



1. PURPOSE

- 1.1 The purpose of this document is to summarize the requirements for Very Small Quantity Generators (VSQGs) at Clayton State University.

2. SCOPE

- 2.1 This document covers assessing generator status, requirements for VSQGs, and episodic generation requirements for VSQGs. Refer to the Hazardous Materials Management Standard Operating Procedures for more information on the management of hazardous materials.

3. DEFINITIONS

- 3.1 **Standard Operating Procedure (SOP):** A set of step-by-step instructions compiled by Clayton State University to help employees carry out complex routine operations.
- 3.2 **Hazardous Waste:** A subset of solid waste (i.e., solid, semi-solid, liquid or contained gaseous material) that may pose a danger to human health and the environment. This type of waste is subject to various handling and disposal requirements.
- 3.3 **Acute Hazardous Wastes:** Wastes from discarded commercial chemical products as listed in [§ 261.33](#) (P-listed wastes).
- 3.4 **Waste Determination:** An accurate determination as to whether a waste material is a hazardous waste in order to ensure wastes are properly managed according to Resource Conservation and Recovery Act (RCRA).
- 3.5 **Hazardous Waste Generation:** Once a chemical or compound is no longer of use and determined to be a waste, a hazardous waste determination is performed. If a chemical or compound is determined to be a hazardous waste, it must be properly managed according to Clayton State Universities Hazardous Materials Management SOP.
- 3.6 **Episodic event** means an activity or activities, either planned or unplanned, that does not normally occur during generator operations, resulting in an increase in the generation of hazardous wastes that exceeds the calendar month quantity limits for the generator's usual category.
- 3.7 **Planned episodic event** means an episodic event that the generator planned and prepared for, including regular maintenance, tank cleanouts, short-term projects, and removal of excess chemical inventory
- 3.8 **Unplanned episodic event** means an episodic event that the generator did not plan or reasonably did not expect to occur, including production process upsets, product recalls, accidental spills, or "acts of nature," such as tornado, hurricane, or flood.



4. ASSESSING GENERATOR STATUS

4.1 Responsibilities

- 4.1.1 The University is responsible for ensuring compliance with these requirements. They are to hire and train their employees in the requirements of their generator status set forth by the Resource Conservation and Recovery Act (RCRA) statute.
- 4.1.2 The Hazardous Materials Manager and individual Laboratory Supervisors are responsible for ensuring compliance with these requirements. They are to train their employees and/ or students in the proper disposal and handling of waste materials to prevent improper regulation of hazardous waste.
- 4.1.3 The Environmental Health and Safety Coordinator and persons delegated in each department (i.e., Art, Biology, Chemistry & Physics, and Facilities Management) that generates hazardous waste are responsible for conducting hazardous waste determinations.
- 4.1.4 The Environmental Health and Safety Coordinator is responsible for maintaining hazardous waste records.

4.2 Generator Status

- 4.2.1 If the campus generates no more than 100 kilograms (kg) or 220 pounds (lbs) of hazardous waste and no more than 1 kg (2.2 lbs) of acute hazardous waste per month, the University is a VSQG.
- 4.2.2 If the campus generates more than 100 kg but less than 1000 kg (2204.6lbs) of hazardous waste and no more than 1 kg of acute hazardous waste per month, the University is a Small Quantity Generator (SQG).
- 4.2.3 If the campus generates more than 1000 kg hazardous waste and/ or more than 1 kg of acute hazardous waste per month, the University is a Large Quantity Generator (LQG).
- 4.2.4 The Hazardous Waste Tracking Tool will be used to assist in the monthly assessment of the University's hazardous waste generator status

5. SUMMARY OF REQUIREMENTS FOR VSQGS [§ 262.14](#)

- 5.1 Identify all hazardous wastes generated on campus in satellite accumulation areas.
- 5.2 Do not store more than 1,000 kg (2,200 lbs) of hazardous waste or 1 kg (2.2 lbs) of acute hazardous waste on campus at any time.
- 5.3 The University must ensure delivery of hazardous waste to an off-site treatment or disposal facility that is one of the following
 - A state or federally regulated hazardous waste treatment, storage, or disposal facility (TSDF).
 - A facility permitted, licensed, or registered by Georgia to manage municipal or industrial solid waste.



- A facility that uses, reuses, or legitimately recycles the waste (or treats the waste prior to use, reuse, or recycling).
- A universal waste handler or destination facility subject to the universal waste requirements of RCRA.

6. EPISODIC GENERATION ([§ 262 SUBPART L.230-233](#))

6.1 A VSQG may maintain its existing generator category for hazardous waste generated during an episodic event provided that the generator complies with the following conditions:

6.1.1 The University is limited to one episodic event per calendar year, unless a petition is granted by the EPA;

a) The petition must include the following:

- i. The reason(s) why an additional episodic event is needed and the nature of the episodic event;
- ii. The estimated amount of hazardous waste to be managed from the event;
- iii. How the hazardous waste is to be managed;
- iv. The estimated length of time needed to complete management of the hazardous waste generated from the episodic event - not to exceed sixty (60) days; and
- v. Information regarding the previous episodic event managed by the generator, including the nature of the event, whether it was a planned or unplanned event, and how the generator complied with the conditions.

6.1.2 Specific notification for planned and unplanned episodic events;

- a) The VSQG must notify EPA no later than thirty (30) calendar days prior to initiating a planned episodic event using EPA Form 8700-12 and the addendum to the Site Identification: Episodic Generator.
- b) In the event of an unplanned episodic event, the generator must notify EPA within 72 hours of the unplanned event via phone, email, or fax and subsequently submit EPA Form 8700-12.
- c) The generator shall include the start date and end date of the episodic event, the reason(s) for the event, types and estimated quantities of hazardous waste expected to be generated as a result of the episodic event, and shall identify a facility contact and emergency coordinator with 24-hour telephone access to discuss the notification submittal or respond to an emergency (procedures found in Clayton State's Hazardous Materials Management Procedure);



- 6.1.3 The VSQG must have an EPA identification number or obtain an EPA identification number using EPA Form 8700-12;
- 6.1.4 A VSQG must accumulate episodic waste in containers:
 - a) In good condition.
 - b) Compatible with the dangerous waste.
 - c) Kept closed except when adding or removing waste.
 - d) Clearly marked or labeled.
- 6.1.5 Containers must be marked or labeled with the following:
 - a) Words "Episodic Hazardous Waste."
 - b) Hazards associated with the waste (ignitable, corrosive, reactive, and/or toxic).
 - c) Episodic event start date.
- 6.1.6 The episodic event hazardous waste must be sent with the hazardous waste manifest off site to a designated facility within sixty (60) calendar days from the start of the episodic event;
- 6.1.7 Records must be maintained for three (3) years from the end date of the episodic event:
 - a) Beginning and end dates of the episodic event;
 - b) A description of the episodic event;
 - c) A description of the types and quantities of hazardous wastes generated during the event;
 - d) A description of how the hazardous waste was managed as well as the name of the RCRA-designated facility that received the hazardous waste;
 - e) Name(s) of hazardous waste transporters; and
 - f) An approval letter from EPA if the generator petitioned to conduct one additional episodic event per calendar year.

