Guidance Document for the Surface Coater 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 surface coating facilities that are 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 surface coating facilities that are 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.

Typical hazardous wastes from a surface coating business include spent paint thinners/solvents, paint waste, and wipes or disposable rags in contact with lacquer thinner. Also, residues, sludge, and pucks from distillation units are most likely hazardous wastes. For additional information regarding hazardous waste requirements, see the "Guide to Generator Requirements for the Colorado Hazardous Waste Regulations" (www.colorado.gov/cdphe/hwguidance).

Universal wastes are certain hazardous wastes that can be managed under an alternative set of reduced management standards designed to reduce the regulatory burden on businesses that generate these wastes in order to encourage recycling. Part of the reduced requirement benefit is that universal wastes are not counted towards your monthly volume of hazardous waste and therefore do not affect your generator category.

Typical universal wastes in a surface coating business are certain waste aerosol cans containing unused product, spent mercury-containing lamps, and waste electronic equipment. For additional information regarding universal waste requirements, see the "Guide to Generator Requirements for the Colorado Hazardous Waste Regulations" (www.colorado.gov/cdphe/hwguidance).

Surface coating businesses may also generate used oils such as motor oil, metal working fluids, hydraulic fluid, grease, and transmission fluids. Used oil is subject to the environmental regulations but is not counted towards your monthly hazardous waste generator status. For additional information regarding used oil requirements, see the "Guide to Generator Requirements for the Colorado Hazardous Waste Regulations" (www.colorado.gov/cdphe/hwguidance).

Hazardous Waste can be Listed and/or Characteristic

Typically, wastes generated throughout a surface coating business are both "F-listed" wastes as well as some characteristic wastes.

Listed Wastes: Your waste is considered hazardous if it appears on one of four lists in the Colorado Hazardous Waste Regulations. Most listed wastes are hazardous regardless of their concentration. Surface coating businesses typically have F-listed hazardous wastes. These wastes are from non-specific sources such as degreasing solvents, spent paint thinners/solvents, and

wastes in contact with spent paint thinner/solvent. For example, rags that have been in contact with the spent solvent toluene would be F005 listed waste and would need either to be laundered by an industrial laundry service or disposed of as hazardous waste.

Most solvents used for degreasing or for cleaning equipment contain methylene chloride, methyl ethyl ketone, xylene, acetone, or toluene. When methylene chloride, methyl ethyl ketone, xylene, acetone or toluene are present in solvents in concentrations greater than ten percent before use, then the spent solvents generated from these processes are F-listed.

There are also P (acute), U and K listed wastes. They are not as likely to be present in surface coating businesses, but it is your responsibility to make that determination. For more information regarding P, U and K listed wastes, refer to Appendix A of this guidance or to www.colorado.gov/cdphe/hwguidance.

Characteristic Wastes: Even if a waste is not listed, it could be a characteristic hazardous waste. The examples below include typical hazardous wastes found in surface coating businesses.

- **Ignitable** (Designated with waste code D001) Examples: liquid paint waste, liquid paint thinner/solvent, acetone, mineral spirits
  - It is a liquid with a flash point less than 140°F.

- **Corrosive** (Designated with waste code D002) Examples: floor and white wall cleaners or surface preparation chemicals
  - It is a liquid and dissolves steel at a certain rate, or
  - It is a liquid and has a pH less than or equal to 2 or greater than or equal to 12.5.

- **Reactive** (Designated with waste code D003) Reactive wastes are not typically used at a surface coating business.
  - It is unstable.
  - It is explosive.

- **Toxic** (Designated with waste codes D004-D043) Examples: paints that contain chromium, cadmium, lead or other heavy metals and solvent wastes that contain methyl ethyl ketone, methylene chloride, benzene or toluene
  - It is a waste containing metals, pesticides and/or solvents and other organics at concentrations that are greater than or equal to the applicable regulatory levels listed in 6 CCR 1007-3, section 261.24.

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

- Go through the products that you use and look at the ingredients and flash points.

- Apply knowledge of your processes and use Material Safety Data Sheets (MSDS) for information regarding the products you use.

  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 present in amounts of 1% or more. (1% = 10,000 parts per million.) Therefore, ingredients in a product that have the potential to generate a hazardous waste may not always be listed on the Material Safety Data Sheet.

