

THE 3 R's:

Reporting, Recordkeeping & Restrictions (LDR)

MARIA PETIX-KENT, R.E.H.S.
Principal Environmental Specialist
Email: maria.kent@dep.state.nj.us

New Jersey Department of Environmental Protection
Hazardous Waste Compliance & Enforcement
7 Ridgedale Avenue, Cedar Knolls, NJ 07927
Phone: 973-656-4470 Telefax: 973-631-6331

C - BUF

Check Before You Fail *your inspection!*

- ❑ **CHECK** THE INFORMATION BEFORE SHIPPING WASTE FROM FACILITY

 - ❑ **BE ON TOP OF YOUR PAPERWORK --**
100% ACCURACY

 - ❑ **UNDERSTAND** BASIC INFORMATION ON WASTE CODES AND WASTE TYPES

 - ❑ **FILE** INFORMATION IN ACCESSIBLE AND CONVENIENT LOCATION
-

RECORDKEEPING & REPORTING REQUIREMENTS

SQG – 40 CFR 262.40

Subpart D

- 262.40 (a) Retain a copy of each manifest signed in accordance with manifest requirements for 3 years;**
 - 262.40 (b) Retain a copy either a hazardous waste report or exception report for 3 years;**
 - 262.40(c) Keep test results, waste analyses, or other determinations per 40 CFR 262.11 for at least 3 years;**
 - 262.40(d) Retention times are extended for unresolved enforcement actions or by request of DEP Commissioner**
-

Recordkeeping and Reporting LQG

40 CFR 262.40 AND 40 CFR 262.41

In addition to 262.40, LQGs are required to:

- ❑ 262.41(a) – Prepare and submit a single copy of a hazardous waste report of manifest activities to the Department by March 1 (even number year);
- ❑ 262.41(b) – Submit a Hazardous Waste Report in accordance with provision of 40 CFR 270, 264, 265, and 266 for wastes treated, stores, or disposes on site;
- ❑ 262.42(a) – Comply with exception reporting requirements

RECORDKEEPING

□ 40 CFR 262.40

(a) A generator must keep a copy of each manifest signed in accordance with 262.23(a) manifest rules for 3 years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least 3 years from the date the waste was accepted by the initial transporter.

BIENNIAL REPORTING (ONLY LQGs)

40 CFR 262.41

- A generator who ships any HW off site to a TSD within the USA must prepared and submit a copy of a Biennial Report to the Regional Administration by March 1st of each even numbered year.

EPA Form 8700-13A, must cover generator activities during the previous year, and must include generator name, address, EPA Id #, names of off-site TSDs, transporters, description of the waste class, DOT hazardous class, and quantity of each waste shipped to a TSD;

EXCEPTION REPORTING

40 CFR 262.42

- ❑ **LQGS** – (a)(1) Greater than 1000 kgs (2,200 lbs.) in a calendar month who does NOT received a signed manifest within **35 days** from initial date of shipment;
- ❑ (a)(2) LQG then must submit an Exception Report to EPA Regional Administrator within **45 days** of the date the waste was accepted by initial transporter and must include the following:
 - (i) & (ii) a copy of manifest & explanation of YOUR efforts to locate the manifest

EXCEPTION REPORTING *CON'T*

40 CFR 262.42 **SQG'S**

(b) Greater than 100 kgs (220 lbs.) but less than 1,000 kg (2,200 lbs.) in a calendar month who does NOT received a signed manifest within **60 days** from initial date of shipment;

(i) & (ii) a copy of manifest & explanation of YOUR efforts to locate the manifest

UNDERSTAND YOUR MANIFEST

40 CFR 262.20 – Subpart B

- ❑ A generator who transports, or offers for transport a hazardous waste for offsite treatment, storage or disposal, or a treatment, storage facility who offers for transport a rejected hazardous waste load, must prepare a Manifest OMB Control # 2050-0039 on EPA Form 8700;
- ❑ All info must be 100% accurate;
- ❑ Must use proper printed forms for Uniform Manifest;
- ❑ Use for railroad shipments, interstate and intra-state loads;
- ❑ **Item 18:** Discrepancies, rejected loads and residuals, "significant differences", Alternate Facility for Receipt of Full Load Rejection
- ❑ Item 18 b. Alternate Facility information/EPA ID #, phone
- ❑ Item 18 c. Alternate Facility Signature

19: Hazardous Waste Report Management Method Codes

TSDF codes identifying the type of hazardous waste systems used to treat or dispose of a hazardous waste.

