

## SECTION 4

### CHEMICAL AND HAZARDOUS WASTE MANAGEMENT PLAN

#### I. INTRODUCTION

A. The United States Department of Agriculture, Agricultural Research Service, and the Stuttgart/Pine Bluff Location (**SPBL**), which consists of the Aquaculture Systems Research Unit (ASRU, 1500 Oliver Road, Pine Bluff, AR 71601), the Dale Bumpers National Rice Research Center (DB NRRC, P.O. Box 1090, Stuttgart, AR 72160) and the Harry K. Dupree Stuttgart National Aquaculture Research Center (HKD SNARC, P.O. Box 1050, Stuttgart, AR 72160) are committed to the ideals of protection to human health and the environment through proper management of hazardous waste.

B. These facilities are classified as conditionally exempt small quantity generators of hazardous waste and have been issued E.P.A. I.D. Numbers listed below:

- |    |         |                       |
|----|---------|-----------------------|
| 1. | DB NRRC | # <b>ARR000011940</b> |
| 2. | SNARC   | # <b>ARR000011932</b> |
| 3. | ASRU    | # <b>ARR000013003</b> |

#### II. SCOPE

A. The general intent of this plan is to establish policy and responsibilities for compliance with local, state, and federal regulations governing hazardous waste management.

B. This plan does not apply to experimental compounds. When requesting or receiving experimental compounds from cooperators (industry), only that amount of material needed to conduct the planned studies will be obtained. These compounds should only be accepted with the understanding that excess amounts will be returned to the cooperator. Also, if larger amounts of material (i.e., low concentration, high volume dips) are required to carry out the cooperative studies, the cooperator shall bear full responsibility for final disposal. These details will be agreed to in writing by the cooperator prior to initiation of the study. Livestock treated with experimental compounds not having experimental use permits will be the responsibility of the respective cooperators for disposal. These actions are necessary to minimize the accumulation of chemical waste materials in our laboratories.

C. Implementation of this plan will help attain the following location goals:

1. Maintenance of the generator status of “conditionally exempt small quantity generator (CESQG)”.
2. Reduction in waste management costs
3. Minimum disruption to research missions caused by waste management

#### III. REFERENCES

A. Protection of the Environment, 40 CFR 260-279

B. Transportation, 49 CFR 172-179

C. AR Hazardous Waste Management – REG 23

**IV. DEFINITIONS - For the purpose of this plan, the following definitions will apply:**

A. Accumulation Start Date: The calendar date that a container is full or declared full of a hazardous waste.

B. Acutely Hazardous Waste: A waste listed in 40 CFR 261.33(e).

C. Characteristic Waste: If a waste is not listed as hazardous (See “Listed Waste, below), it may be classified as “hazardous by characteristic” if it meets one or more of the following characteristics (Reference: 40 CFR 261.21-24):

1. Ignitability:

a. The waste is a (1) liquid, less than 24% alcohol by volume, with a flash point of less than 60 degrees C, (2) solid capable of causing fire by friction, absorption of moisture, or spontaneous chemical change, or (3) an ignitable compressed gas or oxidizer.

2. Corrosivity:

a. The waste is aqueous and has a pH less than or equal to 2.0 or greater than or equal to 12.5, determined by a pH meter.

3. Reactivity:

a. The waste is unstable, reacts violently with water, is capable of generating toxic gases and fumes, or is capable of detonation.

4. Toxicity:

a. The waste is hazardous if a representative extract of the waste is subjected to the Toxicity Characteristic Leaching Procedure (TCLP) and is found to contain any contaminants listed in Table 1 of 40 CFR 261 Subpart C at the concentration equal to or greater than the given value in the table.

D. Exception Report: A report filed by the facility with the EPA if the facility does not receive notification (consisting of a returned copy of the waste manifest) that its waste has been received by a disposal facility within 60 days after the waste was given to the waste transport contractor.

E. Excluded Waste: A solid waste that is listed in 40 CFR 261.4(b) and 40 CFR 261.3 Subpart D. Almost no laboratory waste can be expected to be excluded.

F. Generator: Person that actually creates and generates a hazardous waste.

G. Accumulation Point Manager (APM): Person responsible for Satellite Accumulation Point management.

H. Emergency Coordinator: Person responsible for coordinating all emergency response measures

I. Hazardous waste: A solid waste that is either a Listed Waste (definition below) or a characteristic waste (definition above).

