



THE UNIVERSITY OF MAINE SAFETY AND ENVIRONMENTAL MANAGEMENT

Waste Management at Remote SQG Sites

General

In order to maintain Small Quantity Generator (SQG) status, 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 Maine Department of Environmental Protection (MDEP) 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. No more than 100 kg of hazardous waste or 1 kg of acutely hazardous waste can be generated in any calendar month (*other limits may also apply*).

Additionally, since Universal Hazardous Wastes are managed the same way as other Hazardous Wastes at SQG sites, all Universal Waste must be included in the “monthly generation” and “total storage” calculations.

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 SEM. 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 DOT approved shipping containers before shipment off site.

Waste chemicals must be stored in containers that are chemically compatible with the contents. 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 or 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 (including universal hazardous waste).

Maximum Amount of Waste Generated in any calendar month:

Standard Hazardous Wastes	100 Kg
Acutely Toxic Wastes	1 Kg

Maximum Amount of Waste Stored (or generated):

Standard Hazardous Wastes	55 Gal
Acutely Toxic Wastes	1 Kg
Empty P-listed Containers	None over 20 liters
P-listed Container Liners	10 Kg
P-listed Spill Cleanup Material	100 Kg

Containers of waste must be removed within 180 days of the *Container full date*. The time required to fill a container does not matter, however, containers must be periodically inspected and removed/replaced, as necessary, to prevent container deterioration or excess waste accumulation.

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.

HAZARDOUS WASTE
Federal Law Prohibits Improper Disposal

GENERATOR INFORMATION:
Name: _____
Address: _____

CHEMICAL CONSTITUENTS & CONCENTRATION:

_____ Date waste was first added to container.
_____ Container full date. Call EH&S IMMEDIATELY.
_____ Date transferred to Waste Storage Site.

CAUTION HANDLE WITH CARE
Contains Hazardous or Toxic Wastes

Sample Label (*labels available from SEM*)

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:

Wastes must be removed from a SQG site by an approved waste disposal vendor within 180 days of the container full date. Wastes should also be routinely removed to ensure container integrity and to maintain waste stores within the regulated accumulation limits (i.e., 55 gal and 1 kg).

Schedules for waste pickups are made by SEM through each Remote Site Manager, at least annually. Pickups may be more frequent, when necessary; to ensure that accumulation limits are not exceeded.

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 (APL 46) Hazardous Waste Manifests and accompanying documentation should be retained indefinitely. DEP 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 Material Safety Data Sheets, 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 significant fire, ensure that the flow of hazardous materials is contained in the event of a release, 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):

EPA and EPA 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 that require handling waste or chemicals that may become waste. All training must be documented. Training must be updated as necessary to meet the requirements established by the Hazardous Waste Rules.

Responsibilities

The **Department of Safety and Environmental 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, 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 and generator status.

Each employee 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 less than 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 the same way as other hazardous wastes.

For Additional Information

Contact your Department Safety Coordinator or Safety and Environmental Management at 207/581-4055.

Document History

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