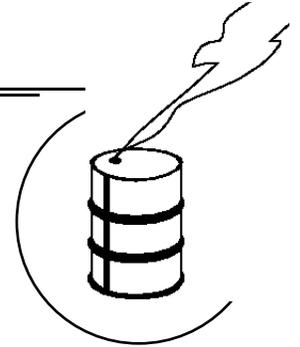




# Hazardous Waste Generator?

## Pollution Prevention Survey Project

Get rid of waste and reduce your regulatory burden through pollution prevention!



- Remember, your forest/district is fully responsible for determining if *any* of the wastes you generate are hazardous according to the Resource Conservation and Recovery Act (RCRA). If there are any, you must collect, store, transport, and dispose of them in a prescribed manner, and must keep certain records.
- You are a Conditionally Exempt Small Quantity Generator (CESQG) if you generate less than 100 kilograms (approximately one-half of a 55-gallon drum) of RCRA waste in any one calendar month. Most forests/districts are CESQGs; it is advantageous to maintain this status or completely eliminate hazardous waste generation through pollution prevention efforts.
- You are a Small Quantity Generator (SQG) if you generate more than 100 kilograms, but less than 1,000 kilograms (approximately four and one-half 55-gallon drums) of RCRA hazardous waste in any one calendar month. SQGs have increased training and administrative burdens which are expensive and time-consuming; this category should be avoided if possible.
- You are a Large Quantity Generator (LQG) if you generate more than 1,000 kilograms of RCRA hazardous waste in any one month. If you become a LQG, your training, administrative, and management responsibilities increase significantly which will likely require an on-site hazardous waste specialist.
- Remember, your waste is considered hazardous if it contains any of over 400 *listed* wastes, or if it has RCRA hazardous waste “characteristics”: *ignitable* (flash point equal to or less than 140° F), *corrosive* (with a pH of less than 2 or greater than 12.5), *reactive* (explosive when mixed with other materials), or *toxic* (e.g., heavy metals or certain pesticides).
- All hazardous wastes must be stored and labeled properly, and shipped off-site within 180 days after filling a drum. You may not accumulate more than 1,000 kilograms at your site if you are a CESQG.
- You will need an EPA Identification Number if you ship hazardous waste off-site, regardless of size! See the Forest Service resource manual listed below.



Got questions? The answers can be found in the *Environmental Tool Kit for the USDA Forest Service*, and the *Environmental Resource Manual for the USDA Forest Service*. For additional copies or more assistance, contact Robert C. Steckley, USDA Forest Service Rocky Mountain Region (Region 2) RCRA Project Manager at (303) 275-5173 (voice), (303) 275-5170 (facsimile), or [rsteckle/r2@fs.fed.us](mailto:rsteckle/r2@fs.fed.us).



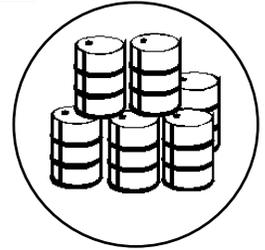


# Labeling Hazardous Waste

## Pollution Prevention Survey Project

Get rid of waste and reduce your regulatory burden through pollution prevention!

- All hazardous wastes (per the definition of the Resource Conservation and Recovery Act (RCRA)) must be stored in a proper container with an acceptable label. Otherwise, you may face a potential regulatory enforcement notification action. See the Forest Service resource manual (cited below) for a discussion of storage containers and limits.



- Every container of hazardous waste must contain a label that has at least the following information:
  - Proper Department of Transportation (DOT) shipping name
  - Proper DOT identification number
  - Proper EPA Waste Code (number) of the waste
  - Your generator EPA Identification Number, name and address
  - Type of hazardous waste (e.g., listed, ignitable, reactive, corrosive, or toxic)
  - Date when container becomes full
  - The words "Hazardous Waste"

All other labels (e.g., original labels if the drum has been previously used) must be removed.

- You can obtain standard hazardous waste drum labels from many sources, e.g., a safety products supplier.
- You are not in compliance with hazardous waste labeling requirements.



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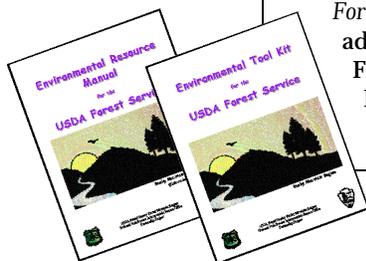


# Storing Hazardous Wastes

## Pollution Prevention Survey Project

Get rid of waste and reduce your regulatory burden through pollution prevention!

