

Guidance Document for the Small Quantity Generator Self-Certification Checklist



Colorado Department
of Public Health
and Environment

2016

Purpose of this Guidance

This document is intended as general guidance for small quantity generators of hazardous waste and is meant to assist in compliance with the hazardous waste regulations. More specifically, this document gives line-by-line guidance and instruction on how to complete the compliance checklist for small quantity generators of hazardous waste. The guidance is not meant to modify or replace the promulgated regulations, which undergo periodic revisions. In the event of a conflict between this guidance and promulgated regulations, the regulations govern. Some portions of the hazardous waste regulations are complex and this guidance does not go into the details of these complex situations.

Phone Numbers

Hazardous Waste Questions – Amy Williams..... (303) 692-3461
Air Pollution Questions – Christine Hoefler (303) 692-3148 or Kaitlin Stabrava ... (303) 692-3175
Environmental Leadership Program – Lynette Myers..... (303) 692-3477

If you are interested in developing an environmental management system or becoming an Environmental Leader, please contact Lynette Myers at (303) 692-3477.

Division Phone Numbers

Division Main number (303) 692-3300
For an EPA Identification Number (303) 692-3360
Generator Assistance Program..... (303) 692-3415
Customer Technical Assistance Line..... (303) 692-3320

Other Phone Numbers

National Response Center..... (800) 424-8802
Colorado 24-hour Emergency Spill/Release Reporting Line (877) 518-5608
Pollution Prevention Program..... (303) 692-2977

Web Sites

Colorado Department of Public Health and Environment Regulations Download Index
(air, water, waste): www.colorado.gov/cdphe/environmental-regulations

Hazardous Materials & Waste Management Division (including guidance documents):
www.colorado.gov/cdphe/hazwaste

Air Pollution Control Division - Small Business Assistance Program
www.colorado.gov/pacific/cdphe/small-business-assistance-program-sbap

Solid and Hazardous Waste Commission: www.colorado.gov/cdphe/shwc

Mailing Address

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
4300 Cherry Creek Drive South (HMWMD-B2)
Denver, CO 80246-1530

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Section A - General Questions and Answers

LINE A-1

Has your facility determined which wastes generated at your facility are hazardous wastes and which wastes are not hazardous wastes?

6 CCR 1007-3, section 262.11

A hazardous waste is a solid, a liquid or a contained gaseous material that is no longer used, or that no longer serves the purpose for which it was produced and could pose dangers to human health and the environment after it is discarded.

Your business is likely to produce hazardous waste if you:

- ◆ Use solvents
- ◆ Use petroleum products.
- ◆ Use dyes, paints, printing inks, thinners, solvents or cleaning fluids.
- ◆ Use pesticides or other related chemicals.
- ◆ Use materials that dissolve metals, paint, wood, paper or clothing.
- ◆ Use flammable materials.
- ◆ Use materials that burn or itch upon contact with skin.
- ◆ Use materials that bubble or fume upon contact with water.
- ◆ Receive products accompanied by a shipping paper or label indicating that the product is hazardous.
- ◆ Use pharmaceuticals.

(See Appendix A for more information on typical waste streams)

Colorado has adopted streamlined hazardous waste management regulations that govern the collection and management of certain widely generated wastes known as "universal wastes." The Universal Waste Regulations reduce the management requirements for these wastes, while still ensuring the management of universal waste is conducted in a manner that is protective of human health and the environment. Even though universal wastes (such as waste electronic devices, waste batteries, and spent light bulbs) are still considered a hazardous waste, universal wastes and used oil are not counted towards your monthly hazardous waste generation volume. The hazardous wastes listed below must be counted in every calendar month they are generated in order to correctly determine your generator category.

Hazardous Waste Can be One of Two Types

1. Listed wastes: Your waste is considered hazardous if it appears on one of four lists in the Colorado Hazardous Waste Regulations. Listed wastes are hazardous regardless of their concentration.

- ◆ **F listed hazardous wastes** are wastes from *non-specific* sources such as spent solvents or wastewater treatment sludges from electroplating.

- Common F-listed wastes used in degreasing or used as solvents contain methylene chloride, methyl ethyl ketone, xylene, acetone, or toluene.
 - ◆ **K listed hazardous wastes** are wastes from a *specific* source. For example, wastewater treatment sludge from the production of chrome yellow and orange pigments is listed as K002.
 - ◆ **P and U listed wastes** are off-specification or discarded commercial chemical products or any residue remaining in a container that held commercial chemical products in the P or U listing or, any residue or contaminated media resulting from the cleanup of a spill of a commercial chemical product in the P or U listing.
2. **Characteristic wastes**: Even if a waste does not appear on the list it is considered hazardous if it falls under one of the following hazardous waste categories:
- ◆ **D001 - ignitable**
 - It is a liquid with a flash point less than 140°F,
 - It is not a liquid but is capable of causing a fire that burns so vigorously that it creates a hazard,
 - Is an oxidizer, or
 - It is an ignitable compressed gas.
 - ◆ **D002 - corrosive**
 - It is a liquid that can dissolve steel, or
 - It is a liquid and has a pH less than or equal to 2 or greater or equal to 12.5.
 - ◆ **D003 - reactive**
 - It is unstable,
 - It is explosive,
 - It undergoes rapid or violent chemical reaction,
 - It produces toxic gases when mixed with water or other materials, or
 - It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors or fumes.
 - The Division holds that waste meets this definition if:
 - It contains a releasable sulfide concentration of 500 mg H₂S/kg, or
 - It contains a releasable cyanide concentration of 250 mg HCN/kg.
 - ◆ **D004 through D043 - toxic**
 - It is a metal, pesticide or organic chemical at high enough concentrations that it is toxic based on the Toxicity Characteristic Leaching Procedure (TCLP) test method 1311.
 - Common metals that are hazardous at certain levels are lead, arsenic, barium, chromium, cadmium, silver, and mercury.

How Do You Determine if You are Generating a Hazardous Waste?

- ◆ Review Part 261 of the Colorado Hazardous Waste Regulations 6 CCR 1007-3 on the Internet at www.colorado.gov/cdphe/hazwaste. Part 261 describes the listing and the identification of hazardous wastes. The Division also has a number of guidance documents to assist you in making this determination, which are available on the Internet at www.colorado.gov/cdphe/hwguidance.
- ◆ Apply knowledge of your process and use Material Safety Data Sheets (MSDS) for information regarding the products you use at your facility.

Be aware that the Material Safety Data Sheets may not provide all the information that you need to make a hazardous waste determination. In most instances OSHA only requires that the MSDS list ingredients that are health hazards if they are 1% or more of the material's composition (1% = 10,000 parts per million). Therefore, some ingredients in a product that may be a hazardous waste when disposed may not be listed on the Material Safety Data Sheet if they are included in the product at amounts less than 1%. Since it is your responsibility to ensure all your hazardous wastes are managed and disposed of properly, it is wise to send samples to an environmental analytical lab that is familiar with the methods of analysis for hazardous waste, so you can make an accurate hazardous waste determination.

- ◆ Talk to your trade organization.
- ◆ Call the Hazardous Materials and Waste Management Division, Customer Technical Assistance Line at 303-692-3320.

For more guidance on typical hazardous waste streams produced by small quantity generators, see Appendix A of this guidance document. There is also information available on hazardous waste identification in the "Hazardous Waste Identification Guidance Document" www.colorado.gov/cdphe/hwguidance.

After counting your hazardous waste, you may find you are episodically changing from one generator category to another. You should always follow the regulations of the larger generator category to ensure that you are in compliance. See Appendix B of this guidance to see the difference in requirements between each generator category.

LINE A-2

Does the physical address at your facility match the address associated with your EPA Identification Number? 6 CCR 1007-3, Part 99 and section 262.12

The EPA Identification number is assigned to your facility and stays with the physical location of site. **The EPA Identification number is address-specific.**

If your **facility changes ownership**, you need to submit a revised Notification Form. To file a revised notification, contact the Notification Coordinator at (303) 692-3360 to request the Colorado Hazardous Waste Notification Form, or you can print it from your computer by going to the Internet at www.colorado.gov/cdphe/hwforms. The facility's EPA Identification number will not change.

If your **facility changes its mailing address**, contact information, phone numbers, etc., you need to submit a revised Notification Form. To file a revised notification, contact the Notification Coordinator at (303) 692-3360 to request the Colorado Hazardous Waste Notification Form, or you can print it from your computer by going to the Internet at www.colorado.gov/cdphe/hwforms.

If your **facility moves to a new location**, you must notify the Division of the new address and submit a new Colorado Hazardous Waste Notification Form. The facility will receive a new EPA Identification number that is unique to the new address. To file a new notification, contact the Notification Coordinator at (303) 692-3360 to request the Colorado Hazardous Waste Notification Form, or you can print it from your computer by going to the Internet at www.colorado.gov/cdphe/hwforms.

If you **no longer operate** at your old location, submit a letter stating that you have closed your old location. Be sure to identify your old location and reference your old EPA Identification number so that you will no longer be billed annual generator and Solid and Hazardous Waste Commission fees.

If your **facility changes generator status**, you must notify the Division of your generator status by submitting a new Colorado Hazardous Waste Notification Form. Please keep in mind that there is a \$100 fee associated with downgrades in generator status. To file a revised notification, contact the Notification Coordinator at (303) 692-3360 to request the Colorado Hazardous Waste Notification Form, or you can print it from your computer by going to the Internet at www.colorado.gov/cdphe/hwforms.

