disposal of hazardous waste.

In order to be considered a SQG of hazardous waste, a generator may not store more than 55 gallons of hazardous waste or 1 kg of acutely hazardous waste, total on the entire site, at any time. Less than 27 gallons or 100 kg of hazardous waste or 1 kg of acutely hazardous waste can be generated in any calendar month (other limits may also apply).

Please Note: The state of Maine uses slightly different terminology for generator status from the federal Environmental Protection Agency (EPA). Maine's SQG rules are in compliance with the EPA's federal rules for Very Small Quantity Generators (VSQGs). What the EPA defines to be a SQG is termed as a SQG+ by the MDEP. There is no variation in the term used to describe a LGQ (Large Quantity Generator) by the EPA or MDEP.

Regulatory Guidance

- The Emergency Planning and Community Right to Know Act
- Maine Department of Environmental Protection (DEP) Chapters 850-851
- U.S. Environmental Protection Agency (EPA) Parts 260-263

Requirements

Waste Determinations:

All hazardous materials which are useless or unwanted must be considered hazardous wastes unless specifically determined to be non-hazardous. Waste determinations must be made by persons properly trained in hazardous waste regulations. Determinations are typically made using knowledge of the waste by a trained SQG Site Manager or by UMS Safety Management (SM). When knowledge of the hazard characteristics is indeterminate or unknown, waste analysis is required. Once a waste determination is made, the waste is either managed as a hazardous waste or discarded as appropriate.

Containers, Compatibility, and Storage:

All wastes must be placed in a Department of Transportation (DOT) approved shipping containers before shipment off site. Waste chemicals must be stored in containers that are chemically compatible with the contents. Plastic coated, 1-gallon amber bottles or a DOT rated drums are examples of acceptable containers. Milk jugs and plastic containers that held other commercial products are not appropriate containers. Incompatible wastes must not be mixed together. Containers must be kept tightly closed when waste is not being added to or removed from the

container. All wastes must be stored indoors on a firm, working surface and have secondary containment to prevent the release of hazardous waste to the environment.

Accumulation Limits:

The following limits may not be exceeded at any time on SQG sites. These limits include the total of all hazardous waste generated or stored anywhere on the entire site.

Maximum Amount of Waste Stored in any calendar month:	
Standard Hazardous Wastes	55 Gal
Acutely Toxic Wastes	1 Kg
Empty P-listed Containers	None over 20 liters

Containers must be dated when full and removed within 180 days of the *full date*. The time required to fill a container does not matter. Central Accumulation Areas (where waste is accumulated and stored) must be inspected monthly and containers should be removed/replaced, as necessary, to prevent container deterioration or excess waste accumulation. Schedules for waste pickups are made by each Remote Site Manager and are done at least annually. Pickups may be more frequent to ensure that accumulation limits are not exceeded.

Labeling Requirements:

Each hazardous waste container must be properly labeled. Fill in **all** applicable information, being sure to include all hazardous chemical constituents and the approximate concentration of each.

The image shows two sample hazardous waste labels. The left label is yellow and titled "HAZARDOUS WASTE Federal Law Prohibits Improper Disposal". It includes sections for "GENERATOR INFORMATION" (Name, Address), "CHEMICAL CONSTITUENTS & CONCENTRATION", and dates for when waste was first added, when the container was full, and when it was transferred to the waste storage site. It also includes a "CAUTION HANDLE WITH CARE" warning. The right label is white and titled "HAZARDOUS WASTE University of Southern Maine". It includes the university's address (96 Falmouth St, 37 College Ave, 51 Westminster Street) and a section for "LIST CHEMICAL CONSTITUENTS & CONCENTRATION (CONTENTS)". It also includes a section for hazard characteristics (IGNITABLE, CORROSIVE, REACTIVE, TOXIC) and dates for when waste was first added, when the container was full, and when it was moved to the waste storage site.

Sample Labels (Available from Site Safety Contact)

Accumulation *Start* and *Full* dates are very important since they are used to determine the amount of waste generated in a calendar month for generator status calculations.

Disposal, Manifesting and Recordkeeping:

Whenever a waste vendor is on site there must be at least one person (usually the Site Manager) who is trained in the Hazardous Waste Regulations and who has current DOT Waste Manifest Training.

In accordance with University of Maine System requirements (Administrative Practice Letter Section IV-D, Record Retention Practices), Hazardous Waste Manifests and accompanying documentation should be retained indefinitely. MDEP requires that Manifests be available on-site for at least 3 years and requires that all waste determinations and waste analysis be available for at least 10 years.