ATTACHMENTS/LINKS:

HAZARDOUS WASTE TRACKING TOOL (EXCEL SPREADSHEET IN SEPRATE FILE)
EPA FORM 8700-12
HAZARDOUS MATERIALS MANAGEMENT STANDARD OPERATING PROCEDURES
UNIVERSAL WASTE STANDARD OPERATING PROCEDURES
PCB WASTE STANDARD OPERATING PROCEDURES

EPA Form 8700-12

United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM



1. Reason for Submittal (Select only one.)

<input type="checkbox"/>	Obtaining or updating an EPA ID number for on-going regulated activities (Items 10-17 below) that will continue for a period of time.
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Report for _____ (Reporting Year)
<input type="checkbox"/>	Site was a TSD facility, a reverse distributor, and/or generator of $\geq 1,000$ kg of non-acute hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year (or State equivalent LQG regulations)
<input type="checkbox"/>	Notifying that regulated activity is no longer occurring at this Site
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
<input type="checkbox"/>	Submitting a new or revised Part A (permit) Form

2. Site EPA ID Number

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3. Site Name

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4. Site Location Address

Street Address		
City, Town, or Village		County
State	Country	Zip Code
Latitude	Longitude	<input type="checkbox"/> Use Lat/Long as Primary Address

5. Site Mailing Address

Same as Location Street Address

Street Address		
City, Town, or Village		
State	Country	Zip Code

6. Site Land Type

<input type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input type="checkbox"/> Federal	<input type="checkbox"/> Tribal	<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
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7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

A. (Primary)	C.
B.	D.

EPA ID Number

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8. Site Contact Information

Same as Location Address

First Name	MI	Last Name
Title		
Street Address		
City, Town, or Village		
State	Country	Zip Code
Email		
Phone	Ext	Fax

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner

Same as Location Address

Full Name	Date Became Owner (mm/dd/yyyy)
Owner Type <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
Street Address	
City, Town, or Village	
State	Country
Zip Code	
Email	
Phone	Ext
Fax	
Comments	

B. Name of Site's Legal Operator

Same as Location Address

Full Name	Date Became Operator (mm/dd/yyyy)
Operator Type <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
Street Address	
City, Town, or Village	
State	Country
Zip Code	
Email	
Phone	Ext
Fax	
Comments	

10. Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities

<input type="checkbox"/> Y	<input type="checkbox"/> N	1. Generator of Hazardous Waste—If "Yes", mark only one of the following—a, b, c	
	<input type="checkbox"/>	a. LQG	-Generates, in any calendar month, 1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste (includes quantities imported by importer site); or - Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or - Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.
	<input type="checkbox"/>	b. SQG	100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.
	<input type="checkbox"/>	c. VSQG	Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.
<input type="checkbox"/> Y	<input type="checkbox"/> N	2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section. <i>Note: If "Yes", you MUST indicate that you are a Generator of Hazardous Waste in Item 10.A.1 above.</i>	
<input type="checkbox"/> Y	<input type="checkbox"/> N	3. Treater, Storer or Disposer of Hazardous Waste—Note: Part B of a hazardous waste permit is required for these activities.	
<input type="checkbox"/> Y	<input type="checkbox"/> N	4. Receives Hazardous Waste from Off-site	
<input type="checkbox"/> Y	<input type="checkbox"/> N	5 Recycler of Hazardous Waste	
	<input type="checkbox"/>	a. Recycler who stores prior to recycling	
	<input type="checkbox"/>	b. Recycler who does not store prior to recycling	
<input type="checkbox"/> Y	<input type="checkbox"/> N	6. Exempt Boiler and/or Industrial Furnace—If "Yes", mark all that apply.	
	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption	
	<input type="checkbox"/>	b. Smelting, Melting, and Refining Furnace Exemption	

B. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g. D001, D003, F007, U112). Use an additional page if more spaces are needed.

C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes. Please list the waste codes of the State hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

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11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.)**A. Other Waste Activities**

<input type="checkbox"/> Y <input type="checkbox"/> N	1. Transporter of Hazardous Waste—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input type="checkbox"/> N	2. Underground Injection Control
<input type="checkbox"/> Y <input type="checkbox"/> N	3. United States Importer of Hazardous Waste
<input type="checkbox"/> Y <input type="checkbox"/> N	4. Recognized Trader—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter
<input type="checkbox"/> Y <input type="checkbox"/> N	5. Importer/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Importer
<input type="checkbox"/>	b. Exporter

B. Universal Waste Activities

<input type="checkbox"/> Y <input type="checkbox"/> N	1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If “Yes” mark all that apply. Note: Refer to your State regulations to determine what is regulated.
<input type="checkbox"/>	a. Batteries
<input type="checkbox"/>	b. Pesticides
<input type="checkbox"/>	c. Mercury containing equipment
<input type="checkbox"/>	d. Lamps
<input type="checkbox"/>	e. Aerosol Cans
<input type="checkbox"/>	f. Other (specify) _____
<input type="checkbox"/>	g. Other (specify) _____
<input type="checkbox"/> Y <input type="checkbox"/> N	2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

<input type="checkbox"/> Y <input type="checkbox"/> N	1. Used Oil Transporter—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Transporter
<input type="checkbox"/>	b. Transfer Facility (at your site)
<input type="checkbox"/> Y <input type="checkbox"/> N	2. Used Oil Processor and/or Re-refiner—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Processor
<input type="checkbox"/>	b. Re-refiner
<input type="checkbox"/> Y <input type="checkbox"/> N	3. Off-Specification Used Oil Burner
<input type="checkbox"/> Y <input type="checkbox"/> N	4. Used Oil Fuel Marketer—If “Yes”, mark all that apply.
<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
<input type="checkbox"/>	b. Marketer Who First Claims the Used Oil Meets the Specifications

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D. Pharmaceutical Activities

<input type="checkbox"/> Y <input type="checkbox"/> N	1. Operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals—if “Yes”, mark only one. Note: See the item-by-item instructions for definitions of healthcare facility and reverse distributor.
<input type="checkbox"/>	a. Healthcare Facility
<input type="checkbox"/>	b. Reverse Distributor
<input type="checkbox"/> Y <input type="checkbox"/> N	2. Withdrawing from operating under 40 CFR Part 266, Subpart P for the management of hazardous waste pharmaceuticals. Note: You may only withdraw if you are a healthcare facility that is a VSQG for all of your hazardous waste, including hazardous waste pharmaceuticals.

12. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262, Subpart K.

<input type="checkbox"/> Y <input type="checkbox"/> N	A. Opting into or currently operating under 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories— If “Yes”, mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.
<input type="checkbox"/>	1. College or University
<input type="checkbox"/>	2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/>	3. Non-profit Institute that is owned by or has a formal written affiliation with a college or university
<input type="checkbox"/> Y <input type="checkbox"/> N	B. Withdrawing from 40 CFR Part 262, Subpart K for the management of hazardous wastes in laboratories.

13. Episodic Generation

<input type="checkbox"/> Y <input type="checkbox"/> N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If “Yes”, you must fill out the Addendum for Episodic Generator.
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14. LQG Consolidation of VSQG Hazardous Waste

<input type="checkbox"/> Y <input type="checkbox"/> N	Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If “Yes”, you must fill out the Addendum for LQG Consolidation of VSQG hazardous waste.
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15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

<input type="checkbox"/> Y <input type="checkbox"/> N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
A. <input type="checkbox"/> Central Accumulation Area (CAA) or <input type="checkbox"/> Entire Facility	
B. Expected closure date: _____ mm/dd/yyyy	
C. Requesting new closure date: _____ mm/dd/yyyy	
D. Date closed : _____ mm/dd/yyyy	
<input type="checkbox"/> 1. In compliance with the closure performance standards 40 CFR 262.17(a)(8)	
<input type="checkbox"/> 2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)	

16. Notification of Hazardous Secondary Material (HSM) Activity

<input type="checkbox"/> Y <input type="checkbox"/> N	Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), (25), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
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17. Electronic Manifest Broker

<input type="checkbox"/> Y <input type="checkbox"/> N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?
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18. Comments (include item number for each comment)

19. Certification I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last)	Title
Email	

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last)	Title
Email	

12 empty boxes for EPA ID Number

ADDENDUM TO THE SITE IDENTIFICATION FORM:
NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY



ONLY fill out this form if:

- You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under 40 CFR 260.30, 261.4(a)(23), (24), (25), or (27) (or state equivalent); See https://www.epa.gov/hw/where-2018-definition-solid-waste-rule-effect for a list of eligible states; AND
You are or will be managing excluded HSM in compliance with 40 CFR 260.30, 261.4(a)(23), (24), (25), or (27) (or state equivalent) or have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section. Note: If your facility was granted a solid waste variance under 40 CFR 260.30 prior to July 13, 2015, your management of HSM under 40 CFR 260.30 is grandfathered under the previous regulations and you are not required to notify for the HSM management activity excluded under 40 CFR 260.30.

1. Reason for Notification (Include dates where requested)
2. Description of Excluded HSM Activity. Please list the appropriate codes (see Code List section of the instructions) and quantities, in short tons, to describe your excluded HSM activity ONLY (do not include any information regarding your hazardous wastes). Use additional pages if more space is needed.

