

HAZARDOUS WASTE MANAGEMENT

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1. PURPOSE AND SCOPE

- 1.1. This procedure is to manage the classification, handling, control and shipment for disposal of hazardous wastes generated at **COMPANY NAME** Sites, and at non-**COMPANY NAME** Sites where **COMPANY NAME** is responsible (see the section “Who Must manage..., below).
- 1.2. This procedure applies to all personnel on **COMPANY NAME** properties and to all **COMPANY NAME** Associates at customer sites.
- 1.3. Prevention and control of spills is covered in **COMPANY NAME** Procedure EHS-16C, Hazardous Materials Spill Prevention and Control.

2. LOCAL PROGRAM

- 2.1. **Each COMPANY NAME Site shall use this procedure and Appendix A to create a site-specific Hazardous Waste Management program** to contain, at a minimum:
 - 2.1.1. An applicability analysis documenting the site’s generator status;
 - 2.1.2. A listing of the applicable local, municipal and/or state regulations;
 - 2.1.3. A listing of the **COMPANY NAME** personnel with specific responsibilities in this program;
 - 2.1.4. A listing of the locations of all Hazardous Waste Accumulation and Storage areas at the site;
 - 2.1.5. The storage location(s) of all records required by this procedure;
 - 2.1.6. An up-to-date site-specific Emergency Contacts listing.
- 2.2. **Applicability Analysis**
 - 2.2.1. For each site, the Region EHS Manager and EHS Headquarters will assist the site’s management in completing a documented analysis to determine:
 - 2.2.1.1. The site’s Generator Status;
 - 2.2.1.2. Whether an EPA ID# is needed;
 - 2.2.1.3. Thresholds at which hazardous waste volume will trigger a generator status change;
 - 2.2.1.4. Which regulations apply to the site.
 - 2.2.2. The analysis will include:
 - 2.2.2.1. Analysis of what hazardous waste is currently being generated;
 - 2.2.2.2. Analysis of historical hazardous waste shipments;
 - 2.2.2.3. Projection of potential waste streams and volumes based on expected expansion;
 - 2.2.2.4. Steps to take for temporary increases in hazardous waste stream volume.
- 2.3. Each **COMPANY NAME** Site Manager will designate at least two Management Associates to become trained and authorized to manage and prepare for shipment of hazardous wastes¹, unless an applicability analysis approved by the Region EHS Manager establishes that no hazardous waste will be generated at the sites for which the Site Manager is responsible.
- 2.4. For purposes of this procedure, the Site Manager and the designated Associate(s) above shall be referred to as **Authorized Hazardous Waste Managers**.
- 2.5. Authorized Hazardous Waste Managers may support multiple **COMPANY NAME** sites.
- 2.6. Each **COMPANY NAME** site that generates hazardous waste must designate and train a Hazardous Waste Emergency Response Associate. See the section “Emergency Response” below.
- 2.7. Each **COMPANY NAME** Site that generates hazardous or universal waste, must designate, train and authorize an appropriate number of Associates to manage day-to-day activities associated with hazardous waste management.

¹ Including signing hazardous waste manifests, Land Disposal Restriction Certifications and Bills Of Lading.

2.8. For purposes of this procedure, these Associates shall be referred to as **Authorized Hazardous Waste Associates**.

2.9. See the sections “Responsibilities” and “Training” below for more information.

3. WASTE CONTROL AND MINIMIZATION THROUGH INPUT CONTROL

3.1. Chemical Input and Procurement Control

3.1.1. Each **COMPANY NAME** site is required to implement Chemical Management, Chemical Procurement and Management Of Change procedures to ensure potential waste streams are identified before materials that may become wastes are introduced to the sites. See **COMPANY NAME** Procedures EHS-16, EHS-16A and EHS-14, respectively.

4. WHO MUST MANAGE AND DISPOSE OF HAZARDOUS WASTE (SEE APPENDIX B)

4.1. **The Generator of Hazardous Waste is responsible for the decision to discard waste and for its management and disposal. Therefore COMPANY NAME personnel must be aware of who the generator is under different operating conditions.** The following shall be the **COMPANY NAME** policy for making the generator determination:

- 4.1.1. For materials owned by **COMPANY NAME** and used on **COMPANY NAME** properties, **COMPANY NAME** is the generator and must manage and dispose of the waste;
- 4.1.2. **COMPANY NAME** personnel may not dispose of any waste materials at customer job sites, except customer-owned waste under direction of authorized customer representatives;
- 4.1.3. For materials owned by **COMPANY NAME** left over from use at non-**COMPANY NAME** properties,² the material shall be brought back to the **COMPANY NAME** Site for the determination as to whether it is waste or will be used further. If the decision is to discard it, **COMPANY NAME** must manage and dispose of the waste.
- 4.1.4. For materials owned by the customer³ or others used at a customer job-site, **COMPANY NAME** shall not be the generator and shall not manage (other than placing waste in proper accumulation containers at customer direction), shall not transport on public roadways or dispose of or accept for disposal any waste.
- 4.1.5. For materials owned by **COMPANY NAME** and used by, or waste by-products generated by contractors’ activities (e.g. waste light ballasts, construction debris, etc.) on **COMPANY NAME** property, **COMPANY NAME** is the generator and must manage and dispose of the waste. **COMPANY NAME** may not contract or allow contractors to remove **COMPANY NAME**-generated waste from **COMPANY NAME** property unless the contractor is a licensed hazardous waste transporter approved by EHS.
- 4.1.6. For materials NOT owned by **COMPANY NAME** and used by contractors on **COMPANY NAME** property^{4,5}, **COMPANY NAME** is NOT the generator, but may assist the contractor in managing and disposal of the waste. Management and disposal of contractor-owned and generated waste must be determined at the time of contractor selection and before the contracted work starts.

4.2. If the responsibility for managing and disposing of any hazardous waste is unclear, the **COMPANY NAME** Site must contact the Region EHS Manager for clarification.

5. GENERATOR STATUS

² Materials sold to customers in whole units (e.g., whole cans, whole tubes etc.) are not owned by **COMPANY NAME**.

³ Including materials **COMPANY NAME** sells to the customer or contractors in whole units.

⁴ e.g., consumables not purchased in whole units by the contract.

⁵ Note: All chemicals introduced onto a **COMPANY NAME** property by contractors must be pre-approved through the Chemical Procurement Procedure EHS-16A.

- 5.1. Each **COMPANY NAME** Location must obtain the assistance of the Region EHS Manager to determine:
 - 5.1.1. Whether the site will generate hazardous waste;
 - 5.1.2. If the site will generate hazardous waste, which generator status it will register.
- 5.2. If the site will be a generator of hazardous waste, the Region EHS Manager will assist the site to obtain an EPA ID number from the United States Environmental Protection Agency (EPA).
 - 5.2.1.1. Note: An EPA ID# for Conditionally Exempt Small Quantity Generators (CESQGs) is not required by Federal regulation but MAY be required by state or local regulation. Contact the Region EHS Manager for assistance.⁶

6. WASTE CLASSIFICATION

6.1. Non-Hazardous Wastes (RCRA D)

- 6.1.1. Wastes not designated as hazardous wastes under RCRA Part C, must be disposed of per all state and local regulations.
- 6.1.2. **Empty Containers and Residues (40CFR261.7)**
 - 6.1.2.1. Empty containers that held materials that would be considered hazardous waste may be disposed as non-hazardous municipal solid waste rather than hazardous waste provided that:
 - 6.1.2.1.1. The containers' volume capacities are 5 gallons or less each;
 - 6.1.2.1.2. The containers are constructed of non-absorptive material (metal, glass or plastic),
 - 6.1.2.1.3. The containers held pourable (see definition, below) materials and material can no longer be poured. Containers that held viscous materials must no longer pour, regardless of how slowly;
 - 6.1.2.1.4. Containers may retain a uniform layer of dried non-pourable material that cannot be removed by common practices for that container (e.g., pouring, pumping).
 - 6.1.2.2. Compressed gas cylinders when the pressure in the cylinder is as close to atmospheric as possible, i.e., no more gas can be detected escaping the open valve. (This does not apply to aerosol containers, which are covered by other procedures.)
 - 6.1.2.3. Materials and containers NOT covered by the empty container exemption:
 - 6.1.2.3.1.1. If these containers held hazardous materials, they must be disposed as hazardous waste.
 - 6.1.2.3.2. Containers that held materials that would be considered Acutely Hazardous Waste or otherwise prohibited from empty container exemption by local regulation (contact your Region EHS Manager for support);
 - 6.1.2.3.3. Container liners are not covered by this section, which if contaminated by hazardous wastes shall be disposed as hazardous waste;
 - 6.1.2.3.4. "Bulk" hazardous materials containers with volume capacity greater than 5 gallons;
 - 6.1.2.3.5. Any unlined container that held regulated medical waste;
 - 6.1.2.3.6. Aerosol cans that contained hazardous materials. Aerosol cans are subject to other procedures;
 - 6.1.2.3.7. Containers otherwise prohibited from empty container exemption by local regulation;

6.2. Hazardous Wastes and Universal Wastes

6.2.1. Waste Classification

⁶ 40CFR261.5 "Special requirements for hazardous waste generated by Conditionally Exempt Small Quantity Generators. (b) Except for those wastes identified in paragraphs (e), (f), (g), and (j) of this section, a conditionally exempt small quantity generator's hazardous wastes are not subject to regulation under parts 262 through 266, 268, and parts 270 and 124 of this chapter, and the notification requirements of section 3010 of RCRA, provided the generator complies with the requirements of paragraphs (f), (g), and (j) of this section."

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- 6.2.1.1. All new waste streams must be properly classified before transport.
- 6.2.1.2. If a waste stream is to be classified internally (by **COMPANY NAME**) rather than classification subcontracted, the **COMPANY NAME** location must review the proposed classification with the Region EHS Manager, who must sign off on the waste profile document.
- 6.2.1.3. A form for classifying waste can be found in Appendix I.