Common Codes

- H020 - Solvent Recovery via distillation, extraction
- H061 – Fuel Blending prior to energy recovery
- H040 – Incineration – thermal destruction other than use as a fuel

8002V

DART-8002V

650

Please print or type. (Form designed for use on 8 1/2 (12-pitch) typewriter.)

032227678

SC PRW 2/10/2009

Form Approved, OMB No. 2050-0039

1. Generator ID Number NJD980208946		2. Page 1 of 1		3. Emergency Response Phone (800) 483-3718		4. Manifest Tracking Number 002249226 FLE			
5. Generator's Name and Mailing Address 1 Incorporated Incorporated 355 Mountain Boulevard South Hackensack, NJ 07606 Generator's Phone: (201) 440-7000				6. Generator's Site Address (if different than mailing address) SAME					
7. Transporter 1 Company Name Clean Harbors Environmental Services Inc				U.S. EPA ID Number MAD039322250					
7. Transporter 2 Company Name Dart Trucking Company, Inc.				U.S. EPA ID Number MD009865825					
8. Designated Facility Name and Site Address Spring Grove Resource Recovery Inc 4879 Spring Grove Avenue Chrometown, OH 45232 Factory's Phone: (519) 681-6738				U.S. EPA ID Number OH0000816629					
9a. HSA		9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
x		1. UN1210, WASTE PRINTING INK RELATED MATERIAL, 3, PG II		90 DM		36,000 P	P	D001, D035	
		2.							
		3.							
		4.							
14. Special Handling Instructions and Additional Information 2. 6J70-013 ERG#129 90x55									
15. GENERATOR/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 activities 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 Signature: Insuk Chung Date: 12/25/09									
16. International Shipments: <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Part of empty/cont. Date leaving U.S.: _____									
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed Name: Jose Carrillo Signature: Jose Carrillo Date: 12/25/09 Transporter 2 Printed Name: MICHAEL A. MELVIN Signature: Michael A. Melvin Date: 12/26/09									
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input checked="" type="checkbox"/> Full Rejection									
18b. Alternate Facility (or Generator) All work associated with this manifest has been resented to the facility listed below Clean Harbors IL Defacto 309 American Circle EL Dorado, AR 71730 U.S. EPA ID Number: OS OFFC MAD069798192									
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H300 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 Name: Brenda Davis Signature: Brenda Davis Date: 12/13/09									

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Clean Harbors has the appropriate permits and will accept the waste the generator is shipping.