Table with 5 columns: A. Facility Code, B. Waste Code(s) for HSM, C. Estimate Short Tons of excluded HSM to be managed annually, D. Actual Short Tons of excluded HSM that was managed during the most recent odd-numbered year, E. Land-based Unit Code

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**ADDENDUM TO THE SITE IDENTIFICATION FORM:
EPISODIC GENERATOR**



ONLY fill out this form if:

- You are an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves the generator to a higher generator category pursuant to 40 CFR 262 Subpart L. Note: Only one planned and one unplanned episodic event are allowed within one year; otherwise, you must follow the requirements of the higher generator category. Use additional pages if more space is needed.

Episodic Event	
1. Planned <input type="checkbox"/> Excess chemical inventory removal <input type="checkbox"/> Tank cleanouts <input type="checkbox"/> Short-term construction or demolition <input type="checkbox"/> Equipment maintenance during plant shutdowns <input type="checkbox"/> Other _____	2. Unplanned <input type="checkbox"/> Accidental spills <input type="checkbox"/> Production process upsets <input type="checkbox"/> Product recalls <input type="checkbox"/> "Acts of nature" (Tornado, hurricane, flood, etc.) <input type="checkbox"/> Other _____
3. Emergency Contact Phone	4. Emergency Contact Name
5. Beginning Date _____ (mm/dd/yyyy)	6. End Date _____ (mm/dd/yyyy)

Waste 1

7. Waste Description	8. Estimated Quantity (in pounds)				
9. Federal and/or State Hazardous Waste Codes					

Waste 2

7. Waste Description	8. Estimated Quantity (in pounds)				
9. Federal and/or State Hazardous Waste Codes					

Waste 3

7. Waste Description	8. Estimated Quantity (in pounds)				
9. Federal and/or State Hazardous Waste Codes					

EPA ID Number

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**ADDENDUM TO THE SITE IDENTIFICATION FORM:
LQG CONSOLIDATION OF VSQG HAZARDOUS WASTE**

**ONLY fill out this form if:**

- You are an LQG receiving hazardous waste from VSQGs under the control of the same person. Use additional pages if more space is needed.

VSQG 1		
1. EPA ID Number (if assigned)	2. Name	
3. Street Address		
4. City, Town, or Village	5. State	6. Zip Code
7. Contact Phone Number	8. Contact Name	
9. Email		

VSQG 2		
1. EPA ID Number (if assigned)	2. Name	
3. Street Address		
4. City, Town, or Village	5. State	6. Zip Code
7. Contact Phone Number	8. Contact Name	
9. Email		

VSQG 3		
1. EPA ID Number (if assigned)	2. Name	
3. Street Address		
4. City, Town, or Village	5. State	6. Zip Code
7. Contact Phone Number	8. Contact Name	
9. Email		

EPA ID Number

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United States Environmental Protection Agency
HAZARDOUS WASTE REPORT _____ (reporting cycle)
WASTE GENERATION AND MANAGEMENT (GM) FORM



1. Waste Characteristics

A. Waste Description						
B. EPA Hazardous Waste Code(s)						
C. State Hazardous Waste Code(s)						
D. Source Code	Management Method (G25)			Country Code (G62)		
E. Form Code	F. Waste Minimization Code			G. Radioactive Mixed <input type="checkbox"/> Y <input type="checkbox"/> N		
H. Quantity	UOM	Density			<input type="checkbox"/> lbs/gal <input type="checkbox"/> sg	

2. On-site Generation and Management of Hazardous Waste

<input type="checkbox"/> Y <input type="checkbox"/> N	Was any of this waste that was generated at this facility treated, disposed, and/or recycled on-site? If yes, continue to On-site Process System 1.	
Process System 1	Management Method Code	Quantity
Process System 2	Management Method Code	Quantity

3. Off-site Shipment of Hazardous Waste

<input type="checkbox"/> Y <input type="checkbox"/> N	A. Was any of this waste that was generated at this facility shipped off-site for treatment, disposal, or recycling? If yes, continue to Site 1.	
Site 1		
B. EPA ID of facility to which waste was shipped	C. Management Method Code	D. Total Quantity Shipped
Site 2		
B. EPA ID of facility to which waste was shipped	C. Management Method Code	D. Total Quantity Shipped
Site 3		
B. EPA ID of facility to which waste was shipped	C. Management Method Code	D. Total Quantity Shipped

4. Comments

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EPA ID Number

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United States Environmental Protection Agency
 HAZARDOUS WASTE REPORT _____ (reporting year)
 WASTE RECEIVED FROM OFF-SITE (WR) FORM



1. Waste 1

A. Waste Description						
B. EPA Hazardous Waste Code(s)						
C. State Hazardous Waste Code(s)						
D. EPA ID Number			E. Form Code		F. Management Code	
G. Quantity	UOM		Density			<input type="checkbox"/> lbs/gal <input type="checkbox"/> sg

2. Waste 2

A. Waste Description						
B. EPA Hazardous Waste Code(s)						
C. State Hazardous Waste Code(s)						
D. EPA ID Number			E. Form Code		F. Management Code	
G. Quantity	UOM		Density			<input type="checkbox"/> lbs/gal <input type="checkbox"/> sg

3. Waste 3

A. Waste Description						
B. EPA Hazardous Waste Code(s)						
C. State Hazardous Waste Code(s)						
D. EPA ID Number			E. Form Code		F. Management Code	
G. Quantity	UOM		Density			<input type="checkbox"/> lbs/gal <input type="checkbox"/> sg

4. Comments

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EPA ID Number

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United States Environmental Protection Agency
HAZARDOUS WASTE REPORT
OFF-SITE IDENTIFICATION (OI) FORM



1. Site 1

A. EPA ID Number of Off-site Installation or Transporter		
B. Name of Off-site Installation or Transporter		
C. Handler Type (mark all that apply) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input type="checkbox"/> Receiving Facility		
D. Address of Off-site Installation		
Street Address		
City, Town, or Village		
State	Zip Code	Country

2. Site 2

A. EPA ID Number of Off-site Installation or Transporter		
B. Name of Off-site Installation or Transporter		
C. Handler Type (mark all that apply) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input type="checkbox"/> Receiving Facility		
D. Address of Off-site Installation		
Street Address		
City, Town, or Village		
State	Zip Code	Country

3. Site 3

A. EPA ID Number of Off-site Installation or Transporter		
B. Name of Off-site Installation or Transporter		
C. Handler Type (mark all that apply) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input type="checkbox"/> Receiving Facility		
D. Address of Off-site Installation		
Street Address		
City, Town, or Village		
State	Zip Code	Country

4. Comments

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EPA ID Number

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT PART A FORM



1. Facility Permit Contact

First Name	MI	Last Name
Title		
Email		
Phone	Ext	Fax

2. Facility Permit Contact Mailing Address

Street Address		
City, Town, or Village		
State	Country	Zip Code

3. Facility Existence Date (mm/dd/yyyy)

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4. Other Environmental Permits

A. Permit Type	B. Permit Number												C. Description		

5. Nature of Business

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**HAZARDOUS MATERIALS
MANAGEMENT STANDARD OPERATING
PROCEDURES**



1. PURPOSE

- 1.1 The purpose of this document is to assist with management of hazardous waste from activities conducted at Clayton State University. Work areas that generate hazardous waste include Art Department, Biology Department, Chemistry & Physics Department, and Facilities Management.

2. SCOPE

- 2.1 This procedure covers handling and disposal of hazardous waste. Clayton State University locations will be required to follow the requirements of this procedure.

3. MATERIAL & SAFETY

- 3.1 Safety Data Sheet(s) for hazardous material(s).
- 3.2 Satellite Accumulation Area (SAA) Monthly Tracking Sheet
- 3.3 Personal Protective Equipment (PPE)

4. DEFINITIONS

- 4.1 **Standard Operating Procedure (SOP):** A set of step-by-step instructions compiled by Clayton State University to help employees carry out complex routine operations.
- 4.2 **Hazardous Waste:** A subset of solid waste (i.e., solid, semi-solid, liquid or contained gaseous material) that may pose a danger to human health and the environment. This type of waste is subject to various handling and disposal requirements.
- 4.3 **Central Accumulation Area:** Designated area where waste is kept once it is removed from satellite area and is awaiting shipment for treatment and disposal.
- 4.4 **Satellite Accumulation Area:** Location near the point of waste generation where hazardous waste is initially accumulated prior to consolidation at the central accumulation area.
- 4.5 **Very Small Quantity Generators (VSQG):** Facilities that generate less than 100 kilograms (approximately 220 pounds) of non-acute hazardous waste and less than 1 kilogram (approximately 2.2 pounds) of acute hazardous waste.
- 4.6 **RCRA Empty:** A container or an inner liner removed from a container holding nonacute hazardous waste is empty when:
- Wastes have been removed using practices commonly employed industry-wide to remove wastes from containers or liners, such as pouring, pumping, aspirating, and draining (§261.7(b)(1)(i)), and
 - No more than 1 inch of material remains in the container or liner (§261.7(b)(1)(ii)), or
 - No more than 3 percent by weight of the container remains for containers with a capacity of 110 gallons or less, and no more than 0.3 percent by weight remains for containers with a capacity greater than 110 gallons (§261.7(b)(1)(iii)).