6.2.2. Waste Classification Subcontracted (See Appendix C)

- 6.2.2.1. In the case where waste classification is sub-contracted the Authorized Hazardous Waste Manager or Authorized Hazardous Waste Associate shall notify the Region EHS Manager and the contracted waste management company:
 - 6.2.2.1.1. When a potential new waste stream is identified through the Chemical Procurement screening process (EHS-16A)
 - 6.2.2.1.2. During Change Management screening (EHS-14) when any new or changed process waste stream is identified, or;
 - 6.2.2.1.3. When any new waste is generated by other means (non-routine repair or maintenance activities, materials found on **COMPANY NAME** property, etc.).

7. WASTE MANAGEMENT

7.1. Emergency Response

- 7.1.1. Each **COMPANY NAME** site that generates hazardous wastes must have a site emergency plan in the case of spills or other emergencies involving hazardous waste, including:
 - 7.1.1.1. Designation and training of a Hazardous Waste Emergency Response Associate;
 - 7.1.1.2. Maintaining an up-to-date Emergency Contacts list (see Appendix J);
 - 7.1.1.3. Appropriate emergency response equipment, including:
 - 7.1.1.3.1. Spill kits appropriate to the wastes being managed, within 10 feet of any hazardous waste storage or accumulation areas;
 - 7.1.1.3.2. Fire extinguishers appropriate to the wastes being managed, within 10 feet of any hazardous waste storage or accumulation areas;
 - 7.1.1.3.3. Other fire-suppression equipment appropriate to the hazardous waste being managed, if needed;
 - 7.1.1.3.4. An emergency telephone immediately available and within 50 feet of any hazardous waste storage or accumulation areas;
 - 7.1.1.3.5. Decontamination equipment appropriate to the hazardous waste being managed;

7.2. Central Storage Area (40CFR262.34) (See Appendix D)

- 7.2.1. Each **COMPANY NAME** location that generates hazardous wastes must create a Hazardous Waste Central Storage Area that complies with the configuration requirements below and illustrated in Appendix D, and with the container management requirements.
- 7.2.2. **Design of All Hazardous Waste Central Storage Areas**
 - 7.2.2.1. Structure and Configuration
 - 7.2.2.1.1. All **COMPANY NAME** Hazardous Waste Central Storage Areas must be under roof and secure (i.e., not accessible to unauthorized personnel).
 - 7.2.2.1.2. The Hazardous Waste Central Storage Area must be configured such that incompatible wastes are separated and ignitable waste fires are prevented and potential fires contained (use of Flammable Cabinets meeting the appropriate construction standards or classified locations).
 - 7.2.2.1.3. Storage must be arranged such that there is ready access to containers and labels can be read. Rows of drums must be separated by at least 3 feet.
 - 7.2.2.2. Equipment:

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7.2.2.2.1. All **COMPANY NAME** Hazardous Waste Central Storage Areas must have the following equipment:

- 7.2.2.2.1.1. An Emergency Telephone immediately available and within 50 feet of the area;
- 7.2.2.2.1.2. Emergency Contact numbers posted in immediately proximity to the telephone;
- 7.2.2.2.1.3. A Spill Kit no further than 10 feet from the outside perimeter of the area;
- 7.2.2.2.1.4. At least one Fire Extinguisher no further than 10 feet from the outside perimeter of the area;
- 7.2.2.2.1.5. A minimum 15 minute capacity Emergency Eyewash Station no further than 10 seconds travel-distance from any point inside the area;

7.2.3. Storage Duration Limits:

- 7.2.3.1. Large Quantity Generators (LQGs) may store hazardous wastes a maximum of 90 days (§ 262.34a).
- 7.2.3.2. Small Quantity Generators (SQGs) may store hazardous wastes a maximum of 180 days § 262.34(d)
- 7.2.3.3. Conditionally Exempt Small Quantity Generators (CESQGs) may store hazardous wastes a maximum of 180 days (**COMPANY NAME** Policy)
- 7.2.3.4. Universal waste may be accumulated for one year from the time the first waste is placed in a waste container. The “start accumulation date” field on the universal waste label must be entered when the first waste is placed into the container.

7.2.4. Inventory

- 7.2.4.1. Each site must maintain an up-to-date hazardous waste inventory log.

7.3. Satellite Accumulation § 262.34(c)(1) (See Appendix E)

7.3.1. **COMPANY NAME** sites may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste in containers:

- 7.3.1.1. At or near any point of generation where wastes initially accumulate;
- 7.3.1.2. That are under the control of the operator of the process generating the waste;
- 7.3.1.3. Marked with the words “Hazardous Waste”, the type of waste being accumulated (e.g., acetone rags, empty spray paint cans, etc.) and the health or physical hazard(s) associated with the waste (e.g., ignitable, corrosive, toxic, reactive);
- 7.3.1.4. The area for satellite accumulation must have a sign designating it a “Hazardous Waste Satellite Accumulation Area”;
- 7.3.1.5. The area must be free of free of potential hazards associated with the wastes accumulated, e.g., away from storm drains, ignitable wastes not accumulated near heat/spark/flame generating processes, etc.

7.3.2. Once the quantities listed above are reached, an Authorized Hazardous Waste Manager or Authorized Hazardous Waste Associate must:

- 7.3.2.1. Seal the container;
- 7.3.2.2. Enter the date the container became full in the Start Accumulation field on the hazardous waste label.
- 7.3.2.3. Move the container to the central hazardous waste storage area;
- 7.3.2.4. Update the Hazardous Waste Inventory Log.

7.4. Hazardous Waste Container Management (§265(l))

- 7.4.1. Hazardous waste containers must be compatible with the materials they will contain;
- 7.4.2. Hazardous waste containers must remain closed except when adding waste to them;
- 7.4.3. Hazardous waste containers must be labeled and the labels must be accessible and legible;
- 7.4.4. Hazardous waste containers must be inspected at least weekly;

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7.4.5. Hazardous waste containers must not allow air emissions.

7.5. Waste Inspections (§ 265.174.)

7.5.1. Large Quantity Generators/Small Quantity Generators:

7.5.1.1. At least weekly, an Authorized Hazardous Waste Manager or Authorized Hazardous Waste Associate must inspect the Hazardous Waste Central Storage Area and all Satellite Accumulation areas using the Inspection Check List in Appendix F.

7.5.2. Conditionally Exempt Small Quantity Generators

7.5.2.1. At least monthly, an Authorized Hazardous Waste Manager or Authorized Hazardous Waste Associate must inspect the Hazardous Waste Central Storage Area and all Satellite Accumulation areas using the Inspection Check List in Appendix F.

7.5.3. Remedial Action: (§265.171)

7.5.3.1. If a container holding hazardous waste is not in good condition, the Authorized Hazardous Waste Manager or Authorized Hazardous Waste Associate must contact the contracted waste management company for instruction on transferring the waste to a compliant container;

7.5.3.2. If a waste container is discovered to be leaking, the Authorized Hazardous Waste Manager or Authorized Hazardous Waste Associate must contact the contracted waste management company immediately, report a spill and follow the instructions given for response.

7.6. Universal Wastes (40CFR273) (See Appendix H)

7.6.1. Universal Wastes are commonly found wastes for which there are special laws to encourage recycling and proper disposal when used in the workplace. Universal wastes include items such as batteries (non-leaking) and mercury containing light bulbs (e.g., fluorescent lamps).

7.6.2. Universal Wastes have special handling requirements described in the flow charts in Appendix H.

7.6.3. Types of Universal Waste

7.6.3.1. Batteries: such as small non-leaking lead acid batteries, Ni-Cad, and rechargeable batteries.

7.6.3.2. (Exception: Automotive-type batteries and any all leaking batteries are NOT Universal Waste but are HAZARDOUS WASTE);

7.6.3.3. Fluorescent lamps

7.6.3.4. (Exception: Broken Lamps are NOT Universal Waste but are HAZARDOUS WASTE);

7.6.3.5. Computer monitors and television picture tubes

7.6.3.6. (Exception: Broken Computer Monitors & TV Picture Tubes are NOT Universal Waste but are HAZARDOUS WASTE);

7.6.3.7. Computers, telephones, radios, and other consumer electronic devices;

7.6.3.8. Mercury thermostats;

7.6.3.9. Mercury switches, thermostats and tip switches in portable heaters, washing machine out-of-balance switches, silent wall switches;

7.6.3.10. Mercury thermometers;

7.6.3.11. Pressure or vacuum gauges that contain mercury.

7.7. Regulated Medical Waste (RMW) – (49 CFR, Part 173.197 & See State Regs.)

7.7.1. **COMPANY NAME** Sites that generate Regulated Medical Waste, including, but not limited to: contaminated sharps from accidents or medical injections (syringes), the cleanup product of medical or first aid treatment contaminated with blood or other potentially infectious material, must comply with the following:

7.7.1.1. Sharps containers shall be puncture resistant and must be kept securely closed except when adding waste;

7.7.1.2. Sharps containers shall be packaged and sealed before shipment.

7.7.1.3. Bags for non-sharps medical waste shall be Red

7.7.1.4. Labeling (OSHA)

7.7.1.4.1. Medical Waste Containers shall have OSHA "BIOHAZARD" markings and the words "Bio-Medical Waste", "Biohazardous Waste", "Biohazardous", "Infection Waste", or "Infection Substances"

7.7.1.4.2. If a bag or Sharps container is to be inserted into a secondary container, the larger container shall have the same labeling as described above.

7.7.1.5. Shipping RMW requires special handling and transporter qualifications. The Region EHS Manager must be notified when preparing to ship RMW.

7.8. Labeling (See Appendix G)

7.8.1. Hazardous Waste Labels for **COMPANY NAME** shall be provided by a contracted service; however each **COMPANY NAME** Site is responsible for ensuring the labels are correct.