- Talk to your trade organization or product manufacturer.

- For more guidance on typical hazardous wastes produced by surface coating facilities, refer to Appendix A of this guidance document. There is also information available on hazardous waste identification in the "Hazardous Waste Identification Guidance Document" and the Division has a number of other guidance documents available at www.colorado.gov/cdphe/hwguidance.

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 the site. **The EPA Identification number is address-specific.**

If your **facility changes ownership**, you or the new owner should 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 the form from your computer by going to www.colorado.gov/cdphe/hwforms. Print and complete both pages of the form, sign it and mail it to:

Notification Coordinator
CDPHE – Hazardous Waste Division
4300 Cherry Creek Drive South
Denver, CO 80246

If your **facility changes its mailing address**, contact information, phone numbers, etc., you should 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 www.colorado.gov/cdphe/hwforms. After completing and signing the form, mail it to the address listed in the "facility changes ownership" section above.

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 location. 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 www.colorado.gov/cdphe/hwforms. After completing and signing the form, mail it to the address listed in the "facility changes ownership" section above.

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. Mail your letter to the address listed in the "facility changes ownership" section above

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 $120 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 www.colorado.gov/cdphe/hwforms. After completing and signing the form, mail it to the address listed in the "facility changes ownership" section above.

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. The EPA Identification number only 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 dispose of hazardous waste at a treatment, storage and disposal facility that has been fully permitted under the hazardous waste regulations by the State of Colorado, another state, or the U.S. EPA. In addition to a full permit, the treatment, storage, and disposal facility must have a current EPA Identification number. Hazardous wastes in surface coating businesses include such wastes as paint waste, spent solvent, distillation bottoms, certain solvent-contaminated rags and wipes, etc.

Note: Rags or paper towels contaminated with F001, F002, F004, and/or F005 solvents are hazardous wastes even when dry.

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 from surface coating businesses that are commonly, but illegally, disposed of to the trash include disposable "3M" paint cups still holding liquid, certain solvent-contaminated disposable rags or paper towels, distillation bottoms and pucks (if F001, F002, F004 or F005 listed), partially full aerosol cans and fluorescent light bulbs.

Disposable paint cups such as "3M" cups must be drained of free-flowing liquid before throwing them in the trash. The best way to drain them is to turn them upside down over a funnel (with a spring-loaded flip top) that has been threaded into the bung of a hazardous waste container.

Rags, shop towels, and other absorbents that are contaminated with F001, F002, F004, F005 listed hazardous waste, or that exhibit a hazardous waste characteristic are regulated as hazardous wastes when they are disposed. At no time is it appropriate for these contaminated towels to be placed in the trash. If rags contaminated with these solvents are commercially laundered, they are not considered to be wastes and thus are not regulated as hazardous wastes.

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.

Hazardous waste distillation bottoms are generated when surface coating facilities use recycling units for paint thinners that contain toluene, methyl ethyl ketone, or other F001, F002, F004, and/or F005 listed solvents in quantities greater than 10% by volume before use. The listing description for these spent solvents ends with the phrase "and still bottoms from the recovery of these spent solvents . . . ." Pucks and sludge from recycling units that recycle these F-listed solvents are hazardous wastes and the residue from these recycling units CANNOT be disposed of into the trash. Still bottoms (treatment residues) from recycling F003 solvents are F003 hazardous wastes only if they are ignitable (have a flash point of 140 degrees Fahrenheit).

LINE A-6

Do you pour out all paint waste from cans and disposable cups into hazardous waste containers before throwing the empty cans and cups into the trash? (Note: disposable cups like "3M" cups can be thrown into the trash only after the liquid has been removed from them.)
6 CCR 1007-3, section 100.10

Paint cans or disposable cups such as "3M" cups may not be disposed of in the trash until all liquid waste is removed that can be removed using the practices commonly employed to remove materials from that type of container. Paint must be poured from cans and cups into a hazardous waste container, and never evaporated. Evaporation constitutes treatment and is illegal. Typically, liquid paint waste is an ignitable hazardous waste. If you can still pour liquid out of a "3M" cup or any other container, such as a partially empty paint can, it is not considered empty and should not be placed into the trash until after the liquid is removed.