LINE A-3

**Does your facility use a transporter that is authorized to transport hazardous waste?
6 CCR 1007-3, section 262.12(c)**

A transporter of hazardous waste must not transport hazardous waste or operate a transfer facility located in Colorado without having received an EPA Identification number. If the transporter has any facilities in Colorado, such as an office or transfer facility, the EPA Identification number must be issued by Colorado. Otherwise, out-of-state transporters can use an EPA Identification number issued by their home state. A transporter with a valid EPA Identification number is authorized to transport hazardous waste in Colorado.

NOTE: An EPA Identification number is **NOT** a hazardous waste permit and does not allow a transporter to treat, store, or dispose of hazardous waste. This number just identifies the transporter's hazardous waste activities for the regulatory agency.

LINE A-4

Does your facility dispose of all hazardous waste through a permitted treatment, storage, and disposal facility?

6 CCR 1007-3, section 100.10

You are required to choose a treatment, storage and disposal facility that has been fully permitted under the hazardous waste regulations by the State of Colorado, other states, or the U.S. EPA. In addition to a full permit, the treatment, storage, and disposal facility must have a current EPA Identification number.

LINE A-5

Does your facility ensure that no hazardous waste is disposed of on the ground or to a sanitary sewer, storm drain, bodies of water, or in the trash?

6 CCR 1007-3, section 100.10

You must not dispose of any hazardous waste to the ground, sanitary sewer, storm drains, bodies of water, or the trash. Examples of hazardous wastes commonly, but illegally, thrown into the trash include certain solvent-contaminated rags, perc dry cleaning lint, solder dross, partially full aerosol cans and fluorescent light bulbs.

Companies are liable for all or part of the cleanup costs from contamination resulting from the illegal disposal of hazardous waste. Non-compliance with the Colorado Hazardous Waste Regulations can result in fines of up to \$25,000 a day per violation, as well as possible criminal charges.

LINE A-6

Do you either dispose of contaminated rags and shop towels as hazardous waste or send them to a commercial laundry service if the rags have been in contact with certain hazardous F- listed solvents like MEK or toluene?

6 CCR 1007-3, section 100.10

Many businesses generate used rags and shop towels that have been in contact with F001, F002, F004, and/or F005 listed solvents. F-listed solvents contain, before use, a total of 10% or more by volume of solvents listed in 6 CCR 1007-3, section 261.31. Typical F-listed solvents contain tetrachloroethylene, methylene chloride, toluene, or methyl ethyl ketone. Even if these rags are dry, the used rags and shop towels are also considered to be F-listed wastes because they have been in contact with an F-listed solvent. It is illegal to dispose of these rags in the trash. The rags must either be sent to a laundry service for cleaning and reuse, or managed and disposed of as a hazardous waste.

Rags or shop towels that are contaminated with F003 solvents (such as acetone or xylene) may not be F003 hazardous waste. F003 solvents are listed only because they are ignitable. If the F003-contaminated rags are dry and do not exhibit the characteristic of ignitability (D001), they would not be hazardous waste. However, if F003 solvent-contaminated rags are placed in a container and gravity causes solvent to accumulate on the bottom of the container, the entire

contents of the container would be considered ignitable (D001) and therefore would also be listed as hazardous waste F003.



Example of F005 listed solvent rags in the trash - this scenario constitutes a hazardous waste determination violation, an open container violation, and an illegal disposal violation.

Container with a large flip top lid that allows for easy disposal of F-listed hazardous waste rags into a hazardous waste container.



LINE A-7

Do you manage your fluorescent lights, batteries, computers, aerosol cans and mercury containing devices as hazardous waste or universal waste instead of throwing them into the trash? 6 CCR 1007-3, Part 273 and section 100.10

Most spent fluorescent lights, batteries, computers and mercury-containing devices contain heavy metals like mercury, lead, cadmium or silver, and therefore must be managed as hazardous wastes or universal wastes. Waste aerosol cans that still contain product must also be managed as hazardous waste if the contents of the can are hazardous waste.

You have the option of managing your fluorescent lights, batteries, computers, aerosol cans and mercury-containing devices as a universal waste instead of as a traditional hazardous waste. Under the universal waste regulations, there are reduced management standards so you are not subject to the full hazardous waste requirements. Part of the reduced management benefit is that universal wastes do not count towards your monthly generation volume of hazardous waste and therefore do not affect your generator category. The reduced management standards are designed to encourage recycling and still protect the environment by ensuring proper recovery of hazardous constituents in these wastes.

If you choose to manage your fluorescent lights, batteries, computers, aerosol cans and/or mercury-containing devices as universal waste, you must make sure to label them as “Universal

Waste (waste type),” “Used (waste type)” or “Waste (waste type),” and hold them on site for no more than one year. Make sure to store your universal wastes in a way to prevent potential releases of hazardous constituents to the environment.



Example of poor fluorescent lamp accumulation practices; store in packaging that will protect them from breakage.

LINE A-8

If you answered “NO” to any of the questions listed in Section A, please indicate the item (for example A.2.) and explain how and by what date you plan to return to compliance.

This certification is designed for you to identify problems before you are inspected so that you may correct any violations and return to compliance. Correct any deficiencies as soon as you identify them and write a brief description of the corrective actions. If there will be a delay in correcting the deficiency, please provide a brief explanation of why and the date you will return to compliance.

Section B – Waste Stream Description Questions and Answers

LINES B1 – B5

List your hazardous waste streams in the space provided below and the approximate volume of each that you generate in your busiest month. If you have more than five (5) waste streams, list only the five that you generate in the highest volume. Be sure to write in the quantity of waste and specify whether the quantity is in gallons or pounds. Do not list used oil or hazardous waste that you manage as universal wastes (such as light bulbs, batteries, or electronic equipment).

6 CCR 1007-3, section 262.11

This question is intended to increase your awareness of the hazardous wastes your business generates by requesting that you conduct an inventory of the hazardous wastes you generate in your busiest month. Look not only at the hazardous wastes you ship off site but also include hazardous waste solvent you recycle if you have a distillation unit. In addition, if you have just become aware of hazardous wastes you may have previously improperly disposed of, make sure to properly manage them as hazardous wastes in the future and list them below.

The following table is an example of typical waste streams and how you should fill out the table.

B.	Waste Stream Description	Approximate Amount Generated During Busiest Month		
		Quantity	Gallons	Pounds
1.	Lab pack of expired pharmaceuticals	0.25	X	
2.	Lacquer thinner and spent solvent	20	X	
3.	Paint waste	5	X	
4.	Paper wipes in contact with F-listed spent solvent	0.5		X
5.	Corrosive mixed waste	20	X	

What Waste Streams are Hazardous Wastes?

- ◆ All quantities of listed and characteristic hazardous wastes that are accumulated on the property for any period of time before disposal or recycling. Laboratories, for example, must count any wastes that are unusable listed liquid reagents, empty P listed containers, and any ignitable solvents.
- ◆ All quantities of listed and characteristic hazardous wastes that are packaged and transported away from your business.

- ◆ All quantities of listed and characteristic hazardous wastes that are placed directly in a regulated treatment or disposal container or tank at your facility.
- ◆ All quantities of listed and characteristic hazardous wastes that are generated as still bottoms or sludge.

For more information on hazardous waste streams, see Appendix A of this document.

The table above is intended to give you a quick way to summarize the total volume of hazardous waste you generated in your busiest month so that you can compare it to your generator status. If you generate more than 220 pounds but less than 2200 pounds of hazardous waste, and no more than 2.2 pounds of acute hazardous waste (P-listed chemicals and the dioxin-containing F-listed wastes) in your busiest month, then you are correctly notified as a small quantity generator.

What Waste Streams Do You Count as Hazardous Waste to Determine Your Generator Size (Category)?

- ◆ All quantities of listed and characteristic hazardous wastes that are accumulated on the property for any period of time before disposal or recycling. Auto body and/or surface coating businesses must count spent paint waste, spent solvent and disposable rags and wipes that have been in contact with F001, F002, F004 and/or F005 listed solvents.
- ◆ All quantities of listed and characteristic hazardous wastes that are packaged and transported away from your business.
- ◆ Waste destined for recycling is counted as follows:
 - If the solvent waste is NOT STORED prior to recycling, count F-listed residue, sludge and pucks from the distillation unit.
 - If the solvent waste IS STORED (more than 24 hours) prior to recycling, count the initial volume of waste that is generated, accumulated and put into the distillation unit plus any more that is added. The distillation bottoms are not counted in this case because that quantity of waste has already been counted once. However, the distillation bottoms must still be disposed of as a hazardous waste.

For more information on hazardous waste streams, see Appendix A of this document.

What Waste Streams Do You NOT Count as Hazardous Waste to Determine Your Generator Size (Category)?

- ◆ Wastes that are specifically exempted from counting. Examples include lead-acid batteries that will be reclaimed; scrap metal that will be recycled; universal wastes such as electronic wastes and mercury lamps; and used oil that is recycled.
- ◆ Wastes that might be left in the bottom of containers that have been thoroughly emptied through conventional means such as pouring or pumping. An example would be empty paint cans that have been gravity drained in order to remove the contents.

