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**RCRA HAZARDOUS
WASTE FINAL RULE:
*The E-Manifest System & Other
Key Revisions (Concise)***

**Leader's Guide, Fact Sheet
& Quiz**

Item Number: 5035

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This easy-to-use Leader's Guide is provided to assist in conducting a successful presentation.

PREPARING FOR THE MEETING

Here are a few suggestions for using this program:

- a) Review the contents of the Fact Sheet that immediately follows this page to familiarize yourself with the program topic and the training points discussed in the program. The Fact Sheet also includes a list of Program Objectives that details the information that participants should learn from watching the program.
- b) If required by your organization, make an attendance record to be signed by each participant to document the training to be conducted.
- c) Prepare the area and equipment to be used for the training. Make sure the watching environment is comfortable and free from outside distractions. Also, ensure that participants can see and hear the TV screen or computer monitor without obstructions.
- d) Make copies of the Review Quiz included at the end of this Leader's Guide to be completed by participants at the conclusion of the presentation. Be aware that the page containing the answers to the quiz comes before the quiz itself, which is on the final page.

CONDUCTING THE PRESENTATION

- a) Begin the meeting by welcoming the participants. Introduce yourself and give each person an opportunity to become acquainted if there are new people joining the training session.
- b) Introduce the program by its title and explain to participants what they are expected to learn as stated in the Program Objectives of the Fact Sheet.
- c) Play the program without interruption. Upon completion, lead discussions about your organization's specific policies regarding the subject matter. Make sure to note any unique hazards associated with the program's topic that participants may encounter while performing their job duties at your facility.
- d) Hand out copies of the review quiz to all of the participants and make sure each one completes it before concluding the training session.

5035 RCRA HAZARDOUS WASTE FINAL RULE: The E-Manifest System & Other Key Revisions (Concise) FACT SHEET

LENGTH: 12 MINUTES

PROGRAM SYNOPSIS:

To address the huge volumes of municipal and industrial solid waste generated annually, the Environmental Protection Agency, or EPA, developed rules and guidelines in the Resource Conservation Recovery Act (RCRA) of 1976. The regulation has recently been updated with new requirements that are designed to make hazardous waste handling protocols easier to understand and to facilitate better compliance. This program reviews the important revisions mandated in the final RCRA rule. The new E-Manifest system is explained in detail to show viewers how to provide more accurate and timely tracking information on hazardous waste shipments electronically instead of using outdated paper forms. The EPA's goal is to phase out written manifests within the next four years, so it is critical that your employees understand how the new system works.

Other topics include listed and characteristic wastes, hazardous waste generator categories, satellite and central accumulation area requirements, container labeling and other requirements and information required on E-manifests.

PROGRAM OBJECTIVES:

After watching the program, the participant should be able to explain the following:

- What the categories of listed and characteristic hazardous wastes are;
- How each of the three categories of hazardous waste generators is determined;
- What the requirements of satellite and central accumulation area are;
- How to properly label and handle hazardous waste containers;
- How the E-manifest system is used to submit more accurate and timely tracking information for hazardous waste shipments.

PROGRAM OUTLINE:

THE PURPOSE OF RCRA

- There are various chemicals and materials used in our manufacturing processes that are necessary in the production of our finished products; and, while beneficial to manufacturing, these same materials can become, or contribute to the creation of, hazardous waste.
- Hazardous wastes are substances that are dangerous or capable of having a harmful effect on human health or the environment.
- To address the huge volumes of municipal and industrial solid waste generated annually, the Environmental Protection Agency, or EPA, developed rules and guidelines in the Resource Conservation Recovery Act of 1976, which has recently been updated with new requirements.
- Commonly called RCRA, this regulation gives the EPA the authority to control hazardous waste from "cradle to grave", which includes the generation, transportation, treatment, storage, and disposal of hazardous waste.

EMPLOYEE TRAINING

- As an employee who is involved in the handling and storage of hazardous waste, you will receive training in the procedures that should be followed when performing specific job tasks related to such materials. Your training will ensure that you know and understand how to comply with RCRA regulations.
- You will also be trained in safe work practices required for handling hazardous wastes, including proper use of personal protective equipment, required material handling procedures, proper bonding and grounding techniques and potential health effects due to exposure.
- Perhaps the most important part of your training will be learning how to respond in the event of an emergency. This involves training on your organization's contingency plan and emergency response plan for dealing with a hazardous waste spill or other type of release.