J. Hazardous Waste Coordinator (HWC): Person responsible for implementing and operating the record keeping, reporting, inspecting, compliance monitoring, personnel education and training, and other duties under this plan.

K. Listed Waste: A solid waste that is listed as a hazardous waste in 40 CFR 261.31-33. If the waste is listed in this section, it is automatically hazardous waste, unless it is excluded (See Excluded Waste, above).

L. Satellite Accumulation Point (SAP): An area at or near the point of generation, in control of the operator of the process generating the waste, where wastes initially accumulate. Laboratory generators of hazardous waste are permitted to accumulate as much as 55 gallons of hazardous waste or 1 quart of acutely hazardous waste listed in 40 CFR 261.33(e) in containers at or near the point of generation.

M. Solid Waste: Any discarded material which is abandoned, to be recycled, or inherently waste-like. See 40 CFR 261.2 for additional details.

N. Source Reduction: The design, manufacture, acquisition, and reuse of materials so as to minimize the quantity and/or toxicity of waste produced. Source reduction prevents waste either by redesigning products or by otherwise changing patterns of consumption, use, and waste generation.

O. Waste Stream: The total flow of solid waste from a facility that must be recycled, burned, or disposed of.

## V. RESPONSIBILITIES

### A. The Location Coordinator

**Current LC for Stuttgart is Don Freeman**

1. Approves, by signature, this plan.
2. Authorizes and supports the implementation of this plan, the annual review of this plan, and amendments or changes to this plan.
3. Provides resources for training, equipment, and other support called for in the program.

### B. The Location Administrative Officer

**Current LAO is Jeanie Gwathney (Acting)**

1. Maintains files and records.
2. Assists in information sharing.
3. Publicizes this plan.

C. Location Safety Committee

1. Reviews and updates this plan annually:
2. Evaluates prior years' operations to verify appropriate procedures have been followed
3. Evaluates employee complaints about the effectiveness of the program.
4. Reviews Hazardous Waste Regulations and recommends program changes to the Location Coordinator.

D. Collateral Duty Safety Officer

**Current CDSO is Diana Morian**

1. Assist the Area Safety Officers with annual compliance inspections
2. Assists the Hazardous Waste Coordinator.
3. Maintains files and records of program activities.
4. Maintains this plan
5. Publicizes this plan.

E. The Hazardous Waste Coordinator

**Current HWC is Rolfe Bryant**

1. Oversees and operates the hazardous waste management program
2. Acts as the primary Emergency and Contingency Coordinator
3. Signs the Hazardous Waste Manifest as delegated by written authority
4. Assists Research Leaders, maintenance personnel, and employees develop standard operating procedures for managing chemical wastes

F. Research Leaders and department heads will:

1. Will identify waste streams in their departments and insure the waste determination is accomplished

2. Will develop pertinent waste management Standard Operating Procedures
3. Ensure employees comply with provisions of this plan

G. Employees will:

1. Comply with provisions of this plan.

## **VI. Hazardous Waste Management Activities**

A. Each department/section will conduct a solid waste stream survey to identify and document all waste streams within the section.

B. A hazardous determination will be conducted on each identified waste stream by the person generating the waste.

1. There after, hazardous determinations will be conducted on all new waste streams and reported to the HWC.

C. Procedures for Determining If Waste Is Hazardous Waste:

1. Hazardous by Listing:

- a. If the waste is listed in 40 CFR 261.31-33, it is automatically hazardous waste without regard to concentration. There are exclusions under the provisions of 40 CFR 261.4(b) and 40 CFR 261.3 Subpart D, but almost no laboratory wastes can be expected to be excluded.

2. Hazardous by Characteristic:

- a. If a waste is not listed as hazardous, then the use of process knowledge, materials used, and end products to identify the waste as hazardous by virtue of it meeting the standards for ignitability, corrosivity, reactivity, or toxicity (see definition of Characteristic Waste, above).
- b. If this process is used to identify a waste as hazardous, the process will be documented with a description of what makes it hazardous. This documentation will be maintained on site for at least three years.

3. Unknown wastes determinations:

- a. For materials not listed or there is a lack of generator knowledge, a chemical analysis must be made of a representative sample to determine its ignitability, corrosivity, reactivity, and/or toxicity.

- b. An approved EPA sampling method, or a method superior to EPA methods, must be used
- c. Hazard analysis and determination documentation will be maintained on site for at least three years.