- ◆ Wastes that are managed in an “elementary neutralization unit,” a “totally enclosed treatment facility,” or a “wastewater treatment unit” without being stored first. Examples are corrosive waste liquids such as caustic floor cleaners that are neutralized before putting down a drain.
- ◆ Wastes that are discharged directly to Publicly Owned Treatment Works (POTWs) without being stored or accumulated first. Caustic cleaners are an example. Discharges to a wastewater treatment plant must comply with the Clean Water Act. Publicly Owned Treatment Works are public utilities, usually owned by the city, special districts or the county that treat industrial and domestic sewage for disposal. Check with your wastewater treatment plant before discharging ANY chemical to the sewer.
- ◆ Liquid wastes that are reclaimed continuously on-site without storing (less than 24 hours) prior to reclamation, such as solvent recycling units in auto body shops. Note: the residues from the distillation process must be counted.
- ◆ Wastes that have already been counted once during the calendar month, and are treated on-site or reclaimed in some manner, and used again. Examples are solvents that are re-distilled onsite and reused in the same calendar month.

Section C - Used Oil Management

Questions and Answers

LINE C-1

**Are containers of used oil marked with the words “Used oil”?
6 CCR 1007-3, section 279.22**

Used oil generators must store used oil in tanks or containers that are in good condition, not leaking, and labeled with the words “Used Oil.” Fill pipes used to transfer used oil into underground storage tanks must also be labeled with the words “Used Oil.” Do not label the containers, tanks or fill pipes as “Waste Oil.”



**Used oil tank incorrectly labeled
as “Waste Oil.”**

**Used oil tank correctly labeled
as “Used Oil.”**



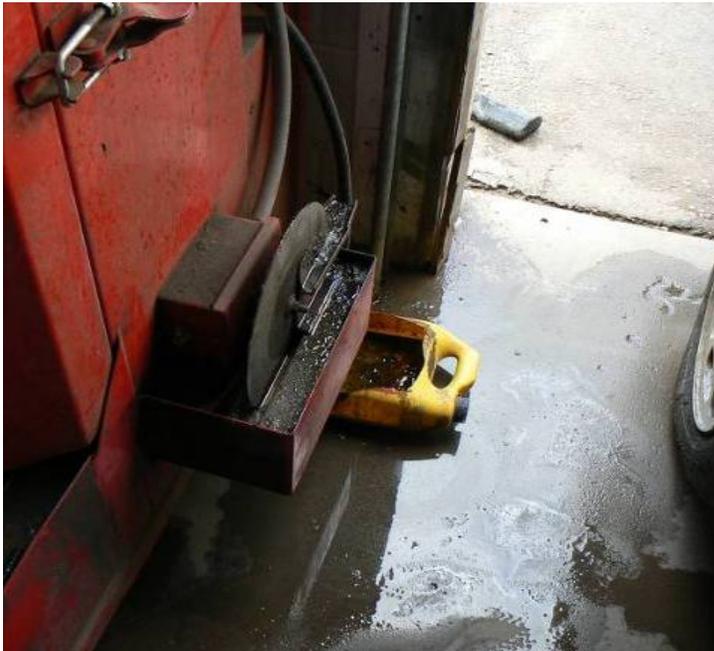
LINES C-2 & C-3

**Are all used oil spills and releases cleaned up immediately and properly managed? Has your facility taken the measures specified in the guidance document to prevent the release of used oil to the environment?
6 CCR 1007-3, section 279.22**

Upon detection of a release of used oil to the environment, a generator must stop the release, contain it, and clean up the release of used oil. You must also take measures to prevent future releases of used oil from occurring. Possible measures to prevent a release of used oil to the environment would be to use secondary containment, keep your containers closed, and do not store used oil near floor drains.

Absorbents contaminated with used oil must be properly disposed of. You may contact your used oil transporter for help in identifying the proper method for disposal or you can check with your local landfill. Landfills do not accept used oil liquid, but some landfills may accept oil contaminated soil or absorbent.

Used oil spills and releases must be cleaned up promptly. These photographs depict violations of the requirement to clean up releases of used oil because the oil spills have not been cleaned up.



LINE C-4

Are all containers used to store used oil outside kept closed except when adding or removing waste? 6 CCR 1007-3, section 279.22

If containers storing used oil are being managed outdoors, the containers must be kept closed during storage except when it is necessary to add or remove used oil.



It is a violation of the regulations to store open containers of used oil outside. The closed container requirement prevents precipitation from getting into the container, potentially causing it to overflow and release used oil to the environment.

LINE C-5

If you answered “NO” to any of the questions listed in Section C, please indicate the item (for example C.2.) and explain how and by what date you plan to return to compliance.

This certification is designed for you to identify problems before you are inspected so that you may correct any violations and return to compliance. Correct any deficiencies as soon as you identify them and write a brief description of the corrective actions. If there will be a delay in correcting the deficiency, please provide a brief explanation of why and the date you will return to compliance.

Section D – Hazardous Waste Container Management Questions and Answers

LINE D-1

Are all containers used to store hazardous waste labeled with the words “Hazardous Waste”?

6 CCR 1007-3, sections 262.34(a)(3) and 262.34(d)(4)

You must have hazardous waste accumulation containers labeled with the words “Hazardous Waste.” The words “Hazardous Waste” can be marked on a container with spray paint or a grease pencil, etc., as long as the words are clearly legible.

Drum correctly labeled with the words “Hazardous Waste.”



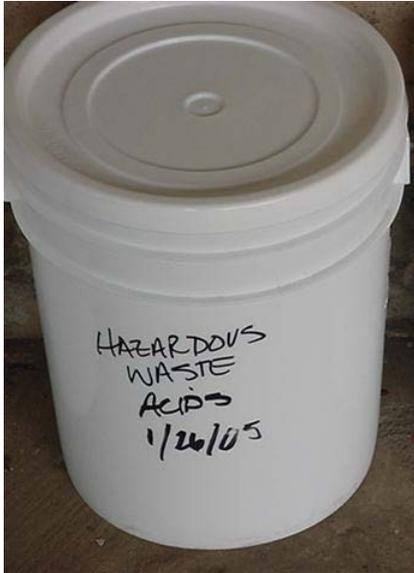
LINE D-2

Are all hazardous waste containers, except satellite accumulation containers, marked with the date when the first drop of hazardous waste is added to the container?

6 CCR 1007-3, sections 262.34(a)(2) and 262.34(d)(4)

The accumulation start date is the date upon which the first drop of hazardous waste is placed in the container. There is a space provided on hazardous waste labels to mark the accumulation start date. Even if you don't use a pre-printed hazardous waste label, the accumulation start date must be clearly marked on the hazardous waste container.

A satellite accumulation area container holds 55 gallons or less and is intended to be used for temporary storage in a work area. If you have a hazardous waste container that holds 55 gallons of hazardous waste or less and the container is in a process area such as a paint mixing room, you may be able to wait to put the accumulation start date on the container until it is full by managing the container in a satellite accumulation area. See an explanation of the satellite accumulation area requirements in the *Guide to Generator Requirements for the Colorado Hazardous Waste Regulations* (<http://www.cdpeh.state.co.us/hm/handbk.pdf>). A satellite accumulation container must be dated immediately (within a few minutes) of becoming full and moved within 24-hours from the satellite area to a 180-day or permitted area.



Accumulation start date should be written on the hazardous waste label or directly on the container

LINE D-3

Are all containers used to store hazardous waste in good condition (not rusted, dented, bulging or leaking)?

6 CCR 1007-3, sections 262.34(d)(2) and 265.171

Containers used to store hazardous waste must be in good condition and cannot be stored in a manner to cause a rupture or leak. Hazardous waste containers can become damaged due to weathering when they are stored outside. Also, hazardous waste containers are occasionally placed in pathways where cars are moved, for example in parking lots against fences. If hazardous waste containers are damaged by automobiles or other equipment, they can leak and hazardous waste can be released to the environment. The hazardous waste stored in a container must be compatible with the type of container and not cause the container to rupture, leak, or corrode.



These hazardous waste containers are not labeled and the containers are deteriorating – these are violations.

LINE D-4

Are all containers used to store hazardous waste kept closed except when adding or removing waste?

6 CCR 1007-3, sections 262.34(d)(2) and 265.173(a)

Containers of hazardous waste must be kept closed except when waste is being added or removed. Flip top funnel lids can be purchased for containers holding liquid paint wastes and for solid wastes such as disposable rags or still bottoms. Flip top funnel lids with the top closed are considered to be closed containers as long as the contents of the container will not spill out if the drum or container is tipped over. In the case of waste liquids stored in containers with flip top funnel lids, the lid should have a latching mechanism to prevent the liquid from spilling if the container were to tip over.



Hazardous waste container has a funnel on top of the drum that is screwed into the bung but is left open. This is a violation because the funnel lid is not closed.

Hazardous waste container with a funnel on top that is screwed into the bung and is latched – this is a good example of a closed container.



LINE D-5

Do you inspect weekly, and correct any issues noted, all containers that are used to store hazardous waste and look for: containers in poor condition, leaking containers, compatibility of wastes, hazardous waste labels, accumulation start dates and ensure that the containers are closed?

6 CCR 1007-3, sections 262.34(d)(2) and 265.174

NOTE: You are not in compliance unless you are checking for all the items listed above during a container inspection.

All containers of hazardous waste must be inspected at least weekly. The Division recommends that generators maintain a written log that documents checking for leaks or deterioration, to make sure wastes stored together are compatible, that containers are labeled with the words “Hazardous Waste,” that containers are marked with accumulation start dates, and that they are closed. If there are any problems noted during the inspections, these issues must be corrected. The correction should be noted on the inspection log.

The following checklist is an example of the things you need to look for during a weekly inspection and how to document your inspections. You can print the small quantity generator 180-day waste container checklist and weekly inspection form from our website at www.colorado.gov/cdphe/hwguidance under Guidance for all generators, Compliance aids.