LINE A-7

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 F-listed lacquer thinners or other solvents?
6 CCR 1007-3, section 100.10

Many surface coating 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 in surface coating businesses contain toluene and/ or methyl ethyl ketone. Because they have been in contact with an F-listed solvent, the used rags and shop towels are also considered to be F-listed wastes. It is illegal to dispose of these rags into the trash. They must either be sent to a commercial 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. If the rags are dry and do not exhibit the characteristic of ignitability (D001), they would not be considered hazardous waste. However, under certain circumstances, F003 solvent-contaminated rags/shop towels containing no free liquids (from the paint filter test) might still be ignitable wastes. This may occur if a number of solvent-contaminated rags are placed in a container and gravity causes free liquids to form on the bottom of the container. If the free liquids are ignitable, the entire container would be considered ignitable (D001), and therefore would also be listed waste (F003).

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-8

Do you ensure that all spent aerosol cans still containing liquid are managed as a hazardous waste or universal waste?
6 CCR 1007-3, section 100.10 and Part 274

Generators of waste aerosol cans are responsible for determining if their wastes are hazardous wastes. Many times, the contents of unusable partially full aerosol cans are a hazardous waste. If the contents are hazardous, the cans must be managed as either hazardous waste or universal waste.

Puncturing waste aerosol cans is allowed as long as you have an onsite written procedure detailing how the can puncturing will be done safely. Once the puncturing activity occurs, the contents from the can must be transferred to a hazardous waste container and be counted towards your monthly accumulation limits.

Aerosol can in which the spray device is missing. Aerosol cans that still hold liquid that is a hazardous waste must not be thrown into the trash.

Waste aerosol cans that were left outside for disposal. This is a violation because the contents of the cans are classified as hazardous waste.

LINE A-9

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

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.

You have the option of managing your fluorescent lights, batteries, computers 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 and/or mercury-containing devices as universal waste, you must make sure to label them as “Universal (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-10

Do you ensure that your waste lead acid batteries are recycled?
6 CCR 1007-3, section 261.6 and Part 267

Waste lead acid batteries are not regulated as hazardous waste while stored on your property if you ensure that they are picked up for recycling by your supplier of new batteries or a battery recycler, and as long as you store them in a manner that prevents leakage of battery acid. If your lead acid batteries are not recycled, they must be managed and disposed of as hazardous waste.

LINE A-11

If you distill your paint waste and your paint waste contains F-listed solvents, do you dispose of your distillation bottoms or waste pucks as a hazardous waste?
6 CCR 1007-3, sections 100.10 and 261.6

If you treat F001, F002, F004, or F005 listed waste in your distillation unit, (for example, lacquer thinner that contains toluene and/or methyl ethyl ketone in a volume of 10% or more before use is F005 hazardous waste), the still bottoms from the distillation unit are also listed hazardous waste and can't be thrown into the trash. If they contain enough liquid, (cannot pass the Paint Filter Liquids Test method 9095 in SW-846), the still bottoms could also be an ignitable hazardous waste (D001).

Each of the five spent solvent listing descriptions (F001 – F005) ends with the phrase "and still bottoms from the recovery of these spent solvents..." However, the May 16, 2001 rule [66 FR 27266] introduced an exception with regard to F003 still bottoms. The rule says that the still bottoms (treatment residues) are F003 wastes only if they are ignitable (6 CCR 1007-3, section 261.3(g)).

Additionally, if you distill a liquid composed of only mineral spirits, it is not F-listed and you can dispose of the dry distillation bottoms in the trash. The disposal of mineral spirit still bottoms in the trash is allowed because mineral spirits are not listed and the dry still bottoms would no longer exhibit a characteristic of hazardous waste. Before disposing of any waste to the trash, (mineral spirit still bottoms, dry rags that had been used with an F003 solvent, or any other waste that had been characteristic for ignitibility and is no longer a D001 waste) be sure that the waste does not have ANY OTHER waste codes. For example, still bottoms from mineral spirits may no longer be ignitable. However, depending on what the mineral spirits were used for, the still bottoms may be toxic for heavy metals, and therefore still hazardous waste. A laboratory analysis is recommended before throwing any suspect waste into the trash.

