



WASTE MANAGEMENT - HAZARDOUS WASTES

ENVIRONMENTAL GUIDELINES



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PURPOSE

The purpose of the guideline is to provide guidance on what DEN's expectations are for Hazardous Waste Management. Following this environmental guideline will prevent waste that is hazardous from being disposed of in the landfill while promoting compliance with State of Colorado Hazardous Waste Regulations and Department of Transportation Shipping Regulations. This environmental guideline outlines a compliance obligation for DEN and Business Partners.

ACTIVITY DEFINITION

Hazardous wastes which includes aerosols, chemicals (antifreeze, solvents, nicotine wastes, etc), lead, mercury-containing materials, absorbents and shop towels, among others that fall under RCRA purview. The activity of hazardous waste management includes:

- Notifying the State of Colorado of hazardous waste activity – using the CDPHE form
- Properly identifying – use of the RCRA rules to determine the characteristics of the waste
- Labeling and marking - adhering a hazardous waste label and DOT labels to display the hazardous characteristics;
- Storing and handling - staging of waste in secondary containment while awaiting disposal;
- Offering for transportation - completion of waste profile, land disposal restriction form and hazardous waste manifest; and
- Disposing– delivery of waste to the treatment disposal facility
- Record keeping
- Training

EXPECTATIONS

Best Practices:

- Each generator of waste is specifically responsible for understanding waste management regulations and managing their waste; accordingly, this Environmental Guideline is meant as guidance only and does not supersede any regulations.
- Hazardous waste must be properly managed according to all legal requirements.
- Regulatory actions:
 - Managers of facilities who manage hazardous wastes shall submit the Colorado Department of Public Health and the Environment equivalent to the EPA



Identification Number using form USEPA 8700-12 (i.e., the Colorado Notification of Regulatory Waste Activity Form) and pay stipulated management fees to the same (6 CCR 1007-3), if required by regulation.

- The generator must be aware of their generator status, i.e. “large”, “small” or “very small”.
- All generators shall properly identify and characterize hazardous wastes using generator process knowledge, SDS or analytical testing, and available regulatory guidance.
- SDSs should be made available to all employees and maintained on file by the Generator at the facility. Manufacturers will supply these documents on demand. Generator knowledge documentation must be kept on site.
- Containerize and label hazardous waste according to DOT, RCRA, and State regulations for storage and shipping.
- Maintain legible hazardous waste labels and markings on all containers and tanks; labels on all containers must have the name of the owner of the container and an associated contact telephone number and must clearly indicate the contents. Markings must be used to indicate characteristic hazards of the waste.
- Storage locations require rigorous supervision for compliance with general housekeeping, access, emergency response, inspection and recordkeeping, secondary containment, and spill control, as well as time limitation for storage depending on generator status.
- Hazardous waste satellite and storage areas are suggested to be inspected and documented every week for RCRA- compliant containment, emergency response items, labeling, and waste hold times. If the facility is classified as a large quantity hazardous waste generator this action is required.
- Segregate, handle, store, and track inventory of hazardous wastes as per regulatory guidance.
- Disposal Activities:
 - All hazardous waste must be profiled by the landfill for disposal. This frequently requires chemical analyses be performed by an EPA-certified analytical laboratory, or equivalent.
 - Generate and maintain a profile with the disposal facility for all hazardous waste.
- Waste must be offered for shipping and disposal in compliance with RCRA and state regulations. Special care should be taken in the preparation of manifests, Land Disposal Regulations (LDRs), and disposal site notification of receipt.



- Records must be kept during generation and at least three years after disposal. This includes analytical results, Safety Data Sheets (SDSs), and any other records used in waste characterization. This includes:
 - Any process knowledge determinations to include or exclude a waste as hazardous,
 - Hazardous waste storage area inspections,
 - Waste shipping Hazardous Waste Manifest,
 - Land Disposal Restriction Form, and
 - Disposal forms.
- Training information:
 - Employees involved in the handling of hazardous wastes must receive site-specific training per RCRA guidance.
 - Site-specific hazardous waste training records for employees must be maintained on site by the generator for the employee during active employment and a minimum of three years after leaving the facility. HAZWOPER OSHA training for companies/employees subject to OSHA regulations.
- If a spill occurs, call DEN Communications Center immediately at 303-342-4200 for all spills.

Shall Not:

- Individuals are not allowed to handle or manage hazardous waste unless they have appropriate training and personal protective equipment.
- Hazardous waste cannot be left unidentified, unclassified, and inadequately managed due to lack of knowledge of regulatory requirements.

REFERENCES

Contacts

- DEN Environmental Services (Main Line): 303-342-2730;
DENEnvironmental@flydenver.com

Additional Resources

- 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
- 40 CFR 261-279 Federal RCRA Regulations



- 40 CFR 100-185 DOT Regulations
- 6 CCR 1007-3, Part 261-279 State RCRA Regulations
- DEN Rules and Regulation 180
- Denver Wastewater Management Division Rules and Regulations
- Metro Water Recovery Rules and Regulations
- Regulatory documents and frameworks (ex: MS4 permit requirements, air quality permit requirements, state and federal requirements, etc)