D. Hazardous Waste Profile

- 1. Once a waste has been determined to be hazardous and is full and ready for pickup, the generator will complete and sign a Hazardous Waste Profile Sheet (Appendix 4.1) for each waste prior to pickup. Contact the HWC for pickup.
- 2. Two copies of the profile will be attached to each waste pickup.
- 3. Once off site transport has occurred, one copy will be returned to the generator indicating manifest number and date of shipment

E. Management of hazardous waste in the work area:

- 1. Satellite Accumulation Point (SAP)
  - a. A SAP will be established in each area where hazardous wastes are generated and are initially accumulated.
  - b. The SAP area must be in control of the operator of the process generating the waste. Ref.: 40 CFR 262.34(c)(1).
  - c. One person will be appointed as the Accumulation Point Manager (APM).
    - ◆ The APM will develop a section SOP that will describe the procedures for the safe handling and management of wastes at their particular SAP
    - ◆ The SOP will include:
      - 1) Location of the SAP
      - 2) A waste inventory
      - 3) Labeling requirements
      - 4) Container Management practices
      - 5) The proper choice and use of PPE to use while handling each waste
      - 6) The location of the MSDS for each waste

- 7) Security measures to be take to alleviate exposure.
- 8) Spill procedures
- 9) Emergency phone numbers
- 10) Profile sheets of routinely generated wastes

- ◆ Unit SOPs will be attached to this plan
- ◆ SOPs will be updated annually or whenever a change occurs
- d. The SAP is permitted to accumulate no more than 5 gallons of hazardous waste or 1 quart of acutely hazardous waste (listed in 40 CFR 261.33(e)) in containers at or near the point of generation.
  - ◆ Although regulations allow up to 55 gallons of hazardous waste, the five gallon limit is a more manageable and safer level for handling and storage.
- e. Container Labeling
  - ◆ Containers will be labeled with the words “Hazardous Waste”, the contents and their concentrations, appropriate hazard labeling, and hazardous waste profile number.

1. Chemicals common name will be used.

- a. When the container is filled or declared full, the accumulation start date must be entered on the label

2. SAP waste management:

- a. Containers will be in good shape
- b. Containers must be compatible with the type of waste,
- c. Containers will be considered “full” when no more than 90% of the containers capacity has been reached.
- d. Incompatible wastes shall be segregated,
- e. Flammable and corrosive material will be stored in the appropriate manner,

- f. Secondary containment will be provided for all containers
- g. Adequate spill kits and cleanup materials will be provided
- h. Provision for emergencies, appropriate warning signs etc.
- i. Containers must be kept closed when not being filled.

It is not acceptable to evaporate the contents of SAP containers in a fume hood or on a bench top.

- j. The area is to be posted with a sign stating “Hazardous Waste Satellite Accumulation Point”.
- k. Emergency Information Posting
- ◆ The following information will be posted next to the telephone:
  - 1) The name and telephone numbers of the Emergency Response Coordinators
  - 2) Location of fire extinguishers and spill control material, and, if present, fire alarm
  - 3) The telephone number of the fire department, unless the facility has a direct alarm.

### 3. SAP Inspections

- a. The APM will conduct an inspection of the SAP weekly and record the inspection using the form in Appendix 4.2.
- b. Records of SAP inspections should be kept at the SAP.

### F. Hazardous Waste Turn-in:

- 1. Hazardous waste turn-ins will be conducted when the five gallon limit has been obtained. The APM will contact the HWC for pickup.
- 2. Containers must be moved to the waste storage facility with-in 24 hours after becoming full or being declared full.
- 3. The APM will insure that container labeling is correct, two copies of the waste profile sheets and an MSDS accompanies each waste.
  - a. HWC will not accept any waste that is not in compliance
- 4. HWC will safely take the waste to the waste storage facility.

5. The HWC will record each waste on the Hazardous Waste Inventory and Generation log (Appendix 4.3).
6. The waste profile sheet and MSDS will be maintained at the storage building until waste disposition.