7.8.2. All Hazardous Waste containers must be properly labeled, including:

7.8.2.1. For containers in storage and satellite accumulation:

7.8.2.1.1. The words "Hazardous Waste";

7.8.2.1.2. A description of the waste contained;

7.8.2.1.3. The primary hazardous characteristic of the waste;

7.8.2.2. For containers ready for shipment, see the section "Shipping" below:

7.8.2.3. For Regulated Medical Waste, see the section "Regulated Medical Waste" above;

7.9. Shipping Hazardous Waste for Disposal

7.9.1. Authorized Treatment, Storage & Disposal Facilities (TSDFs) and Waste Transporters

7.9.1.1. **COMPANY NAME** will authorize and contract with disposal facilities and transporters for all **COMPANY NAME** waste. **COMPANY NAME** sites must use the **COMPANY NAME**-contracted services and may not use others.

7.9.1.2. **COMPANY NAME** sites MAY NOT transport hazardous waste, including universal waste on public roadways for any purpose, including in an attempt to consolidate waste for cost savings.

7.9.2. Labeling (49CFR178)

7.9.2.1. For containers ready for shipment:

7.9.2.1.1. The words "Hazardous Waste";

7.9.2.1.2. The DOT Proper Shipping Name;

7.9.2.1.3. The Generator's EPA ID# (if applicable), Name, Address, and Phone Number;

7.9.2.1.4. The Manifest Number;

7.9.3. Documentation

7.9.3.1. Manifests

7.9.3.1.1. All hazardous waste shipments, except universal waste, must be accompanied by a completed and correct hazardous waste manifest.

7.9.3.1.2. Hazardous waste manifests must be signed by an Authorized Hazardous Waste Manager only.

7.9.3.1.3. The **COMPANY NAME** Site must retain one copy (Labeled "Generator's Copy") of the manifest.

7.9.3.1.4. 35 days after shipment, the Authorized Hazardous Waste Manager must verify that the manifest Receipt Acknowledgement (page 3) has been received by the contracted Hazardous Waste Management Service Provider.

7.9.3.2. Land Disposal Restrictions (40CFR268)

7.9.3.2.1. Regulations require generators to notify TSDFs in writing of each hazardous waste subject to Land Disposal Restrictions (LDR).

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7.9.3.2.2. The **COMPANY NAME**-contracted hazardous waste management service provider will provide Land Disposal Restriction Notice and Certification forms to accompany waste shipments where applicable. Only an Authorized Hazardous Waste Manager may sign LDR documents.

7.9.3.2.3. LDR does not apply to CESQGs.

7.9.3.3. Hazardous Waste Inventory Logs

7.9.3.3.1. Hazardous Waste Inventory Logs shall be updated and reconciled to the manifest for each shipment.

7.9.4. Containers for Transporting Hazardous Waste

7.9.4.1. Containers for Transporting Hazardous Waste must meet the requirements of DOT regulation 49CFR173.

7.9.4.2. Containers for Hazardous Waste shipping, if different from the containers for accumulation and storage, shall be provided by a contracted service, however, each **COMPANY NAME** Site is responsible for ensuring the containers meet the regulatory requirements.

7.9.5. Placards for Transporting Hazardous Waste

7.9.5.1. It is the shipper's (**COMPANY NAME**'s) responsibility to provide DOT compliant placards for hazardous waste shipments. Most transport drivers will carry their own placards and will not ask for them, however, **COMPANY NAME** locations are responsible for having them available for transport drivers and ensuring vehicles are properly placarded before departure.

7.10. Waste Minimization

7.10.1. **COMPANY NAME** sites will make all reasonable efforts to minimize the amounts of hazardous wastes generated at each site by:

7.10.1.1. Screening all new chemicals using the **COMPANY NAME** Procedure EHS-16A (Chemical Procurement) to determine if less hazardous alternatives are feasible;

7.10.1.2. Screening all new processes and equipment using the **COMPANY NAME** Procedure EHS-14 (EHS Management of Change) to determine if less hazardous alternatives are feasible;

7.10.1.3. Participating with product development teams and programs to determine if less hazardous product/process alternatives are feasible.

7.11. Tracking Waste

7.11.1. Manifest Receipt Acknowledgement (Page 3)⁷

7.11.1.1. Thirty-five (35) days after each shipment of hazardous waste an Authorized Hazardous Waste Manager or Authorized Hazardous Waste Associate must contact the contracted hazardous waste management service provider to verify the Manifest Receipt Acknowledgement (Page 3) has been received.⁸


7.11.2. Exception Reports

7.11.2.1. If the contracted hazardous waste management service provider reports the Manifest Receipt Acknowledgement has not been received from the TSDf, the Authorized Hazardous Waste Manager or Authorized Hazardous Waste Associate must contact the Region EHS Manager for follow-up.

7.11.3. Biennial Report (40CFR262.41)

⁷ This is a federal requirement only for LQGs, however, **COMPANY NAME** policy requires it for ALL sites.

⁸ Within 30 days of a hazardous waste shipment, the receiving TSDf must send a completed copy of the manifest to the generator. These receipt acknowledgement copies are received by the contracted hazardous waste services provider on **COMPANY NAME**'s behalf.

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7.11.3.1. By March 1 of every even-numbered year, generators of hazardous waste must file an EPA Form 8700-13A (Biennial Report). Sites must work with the Region EHS Manager to ensure these reports are completed, correct and files on time.

7.11.3.2. Biennial Reports are not required for Conditionally Exempt Small Quantity Generators (CESQGs).

7.12. Recordkeeping and Record Retention - 40CFR262

7.12.1. The following documents must be readily retrievable at the **COMPANY NAME** Site for three (3) years:

- 7.12.1.1. The Generator's copies of Manifests;
- 7.12.1.2. Land Disposal restriction Certifications;
- 7.12.1.3. Biennial Reports, if applicable;
- 7.12.1.4. Waste Classification Profiles;
- 7.12.1.5. Hazardous Waste Inventory Logs with the matching Manifests.

7.12.2. Training Records for current Associates must be maintained and readily retrievable until the site is closed.

7.12.3. Training Records for prior Associates must be maintained and readily retrievable for three (3) years after termination of employment.

7.12.4. Training Records for Associates with Hazardous Waste responsibilities must include:

- 7.12.4.1. Job title & description of duties;
- 7.12.4.2. A description of the Training Plan
- 7.12.4.3. A detailed description of Course Content, including content that is either classroom &/or On the Job Training.

8. TRAINING

8.1. Authorized Hazardous Waste Managers

8.1.1. Authorized Hazardous Waste Managers must receive training on hazardous waste management applicable to the sites they are responsible for, including;

- 8.1.1.1. Procedures for classifying wastes.
- 8.1.1.2. Safe handling of hazardous waste;
- 8.1.1.3. Management of satellite accumulation areas;
- 8.1.1.4. Management of a hazardous waste Central Storage Area;
- 8.1.1.5. Management of Universal Wastes;
- 8.1.1.6. Use of and proper completion of hazardous waste manifests;
- 8.1.1.7. D.O.T. Hazardous waste transportation;
- 8.1.1.8. **COMPANY NAME** procedures for labeling, inspection, accumulation, storage and shipping of hazardous wastes using the contracted waste management service providers;
- 8.1.1.9. Site Emergency response procedures;
- 8.1.1.10. Hazard Communication;
- 8.1.1.11. PPE required for hazardous waste management;

8.2. Authorized Hazardous Waste Associates

8.2.1. Authorized Hazardous Waste Associates must receive training on hazardous waste management applicable to the sites they are responsible for, including;

- 8.2.1.1. Safe handling of hazardous waste;
- 8.2.1.2. Management of satellite accumulation areas;
- 8.2.1.3. Management of a hazardous waste Central Storage Area;
- 8.2.1.4. Management of Universal Wastes;

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- 8.2.1.5. **COMPANY NAME** procedures for labeling, inspection, accumulation, storage and shipping of hazardous wastes using the contracted waste management service providers;
- 8.2.1.6. Site Emergency response procedures;
- 8.2.1.7. Hazard Communication;
- 8.2.1.8. PPE required for hazardous waste management;

8.3. Large Quantity Generators (LQGs)

- 8.3.1. LQGs must have an established written training plan for operator training.

9. RESPONSIBILITIES

9.1. EHS Headquarters and Region EHS Managers are responsible for:

- 9.1.1. Serving as interpretation contact for this procedure;
- 9.1.2. Disseminating revisions to this procedure;
- 9.1.3. Assisting sites with applicability analyses.

9.2. Site/Site Managers are responsible for:

- 9.2.1. All hazardous waste management at the sites;
- 9.2.2. Ensuring all waste streams are properly classified and the classifications are documented;
- 9.2.3. Designation of Authorized Hazardous Waste Managers and Authorized Hazardous Waste Associates;
- 9.2.4. Ensuring all Associates are provided with training to properly discharge their duties in the hazardous waste management program;
- 9.2.5. Ensuring adequate resources are provided for proper hazardous waste management at the sites they are responsible for;
- 9.2.6. Serving as Incident Commander during any emergency involving hazardous waste, until relieved by a superseding authority (See **COMPANY NAME** Procedure EHS-11, Emergency preparedness & Response).

9.3. Authorized Hazardous Waste Managers are responsible for:

- 9.3.1. Hazardous waste management activities as specified above,
- 9.3.2. Preparation of shipments of hazardous wastes;
- 9.3.3. Verification of and signing all hazardous waste shipping documentation;
- 9.3.4. Managing all documentation required by this procedure;
- 9.3.5. Serving as Incident Commander in the absence of the Site/Site manager during any emergency involving hazardous waste, until relieved by a superseding authority.

9.4. Authorized Hazardous Waste Associates are responsible for:

- 9.4.1. Site hazardous waste management activities as specified above;
- 9.4.2. Assisting during any emergency involving hazardous waste.

9.5. All Associates are responsible for:

- 9.5.1. Complying with all rules regarding handling wastes at **COMPANY NAME** Sites and on customer sites;
- 9.5.2. Reporting any situations that they suspect are incorrect to their supervisors;
- 9.5.3. Properly managing satellite accumulation stations associated with their workstations.