5. PROCEDURE

5.1 Responsibilities

- 5.1.1 University staff, lab managers, and supervisors are responsible for ensuring compliance with this procedure. Managers and supervisors are to train their employees in the proper disposal and handling of waste materials to prevent improper regulation of hazardous waste.
- 5.1.2 Managers and supervisors are responsible for conducting hazardous waste determinations.
- 5.1.3 Environmental Health & Safety Coordinator is responsible for maintaining hazardous waste records.
- 5.1.4 Employees that handle or manage hazardous waste are considered a hazardous waste employee and are subject to Federal and State hazardous Waste regulations.
- 5.1.5 Best practice is for each hazardous waste employee to receive initial hazardous training within 6 months of hire prior to beginning work with hazardous waste. Best practice is that employees are allowed to work with hazardous waste prior to receiving initial hazardous waste training only if they are actively supervised by an employee who has received hazardous waste training.
- 5.1.6 University staff, lab managers, and supervisors are responsible for managing hazardous chemicals and waste properly to prevent pollution, minimize waste and protect human health.
- 5.1.7 University staff, lab managers, and supervisors are responsible for knowing lab safety precautions, and safety equipment (Safety Data Sheets, eyewashes, personal protective equipment, etc.).

6. HAZARDOUS WASTE GENERATION

- 6.1 Proper hazardous waste management begins with accurate characterization of wastes and proper packaging, labeling, and storing of characterized waste. Chemical wastes must be properly identified and documented to prevent the generation of unknown wastes that can potentially be harmful to humans and the environment.
- 6.2 Every employee who handles or manages hazardous waste is responsible for proper management of wastes.
- 6.3 Every effort should be made to minimize the amount of hazardous waste generated.

7. HAZARDOUS WASTE IDENTIFICATION

- 7.1 Hazardous waste determinations shall be conducted by university staff, managers and supervisors as defined in section 5.1.1 above. Hazardous waste determinations shall be documented and retained as described in section 13.2



- 7.2 LISTED HAZARDOUS WASTES - Solid waste is considered hazardous if it appears on one of the four lists identified the federal regulations at 40 CFR Part 261 and in the Georgia state regulations at [Subject 391-3-11](#).
- 7.2.1 F listed hazardous wastes are wastes from non-specific sources and certain industrial or manufacturing processes.
- 7.2.2 K listed hazardous wastes are wastes from a specific industry or source such as wastewater treatment sludge from the production of chrome yellow and orange pigments.
- 7.2.3 P and U listed hazardous wastes are unused off-specification or discarded commercial chemical products, or:
- a) Any residue remaining in a container that held commercial chemical products in the P or U listing, unless the container is empty, or
 - b) Any residue or contaminated media resulting from the cleanup of a spill of a commercial chemical product in the P or U listing, or
 - c) Any unused formulation containing one or more active ingredients appearing on the P or U list.
- 7.3 CHARACTERISTIC WASTE – If waste does not appear on one of the hazardous waste lists, it still might be considered hazardous if it demonstrates one or more of the following characteristics:
- 7.3.1 **Ignitability:** (EPA hazardous waste No. D001)
- a) Liquids with a flashpoint less than 140F.
 - b) Non-liquids that can cause a fire that burns so vigorously that it creates a hazard.
 - c) An ignitable compressed gas.
 - d) Oxidizer as defined by the U.S. Department of Transportation.
- 7.3.2 **Corrosivity:** (EPA hazardous waste No. D002)
- a) Liquid with pH < 2 or pH >12.5
 - b) Liquid that dissolves steel
- 7.3.3 **Reactivity:** (EPA hazardous waste No. D003)
- a) Unstable or explosive
 - b) Undergoes rapid or violent chemical reaction.
 - c) Reacts violently with water, forms potentially explosive mixtures with water or produces toxic gases, vapors or fumes when mixed with water.



- d) Cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors or fumes.

7.3.4 **Toxicity:** (EPA hazardous waste No. D004)

- a) It is a metal, pesticide, herbicide organic chemical at a concentration that exceeds its regulatory limit using the Toxicity Characteristic Leaching Procedure constituents into groundwater, potentially contaminating drinking water supplies.

8. HAZARDOUS WASTE LABELING

HAZARDOUS WASTE CONTAINER

CLAYTON STATE UNIVERSITY

DEPARTMENT: CHEMISTRY & PHYSICS BUILDING: MAG ROOM #: 178
CONTACT #: 678-466-4868 ACCUMULATION START DATE: _____

EXPERIMENT: 1151 – ATMOSPHERIC PRESSURE

COMPOSITION OF WASTE: (Please list ALL chemicals and % composition, including water.)
DO NOT USE ACRONYMS OR ABBREVIATIONS!

CHEMICAL NAME	%COMPOSITION
12M Hydrochloric acid	10%
Water	90%
TOTAL	100%
pH	
HAZARD CLASS	
FLAMMABLE <input type="checkbox"/> TOXIC <input type="checkbox"/> CORROSIVE <input checked="" type="checkbox"/> OXIDIZER <input type="checkbox"/> REACTIVE <input type="checkbox"/> NONHAZARDOUS <input type="checkbox"/>	

- 8.1 Containers used to store wastes at Satellite Accumulation Areas (SAAs) in the work areas that generate hazardous waste (i.e., Art Department, Biology Department, Chemistry & Physics Department, and Facilities Management) must be labeled with a written description of waste material, a description of the primary hazard, (i.e., Flammable), and the words “Hazardous Waste.” See the example below:
- 8.2 Containers used to store wastes at the central accumulation area must be labeled with a written description of waste material, a description of the primary hazard, (i.e., Flammable), the words “Hazardous Waste,” and the accumulation start date.



- 8.2.1 The accumulation start date begins when the full waste container is moved from an SAA to the CAA, or on the date where hazardous waste is first added to an empty container already at the CAA.

The image above shows the hazardous waste label used by Clayton State University. These labels can be obtained by the Laboratory Manager or Environmental Health & Safety Coordinator.

9. HAZARDOUS WASTE PACKAGING

- 9.1 First major step of waste disposal process involves obtaining a suitable container. The following may be used to help select a container:
 - 9.1.1 Use plastic or glass containers compatible with the waste. Incompatible containers shall not be used.
 - 9.1.2 Containers must have a secure cap and remain closed at all times unless waste is being actively added to the container.
 - 9.1.3 Empty containers in which the same chemicals were supplied are typically adequate.
 - 9.1.4 Containers must be clean and free of residue that might react with waste.
 - 9.1.5 Container must be in good condition – DO NOT USE rusted, dented, or otherwise damaged or degraded containers.
 - 9.1.6 Do not use beakers, or other labware, coffee cans, plastic milk jugs, soda bottles, or any container that resembles a drinking glass, cup, or coffee mug, etc.
 - 9.1.7 Do not use rubber stoppers, corks, or glass stoppers.
 - 9.1.8 Supervisory personnel will assist with container selection for new waste streams.
- 9.2 Each container must contain only compatible wastes. Segregate waste containers according to chemical compatibility. Flammables, oxidizers, reactive materials, corrosive acids and bases must be stored separately from one another. Reactive and ignitable wastes must be protected from sources of reaction and/or ignition and be grounded.
- 9.3 Metal waste containers containing flammable liquid waste must be bonded to the receiving metal waste container when the flammable liquid waste is being transferred to protect against static discharge.
- 9.4 Secondary containment may be used, as necessary.
- 9.5 Keep all containers CLOSED when material is not being actively added to them. This helps prevent spills, leaks, fires, and the release of fumes.
- 9.6 For RCRA empty containers:
 - 9.6.1 Do not reuse containers that formerly contained P-listed wastes.
 - 9.6.2 If container will be reused for disposal of a hazardous waste:



- a) Reuse the container only with compatible or waste.
- b) Remove or cross-out original label.
- c) Clearly re-label the container as hazardous waste, a description of the waste, along with its hazardous characteristic(s).