Weekly Container Inspection Log Sheet (SQG) Month _____ Year _____

Record any problems noted; document how they were corrected and the date of correction. Attach extra sheet if necessary.

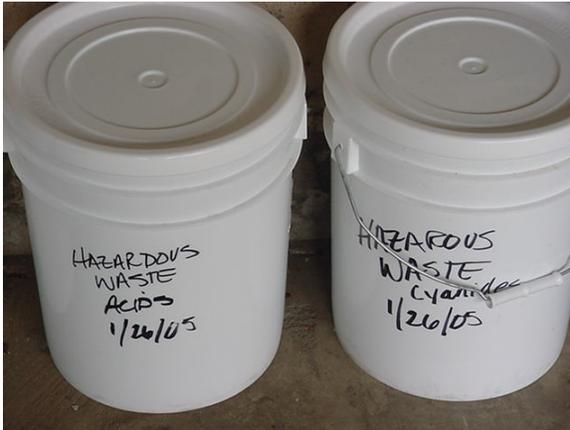
Week	1	2	3	4	Comments
Labeled “Hazardous Waste”					
Accumulation Start Date Marked					
Satellite Containers Moved/Marked					
Start Date <180/270 Days Ago					
Good Condition/Not Leaking					
Kept Closed					
Stored to Prevent Rupture/Leakage					
Waste Compatible With Container					
Incompatible Wastes Separated					
Adequate Aisle Space					
Less than 6000 kg Stored at One Time					
Your Initials					

LINE D-6

Are incompatible wastes segregated from each other? For example, are acids and bases stored separately?

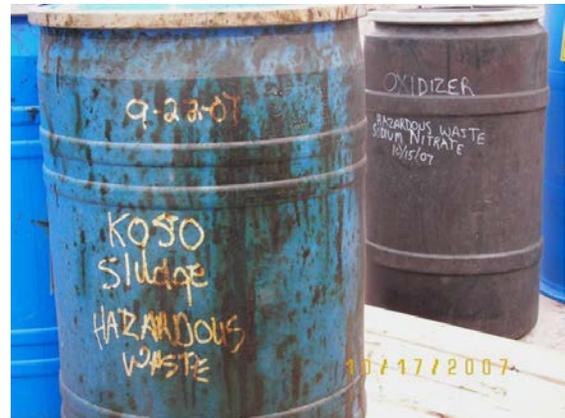
6 CCR 1007-3, sections 262.34(d)(2) and 265.177(c)

Wastes that could react together (for example could cause a fire, explosion, toxic gases or are otherwise incompatible) must not be placed in the same container or an unwashed container that previously held an incompatible material. A storage container holding hazardous waste that is incompatible with wastes in containers nearby must be separated from the other materials by a dike, berm, wall, etc.



This photograph depicts a violation due to incompatible storage of a reactive hazardous waste (D003) and a corrosive hazardous waste (D002) – the storage constitutes a violation because if these containers rupture, the wastes could mix together and cause a harmful reaction.

Incompatible storage of an organic hazardous waste (K050) and an oxidizing hazardous waste (D001).



LINE D-7

Are containers shipped to a permitted treatment, storage, and disposal facility (TSD) within 180 days (or 270 days if the TSD is more than 200 miles away)?

6 CCR 1007-3, sections 262.34(d) and 262.34(e)

A small quantity generator is only allowed to store hazardous waste on site at the facility for 180 days (or 270 days if the treatment, storage and disposal facility is more than 200 miles away). All hazardous waste generated on site must be shipped offsite to a permitted treatment, storage, and disposal facility within this time frame.

It is a violation if hazardous waste is accumulated for more than the appropriate time limit. This can occur if an operator delays shipment to avoid paying the cost of shipping and exceeds the accumulation time limit. This violation can also occur if your solvent recycling unit is broken so that waste normally intended for recycling is stored for an extended period of time.

Regardless of the reason, if a small quantity generator accumulates hazardous waste for more than 180 days (or 270 days if the generator must ship waste farther than 200 miles from the facility) the facility becomes a storage facility without a permit (an illegal storage facility) and may be subject to penalties of up to \$25,000 per day per violation.

A one-time 30-day extension to the 180/270-day accumulation time limit may be granted at the discretion of the Department on a case-by-case basis for temporary and unforeseen circumstances.

LINE D-8

If you answered “NO” to any of the questions listed in Section D, please indicate the item (for example D.2.) and explain how and by what date you plan to return to compliance.

This certification is designed for you to identify problems before you are inspected so that you may correct any violations and return to compliance. Correct any deficiencies as soon as you identify them and write a brief description of the corrective actions. If there will be a delay in correcting the deficiency, please provide a brief explanation of why and the date you will return to compliance.

Section E - Off-Site Shipment of Hazardous Waste

Questions and Answers

LINES E-1 AND E-2

LINE E-1

**Are off-site shipments of hazardous wastes that are not covered by a reclamation agreement accompanied by a hazardous waste manifest?
6 CCR 1007-3, section 262.20.**

LINE E-2

**Are all hazardous waste manifests completed accurately?
6 CCR 1007-3, section 262.20**

Reclamation agreements are often used for wastes generated from parts washers and paint gun cleaners when dirty solvents are changed out for clean solvents on a routine basis. This waste must be counted towards your monthly generation status during the months when the waste is picked up. It cannot be counted as an average over the months of use in between the scheduled pick-ups.

When a small quantity generator has a contract with a company to reclaim its hazardous waste under a "Reclamation Agreement," the manifest requirements of the Colorado Hazardous Waste Regulations do not apply *if*:

- ◆ The waste is reclaimed under a contractual agreement.
- ◆ The type of waste and frequency of shipments are specified in the agreement.
- ◆ The vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste; and
- ◆ The generator maintains a copy of the reclamation agreement in his/her files for a period of at least three years after termination or expiration of the agreement.

The manifest is a multi-copy shipping document designed to track shipments of hazardous wastes from their point of generation to their final destination. In other words, "cradle to grave." The generator, the transporter, and the designated facility each must sign this document and keep a copy. The manifest must include the EPA Identification number of the generator, all transporters and the treatment, storage and disposal facility.

The treatment, storage, and disposal facility or the transporter usually supplies its customers with blank manifest forms. You may also obtain the uniform hazardous waste form from an EPA-approved printing company. A small quantity generator not shipping under a reclamation agreement must use a properly completed hazardous waste manifest when shipping hazardous waste off-site. Regardless of who fills out the manifest, it is always the generator's (your) responsibility to ensure that the information included is correct and complete.

Your facility EPA Identification number must be at the top of the document. The hazardous waste transporter and designated treatment, storage, and disposal facility must also be listed. The

waste must be described accurately in the space provided. The treatment, storage, and disposal facility signs the bottom of the manifest when they receive your waste. They then send you a copy of the manifest with their signature. This is your legal proof that the treatment, storage, and disposal facility received your waste. You must contact your treatment, storage, and disposal company if they have not sent you the signature of receipt within 45 days of your initial shipment, and contact the Division if you have not received the signature of receipt within 60 days of shipment.

Example of a properly completed hazardous waste manifest.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number COB000444555	2. Page 1 of 1	3. Emergency Response Phone (313) 555-1212	4. Manifest Tracking Number 001111111PPK				
5. Generator's Name and Mailing Address Facility XYZ 123 Main Street Hometown, CO 80001 Generator's Phone: (303) 555-1234				Generator's Site Address (if different than mailing address)					
6. Transporter 1 Company Name Troublefree Transport				U.S. EPA ID Number COB111333888					
7. Transporter 2 Company Name				U.S. EPA ID Number					
8. Designated Facility Name and Site Address Disposal, Inc. 555 Dirt Road Gekko, KS 66001 Facility's Phone: (785) 555-9753				U.S. EPA ID Number KSO888555222					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
	X	1. RQ, Waste Corrosive liquid, acidic, inorganic, n.o.s., 9, UN3264, II, (Hydrochloric acid)		10	DF	50	G	D002	
		2.							
		3.							
		4.							
14. Special Handling Instructions and Additional Information									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Officer's Printed/Typed Name Michael Generator				Signature <i>Michael Generator</i>		Month Day Year 2 18 08			
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____									
17. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name Chris Transporter				Signature <i>Chris Transporter</i>		Month Day Year 2 18 08			
Transporter 2 Printed/Typed Name				Signature		Month Day Year			
18. Discrepancy									
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number _____									
18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____									
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1. _____ 2. _____ 3. _____ 4. _____									
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name Mark Disposalsite				Signature <i>Mark Disposalsite</i>		Month Day Year 2 20 08			

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

**Has land disposal restriction (LDR) documentation been completed for each waste stream and for each treatment and storage facility you send waste to?
6 CCR 1007-3, Part 268, Subpart D**

Land disposal restriction documentation is required so that your waste is properly identified for treatment before it is disposed of at the hazardous waste landfill. The hazardous waste landfill must know not only the hazardous waste codes associated with your hazardous waste, but also any underlying hazardous constituents that may be present in your waste in low concentrations. An accurately completed land disposal restriction form ensures proper treatment of your hazardous waste before it is disposed. The land disposal restriction form must be included with each new hazardous waste shipped to the same disposal facility and must be included with each shipment to a new disposal facility. The transporter or designated facility usually provides an LDR form to the generator. However, the regulations do not require the use of a specific form as long as all of the required information is provided to the designated facility. It is the generator's (your) responsibility to meet this requirement even though the hazardous waste disposal facility you are working with may fill out the forms for you.