LINE A-12

If you store solvent or paint waste in containers before you place the spent material in a distillation unit, do you manage your containers as hazardous waste?
6 CCR 1007-3, sections 100.10 and 261.6

If you store spent lacquer thinner, solvent and/or paint waste for more than 24 hours before you place it in a recycling or distillation unit, you must manage the containers holding this waste as hazardous waste containers. Therefore, it is required that these containers have hazardous waste labels, accumulation start dates, are kept closed except when waste is being added or removed from the containers, and are inspected weekly.

Correct storage of hazardous waste solvent before distillation.

LINE A-13

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 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 <u>specify whether the quantity is in gallons or pounds</u>. Do not list hazardous wastes that you manage as universal waste (such as light bulbs, batteries, or electronic equipment). Do not list used oil.
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 at any other hazardous wastes that may potentially be improperly. Also, include hazardous waste solvent you recycle if you have a distillation unit.

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.	Paint waste mixed with solvent	20	X	
2.	Spent solvent from paint gun cleaner	5	X	
3.	Spent paint booth filters with chromium	5		X
4.	Distillation bottoms	10		X
5.	Paper wipes in contact with F-listed spent solvent	0.5		X

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 in your busiest month, then you are correctly notified as a small quantity generator.

If your waste is a liquid waste, and generated in gallons instead of pounds, here is a quick way to get a general idea of your generator status. If your waste has a density about the same as the density of water, about ½ a 55-gallon drum (roughly 27 gallons) would weigh 220 pounds. Additionally, about five 55-gallon drums (roughly 265 gallons) would weigh 2200 pounds. Therefore in your busiest month, if you generated between ½ a drum and 5 drums, depending on the density of your waste, you are likely correctly notified as a small quantity generator.

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.

- 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.

Even though a waste may be a hazardous waste, you may not need to count it when determining your generator category.

What Waste Streams Do You Count as Hazardous Waste to Determine the 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. 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 in the following ways:
  - If the solvent waste is NOT STORED prior to recycling, count F001, F002, F004 and/or F005 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 makeup 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 Wastes Streams Do You NOT Count as Hazardous Waste to Determine the 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. Examples are empty paint cans and empty “3M” cups that have been gravity drained 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 onsite without storing (less than 24 hours) prior to reclamation, such as solvent recycling units in surface coating businesses. Note: the residues from the distillation process must be counted.

- Wastes that have already been counted once during the calendar month, and are treated onsite or reclaimed in some manner, and used again. Examples are solvents that are re-distilled onsite and re-used in the same calendar month.

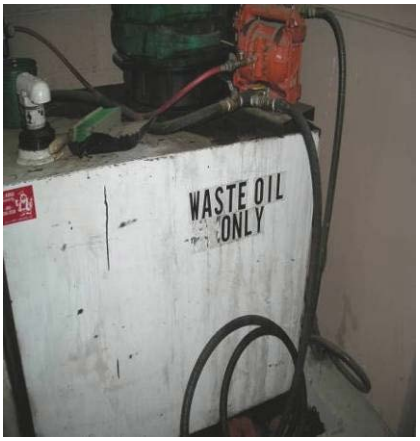
Section C - Used Oil Management

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." Additionally, be sure to label all buckets and drip pans used to catch oil drips or to catch oil drained from equipment with the words "Used Oil." Do not label used oil containers with the words "Waste Oil."



Used oil tank is incorrectly labeled as "Waste Oil."

Used oil tank correctly labeled as "Used Oil."

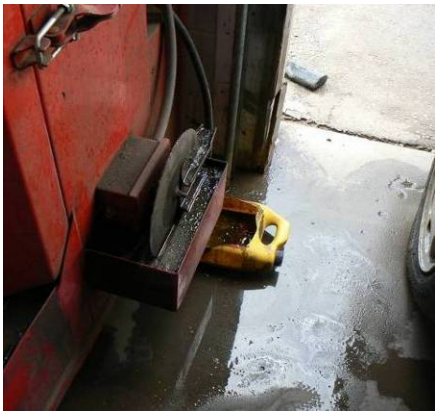
LINES C-2 & C-3

Are all 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 oil to the environment, you must stop the release, contain it, and clean up the release. You must also take measures to prevent future releases 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 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.