G. Hazardous Waste Building/Room/Locker:

1. All hazardous waste will be stored in the designated Building/Room.
2. The HWC will create a SOP for the storage and handling of hazardous waste to include:
  - a. Location of the HWMF
  - b. Labeling requirements
  - c. Container Management
  - d. The proper choice and use of PPE to use while handling each waste
  - e. The location of the profile sheets and MSDS for each waste
  - f. Security measures to be taken to alleviate exposure.
  - g. Spill procedures
  - h. Contingency and emergency plans (40 CFR 262.34(d):
  - i. Name and telephone number of emergency coordinator
  - j. Telephone number of local fire department (NOTE: Although there is no federal or state requirement that the name and telephone number of the Hazardous Waste Coordinator be legible from 25 feet it is a safety measure in aiding first responders
  - k. SOP will be attached to this plan
3. Storage facility waste management:
  - a. Container Storage Area Requirements (40 CFR 265.170-177):
    - ◆ Containers must be closed and stored in a safe manner
    - ◆ All containers must be in good condition

- ◆ Containers must be compatible with the waste being stored
- ◆ Containers are inspected weekly for leakage and signs of deterioration
- b. Containers holding incompatible wastes are separated by a physical barrier such as a wall, or other device to prevent leaks from traveling to other hazardous waste containers and causing corrosion of containers or dangerous chemical reactions
- c. The storage building must have adequate containment protection
- d. Containers of highly flammable wastes are grounded and/or bonded
- e. Containers are protected from freezing or excessive heat
- 4. The facility is equipped with communication or alarm system within easy access
- 5. Adequate fire extinguishing media for the type of waste stored
- 6. Have adequate and compatible spill kit and cleanup material
- 7. Sufficient aisle space to allow unobstructed movement of personnel and equipment
- 8. Telephone number of local fire department.
- 9. Posted "no smoking" signs
- 10. Security (40 CFR 265.14):
  - a. Adequate security or perimeter barriers to control unauthorized entry
  - b. Posted warning sign with the legend, "Danger--Unauthorized Personnel Keep Out"
  - c. Sign legible from at least 25 feet
- 11. The checklist in Appendix 4.4 will be used to inspect the hazardous waste storage building. The building will be inspected on a weekly basis. (40 CFR 265.174)

H. Hazardous waste disposal:

1. The HWC will insure that all waste is transported off site for disposal with-in one year of the waste accumulation start date.
  - a. HWC will track each wastes accumulation start date to insure compliance

I. Waste Disposal:

1. The facility will use a qualified waste disposal contractor.
2. Contractor is responsible for most packaging and document preparation activities and transportation to a permitted waste treatment, storage, and disposal facility.
3. The Hazardous Waste Coordinator will insure the contractor's technical performance for compliance during packaging (40 CFR 262.30), labeling (40 CFR 262.31), marking (40 CFR 262.32), placarding (40 CFR 262.33) and all other aspects of performance.

J. Manifesting:

1. The Manifest (40 CFR 262.20): The contractor fills out the state manifest.
  - a. The Laboratory Director or Hazardous Waste Coordinator, as delegated by the location coordinator in writing, will sign the manifest certification, obtain the signature of the initial transporter, and date the manifest on the date the contractor accepted the waste.
    - ◆ One copy will be retained by the facility.
    - ◆ The remaining copies will be given to the transporter.
  - b. Return of the Manifest (40 CFR 262.42(b)):
    - ◆ Within 60 days of the date the contractor accepts the waste, the laboratory should receive a return copy of the manifest from the operator of the final disposal facility.
      1. If this copy is not received within 60 days, an Exception Report must be filed with the administrator of the EPA region in which the disposal facility is located.
      2. Contact the Southern Plains Area Safety & Health Manager in such occurrence.

#### K. Hazardous Waste profile sheets and MSDS

1. HWC will record the manifest number and transport date on both copies of each wastes profile sheet. This will be verified by HWC initials.
  - a. One copy will be retained by the HWC and filed with the return manifest.
  - b. One copy will be returned to the generator
2. MSDS sheets will be returned to generator

#### L. Facility Generator Status

1. Monthly Inventory and Generation Log:
  - a. A monthly inventory and generation log of hazardous waste will be maintained at the waste facility site with a copy in the Hazardous Waste Coordinator's office. (Appendix 4.3)
2. The HWC will reconcile the monthly generation amounts to insure compliance with Conditionally Exempt Small Quantity Generator (CESQG) requirements of:
3. Conditionally Exempt Small Quantity Generator (CESQG):
  - a. The facility is allowed to generate less than 100 kg of hazardous waste and no more than 1 kg of acutely hazardous waste in any given month
  - b. The facility is allowed to accumulate no more than 1000 kg total accumulation.
4. At any month that the facilities generation amount exceeds those listed above, the HWC will:
  - a. All quantities of that hazardous waste are subject to full regulation under sections 262 through 266, 268, and sections 270 of this regulation and 40 CFR Part 124, and the notification requirements of section 3010 of RCRA.
  - b. The facility will then comply with the appropriate generator status requirements accordingly.
  - ◆ The Federal regulatory differences between the three generator classifications are found in Appendix 4.5.