The following are examples of land disposal restriction forms.

Disposal Industries, Inc.
LAND DISPOSAL RESTRICTION NOTIFICATION FORM

Page 1 of 1

Generator Name/Location: Rowdy Cowboy School District #49

EPA ID Number: COB333222111 Manifest Number: 001155001

Waste Analysis Available: Yes No On file at facility

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable)	TREATABILITY GROUP Please check the applicable treatability group		REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005	UNDERLYING HAZARDOUS CONSTITUENTS FOR D001, D002, D003, D004, D043
				Non-wastewater >1% TOC & >1% TSS	Wastewater		
a	b	c	d	e	f	g	h
310515		D001, D007, D008, D035	1, 12, 16	x		21, 26, 32	235, 239, 168

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column g)

5) Acetone	12) Cresylic acid	19) Methanol	27) 1,1,1 Trichloroethane
6) Benzene	13) Cyclohexane	20) Methylene Chloride	28) 1,1,2 Trichloroethane
7) N-Butyl Alcohol	14) 1,2-Dichlorobenzene	21) Methyl Ethyl Ketone	29) 1,1,2 Trichloro 1,2,2 Trifluoroethane
8) Carbon Disulfide	15) Ethyl Acetate	22) Methyl Isobutyl Ketone	30) Trichloroethylene
9) Carbon Tetrachloride	16) Ethyl Benzene	23) Nitrobenzene	31) Trichlorofluoromethane
10) Chlorobenzene	17) Ethyl Ether	24) Pyridine	32) Xylene (Total)
11) Cresols (o, m, or p isomers)	18) Isobutanol (isobutyl alcohol)	25) Tetrachloroethylene	
		26) Toluene	

This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.

I certify under penalty of law that the above information is accurate and true.

Signature: James Chlorochem Print Name James Chlorochem Date 3/24/08

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM PHASE IV

Page _____ of _____

Generator Name: _____ EPA ID # _____ State Manifest No. _____

1. If waste is a wastewater (see 40 CFR 268.2) place "w" next to the applicable code(s) Profile # _____

2. CODES WITH SUBCATEGORIES (place appropriate letter from section 8 before each code that applies) (See 40 CFR 268 for details)
- | | | | | |
|---------------------------|------------------------------|------------------------------|------------------------------|------------------------------|
| ___ D001 Hi-TOC | ___ D008 Lead acid batteries | ___ K069 Not Calcium Sulfate | ___ P065 Lo RMERC Res. | ___ U151 Hi Hg |
| ___ D001 Except Hi-TOC | ___ D009 Organic Hg > 260ppm | ___ K071 Rmerc Res. | ___ P065 Not Inc./RMERC Res. | ___ U240 2, 4 D |
| ___ D003 Reactive Cyanide | ___ D009 Inorg. Hg > 260 | ___ K071 Not Rmerc Res. | ___ P065 Hi Inc./RMERC Res. | ___ U240 2, 4 esters & Salts |
| ___ D003 Reactive Sulfide | ___ D009 Hg < 260 | ___ K106 Lo Rmerc Res. | ___ P092 Lo Inc. Res. | |
| ___ D003 Explosive | ___ F025 Light ends | ___ K106 Not Rmerc Res. | ___ P092 Lo RMERC Res. | |
| ___ D003 Water Reactives | ___ F025 Spent filter | ___ K106 > 260 ppm Hg | ___ P092 Not Inc./RMERC Res. | |
| ___ D003 Unexp Ord. Emg | ___ K006 Hydrated | ___ P047 Salts | ___ P092 Hi Inc./RMERC Res. | |
| ___ D003 Other Reactives | ___ K006 Anhydrous | ___ P047 Nonsalts | ___ U151 Lo RMERC Res. | |
| ___ D006 Batteries | ___ K069 Calcium Sulfate | ___ P065 Lo Inc. Res. | ___ U151 Lo Not RMERC Res. | |

The subcategory for D018-D043 waste is "treated in nonCWA/nonSDWA facility" unless the following box is checked: "treated in CWA/SDWA facility"

3. COMMON CODES (Place appropriate letter from section 8 before each code that applies)
- | | | | | | | | | | | | | | | | |
|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| ___ D002 | ___ P012 | ___ P030 | ___ P051 | ___ P098 | ___ P105 | ___ P205 | ___ F006 | ___ F007 | ___ F008 | ___ F009 | ___ F010 | ___ F011 | ___ F012 | ___ F019 | ___ F039 |
| ___ D004 | ___ D005 | ___ D006 | ___ D007 | ___ D008 | ___ D009 | ___ D010 | ___ D011 | ___ D012 | ___ D013 | ___ D014 | ___ D015 | ___ D016 | ___ D017 | ___ D018 | ___ D019 |
| ___ D020 | ___ D021 | ___ D022 | ___ D023 | ___ D024 | ___ D025 | ___ D026 | ___ D027 | ___ D028 | ___ D029 | ___ D030 | ___ D031 | ___ D032 | ___ D033 | ___ D034 | ___ D035 |
| ___ D036 | ___ D037 | ___ D038 | ___ D039 | ___ D040 | ___ D041 | ___ D042 | ___ D043 | ___ F001 | ___ F002 | ___ F003 | ___ F004 | ___ F005 | ___ U002 | ___ U003 | ___ U006 |
| ___ U007 | ___ U044 | ___ U061 | ___ U072 | ___ U080 | ___ U108 | ___ U117 | ___ U122 | ___ U123 | ___ U136 | ___ U154 | ___ U188 | ___ U213 | ___ U220 | ___ U226 | ___ U279 |
| | | | | | | | | | | | | | | | ___ K061 |

ADDITIONAL CODES (Enter all codes not identified above which are associated with waste)

4. USEPA HAZARDOUS WASTE CODE(S)	5. TREATMENT STANDARDS FOR NON-PHASE II STATES (INDICATE THE APPLICABLE TREATMENT STANDARD 268.41, 268.43 OR SPECIFIED TECHNOLOGY BELOW)	6. HOW MUST THE WASTE BE MANAGED? ENTER THE LETTER FROM BELOW

To identify F039, or UHCs managed in non-CWA, use the "F039/Underlying Hazardous Constituents Form" provided and check here:
 If no UHCs are present upon generation check here: Check here if disposal facility will check for all UHCs (i.e. no UHC form required)
 To list additional EPA waste code(s), use the supplemental sheet and check here: In lieu of supplemental sheet you may use multiple copies of this form.

7. SOLVENT CONSTITUENTS (F001 - F005) Check here if disposal facility will check for all spent solvents _____
- | | | | |
|--------------------------------|-----------------------------|--|-----------------------|
| ___ Acetone | ___ Benzene | ___ n-Butyl alcohol | ___ Carbon disulfide |
| ___ Carbon Tetrachloride | ___ Chlorobenzene | ___ O-Cresol | ___ Cresols (m&p) |
| ___ Cyclohexanone | ___ o-Dichlorobenzene | ___ 2-Ethoxyethanol | ___ Ethyl acetate |
| ___ Ethyl benzene | ___ Ethyl ether | ___ Isobutanol | ___ Methanol |
| ___ Methylene chloride | ___ Methyl ethyl ketone | ___ Methyl isobutyl ketone | ___ Nitrobenzene |
| ___ 2-Nitropropane | ___ Pyridine | ___ Tetrachloroethylene | ___ Toluene |
| ___ 1,1,1 Trichloroethane | ___ 1, 1, 2-Trichloroethane | ___ 1, 1, 2-Trichloro, 1, 2, 2-trifluoroethane | ___ Trichloroethylene |
| ___ Trichloromonofluoromethane | ___ Xylenes | | |

8. (States authorized by EPA to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed to refer to those state citations instead of the 40 CFR citations.)
- A. or **RESTRICTED WASTE REQUIRES TREATMENT**
 This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
 For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45."
- B.1 **RESTRICTED WASTE TREATMENT TO PERFORMANCE STANDARDS**
 "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."
- B.2 (CERTIFICATION REMOVED BY PHASE IV)
- B.3 **GOOD FAITH AND ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS**
 "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion units as specified in 268.42, Table 1. I have been unable to detect the nonwastewater organic constituents, despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
- B.4 **DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS**
 "I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
- C. **RESTRICTED WASTE SUBJECT TO A VARIANCE**
 This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.
 For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45."
- D. **RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT**
 "I certify under penalty of law that I have personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."
- E. **WASTE NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS**
 This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

I hereby certify that all information in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature _____ Date _____

Title _____

GENERATOR COPY

FORM # OES-78B

LINE E-4

Are all land disposal restriction forms and FINAL SIGNED hazardous waste manifests retained for 3 years?

6 CCR 1007-3, sections 268.7, 262.40(a) and 262.44(a)

The treatment, storage, and disposal facility signs the bottom of the manifest when they receive your waste. They then send you a copy of the manifest with their signature. This is your legal proof that the treatment, storage, and disposal facility received your waste.

Properly signed manifests must be kept on file by the generator for at least three years. You must be able to provide your manifest records upon request by a hazardous waste inspector. If you choose to have your manifest records at an office that is not located at your facility, it is recommended that you keep copies of your shipping records at your facility location also.

The hazardous waste manifest is a tracking mechanism for you to track your waste shipments from the time it leaves your facility until it is properly disposed of at a permitted treatment, storage, and disposal facility. It is your responsibility to follow up on your hazardous waste shipments and ensure they are properly disposed of. A copy of the hazardous waste manifest with the signature of the owner or operator of the disposal facility must be received by the generating facility within 60 days of shipping. Call your disposal facility and inquire about your waste shipment a couple of weeks before the 60 day deadline. If no such copy is received within 60 days, you must submit a legible copy of the manifest to the Hazardous Materials and Waste Management Division with some indication that you have not received confirmation of delivery from the treatment, storage and disposal facility.