All oil spills and releases must be cleaned up promptly. These photographs depict a violation of the requirement to clean up releases of 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 overfill 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)

Hazardous waste containers in surface coating businesses are typically any containers holding spent paint thinners, solvents, paint waste, disposable wipes or rags in contact with lacquer thinner and residues, sludge or pucks from distillation units. 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

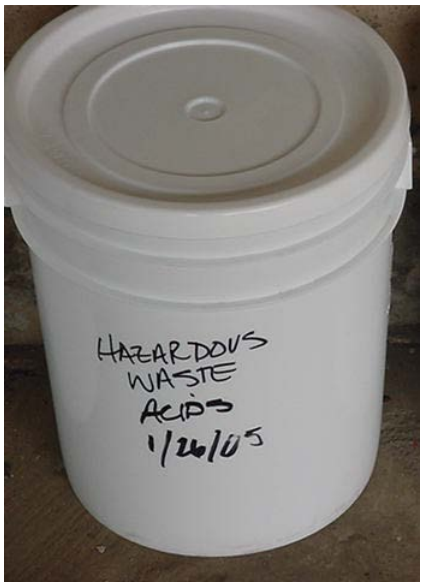
Are containers, except satellite accumulation containers, used to store hazardous waste marked with the date when the first drop of hazardous waste was added?
6 CCR 1007-3, sections 262.34(a)(2) and 262.34(d)(4)

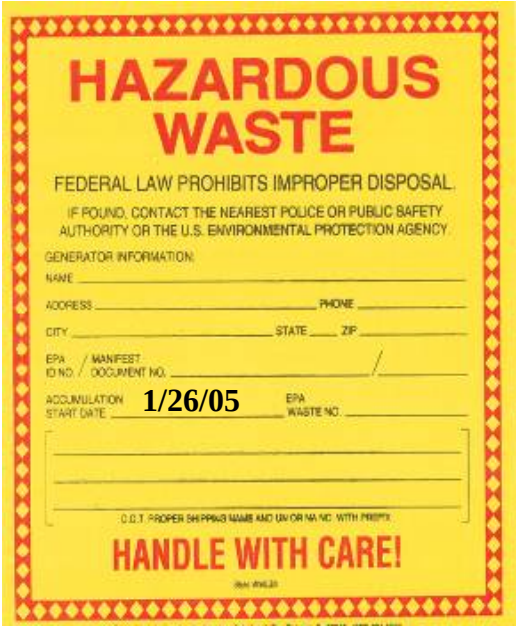
Hazardous waste containers in surface coating businesses are typically any containers holding spent paint thinners, solvents, paint waste, disposable wipes or rags in contact with lacquer thinner and residues, sludge or pucks from distillation units. Hazardous waste containers must be clearly marked with the date when accumulation begins. Accumulation begins when the first drop of hazardous waste is added to the container or when the container is moved from a satellite accumulation area.

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. 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 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. This includes containers of spent solvent that is stored in a 180-day area near the distillation unit, waiting to be distilled.

There is a space provided on hazardous waste labels to mark the accumulation start date. If you don't use a pre-printed hazardous waste label, the accumulation start date must be clearly marked on the hazardous waste 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

Hazardous waste containers in surface coating businesses are typically any containers holding spent paint thinners, solvents, paint waste, disposable wipes or rags in contact with lacquer thinner and residues, sludge or pucks from distillation units. 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 at the corners of building or in parking lots against fences. If hazardous waste containers are damaged by auto

mobiles or other equipment, they can leak and hazardous waste can be released to the environment. 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 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)

Hazardous waste containers in surface coating businesses are typically any containers holding spent paint thinners, solvents, paint waste, disposable wipes or rags in contact with lacquer thinner and residues, sludge or pucks from distillation units. One of the most common violations noted in surface coating businesses are open containers in the paint mixing rooms. This is a violation of the Air and Hazardous Waste regulations.

All containers of hazardous waste must be kept closed except when waste is being added or removed. Flip top funnel lids that are threaded into the bung of drums can be purchased for containers holding liquid paint wastes. The lid should also have a latching mechanism to prevent the liquid from spilling if the container were to tip over. 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.

The hazardous waste container shown on the left 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 and the contents of the container will spill if the container is knocked over.