5. Any department unexpectedly generating more than the usual of Hazardous Waste must immediately notify the HWC to insure facility compliance with the appropriate generator status.
  - a. This will include all hazardous wastes such as wastes from Lead Paint building debris, etc

**VII. Pollution Prevention**

- A. Each section will comply with the facility Pollution Prevention Program.
- B. Toxic and hazardous waste will be eliminated or at a minimum reduced using source reduction methods whenever possible.

**VIII. Training - All employees will receive annual training to include:**

- A. Contents of the waste regulations and this plan
- B. Contents of Standard Operating Procedures in place
- C. Contents and procedures of the Emergency and Contingency Plan

**IX. Compliance**

- A. A waste management inspection and program review will be accomplished at least annually to determine program compliance.
- B. Inspection will verify that:
  1. Location personnel are complying with the facility Hazardous Waste Program,
  2. Location personnel are complying with Standard Operating Procedures and,
  3. Adequacy of current program and whether changes or updates need to be made.
- C. A copy of the inspection and review will be given to the Location Coordinator for correction of any discovered inadequacies or noncompliance.
- D. A copy of the annual inspection will be kept in a central location, for employee review at each site's library.
- E. One copy of the Inspection and review results will be submitted to the safety committee to evaluate methods for improving the waste management plan.

**X. Record Keeping and Reports Recording and Reporting (40 CFR 262.40): The following records will be kept in the safety file at the LAO's office:**

- A. Hazardous Waste Determinations: Records of tests results, waste analysis or other documentation will be kept, in accordance with 40 CFR 262.11, for at least three years.
- B. Waste Inventory will be kept for at least three years.
- C. Hazardous Waste Profiles will be kept for at least three years.
- D. Manifests & Returned Manifests: A copy of each manifest signed by the designated facility which received the waste, in accordance with 40 CFR 262.23 (a), for three years.
- E. Exception Reports: Exception Reports will be kept for at least three years.
- F. Inspection Reports: Inspection Reports will be kept for at least three years.

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NOTE: ALTHOUGH THREE YEARS IS THE REQUIRED PERIOD FOR RECORDS RETENTION, ENVIRONMENTAL LIABILITY LASTS FOREVER. MANY LAWSUITS AND LEGAL ACTIONS HAVE BEEN INITIATED OVER PROCEDURES AND PRACTICES THAT OCCURRED PERHAPS THIRTY TO FORTY YEARS AGO. IT IS STRONGLY RECOMMENDED THAT THE FACILITIES RETAIN HAZARDOUS WASTE RECORDS AND MANIFESTS INDEFINITELY.

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**Appendix 4.1**

<b>HAZARDOUS WASTE PROFILE SHEET</b>			
Accumulation Start Date:		Profile No.	
Generator Name:		Title:	
Facility Address:			
Generator USEPA ID No.:			
Name of Waste:			
EPA Waste Code:			
Process Generating Waste:			
Amount:		Mode of Collection:	
Characteristics: <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas <input type="checkbox"/> Other  <input type="checkbox"/> Ignitable <input type="checkbox"/> Reactive <input type="checkbox"/> Corrosive <input type="checkbox"/> Toxicity <input type="checkbox"/> Characteristic  <input type="checkbox"/> Listed Waste		Material Composition	
		Component	Concentration
		Range	
		Total 100%	
Basis for Information: <input type="checkbox"/> Chemical Analysis (see attached test results) <input type="checkbox"/> User Knowledge (Attach Supporting Documents such as MSDS)			
Generator Certification: I _____ hereby certify that all information submitted in this and all attached documents is to the best of my knowledge an accurate representation of the waste. All known or suspected hazards have been disclosed.			
Signature:		Date:	
Waste Transport Date:			
Shipping Manifest Number:			
Hazardous Waste Coordinator Initials:			