You are required to maintain your records for a minimum of at least three years. To protect yourself from liability, the Division recommends that you retain your shipping documents, including hazardous waste manifests and land disposal restriction forms, forever.

LINE E-5

If you answered “NO” to any of the questions listed in Section E, please indicate the item (for example E.2.) and explain how and by what date you plan to return to compliance.

This certification is designed for you to identify problems before you are inspected so that you may correct any violations and return to compliance. Correct any deficiencies as soon as you identify them and write a brief description of the corrective actions. If there will be a delay in correcting the deficiency, please provide a brief explanation of why and the date you will return to compliance.

Section F - Hazardous Waste Training and Emergency Response

Questions and Answers

LINE F-1

Do you PERFORM TRAINING AND DOCUMENT that all personnel involved with hazardous waste management, including signing hazardous waste manifests, are trained so that they are thoroughly familiar with proper hazardous waste handling, emergency response procedures, and other job-specific hazardous waste aspects of their jobs?

6 CCR 1007-3, section 262.34(d)(5)(iii)

Note: If you keep a copy of this self-certification checklist and the guidance document, you can use it to train your employees. To meet the training documentation requirement, you must have employees sign off that you have reviewed the hazardous waste issues with them.

Small quantity generators are required to document hazardous waste training for all employees who put hazardous waste in containers, are involved in management of hazardous waste and/or who sign hazardous waste manifests and keep hazardous waste manifest records. Every employee should also be trained to know who the emergency coordinator is and that there must be information showing the locations of emergency equipment and the name and contact information for the emergency coordinator posted next to the telephone.

You are required to maintain documentation of hazardous waste training. It is recommended that you keep a roster of employees' names, dates and subject matter of hazardous waste training, including signatures documenting completion of hazardous waste training in your facility records.

Small quantity generator training for managers and employees must include specific hazardous waste subject matter such as hazardous waste labeling, when to mark a container of hazardous waste with an accumulation start date, keeping hazardous waste containers closed, weekly inspections of hazardous waste containers, emergency coordinator information, manifest tracking and record keeping. In addition, whenever hazardous waste is being handled, all personnel involved must have immediate access to an internal alarm or emergency communication device. This could include visual or voice contact with another employee.

OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) training alone is not sufficient for hazardous waste training. A small quantity generator must ensure that all employees are thoroughly familiar with proper hazardous waste handling and emergency response procedures relevant to their job responsibilities.

In a typical business, personnel who should be trained include, but are not limited to:

- ◆ Managers and/or business owners if they are involved in record keeping or hazardous waste management.
- ◆ Any employee who would be placing hazardous waste in containers.

- ◆ Any employee who works around the area where hazardous waste containers are stored.
- ◆ Any employee who conducts weekly inspections.
- ◆ Any employee who completes and/or signs hazardous waste manifests.
- ◆ Any employee who completes Land Disposal Restriction notifications.
- ◆ Any employee who tracks manifests and is in charge of record keeping.
- ◆ Any person who is designated as the emergency coordinator or an alternate emergency coordinator.

The general training example given below would be sufficient for most employees working at a SQG facility. However, managers and employees who sign hazardous waste manifests and complete Land Disposal Restriction notifications require training that is more specific. The following example includes a training roster you could use to conduct a lunch hour hazardous waste training. You could also include these topics in a regularly scheduled safety-training meeting. The division suggests initial hazardous waste training for new employees within the first month of hire and annual training for all employees.

Hazardous Waste Training

Personnel signing below have been trained on the following hazardous waste requirements. The training included a discussion of:

- | | |
|--|--|
| <ul style="list-style-type: none"> • Hazardous waste identification • “Cradle-to-Grave” transport • Hazardous waste manifests • Land disposal restriction forms • Container labeling with the words “Hazardous Waste” • “Used Oil” labels • Satellite accumulation containers • Accumulation start dates | <ul style="list-style-type: none"> • Hazardous waste spill clean-ups • Hazardous waste compatibility • Aisle space • Emergency coordinator contact information • Emergency coordinator phone postings • Arrangements with the local fire department. |
|--|--|

Name Printed	Name Signed	Date
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

LINE F-2

Has an emergency coordinator been established for the facility AND is he/she familiar with his/her responsibilities in that position?

6 CCR 1007-3, section 262.34(d)(5)(i)

You must have one employee onsite or on call with the responsibility for coordinating emergency response measures 24-hours a day. This employee is the Emergency Coordinator. He or she must be familiar with the hazardous waste regulations, and must know the location of all the hazardous waste containers located at the facility.

All employees must know who the emergency coordinator is and how to contact them in an emergency. It's a training violation if employees do not know who the emergency coordinator is.

The Emergency Coordinator's responsibilities include the following:

- ◆ In the event of a fire, call the fire department or attempt to extinguish the fire.
- ◆ In the event of a spill, contain the hazardous waste to the extent possible and as soon as possible clean up the waste and any contaminated surfaces, materials or soils; and
- ◆ In the event of fire, explosion, or any other incident, which could threaten human health off site or where a spill has reached surface water (including storm sewers), the emergency coordinator must immediately contact the National Response Center (call 1-800-424-8802) and the Colorado Emergency Response and Incident Reporting Line at the Colorado Department of Public Health and Environment (call 1-877-518-5608).

LINE F-3

Has emergency response information, including the locations of emergency equipment and the name and phone number of the emergency coordinator, been posted by the telephone(s)?

6 CCR 1007-3, section 262.34(d)(5)(ii)

In addition to identifying an emergency coordinator for your business, you must post the following information by the telephone(s):

- ◆ The name and telephone number of the emergency coordinator.
- ◆ The telephone number of the fire department unless the facility has a direct alarm; and
- ◆ The location of fire extinguishers, spill control materials and, if present, the location of the fire alarm.

Emergency phone posting information should be placed in common areas and any area where an employee would go to use the phone in case of an emergency. A typical violation noted is that the emergency response information is out of date, incomplete, or missing. Make sure your information is up to date. Another typical violation is that the emergency coordinator information is posted, but the locations of the emergency equipment are not. The form on the following page can be used to meet the requirements of the emergency information phone posting. For more information, review the "Small Quantity Generator - Emergency Response / Preparedness and Prevention Guidance." (www.colorado.gov/cdphe/hwguidance)

Emergency Contacts Telephone Posting

Post this sheet near the telephone(s) in areas where hazardous waste is handled or stored.

Company Emergency Coordinator(s)	Work Phone	Pager # or Home Phone
_____	_____	_____
_____	_____	_____

Fire Department Phone _____

Police Department Phone _____

Hospital Phone _____

Colorado 24-hour Emergency Response Line Phone 1-877-518-5608

National Response Center (24-hour) Phone 1-800-424-8802

Location of Emergency Response Equipment

Fire Extinguishers _____

Fire Alarm (if present) _____

Spill Control Materials _____

Special Equipment (if present) _____

(Fulfills emergency contact telephone posting requirements for SQGs)

LINE F-4

**Have you determined what emergency equipment is appropriate for your facility?
6 CCR 1007-3, sections 262.34(d)(4) and 265.32**

Unless none of the hazards posed by the facility could require a particular type of equipment, emergency response equipment typically includes:

- ◆ Internal communication or alarm system capable of providing emergency instructions to facility personnel.
- ◆ A telephone, a hand-held two-way radio or other device capable of summoning emergency assistance.
- ◆ Fire-control equipment, spill-control equipment and decontamination equipment; and
- ◆ Water at adequate volume and pressure to supply a water hose or foam-producing equipment or automatic sprinklers or water spray systems.

All facility communications or alarm systems, fire protection equipment, spill-control equipment and decontamination equipment must be tested and maintained as necessary to assure its proper operation in time of emergency.

LINE F-5

**Is adequate aisle space provided around the containers of hazardous waste to allow for unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment?
6 CCR 1007-3, sections 262.34(d)(4) and 265.35**

Aisle space between containers must be maintained to allow unobstructed movement of emergency response personnel or equipment. Sometimes there is not much storage space at small facilities. It is an aisle space violation if you are unable to remove a hazardous waste container with a dolly without moving other equipment, containers, or vehicles out of the way. Hazardous waste inspectors will generally consider about two feet of aisle space as being adequate.



Example of adequate aisle space between containers.

LINE F-6

Have emergency response arrangements, as appropriate for the type of waste handled and the potential need for services, been made with the local response organizations? (At a minimum, arrangements should be made with your local fire department.)

6 CCR 1007-3, sections 262.34(d)(4) and 265.37

You must attempt to make emergency response arrangements, as appropriate for the type of waste handled and the potential need for services at your facility, with local authorities such as the fire department, local health department, emergency response teams, police, and local hospitals. The information given to the authorities should include the layout of the facility; the properties of the hazardous waste handled at your facility and associated hazards with that waste, where personnel would be working, entrances to roads to the facility and possible evacuation routes. For hospitals, information might include the types of injuries or illnesses that could result from fires, explosions, or releases at your facility.

At a minimum, you should contact your local fire protection district and ensure that they are capable of providing an adequate response to an emergency at your facility. Your fire marshal or other official may require a fire inspection. **Be sure to write in the name of your fire protection district in the space provided on the form.** If you are using chemicals that have unusual properties, you should also contact your local hospital, police department, and/or local emergency response team as appropriate.