The hazardous waste container shown on the right has a funnel on top that is threaded 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 to 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.

Hazardous waste containers in surface coating businesses are typically any containers holding spent paint thinners, solvents, paint waste, disposable wipes or rags in contact with lacquer thinner and residues, sludge or pucks from distillation units. Hazardous waste containers can become damaged for many reasons. They can be rusted due to weathering when they are stored outside. Also, hazardous waste containers are occasionally placed in pathways where cars are moved; for example, at the corners of buildings or 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.

All containers of hazardous waste must be inspected at least weekly. The Division recommends that you 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 container checklist and weekly inspection form from our website at www.colorado.gov/cdphe/hwguidance.

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.

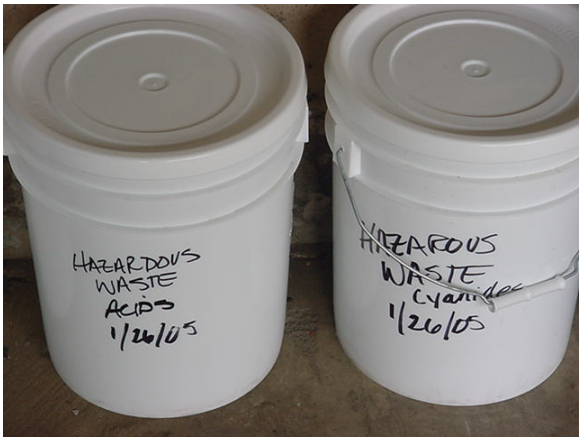
Week	1	2	3	4	Comments
Labeled "Hazardous Waste"					
Accumulation Start Date Marked					
Satellite Containers Moved/Marked					
Start Date <180/270 Days Ago					
Good Condition/Not Leaking					
Kept Closed					
Stored to Prevent Rupture/Leakage					
Waste Compatible With Container					
Incompatible Wastes 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)

Hazardous waste containers in surface coating businesses are typically any containers holding spent paint thinners, solvents, paint waste, disposable wipes or rags in contact with lacquer

thinner and residues, sludge or pucks from distillation units. Some of these wastes can be incompatible with products or other wastes stored in the same area. For example, if you are storing solvent waste next to a corrosive cleaner and there is a release, the waste and corrosive product could react together (for example, could cause a fire, explosion or generate toxic gases). 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. Also, incompatible wastes must not be placed in the same container or in unwashed containers that previously held an incompatible material.



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

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 off-site to an appropriate treatment, storage, and disposal facility within this time frame. For the surface coating industry, these wastes include, but are not limited to, spent paint thinners, solvents, paint waste, disposable wipes or rags in contact with lacquer thinner and residues, sludge or pucks from a distillation unit.

It is a violation if a surface coating business accumulates hazardous waste 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 filled out accurately and completely?
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.
- 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.