LISTED WASTES

- Your organization's first step in achieving RCRA compliance is identifying the materials on site that are classified as regulated hazardous wastes.
- A waste is determined to be hazardous if it is specifically listed on one of four lists found in title 40 of the Code of Federal Regulations (CFR) in section 261.
- The F-list identifies wastes from common manufacturing and industrial processes as hazardous, while the K-list classifies hazardous wastes from specific sectors of industry and manufacturing and are considered source-specific wastes.
- The U- and P-lists identify hazardous wastes from discarded commercial chemical products. P-list wastes are "acutely hazardous", meaning they present a substantial hazard and can be fatal to humans in small doses.
- All listed wastes are assigned an EPA hazardous waste code that identifies the material on container labels, manifests and other documents.
- Be aware that any mixture, or substance derived from, a listed waste is considered a hazardous waste. There is no way to create a non-hazardous waste by diluting a hazardous waste with other materials.

CHARACTERISTIC WASTES

- A substance may also be considered a hazardous waste if it exhibits any of four specific characteristics. Characteristic hazardous wastes are broader categories of waste that are not dependent on the name of the chemical or the process from which it was generated.
- Instead, the focus is on specific characteristics of the waste that make it dangerous. Characteristic hazardous waste includes substances that are ignitable, corrosive, reactive or toxic.
- Be aware that many wastes require multiple waste codes on container labels and manifests because they are considered both listed and characteristic wastes.

HAZARDOUS WASTE GENERATOR CATEGORIES

- If your organization generates hazardous waste, it must comply with regulations according to RCRA categories.
- The amount of hazardous waste generated per month determines how a waste generator is categorized. Very Small Quantity Generators generate 100 kilograms or less per month of hazardous waste or one kilogram or less per month of acutely hazardous waste.
- Very Small Quantity Generators may not accumulate more than 1,000 kilograms of hazardous waste at any time and must ensure that hazardous waste is delivered to a person or facility who is authorized to manage it.
- Very Small Quantity Generators are not required to obtain a unique EPA ID number, track shipments using the uniform hazardous waste manifest, maintain reporting and recordkeeping data; and, there is no limit to the length of time waste may accumulate on site.
- Small Quantity Generators generate more than 100 kilograms, but less than 1,000 kilograms of hazardous waste per month. These generators may accumulate hazardous waste on-site for 180 days without a permit or 270 days if shipping a distance greater than 200 miles. The quantity of hazardous on-site waste must never exceed 6,000 kilograms.
- Large Quantity Generators generate 1,000 kilograms per month or more of hazardous waste or more than one kilogram per month of acutely hazardous waste. These facilities may only accumulate waste on-site for 90 days and do not have a limit on the amount of hazardous waste accumulated on-site.

SATELLITE ACCUMULATION AREA REQUIREMENTS

- Most organizations that accumulate hazardous waste have locations near the point of generation where it is temporarily stored before it is moved to a central accumulation area. These are commonly known as “satellite accumulation areas.”
- As much as 55 gallons of non-acute hazardous waste and/or one quart of liquid acute hazardous waste may be accumulated in this area if it is under the control of the operator of the process generating the waste.
- When a container in a satellite accumulation area is filled to capacity or the accumulation limit is reached, the accumulation start date must be filled in on the container label.
- Filled containers must be taken to the facility’s central accumulation area within three calendar days of being full, where it will remain until transported off site for proper treatment and disposal.
- Be aware that recent updates to the RCRA regulation require satellite accumulation areas to incorporate preparedness, prevention and emergency measures. These include alarms or internal communications systems, a device such as a phone to summon emergency response teams, fire extinguishers or other means to suppress fires and adequate aisle space for the unobstructed movement of personnel and equipment.

WASTE CONTAINER LABELING & OTHER REQUIREMENTS

- The RCRA regulation requires generators to mark hazardous waste containers with an indication of the hazards they contain. The EPA allows flexibility in hazard labeling.
- Labels that become damaged or illegible must be replaced as soon as possible.
- Hazardous waste containers should be inspected to verify they are in good condition before use.
- Be aware that hazardous waste containers must be compatible with the intended waste. Plastic or plastic-lined drums are effective for containing corrosive wastes, while steel drums are a good choice for non-corrosive wastes or flammable liquids.
- Waste containers must be closed at all times, meaning leak-proof and vapor-tight, unless a transfer is taking place. The EPA frequently issues citations for improperly closed containers.
- Any waste that is spilled onto the top or sides of a container must be cleaned up immediately. Containers with hazardous waste residue on the outside are in violation of RCRA and DOT regulations and will be rejected by the waste disposal facility.

