



Small Business Advisor - July - 2017

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Small Business Environmental Council Meeting July 19th

The DNR's Small Business Environmental Council Meeting is scheduled for Wednesday, July 19th at 101 South Webster Street, Madison, WI, in Room 613. The agenda items include:

- DNR Updates
- SBEAP staff and program updates, workplanning for 2017-19
- Follow up from April meeting
- Plan Fall meeting

For more information on the Council or to find a copy of the agenda, go to: <http://dnr.wi.gov/topic/SmallBusiness/Council.html>

Two Hazardous Waste Guides Updated

1) Waste Determination and Recordkeeping

The DNR has updated the 2007 publication "Is Your Waste Hazardous?" and has renamed the guidance "**Waste Determination and Recordkeeping**." This updated guidance document provides assistance to generators, consultants, and environmental contractors in making waste determinations for hazardous and non-hazardous wastes, and recording those decisions for compliance purposes. This document went through the DNR's public input process in October/November 2016.

The publication [WA 1152](#) includes these topics:

- Waste determination process and flowchart
- What is a solid waste
- What is a hazardous waste
- Listed or characteristic hazardous wastes
- Waste determination methods including acceptable knowledge and lab analysis
- Recordkeeping
- Conditional exemptions and exclusions

Additionally, this guidance includes an example waste determination checklist that can be used as a guide to document the waste determination process.

2) Closed Containers Guidance for Hazardous Waste Generators

The hazardous waste rules for containers are intended to help protect ignitable or reactive wastes from sources of ignition, prevent spills of hazardous wastes, prevent emissions and releases of volatile wastes, reduce the potential of mixing incompatible wastes, and reduce the potential of direct contact with hazardous wastes.

As both state and federal hazardous waste rules do not provide a specific definition of “closed container,” this guidance document is intended to both outline the requirements and offer examples of what the department considers acceptable practices in meeting these requirements. These rules and best management practices apply to containers of liquid and non-liquids wastes in central accumulation areas (CAA) and satellite accumulation areas (SAA), and are outlined in publication [WA 1342](#).

Note: A CAA refers to the area on-site where hazardous waste accumulation occurs in containers and tanks. These areas are not subject to an operating license requirement as long as the requirements in s. NR 662.192 (for small quantity generators) or s. NR 662.034 (for large quantity generators) are met. This includes CAAs with 90-day, 180-day or 270-day accumulation time limits. The department is incorporating this federal terminology into publications updates prior to adopting the regulations.

More information on hazardous waste management, including links to the documents listed above, can be found at the department hazardous waste website: <http://dnr.wi.gov/topic/Waste/Hazardous.html>, click on “Publications” under **Related Links**.

OSHA Electronic Recordkeeping Deadline Extended

The requirement for certain employers to electronically submit injury and illness cases has been extended to December 1, 2017.

The electronic reporting system (the website used to submit the records) will be available August 1, 2017. Read all about it in the Federal Register, <https://www.federalregister.gov/documents/2017/06/28/2017-13550/improve-tracking-of-workplace-injuries-and-illnesses-proposed-delay-of-compliance-date>

DISCLAIMER — This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. This guidance does not establish or affect legal rights or obligations and is not finally determinative of any of the issues addressed. This guidance does not create any rights enforceable by any party in litigation with the State of Wisconsin or the Department of Natural Resources. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.



THE SMALL BUSINESS ENVIRONMENTAL ASSISTANCE PROGRAM
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