10. DEFINITIONS 40CFR260.10

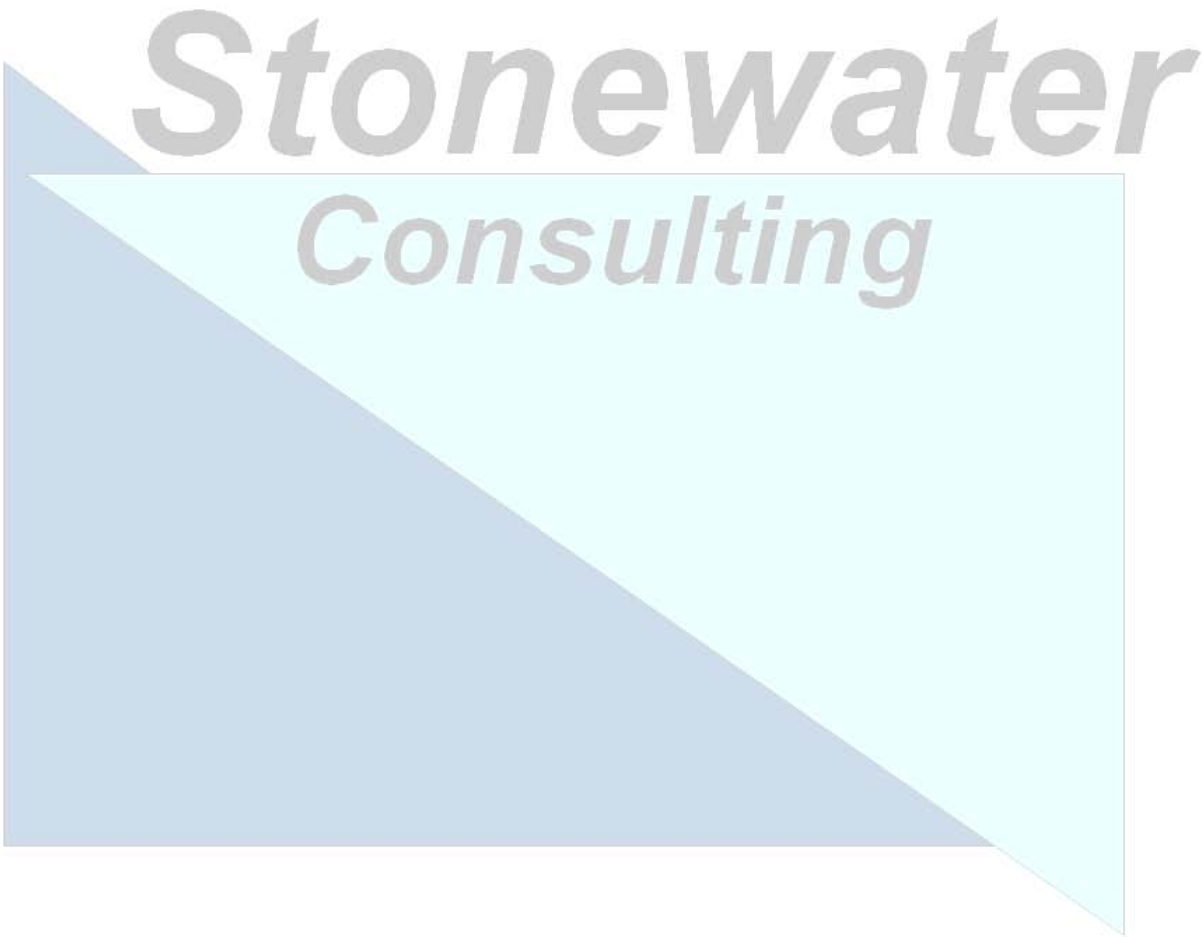
- 10.1. Acutely Hazardous Wastes – Hazardous wastes listed as acutely hazardous in Sections 261.31, 261.32, or 261.33(e) of Title 40 of the Federal Code of Regulations.

- 10.2. Container means any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled.
- 10.3. Disposal means the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
- 10.4. Disposal Facility means a facility or part of a facility at which hazardous waste is intentionally placed into or on any land or water, and at which waste will remain after closure. The term disposal facility does not include a corrective action management unit into which remediation wastes are placed.
- 10.5. Empty, RCRA Empty, etc.: See text.
- 10.6. EPA ID Number means the number assigned by EPA to each generator, transporter, and treatment, storage, or disposal facility.
- 10.7. Facility All contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them).
- 10.8. Generator means any person, by site, whose act or process produces hazardous waste or whose act first causes a hazardous waste to become subject to regulation.
- 10.9. Hazardous Waste – Any waste material defined as hazardous waste in the Federal Code of Regulations or local or state regulations (contact the Region EHS Manager). Hazardous wastes are those which are not specifically excluded as hazardous wastes, are specifically listed as hazardous wastes or exhibit hazardous characteristics as defined by regulation. Universal wastes are included as hazardous wastes, though their management is significantly different from other hazardous wastes.
- 10.10. Pourable – Material is pourable when it will drain from a container held in any orientation (inverted, tilted, etc.).
- 10.11. Solid Waste – see 40CFR261.2
- 10.12. Storage means the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere.
- 10.13. Treatment means any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume.
- 10.14. Transportation means the movement of hazardous waste by air, rail, highway, or water.
- 10.15. Transporter means a person engaged in the offsite transportation of hazardous waste by air, rail, highway, or water.

11. APPENDICES :

- 11.1. Appendix A Site Specific Program
- 11.2. Appendix B Who Must Manage & Dispose of Hazardous Waste
- 11.3. Appendix C Classifying a New Waste
- 11.4. Appendix D Proper Setup of a Central Storage Area
- 11.5. Appendix E Proper Setup of a Satellite Accumulation Area
- 11.6. Appendix F Waste Inspection Check List

11.7. Appendix G	Examples of Hazardous Waste Labels
11.8. Appendix H	Managing Universal Wastes
11.9. Appendix I	Waste Classification Profile
11.10. Appendix J	Site Emergency Contacts
11.11. Appendix R	Regulatory References



APPENDIX A – SITE – SPECIFIC PROGRAM

- 1) Name and Location of Site: _____
- 2) Site Manager: _____
- 3) Site EHS Representative: _____
- 4) Names of Authorized Hazardous Waste Managers (minimum of two):

- 5) Names of Authorized Hazardous Waste Associates:

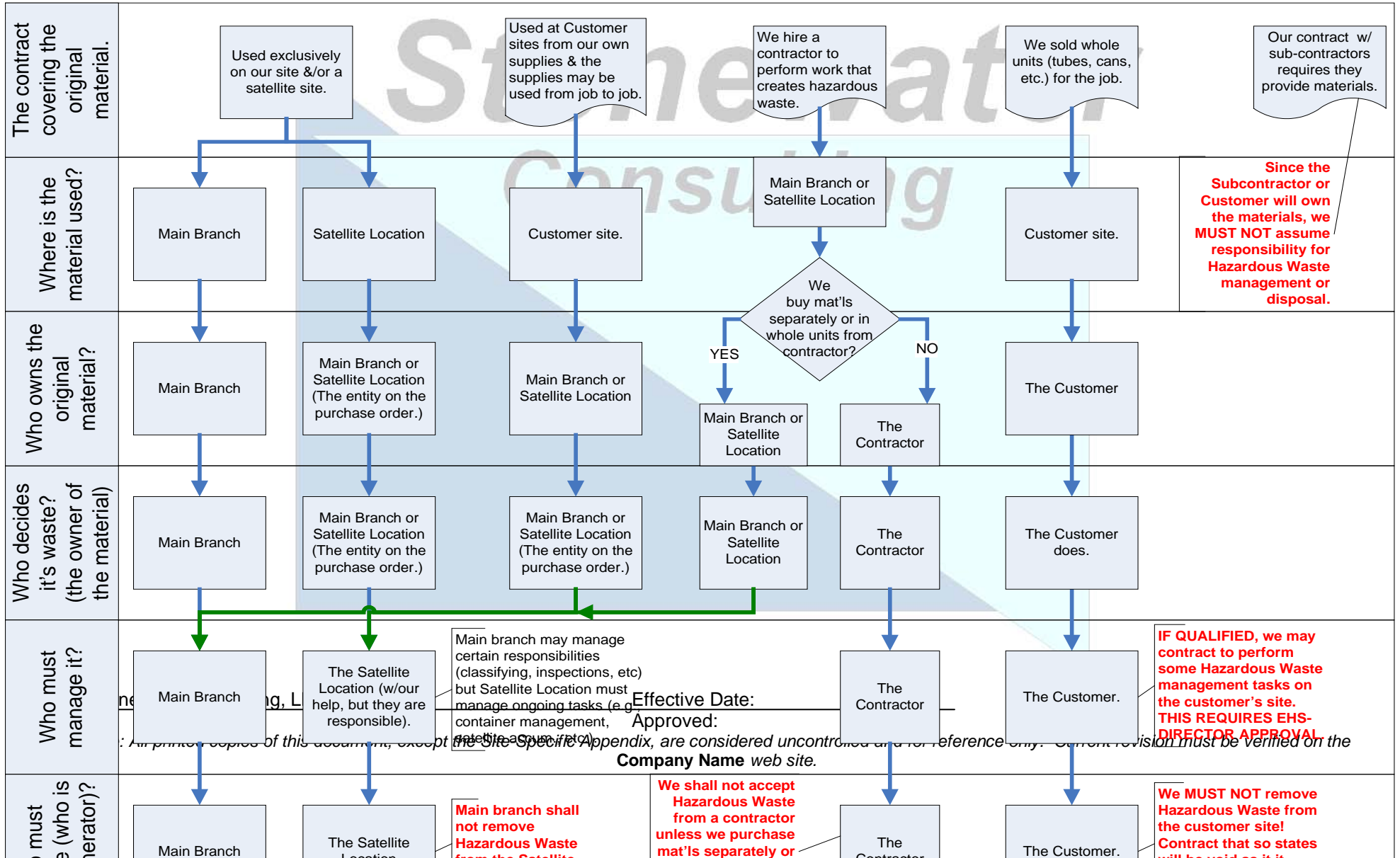
- 6) Method through which state and local regulations are available and specific location (e.g. hardcopy and physical location or web link): _____
- 7) Site Generator Status (contact Region EHS Manager for assistance): _____
- 8) Site EPA ID# (if applicable): _____
- 9) Location of Applicability Analysis: _____
- 10) Location of Hazardous Waste Central Storage Area: _____
- 11) Location of Satellite Accumulation Area(s):