- You can reuse product drums if they are Department of Transportation (DOT) approved. Be sure to remove all labels and clean them thoroughly.
- Segregate all hazardous wastes. Do not mix non-hazardous wastes into hazardous wastes. Store different wastes in separate containers.
- Maintain a hazardous waste storage area. Restrict access to authorized personnel only. Inspect this area frequently for possible leaking drums – if any are found, contact your forest/district pollution prevention and/or health and safety coordinator. Remember – **safety first!**
- After a hazardous waste container is full record the date on the container label and do not keep it beyond the allowable time.
- As a one-time effort, survey your entire forest/district and collect all wastes that are suspected as being hazardous, label them, and arrange for off-site disposal in an approved manner. If the contents of a waste are unknown they must be assumed to be hazardous and treated accordingly.
- Don't overlook cleanup water from pesticide operations. This is very likely a hazardous waste and if not used as makeup water in the next batch of pesticides, it must be collected and stored as a hazardous waste.
- Contaminated wastewater and soils from spills or leaks from above ground and underground storage tanks must be collected and disposed of as hazardous wastes. These should be handled separate from your other wastes.
- Post the *CESQG/SQG Hazardous Waste Storage Record* form at each hazardous waste storage location. Note each movement of hazardous waste into or out of the location. Use a new form each month and file completed ones in your centralized recordkeeping area.
- You are not in compliance with requirements for storing hazardous waste.



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# Hazardous Waste Disposal

## Pollution Prevention Survey Project

Get rid of waste and reduce your regulatory burden through pollution prevention!



- Your forest/district retains the liability of all hazardous waste from when it is generated regardless of who you contract with for transportation or ultimate disposal (“cradle-to-grave” responsibility).
- You are responsible for identifying all hazardous waste, and the proper storage, transportation, and disposal. Be *careful* who you turn your wastes over to for disposal, and make sure your waste manifest is correct!
- There are many qualified and reputable hazardous waste transporters and disposal facilities; make sure they are permitted, do not have EPA violations or actions, and that you can rely on them. See the Forest Service resource manual for more information.
- Make sure you consider all of your potentially hazardous waste, including: traditional spent solvents, still bottoms, leftover oil-based paints, mercury-containing fluorescent lamps, service-provider solvent replacement programs, PCB-containing magnetic fluorescent ballasts, and many others.
- Ensure that all training requirements for employees transporting hazardous waste are fulfilled as required by Forest Service Manual (Section 2161.44).



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Rocky Mountain  
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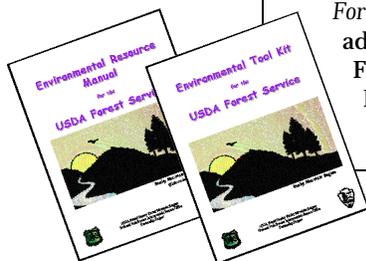
# Hazard Communication

## Pollution Prevention Survey Project

Get rid of waste and reduce your regulatory burden through pollution prevention!



- A hazard communication program is required if you generate hazardous waste at your site. This program can be forest-wide or for the district that is generating the hazardous waste.
- A written hazard communication plan is required for each hazard communication program. This plan outlines the forest/district's approach to providing the necessary information and training to employees regarding workplace chemical hazardous materials and hazardous waste.
- A copy of the correct and latest version of a Material Safety Data Sheet (MSDS) must be strategically placed within the workplace for ready access to every employee for every product that the manufacturer considers hazardous that is located in that workplace area.
- For all products that the manufacturer considers hazardous, the forest/district must provide warning labels. If bulk product is divided into smaller containers, the smaller containers must also be properly labeled.
- Your forest/district must develop a complete list of all hazardous products that are present on the district or forest.
- You must keep records of all employee hazard communication training. Include these records in your recordkeeping files and keep them indefinitely.
- Conduct training as prescribed by the Forest Service in the document entitled "*Hazard Communication*."
- If you generate hazardous waste, a Safety and Health Coordinator must be assigned to accomplish the responsibilities outlined in the Forest Service Manual (Section 2160.43b).
- Additional training may be required as prescribed by the Forest Service Manual in Sections 2161.04c, 2161.4, 2161.41, 2161.41a, 2161.41b, 2161.42, 2161.43, and 2161.44.



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