9.6.3 If the container previously held a hazardous chemical or waste and will not be reused:

- a) Complete draining of the contents of the container for its original use.
- b) Triple-rinse the container with water or an appropriate solvent. Rinse solvent requires collection as hazardous waste.
- c) Remove or permanently mark over the old label.
- d) Mark container as rinsed and safe for disposal then dispose properly.
- e) Another option for container disposal that held a hazardous chemical or waste is disposal through the waste vendor as hazardous waste with the regular offsite shipments

10. SATELLITE ACCUMULATION AREAS

- 10.1 Hazardous waste must be accumulated at or near the point of generation, also referred as satellite accumulation areas (SAA).
- 10.2 SAAs should be in a secure location under the control of the generator. Waste containers and secondary containment containers should be positioned so that they do not block vents and potentially inhibit proper airflow, nor should they block emergency egress paths.
- 10.3 Inspected monthly and logged:
 - 10.3.1 Each container labeled as "HAZARDOUS WASTE"
 - 10.3.2 Labeled with a description of the hazardous waste material
 - 10.3.3 Labeled with an indication of hazards posed by container's contents
 - 10.3.4 In secondary spill containment
 - 10.3.5 Closed and not leaking, if not used.
 - 10.3.6 Segregated by compatibility.
 - 10.3.7 No more than 55 gallons total, per SAA.
 - 10.3.8 Containers are maintained in good condition. If not, the contents are to be transferred to another container in good condition.



10.3.9 No more than one quart of pure, acutely toxic material (see EPA "P" listed wastes in [40 CFR Section 261.33](#) or contact the Environmental Health and Safety Coordinator for P-listed chemical utilized on campus.)

10.4 Prior to the accumulation of 55 gallons of hazardous waste or one quart of acute hazardous waste is exceeded in the SAA, the waste must be moved to the central hazardous waste accumulation area (CAA) and marked with the date it was moved to the CAA.

11. CENTRAL ACCUMULATION AREAS

11.1 A hazardous waste CAA is not being currently utilized at Clayton State University. If a CAA is needed at a later date, the following requirements will be followed. All accumulated wastes are stored at the CAA or consolidated from the SAA prior to being shipped off-site for disposal.

11.2 The current inventory of wastes collected is maintained and proper labeling and segregation techniques are to be employed.

11.2.1 All waste containers in the CAA must be marked and labeled with the words "Hazardous Waste", a description of the waste material, an indication of the hazards, and the accumulation start date (i.e., the date the container was moved to the CAA).

11.2.2 Segregation of incompatible wastes and storage of waste in compatible containers.

11.2.3 Containers holding ignitable or reactive waste must be located at least 50 feet from the property line unless written approval has been received from the fire department to store it closer. The waste must be separated and protected from sources of ignition or reaction.

11.2.4 Containers are in good condition and kept closed except when adding or removing wastes.

11.2.5 Adequate aisle space between containers is maintained.

11.3 Monthly inspections of the CAA are to be conducted and documented. This includes, but not limited to looking for leaks, deterioration, compatibility with the hazardous waste accumulated inside the container, whether they are closed, whether they are properly marked and labeled, that ignitable and reactive wastes are stored safely, and that incompatible wastes are kept separated.

11.3.1 Monthly inspections of the CAA are documented using the Hazardous Waste Inspection Log.

11.4 **Hazardous wastes shall not be stored in the CAA for more than the 270-day period.** Documentation must show that waste in the area is stored for less than 270 days.

12. EMERGENCY RESPONSE

12.1 Fire or Explosion Response



12.1.1 If You Discover Fire or Smoke Remember: R.A.C.E.

- a) Rescue: Remove anyone from immediate danger.
- b) Alarm: Activate the nearest fire alarm pull station and contact University Police.
- c) Contain: Close all doors to confine smoke and fire.
- d) Extinguish/Evacuate: If the fire is small, and you have been trained in fire extinguisher use, you can attempt to extinguish a fire. Otherwise follow your Evacuation Plan and proceed to the nearest exit and designated area outside the building

12.1.2 If You Catch Fire, Do Not Run!

- a) Stop where you are, and
- b) Drop to the ground, and
- c) Roll over and over to smother flames.

12.1.3 Response to Fire Alarms or Explosion

- a) Remain calm.
- b) Evacuate and stay with your class or office group.
- c) Notify University Police.
- d) Remember to take your class roster with you to the designated area.
- e) Once you have reached the designated area, report any missing person to University Police.
- f) Only return to the building when directed by University Police.

12.1.4 Evacuation Reminders

- a) If leaving a room, feel the door with the back of your hand before opening it. Do not open any door that feels hot.
- b) Do not return to your area for personal belongings.
- c) If smoke is present, stay low. The best quality air is near the floor.
- d) Use the stairway or horizontal exit to evacuate.
- e) DO NOT USE ELEVATORS!
- f) Consider individuals with disabilities who may need assistance evacuating.
- g) Individuals with disabilities should exit to the next building or outside by horizontal egress (when available) or otherwise to stairway landing (considered an area of refuge).
- h) Notify University Police of any missing person and where they were last seen.
- i) Never allow the fire to come between you and the exit.
- j) University Police responds to all fire alarm* signals.

*The building alarm rings only locally inside the building - report emergencies to University Police.



12.1.5 If You are Trapped In Your Office or Classroom

- a) Wedge wet towels or cloth materials along the bottom of the door to keep out smoke.
- b) Try to close as many doors between you and the fire as possible.
- c) Use the telephone to notify 9-1-1 and University Police of your problem and location.
- d) Be prepared to signal your location through the window.
- e) Do not open or break windows unless necessary to alert emergency personnel to your location or to escape.

12.2 Spill Response

12.2.1 In the event of a spill, first contain the spill to minimize the impact of the spill. Ensure the spillage is communicated to others in the area. Immediately notify others working in the area and any supervisory personnel of the hazard, and if the situation warrants, evacuate the area.

- a) Notify supervisory contact or Director at (303-229-7746) to provide information regarding a spill event. Provide any of the following information:
 - (a) Material spilled and quantity.
 - (b) If radioactive or infectious agents are involved.
 - (c) Other hazardous conditions that might exist in area.
 - (d) Damages or injuries of spill.
 - (e) Time and cause of spill.
 - (f) Actions taken.
- b) The supervisory contact or director will lead and coordinate the spill clean-up activities and evaluate if a third-party team will be required to perform clean-up activities.

12.2.2 Wear appropriate PPE to help avoid breathing vapors and reduce contact with chemicals.

12.2.3 If it is safe to do so without endangering yourself or others, extinguish incipient stage fires, remove other sources of ignition and isolate incompatible or reactive chemical substances.

12.2.4 If there is an immediate threat to human health, evacuate the area.

12.2.5 Attempt to stop or contain the spill at the source with any absorbent powders or pads if there are no major health or safety hazards.



13. RECORDKEEPING

- 13.1 Very small quantity generators must keep a copy of each final signed manifest for at least 3 years from the date the waste was shipped off-site for disposal. This includes the copy of the manifest that is given to the hazardous waste transporter as well as the copy that is sent back to Clayton State University from the final treatment, storage, and disposal facility.
- 13.2 Records supporting hazardous waste determinations must be maintained for at least 3 years from the date the waste was last shipped off-site for disposal, if applicable.
- 13.2.1 This includes any test results, records used to determine the process that generated the waste, properties of the waste, and the basis of any generator knowledge of the waste as applicable.

14. REFERENCES

- **40 CFR Part 261:** Federal Regulations
- **Subject 391-3-11** Georgia State Regulations

UNIVERSAL WASTE STANDARD OPERATING PROCEDURES



1. PURPOSE

- 1.1 The purpose of this document is to ensure proper management of Universal Waste from activities conducted at Clayton State University. Work areas that generate Universal Waste include Art Department, Biology Department, Chemistry & Physics Department, and Facilities Management.