If state and local authorities decline to enter into an arrangement, you need to document this refusal in your facility operating records.

LINE F-7

Is the facility operated in a manner that minimizes the potential for releases of hazardous waste?

6 CCR 1007-3, sections 262.34(d)(4) and 265.31(a)

You must maintain and operate your facility in a manner to minimize the possibility of a fire, explosion, or any release of hazardous waste or hazardous waste constituents to the air, soil, or water, which could threaten human health or the environment. This can be accomplished through the use of fire protection systems, standard operating procedures, effective maintenance schedules and comprehensive emergency response procedures. In addition to these elements, incidents and any impacts can be further minimized through prevention elements like locating hazardous waste containers away from high-traffic areas and uncontrolled floor drains, providing secondary containment in container storage/accumulation areas through the use of chemical-resistant floor coatings or secondary-containment pallets, ensuring compatibility of waste with containers, keeping incompatible wastes separated, keeping containers closed and labeled for easy identification, and repairing cracked or damaged floors in waste storage areas.



Floor is in poor condition and there is the potential for a release of hazardous waste to soak through the floor and into the soil beneath the foundation of the building.

Hose leading to the outside storm sewer drain releasing hazardous waste to the environment.



LINE F-8

If you answered “NO” to any of the questions listed in Section F, please indicate the item (for example F.2.) and explain how and by what date you plan to return to compliance.

This certification is designed for you to identify problems before you are inspected so that you may correct any violations and return to compliance. Correct any deficiencies as soon as you identify them and write a brief description of the corrective actions. If there will be a delay in correcting the deficiency, please provide a brief explanation of why and the date you will return to compliance.

Section G – Air Pollution Control

Questions and Answers

LINE G-1

If you are required to, has your facility filed an Air Pollution Emission Notice (APEN) or been issued an air permit?

5 CCR 1001- 5, Regulation No. 3, Part A, Section II

If you do not know if you need an APEN or Permit, or if you need assistance with the Air Pollution Control Division regulations, call the Small Business Assistance Program at (303) 692-3175.

LINE G-2

If you answered “NO” to the question listed in Section G, please indicate the item (for example G.1.) and explain how and by what date you plan to return to compliance.

This certification is designed for you to identify problems before you are inspected so that you may correct any violations and return to compliance. Correct any deficiencies as soon as you identify them and write a brief description of the corrective actions. If there will be a delay in correcting the deficiency, please provide a brief explanation of why and the date you will return to compliance.

Pollution Prevention

If you have implemented pollution prevention measures such as design changes, process changes, product substitutions or adding recycling units for the purpose of water conservation, energy conservation and reduction of harmful substances, you could be recognized as an environmental leader through the State Environmental Leadership Program. The Environmental Leadership Program (ELP) is a voluntary program designed to recognize and reward organizations and businesses that demonstrate superior environmental performance and, as a result, consistently operate at a level that goes beyond mere compliance with environmental regulations.

If you would like to develop an environmental management system or implement pollution prevention techniques in your business, but need guidance on the most current and efficient options, a state representative or another business in the Environmental Leadership Program may be able to help you. For assistance, call the Environmental Leadership Program at (303) 692-3477.

Appendix A
Typical Hazardous Waste Streams Produced
by Small Quantity Generators

Typical Hazardous Waste Streams Produced by Small Quantity Generators

Laboratories

Acids/Bases, Heavy Metals/Inorganics, Ignitable Wastes, Reactives, Solvents

Printing and Allied Industries

Acids/Bases, Heavy Metals/Inorganics, Spent Ignitable Blanket Washes, Ink Sludges, Spent Plating Wastes, Solvents

Pesticide End Users and Application

Heavy Metals/Inorganics, , Pesticides, Solvents

Construction

Acids/Bases, Ignitable Wastes, Solvents

Equipment Repair

Acids/Bases, Ignitable Wastes, Lead Acid Batteries, Solvents

Furniture/Wood Manufacturing and Refinishing

Ignitable Wastes, Solvents

Other Manufacturing (Textiles, Plastics, Leather)

Heavy Metals/Inorganics, Solvents

Perc Dry Cleaner Operations

Dry Cleaning Filters, Muck, Solvents, Lint, Separator Water

Educational and Vocational Shops

Acids/Bases, Ignitable Wastes, Pesticides, Reactives, Solvents

Building Cleaning and Maintenance

Acids/Bases, Solvents

Vehicle Maintenance

Acids/Bases, Heavy Metals/Inorganics, Ignitable Wastes, Lead Acid Batteries, Solvents

Wood Preserving

Preserving Agents

Motor Freight Terminals and Railroad

Acids/Bases, Transportation, Heavy Metals/Inorganics, Ignitable Wastes, Lead Acid Batteries, Solvents

Funeral Services

Solvents (formaldehyde)

Metal Manufacturing

Acids/Bases, Cyanide Wastes, Heavy Metals/Inorganics, Ignitable Wastes, Reactives, Solvents, Spent Plating Wastes

Chemical Manufacturers

Acids/Bases, Cyanide Wastes, Heavy Metals/Inorganics, Ignitable Wastes, Reactives, Solvents

Cleaning Agents and Cosmetics

Acids/Bases, Heavy Metals/Inorganics, Ignitable Wastes, Pesticides, Solvents

Formulators

Acids/Bases, Cyanide Wastes, Heavy Metals/Inorganics, Ignitable Wastes, Pesticides, Reactives, Solvents

Health Care Providers and Veterinarians

Expired & Unused P or U-listed pharmaceuticals, P-listed empty containers, mercury, silver, Ignitable, Corrosive, Toxic and/or Reactive Hazardous Waste

Typical Hazardous Waste Streams and their EPA Hazardous Waste Numbers

Acids/Bases:

Acids, bases or mixtures having a pH less than or equal to 2 or greater than or equal to 12.5, or liquids that corrode steel at a rate greater than 0.25 inches per year, are considered to be corrosive (for a complete description of corrosive wastes, see 6 CCR 1007-3, section 261.22, Characteristic of Corrosivity). All corrosive materials and solutions have the EPA Hazardous Waste Number D002. The following are some examples of the more commonly used corrosives:

Typical Corrosive Waste Streams (D002 Waste Number)

- Acetic Acid
- Ammonium Hydroxide
- Chromic Acid
- Hydrobromic Acid
- Hydrochloric Acid
- Hydrofluoric Acid
- Nitric Acid
- Oleum
- Perchloric Acid
- Phosphoric Acid
- Potassium Hydroxide
- Sodium Hydroxide
- Sulfuric Acid

Dry Cleaning Filtration Residues:

Cooked powder residue (perchloroethylene plants only), still residues and spent cartridge filters containing perchloroethylene or valclene are hazardous and have an EPA Hazardous Waste Number of F002. Still residues containing petroleum solvents with a flash point less than 140^oF are also considered hazardous and have an EPA Hazardous Waste Number of D001.

Heavy Metals/Inorganics:

Heavy metals and other inorganic waste materials exhibit the characteristic of TCLP Toxicity and are considered hazardous if the extract from a representative sample of the waste has any of the specific constituent concentrations as shown in 6 CCR 1007-3, section 261.24, Table 1. This may include dusts, solutions, wastewater treatment sludges, paint wastes, waste inks, and other such materials that contain heavy metals/inorganics (note that wastewater treatment sludges from electroplating operations containing nickel and cyanide are identified as F006). Following are some of the TCLP Toxic hazardous wastes:

Heavy Metals/Inorganics Waste Stream-EPA Hazardous Waste Numbers

- Arsenic D004
- Barium D005
- Cadmium D006
- Chromium D007
- Lead D008
- Mercury D009
- Selenium D010
- Silver D011

Ignitable Wastes:

Ignitable wastes include any flammable liquids, non-liquids and contained gases that have a flashpoint less than 140°F (for a complete description of ignitable wastes, see 6 CCR 1007-3, section 261.21, Characteristic of Ignitability). Examples are spent solvents (see also solvents), solvent still bottoms, ignitable paint wastes (paint removers, brush cleaners and stripping agents), epoxy resins and adhesives (epoxies, rubber cements and marine glues) and waste inks containing flammable solvents. Unless otherwise specified, all ignitable wastes have an EPA Hazardous Waste Number of D001. Some ignitable wastes are also F-listed hazardous wastes. In that case, the waste code that applies to the listing is used and you don't need to use the D001 waste code. Some commonly used ignitable compounds are:

Ignitable Waste Stream Waste Codes

- Acetone F003
- Benzene D001
- n-Butyl Alcohol F003
- Chlorobenzene F002
- Cyclohexanone F003
- Ethyl Acetate F003
- Ethylbenzene F003
- Ethyl Ether F003
- Ethylene Dichloride D001
- Methanol F003
- Methyl Isobutyl Ketone F003
- Petroleum Distillates D001
- Toluene D001, F005
- Xylene F003

Ink Sludges Containing Chromium and Lead:

This includes solvent washes and sludges, caustic washes and sludges or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps and stabilizers containing chromium and lead. All ink sludges have an EPA Hazardous Waste Number of K086.

Lead Acid Batteries:

Used lead acid batteries should be reported on the notification form only if they are not recycled. Used lead acid batteries that are recycled do not need to be counted in determining the quantity of waste that you generate per month, nor do they require a hazardous waste manifest when shipped off your premises. (Note: Special requirements do apply if you recycle your batteries on your own premises - see 6 CCR 1007-3, section 267.80.)

