



| <i>Environmental Guideline</i> Hazardous Waste Management | |
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| <i>Contact Person:</i> | Paul Bedard (DEQ) |
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| Activity Description |
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| <p>Hazardous Waste Management is the collection, containment, and disposal or recycling of discarded material that is regulated by the state and federal government as a "hazardous waste" as defined in the Resource Conservation and Recovery Act (RCRA) and the Colorado Hazardous Waste Regulations.</p> <p>Hazardous waste is a specific term and refers exclusively to discarded, spent, or contaminated materials listed by name in the Colorado Code of Regulations title 6, volume 1007-3, part 261.31 through 261.33, or which have characteristics of toxicity as narrowly described by section 261.24, table 1, or which demonstrate physical hazards of ignitability, corrosivity or reactivity per sections 261.21 through 261.23 of this part. If a discarded material does not meet any of the definitions set forth in 6 CCR 1007-3 part 261, it is not a hazardous waste.</p> <p>Determining if a discarded, spent, or contaminated material is a hazardous waste per RCRA regulations can be difficult. RCRA regulations also provide for exclusions and exemptions of some materials otherwise defined as hazardous wastes. Furthermore, some specific substances (radioactive material, asbestos, polychlorinated biphenyls) which are dangerous and toxic are regulated completely by other bodies of law. Seek the assistance of DEH in any hazardous or regulated waste determinations. Faulty or negligent "hazardous waste determination" is the leading cause of non-compliance in environmental health and safety programs.</p> |

| Potential Environmental Risks |
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| <p>The following environmental concerns are associated with this activity:</p> <ul style="list-style-type: none"> • Contaminating your workplace • Creating a health hazard in your workplace • Creating a fire or other safety hazard • Contributing to illegal disposal • Jeopardizing the health and safety of solid waste handlers • Contaminating otherwise non-regulated waste • Contaminating soil and ground water • Violating landfill use rules |
| <p>Potential consequences from performing the activity incorrectly:</p> <ul style="list-style-type: none"> • Personal injury, injury to co-workers or members of the public, contamination of local eco-systems, property damage, and environmental pollution • Legal orders and penalties for violation of local, state and federal laws- civil and criminal proceedings, arraignment, litigation and financial and other legal penalties. • Job loss and significant disruption to delivery of services to the public. |

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Critical Operating Requirements

A. General Requirements

Prohibited Activities

- Hazardous wastes shall not be discarded in the trash or otherwise mixed with normal municipal solid waste.
- Hazardous wastes shall not be mixed with other chemicals or otherwise treated unless specifically authorized in a hazardous waste management plan and treatment permit.
- Hazardous wastes shall not be allowed to evaporate, dissolve, spread or flow, or otherwise be diluted or allowed to escape into the air or on to the land.
- Spills of hazardous wastes shall not be swept or washed into any sewer system or waterway, or on to any soils unless specifically authorized in a spill response or contingency plan.
- Soil, water, or other media which become contaminated by release of hazardous wastes shall not be left in place to cause contamination or harm, but must be contained and remediated as soon as possible.

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Critical Operating Requirements

A. General Requirements *Responsible: All Staff*

General Considerations

- Each person performing a task or job in which hazardous wastes are generated, collected, or managed is responsible for understanding how the waste must be managed and what specific rules or procedures need to be followed. This Environmental Guideline is provided for general instruction only and does not supersede any regulations or specific work instructions.
- Some hazardous wastes may be incompatible with other wastes, other materials, or the container in which they are placed. Avoid creating hazards caused by placing incompatible materials and wastes in contact with each other.
- All hazardous wastes need to be properly contained. Determine the best container and means of collecting hazardous wastes in compliance with state rules, and always keep containers of hazardous wastes closed when not in use.
- Hazardous waste containers must always be properly marked or labeled including the words "hazardous waste".
- Materials and media (e.g., soil, water, absorbent products) contaminated by the release and clean-up of hazardous wastes, plus the spilled waste itself, must, in most cases, be managed as hazardous wastes.

Training Requirements

- Workers and supervisors who generate or manage hazardous wastes on the job are required to have specific training relating to their role in hazardous waste management.
- Training may consist of classroom instruction and discussion of applicable topics, plus some hands-on practice in the workplace.
- Training is usually provided by DEH several times a year.
- Workers require initial hazardous waste training, plus annual "refresher" training.

Storage & Material Handling Requirements

- All containers of hazardous waste must be marked with the words "Hazardous Waste" plus a description of the waste (e.g., paint, rags, filters, etc.)
- Hazardous wastes must be separated from all other discarded materials and collected in containers appropriate to the waste.
- Do not mix different hazardous wastes in a single container.
- Store hazardous wastes containers in a location and in such a manner as to protect them from damage or deterioration and prevent release of the hazardous wastes within them.
- Maintain legible labels and markings on all containers of hazardous waste.
- Depending upon the size and nature of your facility, collected hazardous wastes may remain in storage for a period of from 90 to 180 days. Follow specific work instructions regarding how to comply with this time limit.
- Do not store hazardous wastes in any tanks or bulk containers, use drums or containers that are 55-gallons or smaller in size.