Completed by: _____ Date: _____

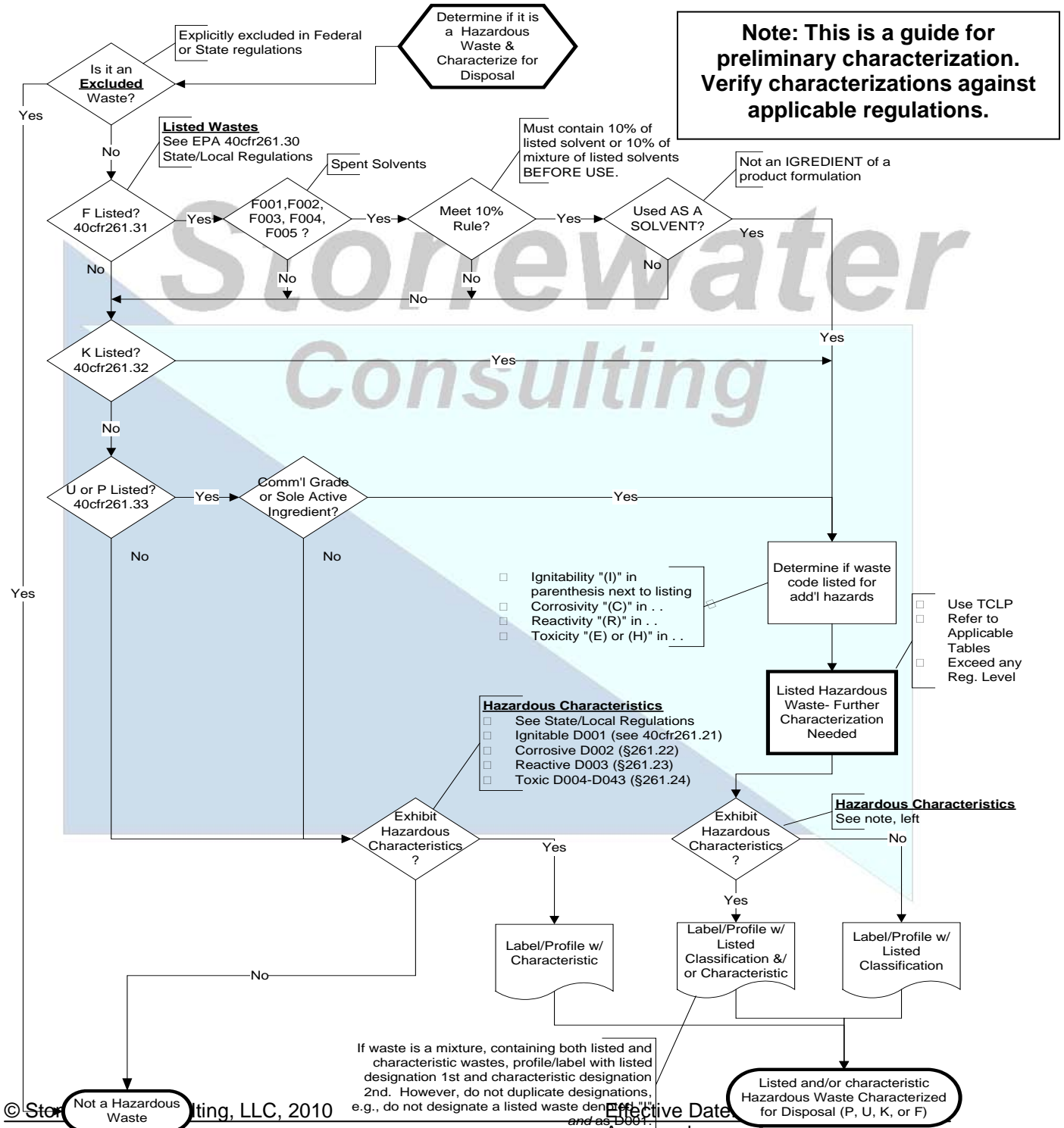
Approved by: _____ Date: _____

Site Manager Signature

APPENDIX B – WHO MUST MANAGE HAZARDOUS WASTE



APPENDIX C – CLASSIFYING A NEW WASTE



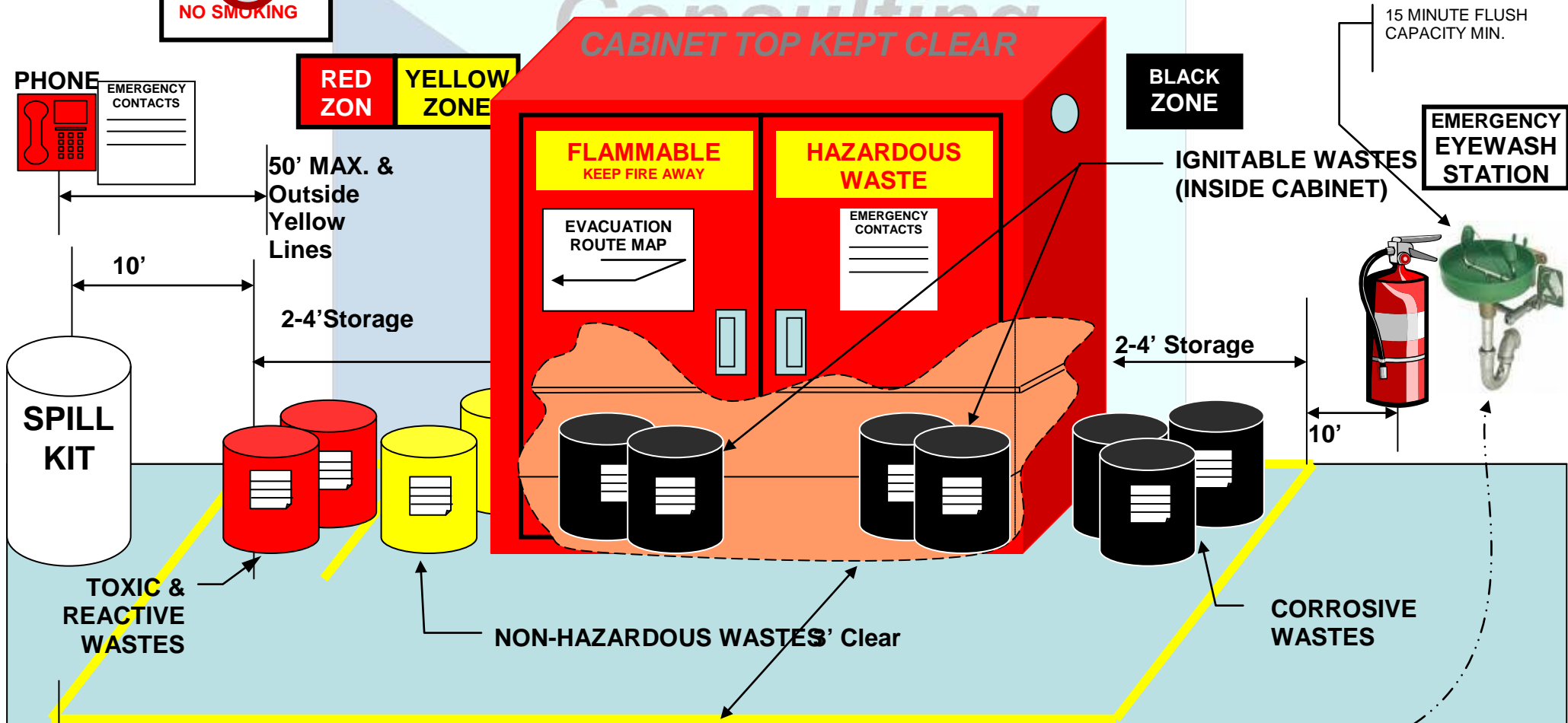
Note: All printed copies of this document, except the Site-Specific Appendix, are considered uncontrolled and for reference only. Current revision must be verified on the Company Name web site.

APPENDIX D – RECOMMENDED SETUP OF THE CENTRAL STORAGE AREA

Note: This is a guidance document only and does not replace or supersede the **COMPANY NAME** controlled Hazardous Waste Management procedure.