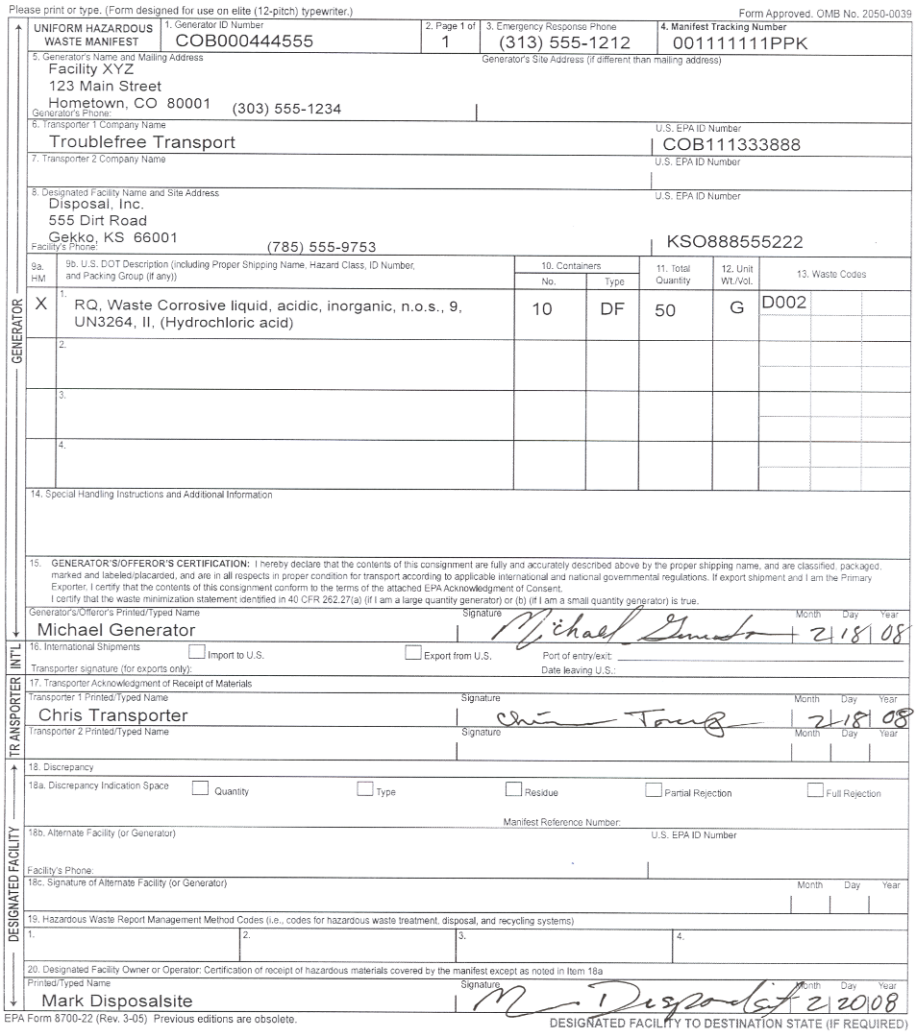
The manifest is a multi-copy shipping document designed to track shipments of hazardous wastes from their point of generation to their final destination. In other words, "cradle to grave." The generator, the transporter, and the designated facility each must sign this document and keep a copy. The manifest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

A common violation found at surface coating businesses is that the hazardous waste manifest does not include the facility's EPA Identification number. Manifests will often only show the letters "CESQG" in place of the EPA Identification number. This could be a notification and/or a manifest violation for small quantity generators. The manifest must include the generating facility's EPA Identification number.

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 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 should contact your treatment, storage, and disposal company if they have not sent you the signature of receipt within a couple of weeks of your initial shipment, and contact the Division if you have not received the signature of receipt within 60 days of shipment.



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

GENERATOR

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

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers 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/Offeror's Printed/Typed Name: Michael Generator — Signature: Michael Generator — Month Day Year: 2 18 08

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Chris Transporter — Signature: Chris Young — Month Day Year: 2 18 08
Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
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: Mark Disposalsite — Month Day Year: 2 20 08

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

Example of a properly completed hazardous waste manifest.

LINE E-3

Has land disposal restriction (LDR) documentation been completed for each waste stream and for each treatment and storage facility?
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 my 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. These forms can have several different formats. Look in your paperwork to make sure you have documents titled as "Land Disposal Restriction" or "Land Disposal Notification."

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 ___X___ 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 HAZADOUS CONSTITUENTS FOR D001, D002, D003, D004, D043
				Non-wastewater >1% TOC & >1% TSS	Wastewater	List all applicable constituents from key below	List all applicable constituents from Table 1
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
6) Benzene
7) N-Butyl Alcohol
8) Carbon Disulfide
9) Carbon Tetrachloride
10) Chlorobenzene
11) Cresols (o, m, or p isomers)
12) Cresylic acid
13) Cyclohexane
14) 1,2-Dichlorobenzene
15) Ethyl Acetate
16) Ethyl Benzene
17) Ethyl Ether
18) Isobutanol (Isobutyl alcohol)
19) Methanol
20) Methylene Chloride
21) Methyl Ethyl Ketone
22) Methyl Isobutyl Ketone
23) Nitrobenzene
24) Pyridine
25) Tetrachloroethylene
26) Toluene
27) 1,1,1 Trichloroethane
28) 1,1,2 Trichloroethane
29) 1,1,2 Trichloro 1,2,2 Trifluoroethane
30) Trichloroethylene
31) Trichlorofluoromethane
32) Xylene (Total)

☑ 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_____

Title _____ Date _____

FORM # OES-78B

GENERATOR COPY

LINE E-4

Are all land disposal restriction forms and FINAL SIGNED hazardous waste manifests retained for 3 years?
6 CCR 1007-3, sections 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 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.