**Appendix 4.2**

<b>SATELLITE ACCUMULATION POINT INSPECTION CHECK LIST</b>					
<b>Location:</b>	<b>Month and Year</b>				
<b>Inspection Item</b>	<b>Week 1</b>	<b>Week 2</b>	<b>Week 3</b>	<b>Week 4</b>	<b>Week 5</b>
1. Is the SAP under the control of the operator of the waste generating process?					
2. Are containers in good condition?					
3. Are containers compatible with the waste stored in them?					
4. Are containers kept closed except when waste is being added or removed?					
5. Are containers marked "HAZARDOUS WASTE"?					
6. Are containers labeled with the COMMON NAME of the hazardous waste being stored in the container?					
7. Are containers labeled with the HAZARD associated with the hazardous waste?					
8. Are containers labeled with the appropriate Hazardous Waste Profile number?					
9. Are containers protected from freezing or excessive heat?					
10. Are incompatible hazardous wastes segregated?					
11. Are containers located near floor drains or other drains?					
12. Is there more than 5 gallons of hazardous waste or 1 qt of acutely hazardous waste present?					
13. Are containers considered "full" at 90% capacity of the container?					
14. Are containers stored in spill containment?					
15. Is a spill kit provided?					
16. Is the emergency eye wash tested and working?					
17. Is the emergency shower tested and working?					
18. Are containers marked with the accumulation start date when full?					
19. Are containers transported to the marshaling facility within 24 hours of being full?					
20. Are MSDS and Hazardous Waste Profile Sheets available?					
21. Is the Emergency Contact List posted next to the telephone?					




Appendix 4.4

**Weekly Waste Storage Facility Inspection**

<b>Bldg. X Weekly Hazardous Waste Facility Inspection Checklist: Month ____ Year ____</b>						
<b>Inspection Item</b>	<b>Wk 1</b>	<b>Wk 2</b>	<b>Wk 3</b>	<b>Wk 4</b>	<b>Wk 5</b>	<b>Comments</b>
<b>Facility Exterior</b>						
Accessible for inspection?						
Entry accessible and safe?						
Facility in good condition?						
Warning signs posted/visible?						
Emergency contact sign visible?						
Indications of leaks on ground?						
<b>Facility Interior</b>						
Shelves secure?						
Metal containers grounded?						
Containers free of leaks?						
Containers securely closed?						
No signs of spills?						
Secondary containment?						
Containers labeled?						
Storage by compatibility?						
Lights and fixtures working?						
Ventilation working/adequate?						
Fire suppression working?						
Aisles clear?						
<b>Emergency Equipment</b>						
Fire extinguisher present?						
Safety shower working?						
Eyewash working?						
Spill kit available?						

MSDS available?						
Alarms working (if any)?						
Emergency communications?						

Appendix 4.5

**Comparison of Regulatory Requirements  
For Different Categories of Waste Generation**

**RCRA REQUIREMENTS FOR HAZARDOUS WASTE (HW) GENERATORS**

RCRA Requirements	Category of Generator		
	Conditionally Exempt (CESQG)	Small Quantity (SQG)	Large Quantity (LQG)
Accumulation Time	no limit	180 day maximum <sup>1</sup>	90 days maximum
HW generated per month	< 100 kg	100-1,000 kg	no limit
Onsite HW accumulation limit	1,000 kg	6,000 kg	no limit
Onsite Acute HW accumulation limit (Defined in 40 CFR 261)	1 kg	1 kg	1 kg
HW Hazard Determination?	Yes	Yes	Yes
EPA ID Number?	Recommended <sup>2</sup>	Yes	Yes
Manifesting of Waste Shipment?	Recommended <sup>3</sup>	Yes	Yes
Monthly Waste Inventory?	Recommended <sup>4</sup>	Yes	Yes
Container Management?	Recommended <sup>5</sup>	Yes	Yes
Marking & Labeling?	Recommended <sup>5</sup>	Yes	Yes
Tank Management?	No	Yes, but less than LQG	Yes
Emergency Planning?	Yes	Yes	Yes
Personnel Training?	Recommended <sup>5</sup>	Yes	Yes
Permits?	No	No	Yes
Exception Reports <sup>6</sup> sent to EPA?	No	Yes, within 60 days	Yes, within 45 days

NOTES

<sup>1</sup> Or 270 days if waste disposal site is more than 200 miles away.

<sup>2</sup> Most hazardous waste haulers won't accept waste without an EPA ID Number. Most CESQG's use "CESQG" as their number.

<sup>3</sup> Most hazardous waste disposal facilities won't accept waste without a manifest.

<sup>4</sup> Not actually required, but CESQG status cannot be proved without it. Dividing an annual waste tally by 12 to get average monthly waste generation is not acceptable.

<sup>5</sup> Not actually required under RCRA, but omission is a sign of poor management.

<sup>6</sup> Reports filed when the waste disposal facility fails to return a copy of the manifest to the generator.