2. SCOPE

- 2.1 This procedure covers handling and disposal of universal waste. All Clayton State University locations will be required to follow the requirements of this procedure.

3. MATERIAL & SAFETY

- 3.1 Safety Data Sheet(s) for hazardous material(s).
- 3.2 Personal Protective Equipment (PPE)

4. DEFINITIONS

- 4.1 **Standard Operating Procedure (SOP):** A set of step-by-step instructions compiled by Clayton State University to help employees carry out complex routine operations.
- 4.2 **Universal Waste:** Universal Waste means any of the following hazardous wastes that are subject to the Universal Waste requirements of this part 273:

(1) Batteries means a device consisting of one or more electrically connected electrochemical cells which is designed to receive, store, and deliver electric energy. An electrochemical cell is a system consisting of an anode, cathode, and an electrolyte, plus such connections (electrical and mechanical) as may be needed to allow the cell to deliver or receive electrical energy. The term battery also includes an intact, unbroken battery from which the electrolyte has been removed.

(2) Pesticides means any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant, other than any article that:

(a) Is a new animal drug under FFDCA section 201(w), or

(b) Is an animal drug that has been determined by regulation of the Secretary of Health and Human Services not to be a new animal drug, or

(c) Is an animal feed under FFDCA section 201(x) that bears or contains any substances described by paragraph (a) or (b) of this section.

(3) Mercury-containing equipment means a device or part of a device (including thermostats but excluding batteries and lamps) that contains elemental mercury integral to its function.

(4) Lamps also referred to as "Universal Waste lamp" is defined as the bulb or tube portion of an electric lighting device. Examples of common Universal Waste electric lamps include, but are not limited to, fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps.



(5) Aerosol Cans is defined as means a non-refillable receptacle containing a gas compressed, liquefied, or dissolved under pressure, the sole purpose of which is to expel a liquid, paste, or powder and fitted with a self-closing release device allowing the contents to be ejected by the gas.

- 4.3 **Universal Waste Handler:** A generator (as defined in this section) of universal waste; or the owner or operator of a facility, including all contiguous property, that receives universal waste from other universal waste handlers, accumulates universal waste, and sends universal waste to another universal waste handler, to a destination facility, or to a foreign destination.
- 4.4 **Small Quantity Handler of Universal Waste:** A Universal Waste handler (as defined in this section) who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.
- 4.5 **Large Quantity Handler of Universal Waste:** A Universal Waste handler (as defined in this section) who does accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time. This designation as a large quantity handler of universal waste is retained through the end of the calendar year in which the 5,000-kilogram limit is met or exceeded.

5. PROCEDURE

5.1 Responsibilities

- 5.1.1 University staff, lab managers, and supervisors are responsible for compliance with this procedure.
- 5.1.2 Managers and supervisors must inform all employees who handle or have responsibility for managing Universal Waste. The information must describe proper handling and emergency procedures appropriate to the type(s) of Universal Waste handled at the University.
- 5.1.3 Managers and supervisors are responsible for determining when a Universal Waste is accumulated.
- 5.1.4 Environmental Health & Safety Coordinator is responsible for maintaining Universal Waste records. Record of the total annual accumulation should be kept for a minimum of three years.
- 5.1.5 A small quantity handler of universal waste must inform all employees who handle or have responsibility for managing universal waste. The information must describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.
- 5.1.6 Manage Universal Wastes properly to prevent pollution, minimize waste and protect human health.
- 5.1.7 Know lab safety precautions, and safety equipment (Safety Data Sheets, eyewashes, personal protective equipment, etc.).



6. WASTE MANAGEMENT

6.1 Universal Waste batteries must be managed in a way that prevents releases of any Universal Waste or component of a Universal Waste to the environment, as follows:

6.1.1 Universal Waste batteries must be contained and Universal Waste battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container. The container must be closed, structurally sound, compatible with the contents of the battery, and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

6.1.2 Universal Waste handlers may conduct the following activities as long as the casing of each individual battery cell is not breached and remains intact and closed (except that cells may be opened to remove electrolyte but must be immediately closed after removal):

- Sorting batteries by type;
- Mixing battery types in one container;
- Discharging batteries so as to remove the electric charge;
- Regenerating used batteries;
- Disassembling batteries or battery packs into individual batteries or cells;
- Removing batteries from consumer products; or
- Removing electrolyte from batteries.

6.1.3 A small quantity handler of Universal Waste who removes electrolyte from batteries, or who generates other solid waste (e.g., battery pack materials, discarded consumer products) as a result of the activities listed above, must determine whether the electrolyte and/or other solid waste exhibit a characteristic of hazardous waste. Hazardous waste procedures should be followed in the event the waste is determined to be a hazardous waste.

6.2 Universal waste pesticides must be managed in a way that prevents releases of any universal waste or component of a universal waste to the environment. The universal waste pesticides must be contained in one or more of the following:

6.2.1 A container that remains closed, structurally sound, compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions; or

6.2.2 A container that does not meet the requirements of 6.2.1 in this Section, provided that the unacceptable container is overpacked in a container that does meet the requirements of 6.2.1 of this Section; or

6.2.3 A tank that meets the requirements of 40 CFR part 265 subpart J, except for 40 CFR 265.197(c), 265.200, and 265.201; or



- 6.2.4 A transport vehicle or vessel that is closed, structurally sound, compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.
- 6.3 Mercury-containing equipment must be managed in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows:
- 6.3.1 In a container any universal waste mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. The container must be closed, structurally sound, compatible with the contents of the device, must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions, and must be reasonably designed to prevent the escape of mercury into the environment by volatilization or any other means.
- 6.3.2 Handlers of universal waste may remove mercury-containing ampules from universal waste mercury-containing equipment provided the handler:
- Removes and manages the ampules in a manner designed to prevent breakage of the ampules;
 - Removes the ampules only over or in a containment device (e.g., tray or pan sufficient to collect and contain any mercury released from an ampule in case of breakage);
 - Ensures that a mercury clean-up system is readily available to immediately transfer any mercury resulting from spills or leaks from broken ampules from that containment device to a container that meets the requirements of the Hazardous waste procedure;
 - Immediately transfers any mercury resulting from spills or leaks from broken ampules from the containment device to a container that meets the requirements of the Hazardous Waste Procedure;
 - Ensures that the area in which ampules are removed is well ventilated and monitored to ensure compliance with applicable OSHA exposure levels for mercury;
 - Ensures that employees removing ampules are thoroughly familiar with proper waste mercury handling and emergency procedures, including transfer of mercury from containment devices to appropriate containers;
 - Stores removed ampules in closed, non-leaking containers that are in good condition;
 - Packs removed ampules in the container with packing materials adequate to prevent breakage during storage, handling, and transportation;
- 6.3.3 Mercury-containing equipment that does not contain an ampule may remove the open original housing holding the mercury from universal waste mercury-containing equipment provided the handler:



- Immediately seals the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment; and
- Follows all requirements for removing ampules and managing removed ampules under 6.3.2 of this section; and
- A handler of universal waste who removes mercury-containing ampules from mercury-containing equipment or seals mercury from mercury-containing equipment in its original housing must determine whether the following exhibit a characteristic of hazardous waste:

(A) Mercury or clean-up residues resulting from spills or leaks and/or

(B) Other solid waste generated as a result of the removal of mercury-containing ampules or housings (e.g., the remaining mercury-containing device).

If the mercury, residues, and/or other solid waste exhibits a characteristic of hazardous waste, it must be managed in compliance with all applicable requirements of 40 CFR parts 260 through 272. The handler is considered the generator of the mercury, residues, and/or other waste and must manage it in compliance with the Hazardous Waste procedures.

- If the mercury, residues, and/or other solid waste is not hazardous, the handler may manage the waste in any way that is in compliance with applicable federal, state or local solid waste regulations.

6.4 Universal Waste Lamps must be managed in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows:

6.4.1 Lamps must be placed in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

6.4.2 Broken lamps must immediately be cleaned up and placed in a container and must place in a container any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. Containers must be closed, structurally sound, compatible with the contents of the lamps and must lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions.

6.5 Aerosol Cans must be managed in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows:

6.5.1 Universal waste aerosol cans must be accumulated in a container that is structurally sound, compatible with the contents of the aerosol cans, lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions, and is protected from sources of heat.