12/07/10

Code	Management Method Description
Reclamation and Recovery	
H010	Metals recovery including retorting, smelting, chemical, etc.
H020	Solvents recovery (distillation, extraction, etc.)
H039	Other recovery or reclamation for reuse including acid regeneration, organics recovery, etc. (specify in comments)
H050	Energy recovery at this site - used as fuel (includes on-site fuel blending before energy recovery; report only this code)
H061	Fuel blending prior to energy recovery at another site (waste generated either on site or received from off site)
Dest. or Treatment	
H040	Incineration - thermal destruction other than use as a fuel (includes any preparation prior to burning)
H071	Chemical reduction with or without precipitation (includes any preparation or final processes for consolidation of residuals)
H073	Cyanide destruction with or without precipitation (includes any preparation or final processes for consolidations of residuals)
H075	Chemical oxidation (includes any preparation or final processes for consolidation of residuals).
H076	Wet air oxidation (includes any preparation or final processes for consolidation of residuals).
H077	Other chemical precipitation with or without pre-treatment (includes processes for consolidation of residuals).
H081	Biological treatment with or without precipitation (includes any preparation or final processes for consolidation of residuals).
H082	Adsorption (as the major component of treatment)
H083	Air or steam stripping(as the major component of treatment)
H101	Sludge treatment and/or dewatering(as the major component of treatment; not H071-H075, H077, or H082)
H103	Absorption (as the major component of treatment)
H111	Stabilization or chemical fixation prior to disposal at another site (as the major component of treatment; not H071-H075, H077, or H082)
H112	Macro-encapsulation prior to disposal at another site (as the major component of treatment; not reportable as H071-H075, H077, or H082)
H121	Neutralization only (no other treatment)
H122	Evaporation (as the major component of treatment; not reportable as H071-H083)
H123	Settling or clarification (as the major component of treatment; not reportable as H071-H083)
H124	Phase separation (as the major component of treatment; not reportable as H071-H083)
H129	Other treatment (specify in comments; not reportable as H071-H124)

LAND DISPOSAL RESTRICTION

40 CFR Part 268

- ❑ History – Congress wanted treatment standards development in stages in Hazardous & Solid Waste Amendments (HSWA) 1984
- ❑ Prohibits high-risk and high volume wastes for land application to protect groundwater
- ❑ Leaching from buried wastes contaminating the groundwater – TCLP
- ❑ Reduce the mobility or leachability of hazardous constituents in a waste to impact groundwaters
- ❑ Creation of Treatment Standards – Best Demonstrated Available Technology (BDAT)

INTERNET LINKS

Introduction to Land Disposal Restrictions 40 CFR Part 268

<http://www.epa.gov/osw/hazard/tsd/ldr/guidance.htm>

Land Disposal Restrictions: Summary of Requirements August 2001

<http://epa.gov/osw/hazard/tsd/ldr/ldr-sum.pdf>

NJ Dept of Environmental Protection – HW Waste Codes

<http://www.nj.gov/dep/dshw/hwr/hwcodes.htm>

NJ Dept of Environmental Protection–Contact/phone #s

<http://www.nj.gov/dep/easyaccess/compenf.htm>

State of New Jersey Hazardous Waste Numbers and Handling Codes - TSDS

- ❑ **D WASTE CODES:** Characteristics of hazardous waste
- ❑ **F WASTE CODES:** Hazardous waste from nonspecific sources
- ❑ **K WASTE CODES:** Hazardous waste from specific sources
- ❑ **P WASTE CODES:** Discarded commercial chemical products, off-specification species, container residuals and spill residues thereof -- Acute Hazardous Waste
- ❑ **U WASTE CODES:** Discarded commercial chemical products, off-specification species, container residuals and spill residues thereof -- Toxic Waste

Land Restriction Certification Form

SECTION 1 Generator Information

Generator Name:	WASTE EXPRESS® Approval Code:
Address:	Manifest #:
	EPA ID #:

SECTION 2 Material NOT Subject To Land Disposal Restrictions

The Land Disposal Restrictions as stipulated in 40 CFR 268 DO NOT apply to these waste materials because:

- The waste material is NOT regulated by the EPA.
- The waste material is regulated by the EPA, but is subject to a variance, extension or exemption to the effective data.

EPA Code	Subcategory	Treatability Group	Effective Date

SECTION 3 Waste Material Subject To Disposal Restrictions

Note: WASTE EXPRESS® DOES NOT ACCEPT EPA regulated wastewaters and dioxin-containing wastes (F020 – F023 and F026 – F028)

- The shipment contains F001 – F005 spent solvents; complete "F001 – F005"
- The shipment includes F039 multi-source leachate; complete "F039 and Universal Treatment Constituents"
- The shipment includes D001 and/or D002 waste prohibited under 40 CFR 268.37, and/or D012 – D043 Characteristic Wastes prohibited under 40 CFR 268.38; complete "F039 and Universal Treatment Constituents"
- The shipment includes RCRA Section 3003(d) California List wastes; complete "California List Constituents"
- The shipment includes other Land Disposal Restricted wastes; identify below:

Land Restriction Certification Form

Hazardous Waste Description	Constituents Of Concern
<input type="checkbox"/> F001 – Spent Halogenated Solvents used in Degreasing	Carbon Tetrachloride Methylene Chloride Tetrachloroethane 1,1,1-Trichloroethane Trichloroethylene 1,1,2-Trichloro-2,2-trifluoroethane Trichloromonofluoromethane
<input type="checkbox"/> F002 – Spent Halogenated Solvents	Chlorobenzene o-Dichlorobenzene Methylene Chloride Methylene Chloride (wastewater from the Pharmaceutical industry) Tetrachloroethane 1,1,1-Trichloroethane 1,1,2-Trichloroethane Trichloroethylene 1,1,2-Trichloro-2,2-trifluoroethane Trichloromonofluoromethane

Land Restriction Certification Form

<input type="checkbox"/> F003 – Spent non-halogenated Solvents	Acetone n-Butyl Alcohol Cyclohexanone ¹ Ethyl Acetate Ethyl Benzene Ethyl Ether Methanol ¹ Methanol Isobutyl Ketone Xylenes (total)
<input type="checkbox"/> F004 – Spent non-halogenated Solvents	Cresol (m- and p-isomers) o-Cresol Nitrobenzene
<input type="checkbox"/> F005 – Spent non-halogenated Solvents	Benzene Carbon Disulfide ¹ 2-Ethoxyethanol Isobutyl Alcohol Methyl Ethyl Ketone 2-Nitropropane Pyridine Toluene

Land Restriction Certification Form

F039 AND UNIVERSAL TREATMENT CONSTITUENTS

[Check the line that applies.]

- This shipment includes F039 multi-source leachate. The individual constituents likely to be present are checked below or on the following pages.
- This shipment includes a D001 or D002 waste prohibited under 268.37 and/or D012 – D043 characteristic waste and is prohibited under 268.38. The underlying hazardous constituents in the waste, as defined in 268.2 (1) are identified below or on the following pages.

EPA Code	Constituent/Subcategory	Treatability Group

CONSTITUENTS

- | | | |
|---|---|---|
| <input type="checkbox"/> Acetone | <input type="checkbox"/> Chlorobenzilate | <input type="checkbox"/> Dieldrin |
| <input type="checkbox"/> Acenaphthylene | <input type="checkbox"/> 2-chloro-1.3butabien | <input type="checkbox"/> Diethyl phthalate |
| <input type="checkbox"/> Acenaphthene | <input type="checkbox"/> Chlordibromomethane | <input type="checkbox"/> p-Dimethylaminoazobenzene ¹ |
| <input type="checkbox"/> Acetonitrile | <input type="checkbox"/> Chloroethane | <input type="checkbox"/> 2.4-Dimethyl phenol |

Land Restriction Certification Form

SECTION IV Lab Packs

EPA Code(s):

Lab Packs with EPA Code(s) specified by 40 CFR 268 Appendix IV must be reference in Section III of this form and may not be packaged or manifested for alternative lab pack treatment standards.

As required by 40 CFR 268.7(a)(8), the following certification is made for these restricted wastes:

I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only the wastes which have not been excluded under appendix IV to 40 CFR Part 268 or solid wastes not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibilities of fine or imprisonment.

SECTION V Certification

CERTIFICATION FOR MATERIALS MEETING LAND DISPOSAL TREATMENT STANDARDS

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support his certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set fort in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am ware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Land Restriction Certification Form

CERTIFICATION FOR MATERIALS NOT MEETING LAND DISPOSAL TREATMENT STANDARDS

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste and I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false certification, including the possibility of a fine and imprisonment.

Authorized Representative Signature

Print or Type Name

Title

Date