

Examples

What if ???

NR 662

Large Quantity Generator Requirements

- You find the following during an audit at your company, which is a LQG:
 - Contingency plan was not sent to DNR
 - 55-gallon drums in the 90 day accumulation area are marked “Hazardous Waste”
 - Manifest copies signed by the TSD are on file
 - Copies of in-state manifests not sent to WDNR
 - A 3 yd box of D008 sludge to be shipped offsite does not have the DOT shipping label
 - Which of these are violations?

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- Copies of in-state manifests are not sent to DNR
- A 3 yd box of D008 sludge to be shipped offsite does not have the DOT shipping label
- Which of these are violations?
 - **None - The facility is in compliance**

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Small Quantity Generator Requirements

- You find the following during an audit at your company, which is a SQG:
 - Emergency information is posted by the telephone
 - Four full 55 gallon containers are in one satellite accumulation.
 - No employee training records exist
 - No inspection logs exist
 - No containers are labeled or dated
 - No aisle space is maintained
- Which of these are violations?

You find the following during an audit at your company, which is a SQG :

- Emergency information is posted by the telephone
- **Four full 55 gallon containers are in satellite accumulation.**
- No employee training records exist
- No inspection logs exist
- **No containers are labeled or dated**
- **No aisle space is maintained**
- Which of these are violations?

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Very Small Quantity Generator Requirements

- You find the following during an audit at your company, which is a VSQG:
 - HW containers are not in good condition
 - No aisle space is maintained
 - Bills of lading have been used for prior shipments
 - No LDR notification forms are in the file
- Which of these are violations?

You find the following during an audit at your company, which is a VSQG:

- **HW containers are not in good condition**
- No aisle space is maintained
- Bills of lading have been used for prior shipments
- No LDR notification forms are in the file
- Are there any violations?

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HW Identification

- A site is performing remediation by filtering the groundwater. Historically, the source of contamination is used pentachlorophenol formulations.
 - Are the filters a hazardous waste?

A site is performing remediation by filtering the groundwater. Historically, the source of contamination is used pentachlorophenol formulations.

- Are the filters a hazardous waste?
 - They are not F027 listed waste by definition , but may be hazardous for the toxicity characteristic for pentachlorophenol or trichlorophenols.

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Commercial Chemical Products

- During an audit, you find a 55 gallon container of product toluene that was used in a process discontinued 3 years ago. It was previously thought that the toluene could be used for another process, but your company has no use for it.
 - Is the container of toluene hazardous waste?
 - Is the facility an unlicensed storage facility?

During a weekly audit, you find a 55 gallon container of product toluene that was used in a process discontinued 3 years ago. It was previously thought that the toluene could be used for another process, but your company has no other use for it.

- Is the container of toluene hazardous waste?
 - No, if it is still considered to be a product.
- Is the facility an unlicensed storage facility?
 - No. However, if the company cannot use the product toluene, it should either be advertised for waste exchange, sent back to the manufacturer or declared a waste.

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Secondary Materials

- Your company reclaims a spent lacquer thinner containing >10% MEK and toluene. The still bottoms have a high BTU content. An employee asks if the still bottoms can be burned in the boiler as a fuel.
- Are the still bottoms a solid waste?
- Are the still bottoms a hazardous waste?
- How would this activity be regulated?

A generator reclaims a spent lacquer thinner containing >10% MEK and toluene. The still bottoms have a high BTU content. An employee asks if the still bottoms can be burned in the boiler as a fuel.

- Are the still bottoms a solid waste?
 - Yes, waste burned for energy recovery is a solid waste.
- Are the still bottoms a hazardous waste?
 - Yes, by definition, the still bottoms are F005 listed waste
- How would this activity be regulated?
 - Subject to full HW regulation as a boiler or industrial furnace (BIF)

NR 664

Exemptions

- Your company is thinking about neutralizing acid waste in an elementary neutralization unit. Do any of these requirements apply?
 - Maintain an operating log
 - Inspect the unit weekly for leaks or deterioration
 - Obtain EPA ID #
 - Annual reporting requirements

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- Maintain an operating log
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-
- **None of these are requirements for operating the neutralization unit.**

Manifest Requirements

- The TSDF notifies you that 4 of 10 drums of F003 solvent will be rejected because of PCB contamination. No alternate facility will accept the waste. Can the TSDF ship the waste back to your company, as the generator?

The TSDF notifies you that 4 of 10 drums of F003 solvent will be rejected because of PCB contamination. No alternate facility will accept the waste. Can the TSDF ship the waste back to your company, as the generator?

- **Yes, this is a partial load rejection**
- **Waste is to be returned to the generator within 30 days of rejection**
- **May require the creation of a new manifest**
- **Cross-reference between the initial & new manifests**
- **Waste is subject to accumulation requirements once it is returned to the generator**
- **Mark containers with new accumulation start date**
- **If this is not resolved within 15 days of receipt, the TSDF submits a discrepancy report to WDNR**