6.5.2 Universal waste aerosol cans that show evidence of leakage must be packaged in a separate closed container or overpacked with absorbents, or immediately punctured and drained



- 6.5.3 A small quantity handler of universal waste may conduct the following activities as long as each individual aerosol can is not breached and remains intact:
- a) Sorting aerosol cans by type;
 - b) Mixing intact cans in one container; and
 - c) Removing actuators to reduce the risk of accidental release; and
- 6.5.4 A small quantity handler of universal waste who punctures and drains their aerosol cans must recycle the empty punctured aerosol cans and meet the following requirements while puncturing and draining universal waste aerosol cans:
- a) Conduct puncturing and draining activities using a device specifically designed to safely puncture aerosol cans and effectively contain the residual contents and any emissions thereof.
 - b) Establish and follow a written procedure detailing how to safely puncture and drain the universal waste aerosol can (including proper assembly, operation and maintenance of the unit, segregation of incompatible wastes, and proper waste management practices to prevent fires or releases); maintain a copy of the manufacturer's specification and instruction on site; and ensure employees operating the device are trained in the proper procedures.
 - c) Ensure that puncturing of the can is done in a manner designed to prevent fires and to prevent the release of any component of universal waste to the environment. This manner includes, but is not limited to, locating the equipment on a solid, flat surface in a well-ventilated area.
 - d) Immediately transfer the contents from the waste aerosol can or puncturing device, to an appropriate container or tank that meets the applicable requirements of 40 CFR 262.14 through 262.17.
 - e) Conduct a hazardous waste determination on the contents of the emptied aerosol can per 40 CFR 262.11. Any hazardous waste generated as a result of puncturing and draining the aerosol can is subject to all applicable requirements of 40 CFR parts 260 through 272. The handler is considered the generator of the hazardous waste and is subject to 40 CFR part 262.
 - f) If the contents are determined to be nonhazardous, the handler may manage the waste in any way that is in compliance with applicable Federal, state, or local solid waste regulations.
 - g) A written procedure must be in place in the event of a spill or leak and a spill clean-up kit must be provided. All spills or leaks of the contents of the aerosol cans must be cleaned up promptly.



7. LABELING/MARKING

- 7.1 A small quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste as specified below and the accumulation start date for that container:
- 7.1.1 Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste—Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);"
- 7.1.2 A container, (or multiple container package unit), tank, transport vehicle or vessel in which recalled universal waste pesticides as described in 40 CFR 273.3(a)(1) are contained must be labeled or marked clearly with:
- The label that was on or accompanied the product as sold or distributed; and
 - The words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s);"
- 7.1.3 A container, tank, or transport vehicle or vessel in which unused pesticide products as described in 40 CFR 273.3(a)(2) are contained must be labeled or marked clearly with:
- The label that was on the product when purchased, if still legible;
 - If using the labels described in paragraph (c)(1)(i) of this section is not feasible, the appropriate label as required under the Department of Transportation regulation 49 CFR part 172;
 - If using the labels described above is not feasible, another label prescribed or designated by the waste pesticide collection program administered or recognized by a state; and
 - The words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)."
- 7.1.4 Waste mercury-containing equipment (i.e., each device), or a container in which the equipment is contained, must be labeled or marked clearly with any of the following phrases: "Universal Waste—Mercury Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment."
- 7.1.5 Waste mercury-containing thermostat or container containing only universal waste mercury-containing thermostats may be labeled or marked clearly with any of the following phrases: "Universal Waste—Mercury Thermostat(s)," "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)."
- 7.1.6 Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste—Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)".
- 7.1.7 Universal waste aerosol cans (i.e., each aerosol can), or a container in which the aerosol cans are contained, must be labeled or marked clearly with any of the following phrases: "Universal Waste - Aerosol Can(s)," "Waste Aerosol Can(s)," or "Used Aerosol Can(s)".

8. ACCUMULATION TIME LIMITS



- 8.1 A small quantity handler of Universal Waste may accumulate Universal Waste for no longer than one year from the date the universal waste is generated, or received from another handler, unless such activity is solely for the purpose of accumulation of such quantities of Universal Waste as necessary to facilitate proper recovery, treatment, or disposal. However, the handler bears the burden of proving that such activity is solely for the purpose of accumulation of such quantities of Universal Waste as necessary to facilitate proper recovery, treatment, or disposal.
- 8.2 Universal Waste handlers must be able to demonstrate the length of time that the Universal Waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:
 - 8.2.1 Placing the Universal Waste in a container and marking or labeling the container with the earliest date that any Universal Waste in the container became a waste or was received;
 - 8.2.2 Marking or labeling each individual item of Universal Waste (e.g., each battery or thermostat) with the date it became a waste or was received;
 - 8.2.3 Maintaining an inventory system on-site that identifies the date each Universal Waste became a waste or was received;
 - 8.2.4 Maintaining an inventory system on-site that identifies the earliest date that any Universal Waste in a group of waste items or a group of containers of Universal Waste became a waste or was received;
 - 8.2.5 Placing the Universal Waste in a specific accumulation area and identifying the earliest date that any Universal Waste in the area became a waste or was received; or
 - 8.2.6 Any other method which clearly demonstrates the length of time that the Universal Waste has been accumulated from the date it becomes a waste or is received.

9. OFF-SITE SHIPMENTS

- 9.1 A small quantity handler of Universal Waste is prohibited from sending or taking wastes to a place other than another Universal Waste handler, a destination facility, or a foreign destination.
- 9.2 If a small quantity handler of Universal Waste self-transport waste off-site, the handler becomes a Universal Waste transporter for those self-transportation activities and must comply with the transporter requirements of 40 CFR part 273 (Subpart D – Standards for Universal Waste Transporters) while transporting the Universal Waste.
- 9.3 If a Universal Waste being offered for off-site transportation meets the definition of hazardous materials under 49 CFR parts 171 through 180, a small quantity handler of Universal Waste must package, label, mark and placard the shipment, and prepare the proper shipping papers in accordance with the applicable Department of Transportation regulations under 49 CFR parts 172 through 180;
- 9.4 Prior to sending a shipment of Universal Waste to another Universal Waste handler, the originating handler must ensure that the receiving handler agrees to receive the shipment.
- 9.5 If a shipment of Universal Waste is sent to another handler or to a destination facility and the shipment is rejected by the receiving handler or destination facility, the originating handler must either:



- 9.5.1 Receive the waste back when notified that the shipment has been rejected, or
- 9.5.2 Agree with the receiving handler on a destination facility to which the shipment will be sent.

10. EMERGENCY RESPONSE

- 10.1 A small quantity handler of universal waste must immediately contain all releases of universal wastes and other residues from universal wastes.
- 10.2 A small quantity handler of Universal Waste must determine whether any material resulting from the release is hazardous waste, and if so, must manage the hazardous waste in compliance with all applicable requirements of the Hazardous Waste procedures.

11. RECORDKEEPING

- 11.1 A small quantity handler of universal waste is not required to keep records of shipments of universal waste.
- 11.2 Record of the total annual accumulation should be kept for a minimum of three years.

12. REFERENCES

- **40 CFR Part 273:** Federal Regulations

PCB WASTE STANDARD OPERATING PROCEDURES



1. PURPOSE

- 1.1 The purpose of this document is to ensure proper management of PCB ballast from activities conducted at Clayton State University. Work areas that generate PCB ballast waste include Facilities Management.

2. SCOPE

- 2.1 This procedure covers handling and disposal of waste PCB ballasts. All Clayton State University locations will be required to follow the requirements of this procedure.

3. MATERIAL & SAFETY

- 3.1 Safety Data Sheet(s) for hazardous material(s).
- 3.2 Personal Protective Equipment (PPE)

4. DEFINITIONS

- 4.1 **Standard Operating Procedure (SOP):** A set of step-by-step instructions compiled by Clayton State University to help employees carry out complex routine operations.
- 4.2 **Polychlorinated biphenyls (PCBs):** PCBs were domestically manufactured from 1929 until fabrication was banned in 1979 by the Toxic Substances Control Act (TSCA), with some products and processes excluded from the ban by regulation. PCBs were used extensively as coolants in hydraulic systems and as dielectric fluids in electrical equipment as well as many other applications. PCBs have been identified as probable human carcinogens and cause a variety of non-cancer health effects as well.
- 4.3 **Fluorescent light ballast:** means a device that electrically controls fluorescent light fixtures and that includes a capacitor containing 0.1 kg or less of dielectric.