A copy of the hazardous waste manifest with the signature of the owner or operator of the designated treatment, storage, and disposal facility must be received by the generating facility within 45 days of shipping. 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 the treatment, storage, and disposal facility. It is your responsibility to follow up on your hazardous waste shipments and ensure they are properly disposed of. If you have not received this signature of receipt within a couple of weeks, call your treatment, storage and disposal facility and inquire about your waste shipment. 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 records. Additionally, best management practices would dictate that all personnel receive refresher training for all hazardous waste activities in which they are involved at least annually. New employees would benefit from training prior to engaging in any handling or managing of hazardous wastes.

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 Standard (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 surface coating business, personnel who should be trained include, but are not be limited to:

- Painters who mix paint and place paint waste and solvent into hazardous waste containers.
- 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 employee 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 facility. However, managers and employees who sign hazardous waste manifests require training that is more specific. The following example includes a training roster you could use to conduct a lunch hour hazardous waste training showing topics of discussion. 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:

- 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
- 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)

In a surface coating business, the emergency coordinator is usually the owner or a manager. There must be at least one emergency coordinator 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.
- In the event of fire, explosion, or any other incident that 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:

- The name and telephone number of the emergency coordinator.
- The telephone number of the fire department unless the facility has a direct alarm.
- The location of fire extinguishers, spill control materials and, if present, the location of the fire alarm. (You may use a map of your facility in meeting this requirement.)

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 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 response 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 system (can be verbal) or (in a large facility) an 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.
- 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 surface coating businesses. 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.

Example of multiple violations – inadequate aisle space, no "Hazardous Waste" labels, and containers in poor condition.

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.

In a surface coating business, hazardous waste containers that are stored outside can become damaged due to weathering. Also, hazardous waste containers are occasionally placed in pathways where cars are moved, for example at the corners of buildings or in parking lots against fences. If these containers are hit, the damage can cause leaking and releases of hazardous waste to the environment. Hazardous waste containers stored outside need to be stored in a way that prevents damage. Also, if they are stored outside on gravel or dirt, the Division suggests that the hazardous waste containers be placed in secondary containment. If the containers are on asphalt or concrete floor areas, the floor surfaces should not have cracks or floor drains.

Leaking containers and storage method have caused a release to the ground.

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 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 Surface Coating Businesses

Typical Hazardous Waste Streams Produced by Surface Coating Shops

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

Educational and Vocational Shops
Computer Monitors, 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

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

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

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

Typical Hazardous Waste Streams and 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
Hydrochloric Acid
Nitric Acid
Oleum
Phosphoric Acid
Potassium Hydroxide
Sodium Hydroxide
Sulfuric Acid

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, paint wastes, filters from paint booths, waste inks, and other such materials that contain heavy metals/inorganics. The following are some of the TCLP Toxic, which you may generate:

Heavy Metals/Inorganics Waste Stream EPA Hazardous Waste Numbers:

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

Ignitable Wastes:

Ignitable wastes include any flammable liquids, non-liquids, and contained gases with a flash point of less than 140°F, that ignite and burn persistently (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. Some commonly used ignitable compounds are:

Ignitable Waste Stream Waste Codes:

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

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:

Spent Acids D002
Lead Acid Batteries D008, D002

Characteristic for Toxicity:

See 6 CCR 1007-3, section 261.24, Table 1 - Maximum Concentration of Contaminants for the Toxicity Characteristic (TC), for a list of constituents and regulatory levels. Forty TC constituents are listed here, including eight heavy metals, six pesticides, and 26 solvents and other organics.

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):

Solvents Waste Stream Waste Codes:

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

Reactives:

Reactive wastes are not likely to be generated from a typical surface coating facility. 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	Organic Peroxides D003	Hypochlorites D003
Chromic Acid D003	Perchlorates D003	Sulfides D003
Cyanides D003	Permanganates D003	

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 1st 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 unless at Satellite Accumulation Area	Good Condition, Compatible with Waste, Labeled and Haz. Waste, Aisle Space, Lids, Weekly Inspections & Accumulation Start Date unless 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