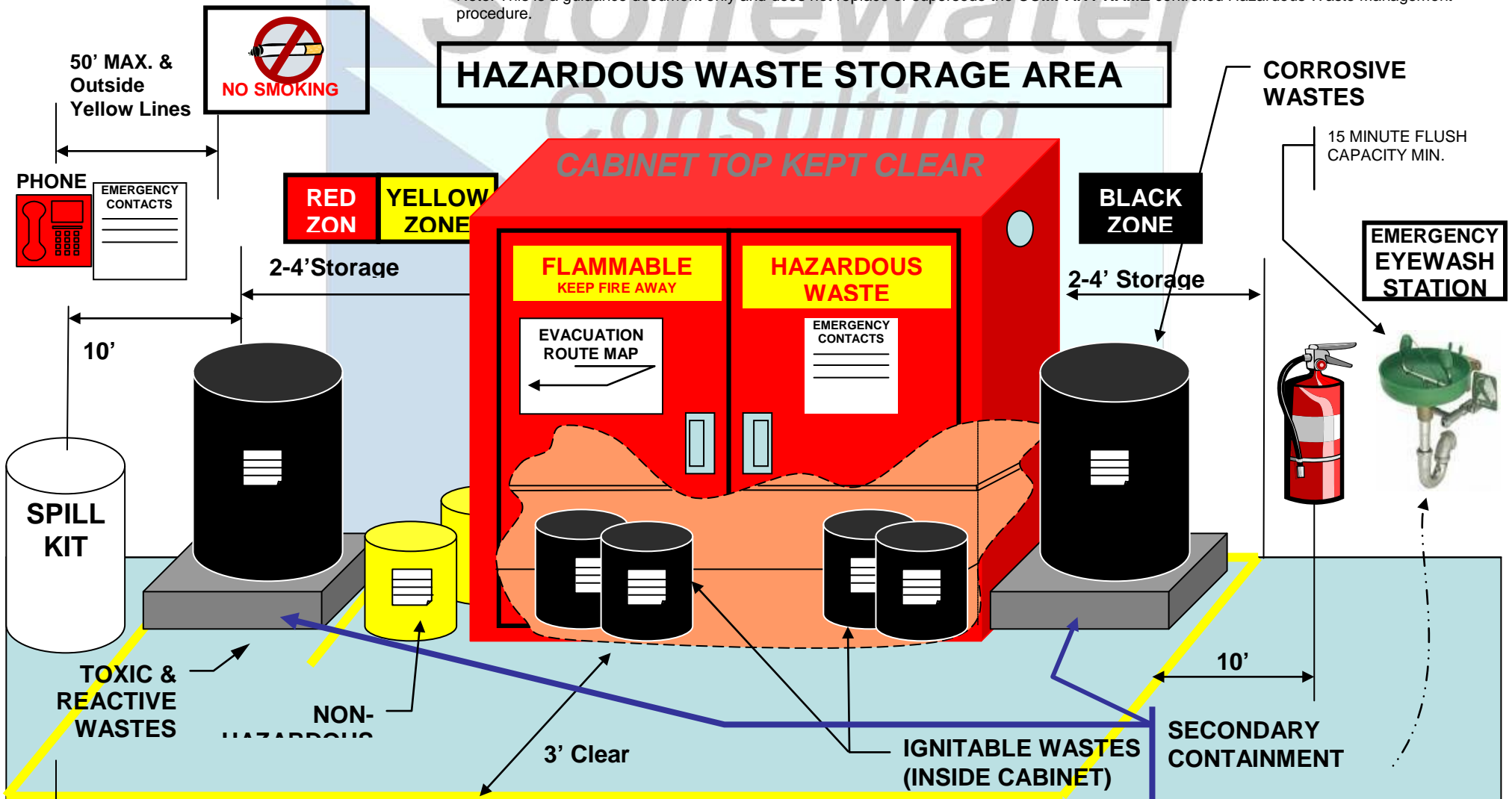


HAZARDOUS WASTE STORAGE AREA

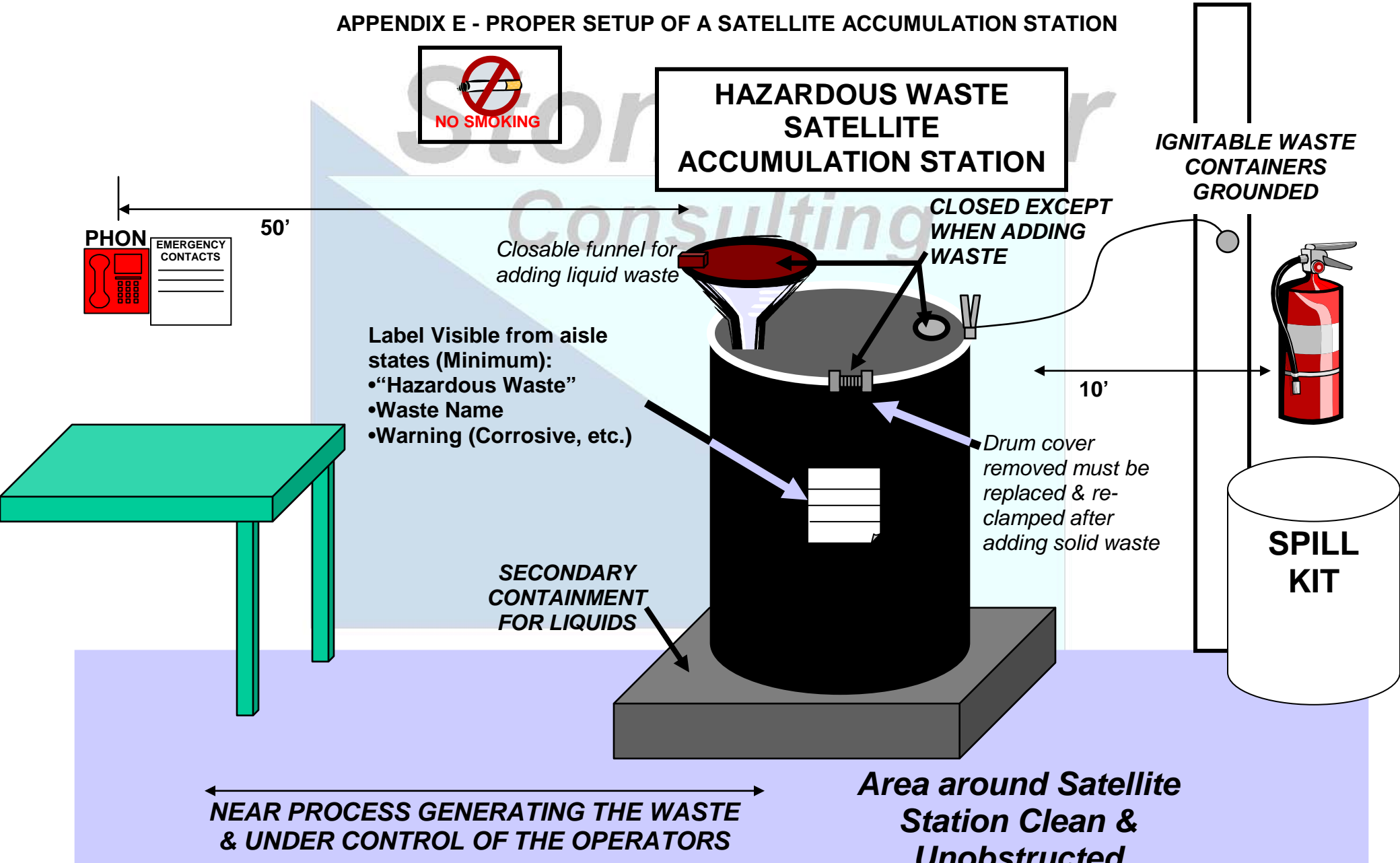


APPENDIX D – RECOMMENDED SETUP OF THE CENTRAL STORAGE AREA USING 55 GALLON DRUMS

Note: This is a guidance document only and does not replace or supersede the *COMPANY NAME* controlled Hazardous Waste Management procedure.



APPENDIX E - PROPER SETUP OF A SATELLITE ACCUMULATION STATION



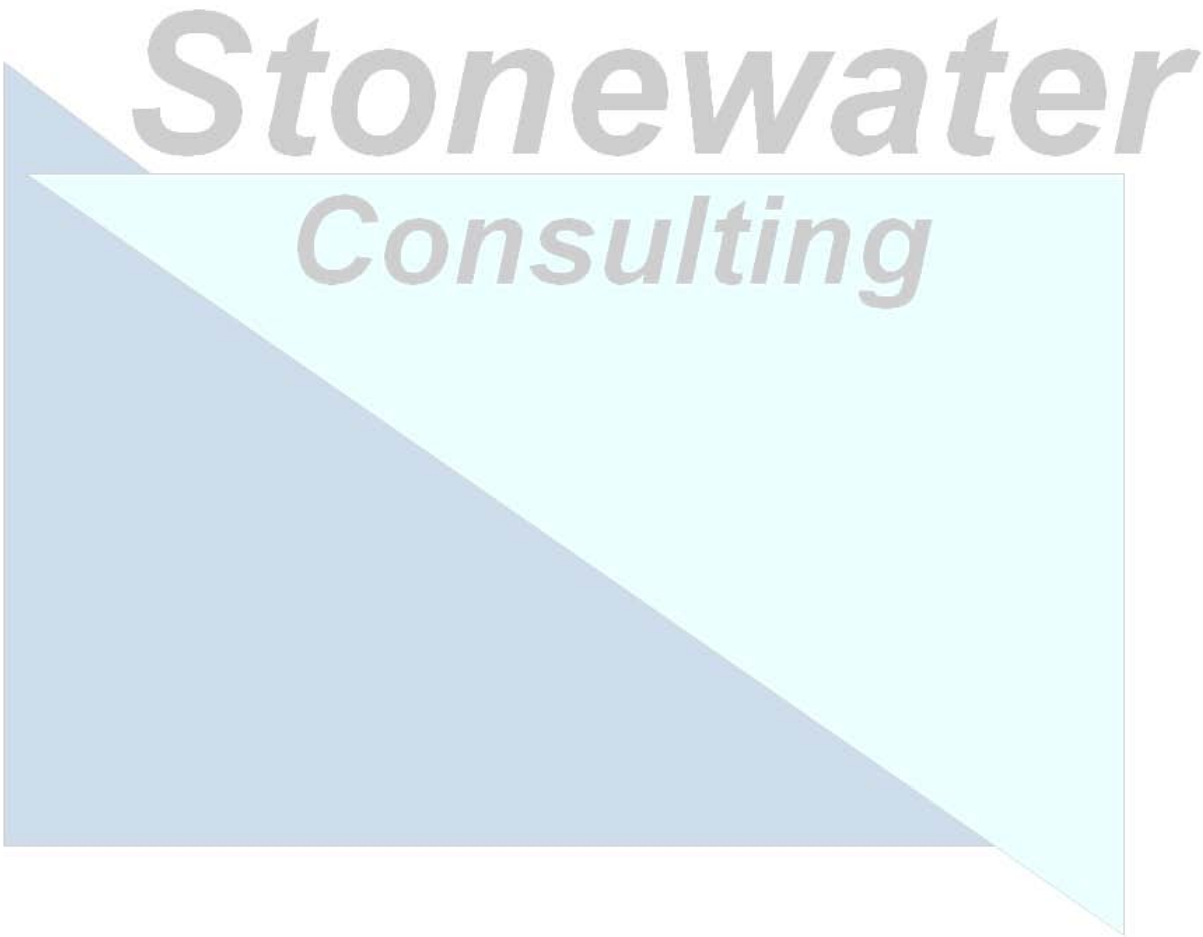
APPENDIX F – WASTE INSPECTION CHECK LIST