CENTRAL ACCUMULATION AREA REQUIREMENTS

- Waste containers must be taken to the facility’s central accumulation area within three calendar days of being filled.
- The central storage area should have two and a half feet or more of aisle space to allow for unobstructed movement and emergency equipment.
- These areas must be inspected weekly. Make sure to check closely for signs of damaged or leaking containers during your inspection. The findings of your inspection must be recorded in a written log and retained for at least three years.
- If a leaking container is discovered, its contents must be transferred to another container or the container must be repacked inside a larger one. Any spillage must be contained and cleaned up promptly by qualified personnel.
- Central accumulation areas must have the same preparedness, prevention and emergency measures as satellite accumulation areas, such as alarms or internal communications systems, fire extinguishers and spill control equipment.

THE E-MANIFEST SYSTEM

- The EPA requires both small quantity generators and large quantity generators to use a uniform hazardous waste manifest to track waste from the time it leaves the generator's facility until it is disposed of at the treatment, storage or disposal facility, the TSDF.
- The EPA recently launched its new electronic manifest system that allows generators to submit hazardous waste manifests electronically.
- Commonly known as the e-manifest rule, or regulation, the system is now in effect in all states, even those that are not authorized to run RCRA programs. In order to use the E-manifest system, users must go to the RCRA info website and register.
- The hazardous waste manifest has three sections that must be completed by each entity involved in handling a hazardous waste: the generator, the transporter and the designated facility or TSDF.
- Some of the important information that the generator must include on the manifest are its generator ID number, an emergency response phone number, its name and mailing address, the transporter and TSDF names and their EPA ID numbers, US DOT information about the waste being transported and any special handling instructions.
- The transporter's section must include the transporter or transporters names, a signature by an authorized official of the company and the date to acknowledge they have received the materials.
- The third and final section is completed by the designated facility, or TSDF, and must include its name, site address, phone number and EPA ID number, any alternate facility information, the Hazardous Waste Report Management Record Codes and the name, signature and date of receipt of the designated facility owner or operator to certify the receipt of the materials.
- Should a waste generator choose to fill out a paper manifest, rather than using the E-manifest system, the EPA now requires it to use a new five-copy paper form instead of the traditional six copy version. The old forms are no longer accepted by the EPA.
- It is important to note that the fee for mailing in a paper manifest is five times more than the fee for a manifest that is submitted fully electronically.

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ANSWERS TO THE REVIEW QUIZ

1. c

2. a

3. c

4. b

5. c

6. b

7. c

8. a

9. b

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REVIEW QUIZ**

The following questions are provided to determine how well you understand the information presented in this program.

Name _____ Date _____

1. Perhaps the most important part of hazardous waste training is learning _____.
 - a. How to comply with RCRA regulations
 - b. How to handle hazardous waste safely
 - c. How to respond to an emergency
2. Your organization's first step in achieving RCRA compliance is identifying the materials on site that are classified as regulated hazardous wastes.
 - a. True
 - b. False
3. _____ wastes are "acutely hazardous", meaning they present a substantial hazard and can be fatal to humans in small doses.
 - a. F-list
 - b. K-list
 - c. P-list
 - d. U-list
4. A non-hazardous waste can be creating by diluting a hazardous waste with other materials.
 - a. True
 - b. False
5. The quantity of hazardous waste on-site for Small Quantity Generators must never exceed _____ kilograms.
 - a. 600
 - b. 1,000
 - c. 6,000
6. Only Large Quantity Generators are required to use a uniform hazardous waste manifest to track shipments of hazardous waste.
 - a. True
 - b. False
7. Filled containers in a satellite accumulation area must be taken to the facility's central accumulation area within _____ of being full.
 - a. 1 calendar day
 - b. 2 calendar days
 - c. 3 calendar days
8. Hazardous waste containers with waste residue on the outside are in violation of RCRA and DOT regulations and will be rejected by the waste disposal facility.
 - a. True
 - b. False
9. Which section of the hazardous waste manifest includes US DOT information about the waste being transported and any special handling instructions?
 - a. The designated facility's section
 - b. The generator's section
 - c. The transporter's section