Emergency Response Equipment and Procedures:

All personnel are required to be trained in emergency procedures during their Department Annual Safety Training. Area-specific Emergency Action Plans, the location and availability of Safety Data Sheets (SDSs), use and limits of Personal Protective Equipment, and department spill procedures are typically included as part of an employee's annual training.

Emergency phone numbers, including the number of the local fire department and site manager or Emergency Coordinator, should be posted near each telephone. The locations of fire extinguishers, alarm pull stations (if any), and spill control equipment should be clearly marked.

Each SQG site must designate at least one Facility Emergency Coordinator (FEC) capable of responding to emergencies within a short period. The FEC or their designee must call the fire department in the event of a fire, ensure that the flow of hazardous materials is contained in the event of a release (if trained and authorized), and ensure that any contaminated materials or soils are removed. FECs are not expected to clean up spills of hazardous materials or hazardous waste.

Hazardous Waste Training (SQG Site Waste Handlers):

MDEP regulations require that persons handling waste at SQG sites be trained to ensure that they are thoroughly familiar with proper handling and emergency response procedures relevant to their responsibilities, which may include any or all of the topics outlined in this policy:

- Hazardous Waste Determinations (Site Managers, *at a minimum*)
- Containers, Compatibility and Storage
- Accumulation Limits
- Labeling Requirements
- Disposal and Manifesting (Site Managers, *at a minimum*) and
- Spill response procedures (Emergency Action Plan)

Training should be conducted at the time of initial assignment to duties. All training must be documented. Training must be updated as necessary to meet the requirements established by the Hazardous Waste Rules.

Responsibilities

The **UMS Safety Management** is responsible for the management of the University contract for disposal of hazardous wastes generated by all SQG sites.

The **Facility Emergency Coordinator (FEC)** is responsible for responding to emergencies within a short period of time (1 hour or less), making the required notifications in the event of a fire or

release of hazardous materials, contacting designated responders to clean-up emergency spills, and arranging for removal of contaminated materials or soils.

SQG Site Managers are responsible for the management and disposal of wastes generated at their site, including regular assessment of waste storage, generator status and completion of the monthly **“Small Quantity Generator (SQG) Central Accumulation Area Monthly Checklist”** available on SM’s web page.

Each employee that generates hazardous waste is responsible for attending the site-specific training and maintaining appropriate chemical and waste storage in accordance with these guidelines. Employees are also responsible for notifying the SQG Site Manager of wastes accumulated as soon as containers are full and of chemicals that are no longer needed.

Definitions

Acutely Hazardous Waste: Hazardous wastes that are listed by the EPA or DEP as Acutely Hazardous carrying a “P” waste code (P-listed waste) or any of the following F-listed wastes F020-F023, F024, and F026-F028 containing chlorobenzenes or chlorophenols.

Corrosive: Aqueous solutions with a pH less than or equal to 2, or greater than or equal to 12.5; liquids that corrode steel or aluminum at a rate greater than 0.250" per year; and chemicals that cause visible destruction or irreversible alteration of human tissue.

Hazardous Waste: Wastes that display the characteristics of ignitability, corrosivity, reactivity, or toxicity, or are listed as hazardous wastes by the EPA or DOT for displaying either one of the hazardous waste characteristics or for other reasons of potential harm to human health or the environment if improperly disposed.

Ignitable: Liquids, other than aqueous solutions containing at least 24% alcohol by volume, with a flash point less than 60° C (140° F) or solids capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture, or spontaneous chemical changes and which when ignited, burn so vigorously and persistently that they create a hazard.

Listed Wastes: Chemicals specifically listed by name in EPA or DEP regulations including characteristic of toxicity as defined in 40 CFR 261.24; wastes from non-specific sources (“F” list); wastes from specific sources (“K” list); Commercial products, off-spec products, spill residues (“U” list & “P” list); PCB-containing waste oils, transformers, and ballasts containing or possibly containing PCB oils (“M” list).

Reactive: Substances which are normally unstable and readily undergo violent change; react violently with water; are capable of forming toxic vapors, gases, or fumes when mixed with water in a quantity sufficient to present a danger to human health or the environment; and are capable of detonation or explosive reaction.

Universal Hazardous Waste includes waste Cathode Ray Tubes (CRT), mercury containing lamps and devices and non-leaking PCB Ballasts. At SQG sites all Universal Hazardous Wastes are

labeled, stored and managed similar to other hazardous wastes, **however their accumulations are counted separately** from hazardous waste accumulations towards the generators status as a SQG.

For Additional Information

- Contact your Site Safety Contact or UMS Safety Management at 207/581-4055.

Document History

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