Date of Inspection: _____
Inspecting Associate Name: _____

A. Labeling	Y	N	C/A [†]	Cpt Date	By	
1. All containers must be labeled.						
2. Labels must be legible and visible.						
3. Labels must include the following information:						
a. "Hazardous Waste"						
b. Chemical name or COMPANY NAME approved identity of the waste in the container						
c. Hazard(s) associated with the waste						
d. Accumulation Start Date						
4. Contents of the containers must match the label description.						
5. Labels must be in good condition (not stained or partially adhered).						
6. Full containers must be dated.						
B. Container Management						
1. Containers must be in good condition (no leaks, dents, or bulging).						
2. Containers must be closed when not in use (cover clamped, bungs closed, funnel covers latched).						
3. Containers sides must be clean and free of waste.						
4. Tops of containers must be clear (free of tools, rags, debris, and waste).						
5. Containers must be appropriate for stored waste (e.g., no acids in unlined steel drums).						
C. Storage Area						
1. Access to storage area must be free (no waste or debris on floor).						
2. Flammable containers must be grounded.						
3. Emergency Phone within 50' and working.						
4. Fire extinguisher in area.						
5. Spill kit in area and complete.						
6. Eyewash station within 10 second travel distance.						
7. Signs correct.						
a. Hazardous Waste Storage Area						
b. No Smoking						
D. Satellite Accumulation Areas						
1. Full containers must be removed within 3 days.						
2. No more than 55 gallons total of hazardous waste may be stored in a satellite area.						
3. Container labeled.						
a. "Hazardous Waste"						
b. Chemical name or COMPANY NAME approved identity of the waste in the container						
c. Hazard(s) associated with the waste						
d. NO Accumulation Start Date or date <3days old.						
E. Universal Waste						
1. Container labeled						
a. "Universal Waste"						
b. Contents						
c. Accumulation Start Date*						
2. Accumulation Start Date <1year old.						

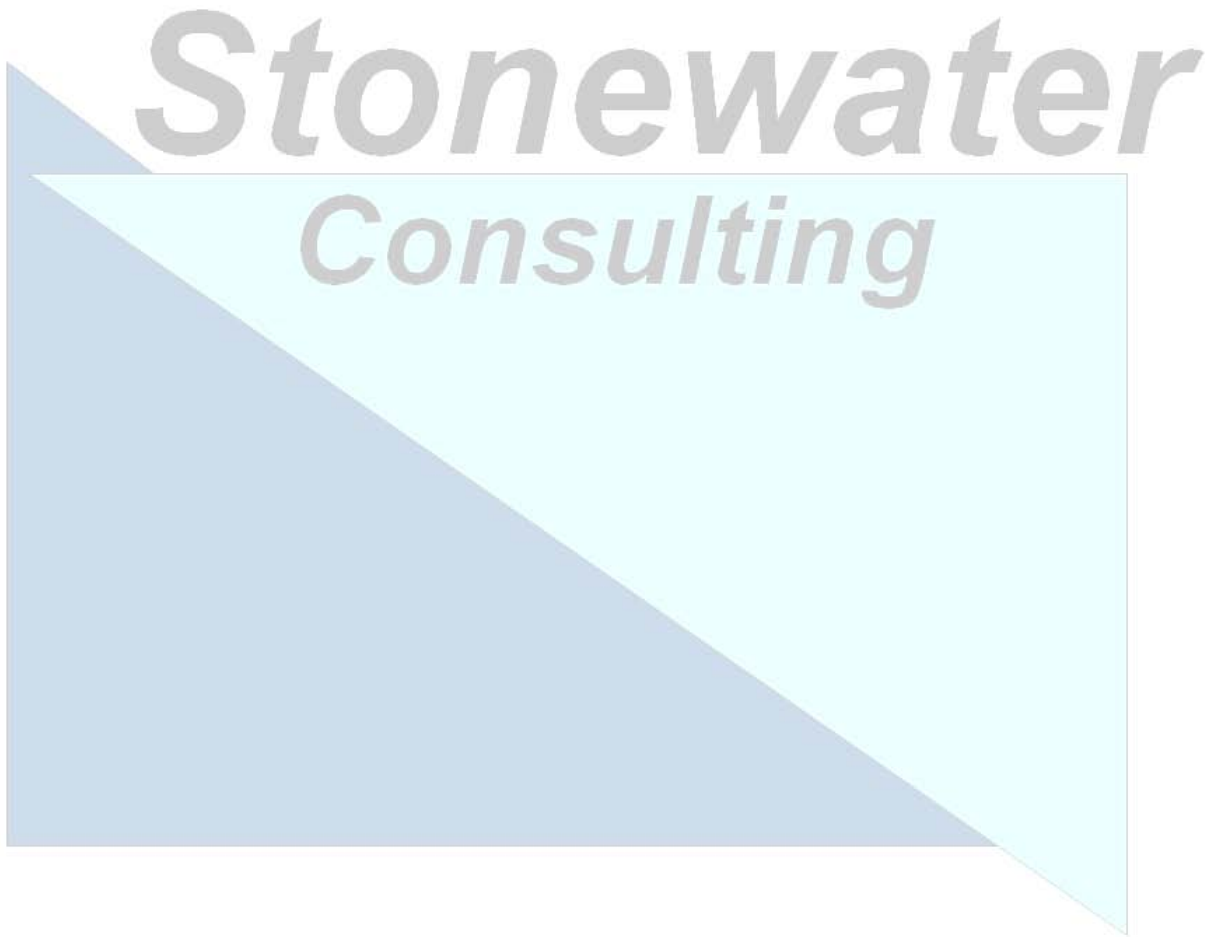
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* For Universal Waste the Accumulation Start Date is the date the 1st waste is placed in the container.
†C/A = Corrective Action



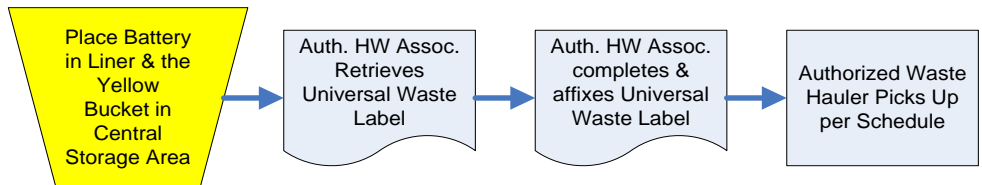
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APPENDIX G – EXAMPLE HAZARDOUS WASTE LABELS



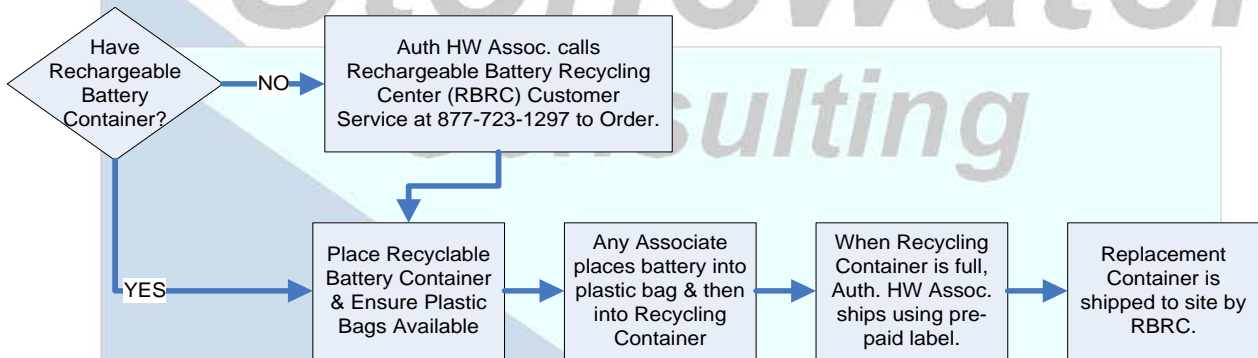
APPENDIX H – MANAGEMENT OF UNIVERSAL WASTES

Non-Leaking / Non-Automotive / Non-Rechargeable Batteries

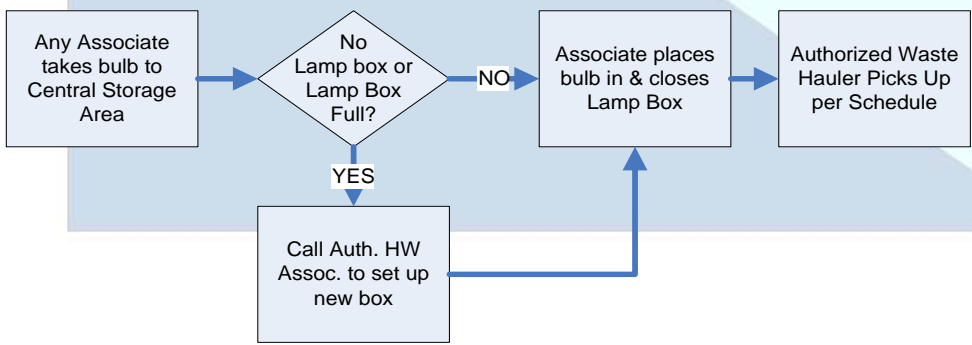


Rechargeable Batteries

Note: A leaking battery must be managed as hazardous waste.



Intact Florescent Bulbs



NOTE: Broken bulbs not contained in the original container must be handled as Hazardous Waste. Never break a fluorescent light bulb to place it into a bucket.

NOTE: Broken fluorescent lamps in a sealed full case of bulbs will be managed as hazardous waste.

APPENDIX H – MANAGEMENT OF UNIVERSAL WASTE

COMPUTER EQUIPMENT & TV PICTURE TUBES



LABELING UNIVERSAL WASTE

UNIVERSAL WASTE

CONTENTS _____

ACCUMULATION START DATE _____

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

Note: For Universal Waste, the Start Accumulation date is the date the 1st waste is placed in the container.