Batteries Waste Stream Waste Codes

- Lead Dross D008
- Spent Acids D002
- Lead Acid Batteries D008, D002

Organic Wastes:

See 6 CCR 1007-3, section 261.24, Table 1 - Maximum Concentration of Contaminants for the Toxicity Characteristic, for a list of constituents and regulatory levels.

Pesticides:

Pesticides, pesticide residues, washing and rinsing solutions and dips that contain constituent concentrations at or above Toxicity Characteristic regulatory levels (6 CCR 1007-3, section 261.24) are hazardous waste. The following pesticides would be hazardous waste if they are unused and need to be disposed of. For a more complete listing, see 6 CCR 1007-3, section 261.32-33 for specific listed pesticides, discarded commercial chemical products and other wastes, wastewaters, sludges and by-products from pesticide production. (Note that while many of these pesticides are no longer in common use, they are included here for those cases where they may be found in storage.)

Pesticide Waste Stream Waste Codes

- Aldicarb P070
- Aldrin P004
- Amitrole U011
- Arsenic Pentoxide P011
- Arsenic Trioxide P012
- Cacodylic Acid U136
- Carbamic Acid, Methylnitroso-Ethyl Ester U178
- Chlordane U036
- Copper Cyanides P029
- 1,2-Dibromo-3-Chloropropane U066
- 1,2-Dichloropropane U083
- 1,3-Dichloropropene U084
- 2,4-Dichlorophenoxy Acetic Acid U240
- DDT U061
- Dieldrin P037
- Dimethoate P044
- Dimethylcarbamoyl Chloride U097
- Dinitrocresol P047 Colorado Hazardous Waste Notification Form Revised 11/06 18
- Dinoseb P020
- Disodium Monomethane arsonate D004
- Disulfoton P039
- Endosulfan P050
- Endrin P051
- Ethylmercuric Chloride D009
- Famphur P097
- Nephachlor P059
- Hexachlorobenzene U127
- Kepone U142
- Lindane U129
- 2-Methoxy Mercuric Chloride D009
- Methoxychlor D014
- Methyl Parathion P071
- Monosodium Methanearsonate D014
- Nicotine P075
- Parathion P089
- Pentachloronitrobenzene U185
- Pentachlorophenol U242
- Phenylmercuric Acetate D009
- Phorate P094
- Strychnine P108
- 2,4,5-Trichlorophenoxy Acetic Acid U232
- 2-(2,4,5-Trichlorophenoxy)-Propionic Acid U233
- Thallium Sulfate P115
- Thiram U244
- Toxaphene P123
- Warfarin U248

Solvents:

Spent solvents, solvent still bottoms, or mixtures containing solvents are often hazardous. This includes solvents used in degreasing and paint gun cleaning and distillation residues from reclamation. The following are some commonly used hazardous solvents (see also Ignitable Wastes for other hazardous solvents and 6 CCR 1007-3, section 261.31 for other listed hazardous waste solvents):

Solvent Waste Stream Waste Codes

- Acetone F003
- Benzene D001
- Carbon Disulfide F005
- Carbon Tetrachloride F001
- Chlorobenzene F002
- Cyclohexanone F003
- O-Dichlorobenzene F002
- Ethyl Acetate F003
- Ethylbenzene F003
- Ethyl Ether F003
- Ethylene Dichloride D001
- Ethanol D001
- Isobutanol F005
- Isopropanol D001
- Kerosene D001
- Methanol F003
- Methyl Isobutyl Ketone F003
- Methyl Ethyl Ketone F005
- Methylene Chloride F001 (Sludges), F002 (Still Bottoms)
- Naphtha D001
- n-Butyl Alcohol F003
- Petroleum Solvents (FP less than 140F) D001
- Petroleum Distillates D002
- Pyridine F005
- 1, 1, 1-Trichloroethane F001 (Sludges), F002 (Still Bottoms)
- Tetrachloroethylene F001 (Sludges), F002 (Still Bottoms)
- Toluene D001, F005
- Trichloroethylene F001 (Sludges), F002 (Still Bottoms)
- Trichlorotrifluoroethane F002
- White Spirits D001
- Xylene F003

Reactives:

Reactive wastes include reactive materials or mixtures which are unstable, react violently with or form explosive mixtures with water (or when exposed to pH conditions between 2 and 12.5 in the case of cyanide- or sulfide-bearing wastes); or are capable of detonation or explosive reaction when irritated or heated (for a complete description of reactive wastes, see 6 CCR 1007-3, section 261.23, Characteristic of Reactivity). Unless otherwise specified, all reactive wastes have an EPA Hazardous Waste Number of D003. The following materials are commonly considered to be reactive:

Reactive Waste Stream Waste Codes

- Acetyl Chloride D003
- Chromic Acid D003
- Cyanides D003
- Organic Peroxides D003
- Perchlorates D003
- Permanganates D003
- Hypochlorites D003
- Sulfides D003

Spent Plating and Cyanide Wastes:

Spent plating wastes contain cleaning solutions and plating solutions with caustics, solvents, heavy metals and cyanides. Cyanide wastes may also be generated from heat treatment operations, pigment production and manufacturing of anti-caking agents. Plating wastes are generally Hazardous Waste Numbers F006-F009. Heat treatment wastes are generally Hazardous Waste Numbers F010-F012. See CCR 1007-3, section 261.31 for a more complete description of plating wastes.

Wood Preserving Agents:

Compounds or mixtures used in wood preserving, including the wastewater treatment sludge from wastewater treatment operations, are considered hazardous wastes. Bottom sediment sludges from the treatment of wastewater from wood preserving processes that use creosote or pentachlorophenol are hazardous and have an EPA Hazardous Waste Number of K001. In addition, wastewaters, process residuals, preservative drippage and spent formulations from certain wood preserving processes are also hazardous wastes and carry EPA Hazardous Waste Numbers F032, F034 or F035, depending on the contaminants they contain. Unless otherwise indicated, specific wood preserving components are as follows:

Wood Preserving Waste Stream Waste Codes

- Chromated Copper Arsenate D004
- Creosote K001
- Pentachlorophenol K001

Appendix B
Hazardous Waste Generator
Requirements Summary Table

HAZARDOUS WASTE GENERATOR MATRIX

GENERATOR REQUIREMENT	GENERATOR CATEGORY		
	CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG)	SMALL QUANTITY GENERATOR (SQG)	LARGE QUANTITY GENERATOR (LQG)
Hazardous Waste Determination	Required through process knowledge or analysis (supporting documentation recommended)	Required through process knowledge or analysis (supporting documentation required)	Required through process knowledge or analysis (supporting documentation required)
On-site Storage & Disposal	Part "B" Permit required	Part "B" Permit required	Part "B" Permit required
Monthly Generation Rate	< 1 kg of acutely HW < 100 kg of HW*	< 1 kg of acutely HW >100 kg but <1,000 kg of HW*	> 1 kg of acutely HW >1,000 kg of HW*
Maximum Accumulation	< 1 kg of acutely HW < 1,000 kg of HW*	< 1 kg of acutely HW <6,000 kg of HW*	No limit
On-site Treatment	Unrestricted (knowledge of proper & safe treatment methods implied)	Part "B" Permit, Permit-by-Rule, Treat in WWTU or Treat to meet LDR	Part "B" Permit, Permit-by-Rule, Treat in WWTU or Treat to meet LDR
Accumulation Time Period	None	180 days or 270 days if TSD facility is > 200 miles away (30-day extension available)	90 days (30-day extension available)
EPA ID Number	Required if generating hazardous waste codes F001, F002, F004, and/or F005	Required	Required
Manifests & LDR	Not required (recommended)	Required	Required
Exception Reports	Not required (recommended)	Notify CDPHE within 60 days & include a copy of the Manifest	Contact handler within 35 days Report to CDPHE within 45 days
Biennial Reports	Not required	Not required	Required (March 1 st of even numbered years)
Contingency Plan	Not required (recommended)	Basic Plan Required	Written Plan Required
Container Management	Not required (recommended)	Good Condition, Compatible with Waste, Labeled as Haz. Waste, Aisle Space, Lids, Weekly Inspections & Accumulation Start Date <u>unless</u> at Satellite Accumulation Area	Good Condition, Compatible with Waste, Labeled and Haz. Waste, Aisle Space, Lids, Weekly Inspections & Accumulation Start Date <u>unless</u> at Satellite Accumulation Area, Subpart AA, BB, & CC apply
Tank Management	Not required (recommended)	Good Condition, Compatible with Waste, Labeled as Haz. Waste, Accumulation Start Date Tracked & Daily Inspections	Good Condition, Compatible with Waste, Labeled as Haz. Waste, Accumulation Start Date Tracked & Daily Inspections, Subpart AA, BB, & CC apply & Secondary Containment is Required
Personnel Training	Not required (recommended)	Basic Training Required	Written Training Plan Required
Record Keeping	Disposal Receipts & Waste Analysis Records (recommended)	Manifests, LDR & Waste Analysis Records Training Records	Manifests, LDR & Waste Analysis Records, Training Records, Biennial Reports & Exception Reports

* 1 kg ~ 1 qt
 100 kg ~ 27 gal (~ ½ of a 55 gallon drum) or 220 lbs, depending on material
 1,000 kg ~ 270 gal (~ five (5) 55 gallon drums) 2,200 lbs, depending on material
 6,000 kg ~ 1,620 gal (~ thirty (30) 55 gallon drums) or 13,200 lbs, depending on material
 For liquids, specific gravity x 8.3 ~ lbs/gal