5. PROCEDURE

5.1 Responsibilities

- 5.1.1 University staff, lab managers, and supervisors are responsible for compliance with this procedure.
- 5.1.2 Managers and supervisors must inform all employees who handle or have responsibility for managing PCB ballasts. The information must describe proper handling and emergency procedures appropriate to PCB ballasts handled at the University.
- 5.1.3 Managers and supervisors are responsible for determining when a waste PCB ballast is accumulated.
- 5.1.4 Environmental Health & Safety Coordinator is responsible for maintaining PCB ballast waste records. Record of the total annual accumulation should be kept for a minimum of three years.



- 5.1.5 Manage waste PCB ballast properly to prevent pollution, minimize waste and protect human health.
- 5.1.6 Know lab safety precautions, and safety equipment (Safety Data Sheets, eyewashes, personal protective equipment, etc.).

6. PCB BALLAST IDENTIFICATION

- 6.1 Fluorescent light ballast (FLBs) that contain PCBs are regulated under TSCA. Below is a summary of how to identify if an FLB contains or may contain PCBs.
 - Any FLBs manufactured before July 2, 1979, may contain PCBs.
 - Any FLBs marked with the statement "This equipment contains PCB Capacitor(s)," in accordance with 40 Code of Federal Regulations (CFR) § 761.40(d), contain PCBs.
- 6.2 In accordance with 40 CFR § 761.2(a)(4):
 - Any person must assume that a capacitor manufactured prior to July 2, 1979 whose PCB concentration is not established, or whose date of manufacture is unknown, contains greater than or equal to (\geq) 500 parts per million (ppm) PCBs.
 - Any person may assume that a capacitor marked at the time of manufacture with the statement "No PCBs" in accordance with 40 CFR § 761.40(g) does not contain PCBs. 40 CFR § 761.40(g) required non-PCB ballasts manufactured from July 1, 1978 to July 1, 1998, to be labeled with the statement "No PCBs."
- 6.3 If an FLB was manufactured prior to July 2, 1979, the potting material may be sampled and analyzed for PCBs or assumed to contain PCBs. The potting material in PCB FLBs manufactured prior to July 2, 1979, frequently contains concentrations of PCBs over 50 ppm. EPA generally does not recommend opening the FLBs just to sample the potting material due to the risk of PCB exposure. The disposal requirements are different for PCBs in the potting material than for the PCB small capacitors, as noted below.

7. PROPER MANAGEMENT AND DISPOSAL

- 7.1 The PCB regulations to follow regarding proper disposal of PCB FLBs and decontamination and sampling related to leaks or spills of PCB FLBs include:
 - 7.1.1 Disposal requirements for PCB small capacitors in FLBs - See 40 CFR § 761.50(b)(2), § 761.60(b)(2)(ii), and § 761.62(a) or (c).
 - 7.1.1 Disposal requirements for PCBs in potting material of FLBs - See 40 CFR § 761.50(b)(2)(ii), § 761.60(b)(6)(iii), and § 761.62. • Decontamination requirements for PCB contaminated non-porous surfaces – See 40 CFR § 761.79(b)(3).
 - 7.1.2 Sampling non-porous surfaces for measurement-based use, reuse, and decontamination under 40 CFR § 761.79(b)(3) – See 40 CFR Part 761 Subpart P.
 - 7.1.3 Option for an approval from EPA to use alternative decontamination and/or sampling procedures (other than those specified in 40 CFR § 761.79 and 40 CFR Part 761 Subpart P) – See 40 CFR § 761.79(h).



7.2 PCB FLB generators, recyclers, and disposers should consult the TSCA Storage Disposal Requirements for Fluorescent Light Ballasts Chart below.

TSCA Storage Disposal Requirements for Fluorescent Light Ballasts

Location of the PCBs		Storage Requirements (if not at a PCB Commercial Storage Facility)	Labeling, Transportation, & Manifesting for Disposal	Disposal Reference in 40 CFR 761	Disposal Options
Capacitor	Potting Material				
"No PCBs" label		Not regulated for storage or disposal under TSCA			
< 50 ppm	< 50 ppm	Not regulated for storage or disposal under TSCA			
≥ 50 ppm, non-leaking	≥ 50 ppm	761.65(c)(9) for up to 180 days or 761.65(b) for longer	Is regulated as a PCB bulk product waste¹ - Manifesting and labeling ⁴ are required for disposal in accordance with 761.62(a); is not required under 761.62(b); may be required under 761.62(c)	761.50(b)(2)(ii) and 761.62(a), (b), or (c)	<ul style="list-style-type: none"> - TSCA incinerator - TSCA/RCRA landfill - TSCA-approved Alternative destruction method - Decontamination - Coordinated approval - State-approved landfill (leach test required) - Risk-based approval
< 50 ppm	≥ 50 ppm				
≥ 50 ppm, non-leaking	< 50 ppm	not regulated for storage under TSCA ³	Is regulated as PCB Equipment - No labeling or manifesting required ⁴	761.50(b)(2)(i) and 761.60(b)(2)(ii)	As municipal solid waste 40 CFR 761 subpart D options
≥ 50 ppm, leaking	any	761.65(c)(1) for up to 30 days or 761.65(b) for longer	Is regulated as PCB Equipment, but is Regulated as a PCB Bulk Product Waste for Disposal² - Manifesting and labeling are required for disposal in accordance with 761.62(a); may be required under 761.62(c) ⁴	761.50(b)(2) and 761.62(a) or (c)	<ul style="list-style-type: none"> - TSCA incinerator - TSCA or RCRA Hazardous waste landfill - TSCA-approved alternative destruction method - Decontamination - Coordinated approval - Risk-based approval

¹ Based on the definition of PCB Bulk Product Waste (761.3)

² Based on 761.50(b)(2)

³ Based on 761.60(b)(7)

⁴ Although labeling may not be required, records or optional labeling must show that the waste is less than 1 year old.

7.2.1 Storage of PCB FLBs is regulated in accordance with 40 CFR § 761.65. Once PCB FLBs are taken out of service for disposal (i.e., they are no longer in use), they must be sent to an approved disposal facility within nine months and disposed of within one year. See 40 CFR § 761.65(a)(1) and see the chart above for storage requirements.

7.2.2 There are special considerations for commercial storers of PCB waste. Commercial storers of PCB waste who store more than 500 gallons of PCB waste (such as PCB capacitors and/or potting material) generated by others or who store waste removed while servicing the equipment owned by others and brokered for disposal are required to obtain a PCB commercial storage approval from EPA (see the definition of Commercial storer of PCB waste in 40 CFR § 761.3). See 40 CFR § 761.65(b).

- 7.2.3 Any company or person storing, transporting or disposing of PCBs must notify EPA and receive an identification number using Form 7710-53. EPA will issue a unique EPA identification number to the notifier if the notifier does not have one. See 40 CFR § 761.205.
- 7.2.4 Generators who do not own or operate PCB commercial storage facilities subject to the storage requirements of 40 CFR § 761.65 (b) or (c)(7) do not need to submit the notification form.
- Clayton State University is exempt from this requirement since it is not a PCB storage facility as defined in 40 CFR § 761.65,
- 7.2.5 Generators exempted from the notification requirements shall use the generic identification number “40 CFR Part 761” on manifests, records, and reports, unless such generators elect to use a unique EPA identification number previously assigned to them under the Resource Conservation and Recovery Act (RCRA) by EPA or a State. See 40 CFR § 761.205(c).
- 7.2.6 No labeling or manifesting is required for PCB FLBs that have both intact non-leaking PCB capacitors and potting material with PCBs at concentrations of less than 50 ppm PCBs.
- 7.2.7 Labeling and manifesting is required if the PCB FLBs have non-intact leaking small capacitors and/or potting material with PCBs at concentrations of greater than or equal to 50 ppm PCBs (refer to the chart above for a summary). See 40 CFR §§ 761.40 and 761.45 for marking requirements and 40 CFR Part 761 Subpart K for manifesting requirements.
- 7.2.8 Example Labels provided below:



8. REFERENCES

40 CFR Part 761: Federal Regulations