SHIPPING PAPERS FOR RECYCLING & UNIVERSAL WASTE

- Shipping papers generated for universal waste and recycled waste will usually be a bill of lading;
- A salaried manager is responsible for verifying the accuracy of all the paperwork (bill of lading) used for transporting Universal Waste;
- The Facility Manager must retain all paperwork in the Records Tab of the Hazardous Waste Management procedure manual, chronologically by shipment.

Appendix I – Waste Classification Profile

Generating Site: _____	Completed by: _____	Date: _____
Region EHS Mgr.: _____		
Waste Description: _____		
Generating Process: _____	Process Description: _____	

General Characteristics:

Phase: Liquid _____% Solid _____% Sludge _____% Powder _____% Gas _____%
Waste is a: Single material _____ Mixed wastes _____
Color: _____ Odor: _____

Waste Profile Information:

Is this a USEPA RCRA Hazardous Waste?	Yes ___	No ___
Is this a USEPA RCRA Acutely Hazardous waste?	Yes ___	No ___
Is this a State Hazardous Waste?	Yes ___	No ___
Is this waste subject to land disposal restrictions?	Yes ___	No ___
Is this Universal Waste	Yes ___	No ___
Is this used oil?	Yes ___	No ___
Does the waste contain PCBs?	Yes ___	No ___
Is this Regulated Medical Waste?	Yes ___	No ___
Waste Determination by:	TCLP/Lab. Analysis _____ (Attach analysis report)	
	Generator Knowledge _____ (Describe & attach source documents)	

List the USEPA Hazardous Waste Codes:

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

List any State Hazardous Waste Codes:

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

Hazardous Characteristics:

Ignitable _____	Corrosive _____	Toxic _____	Reactive _____
Other Hazard Information:			
Explosive _____	Water Reactive _____	Air Reactive _____	Shock Sensitive _____
Pyrophoric _____	Biological _____	Oxidizer _____	Asbestos _____
			Ozone Depleting _____
Shipping Information:			
DOT Proper Shipping Name: _____			
DOT Hazardous Material? Yes ___ No ___		Marine Pollutant? Yes ___ No ___	
RQ: _____ Lbs.	Packing Group: _____	Hazard Class: _____	ID#: _____

Approved by Region EHS Manager: Yes ___ No ___ Date: _____

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Effective Date: _____
Approved: _____

*Note: All printed copies of this document, except the Site-Specific Appendix, are considered uncontrolled and for reference only. Current revision must be verified on the **Company Name** web site.*

APPENDIX J – SITE EMERGENCY CONTACTS

CALL THESE FIRST

EPA ID #: _____

IF THERE IS A FIRE OR PEOPLE ARE INJURED:

Local Emergency Assistance: 911 and/or number shown

Fire Department Phone # _____

Authorized Hazardous Waste Manager

Name _____ 24-Hr Phone # _____

Site/Site Manager

Name _____ 24-Hr Phone # _____

Operations Manager or Assistant Manager

Name _____ 24-Hr Phone # _____

THEN CALL:

[EMERGENCY SPILL RESPONSE CO.]: _____

COMPANY NAME Region EHS Manager

Name _____ 24-Hr Phone # _____

Additional Emergency Contacts & Assistance as needed:

Police Department Phone # _____

Ambulance Phone # _____

REGULATORY NOTIFICATIONS – AUTHORIZED HAZARDOUS WASTE MANAGERS ONLY

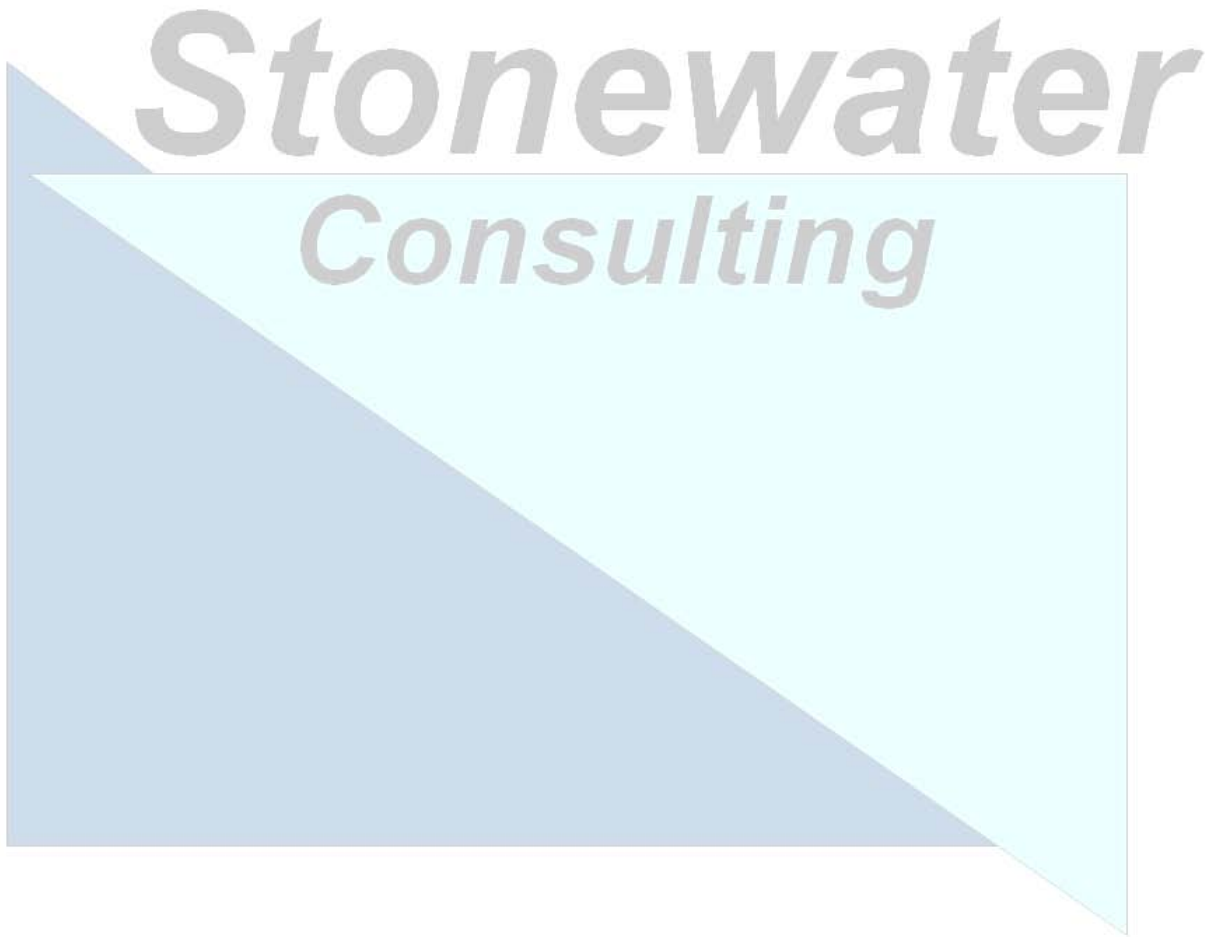
Local Regulatory Agency Name: _____ Phone _____

State Response Center/Hotline Phone # _____

National Response Center (NRC): (800) 424-8802

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APPENDIX K - STATE-SPECIFIC REQUIREMENTS



APPENDIX R - REGULATIONS

1. FEDERAL

- 1.1. EPA
 - 1.1.1. Solid Waste 40CFR260
 - 1.1.2. Generator Req'ts 40CFR262
 - 1.1.3. TSDF Req'ts 40CFR265
 - 1.1.4. Haz Waste Listing 40CFR261
 - 1.1.5. Universal Waste 40CFR273
 - 1.1.6. Used Oil 40CFR279
 - 1.1.7. Land Disposal Restrictions 40CFR286
 - 1.1.8. PCBs 40CFR761
- 1.2. DOT
 - 1.2.1. Hazardous Materials 49CFR171
 - 1.2.2. Haz.Mat.Transportation 49CFR172
 - 1.2.3. Shipments & Packaging 49CFR173

2. STATE

- 2.1. AZ <http://www.azleg.state.az.us/ArizonaRevisedStatutes.asp?Title=49>
- 2.2. CA <http://government.westlaw.com/linkedslice/default.asp?Action=TOC&RS=GVT1.0&VR=2.0&SP=CCR-1000>
- 2.3. <http://www.ciwmb.ca.gov/Regulations/>
- 2.4. CO <http://www.cdph.state.co.us/regulations/hazwaste/index.html>
- 2.5. DE <http://www.dnrec.delaware.gov/info/Rules.htm>
- 2.6. FL http://www.dep.state.fl.us/waste/quick_topics/rules/default.htm
- 2.7. IN <http://www.in.gov/legislative/ic/code/title13/>
- 2.8. KY <http://www.lrc.state.ky.us/kar/TITLE401.HTM>
- 2.9. MD http://www.dsd.state.md.us/comar/subtitle_chapters/26_Chapters.htm
- 2.10. MI http://www.michigan.gov/deq/0,1607,7-135-3307_4132-14902--,00.html#Waste
- 2.11. NC <http://www.wastenotnc.org/laws.htm#state>
- 2.12. NJ <http://www.state.nj.us/dep/dshw/resource/rules.htm>
- 2.13. NM www.nmenv.state.nm.us/Common/regs_idx.html
- 2.14. NV <http://ndep.nv.gov/admin/nac44401.htm>
- 2.15. NY <http://www.dec.ny.gov/regs/2491.html>
- 2.16. OH http://www.epa.state.oh.us/dhwm/laws_regs.html
- 2.17. PA <http://www.depweb.state.pa.us/landrecwaste/cwp/view.asp?A=1242&Q=455143>
- 2.18. SC <http://www.scdhec.gov/lwm/html/regs.html>
- 2.19. VA <http://www.deq.virginia.gov/waste/wasteregs.html>