B. Planning Requirements

Responsible: supervisors or managers

- B1. Document the quantity of the different hazardous wastes you collect and store on a periodic basis (daily, weekly, or monthly) per specific work instructions and inspection forms.
- B2. Be sure to obtain and keep on hand all MSDSs for all products at your facility that may contribute to or be involved in the generation of a hazardous waste.
- B3. Procure the right containers and ancillary equipment (drums, funnels, labels, gloves.) needed to properly collect and store the hazardous wastes you will generate, before you generate them.

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B4. Ensure that your facility has appropriate spill response materials at all times for the types of hazardous wastes you collect on site.

C. Critical Tasks *Responsible: All Staff*

- C1. Keep all containers of hazardous wastes closed when not adding to or emptying them.
- C2. Label all containers of hazardous wastes accurately and completely including the words "hazardous wastes" according to specific work instructions.
- C3. Mark all containers of hazardous wastes in timed storage with their accumulation start date. See specific work instructions regarding this task.
- C4. Document hazardous waste collection, storage and removal on the appropriate inventory form according to specific work instructions.

D. Emergency Response *Responsible: All Staff*

- D1. If a spill occurs, refer to Environmental Guideline Spill Response.
 - **Call 311 immediately (during normal business hours) or at 303-206-0001 after normal business hours for all spills.**
- D2. If a spill of hazardous waste or wastes occurs, act immediately to contain it both to minimize property damage and prevent an imminent risk to human health and the environment.
- D3. If a hazardous waste container is found to be leaking as a result of damage, deterioration, or incompatibility with the waste act immediately to re-package the hazardous waste in a proper container that is compatible with the hazardous waste and resistant to the external environment in which it is stored.
- D4. Consult the emergency response, spill response, or contingency plan specific to your facility for the exact actions to take and people to notify in the event of a spill or release of hazardous wastes.
- D5. Collect and containerize all hazardous wastes and contaminated media derived from a spill and re-evaluate the material for correct labeling, storage, and disposal as a hazardous waste.

E. Inspection & Maintenance Requirements *Responsible: All Staff*

- E1. Inspect hazardous waste containers, collection and storage areas regularly (daily, weekly or monthly) according to specific work instructions.
- E2. Document your inspections on the appropriate form specific to your facility and detailed work instructions, and provide a copy of your inspection form to DEH for log-term recordkeeping and compliance demonstration.
- E3. During inspection look for and correct: open containers, unlabeled and improperly labeled containers, containers lacking dates or other markings, inaccessible waste containers, container deterioration, cluttered waste storage areas, leaks and spills, and undocumented or unidentified wastes and containers in inventory.
- E4. Work with DEH facility compliance staff to collect, manage, transport, and dispose of all hazardous wastes generated at your facility.

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| Expected Records / Outputs | |
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| <u>Record / Output</u> | <u>Instructions</u> |
| Waste Inventory and Inspection form | <ul style="list-style-type: none"> Form is specific to your facility Weekly hazardous waste inspections are a required activity. Records of inspection must be provided to the DEH for recordkeeping and compliance demonstration |
| Waste disposal records (profiles, LDR forms, manifests, waste characterization results, etc.). | <ul style="list-style-type: none"> These documents are critical to environmental compliance demonstration and their use and provision are required by law. These documents will be prepared by DEH or technical and professional service contracted in the process of waste management and disposal. Originals and "return" copies must be provided to and retained by DEH for waste accounting, long-term recordkeeping and compliance demonstration. Copies may be given to concerned parties and the operating agency. |
| Training Records | <ul style="list-style-type: none"> Training is required of all staff who generate or manage hazardous waste. Any formal training program must yield a clear record of training (and annual refresher training) for each individual trained. DEH sponsored training generates a single one page record of training for each participant. Provide DEH with a copy of each record of training for each employee for purposes of record keeping and compliance demonstration |

| References |
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| <p>Phone Numbers</p> <ul style="list-style-type: none"> 311 (for Spill Reporting during normal business hours)3-1-1 DEH DEQ Emergency Response (after normal business hours)..... (303) 206-0001 Paul Bedard (Facility Compliance Program Administrator) (303) 880-9865 Gary Lasswell (Environmental Compliance Supervisor) (720) 865-5440 |

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References

Guidance Materials (list not limited to the following)

- MSDSs
- WMD MS4 Permit
- DOT Labeling and Placarding Guidance
- SPCC Plan

Training Materials (list not limited to the following)

- Operating procedures training (On-the-Job)
- Operator site specific training materials for handling Hazardous Wastes

Related Environmental Guidelines (list not limited to the following)

- Spill Response
- General Regulated Waste Management

Applicable Regulations (list not limited to the following)

- 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
- 40 CFR 122-124 NPDES Regulations for Storm Water Discharges
- 6 CCR 1007-3, Part 261 State RCRA Regulations
- CCoD Ordinances
- Denver Wastewater Management Division Rules & Regulations
- Metro Wastewater Reclamation District Rules & Regulations

Other Documents

- Air Pollution Emission Notification (APEN) forms
- Compliance Bulletins
- CCoD Executive Orders