

ADEM

AWMA Southern Section Meeting Hazardous Waste Overview



September 28, 2023

- Hazardous Waste Compliance Overview
- Common Findings
- Hazardous Waste Incinerator Backlog





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Hazardous Waste Facility Categories

- Treatment, Storage or Disposal Facility (TSDF)
 - Facilities that obtain a AHWMMMA Permit to Treat, Store or Dispose of Hazardous Waste (HW)
- Large Quantity Generator (LQG)
 - Generate \geq 1000 Kg (2200 lbs) of Non-Acute HW or $>$ 1 Kg (2.2 lbs) of Acute HW During a Calendar Month
- Small Quantity Generator (SQG)
 - Generate $>$ 100 Kg (220 lbs) but $<$ 1000 Kg (2200 lbs) of Non-Acute HW and \leq 1 Kg (2.2 lbs.) of Acute HW During a Calendar Month
- Very Small Quantity Generator (VSQG)
 - Generate \leq 100 Kg (220 lbs) of Non- Acute HW and \leq 1 Kg (2.2 lbs.) of Acute HW During a Calendar Month



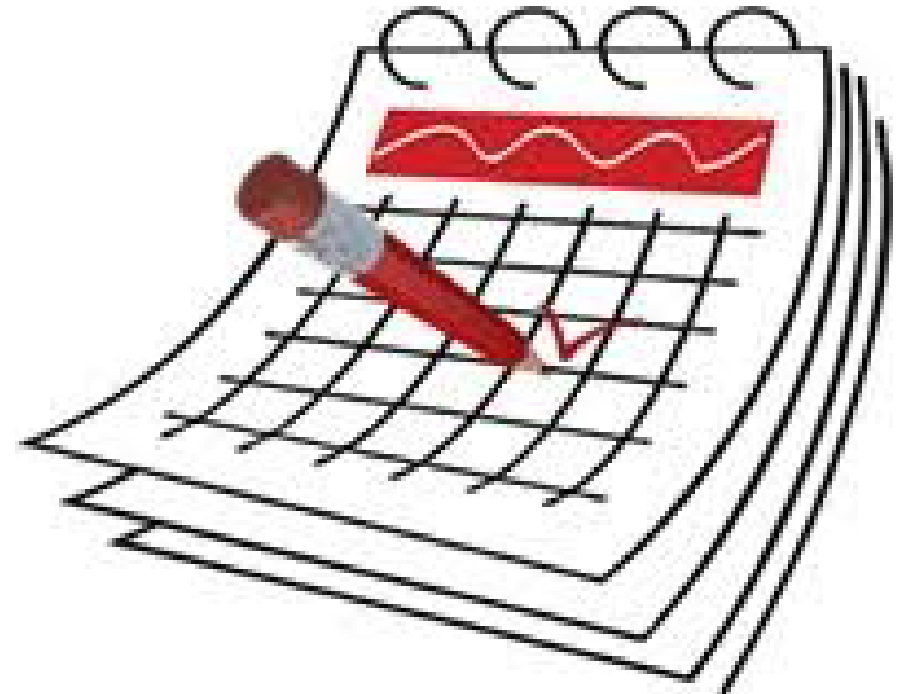
Annual Notification Schedule

ADEM Admin. Code r.
335-14-1-.02(1)(a)267.

If your site of waste generation is located in the county of ...	Submit ADEM Form 8700-12 by the 15th of ...
Colbert, Fayette, Franklin, Greene, Hale, Lamar, Lauderdale, Lawrence, Limestone, Marion, Morgan, Pickens, Sumter, Tuscaloosa, Walker, Winston	February
Blount, Cherokee, Cullman, DeKalb, Etowah, Jackson, Madison, Marshall, St. Clair	April
Jefferson	June
Calhoun, Chambers, Clay, Cleburne, Coosa, Elmore, Lee, Macon, Montgomery, Randolph, Shelby, Talladega, Tallapoosa	August
Autauga, Baldwin, Barbour, Bibb, Bullock, Butler, Chilton, Choctaw, Clarke, Coffee, Conecuh, Covington, Crenshaw, Dale, Dallas, Escambia, Geneva, Henry, Houston, Lowndes, Marengo, Monroe, Perry, Pike, Russell, Washington, Wilcox	October
Mobile	December

Inspection Frequency in AL

- TSDF
 - 100% Inspected Annually
- LQG
 - 20% Inspected Annually
 - Once Every 5 Years
- SQG
 - 3% Inspected Annually
 - Priority to sites never inspected/complaints
- VSQG
 - As Needed Basis

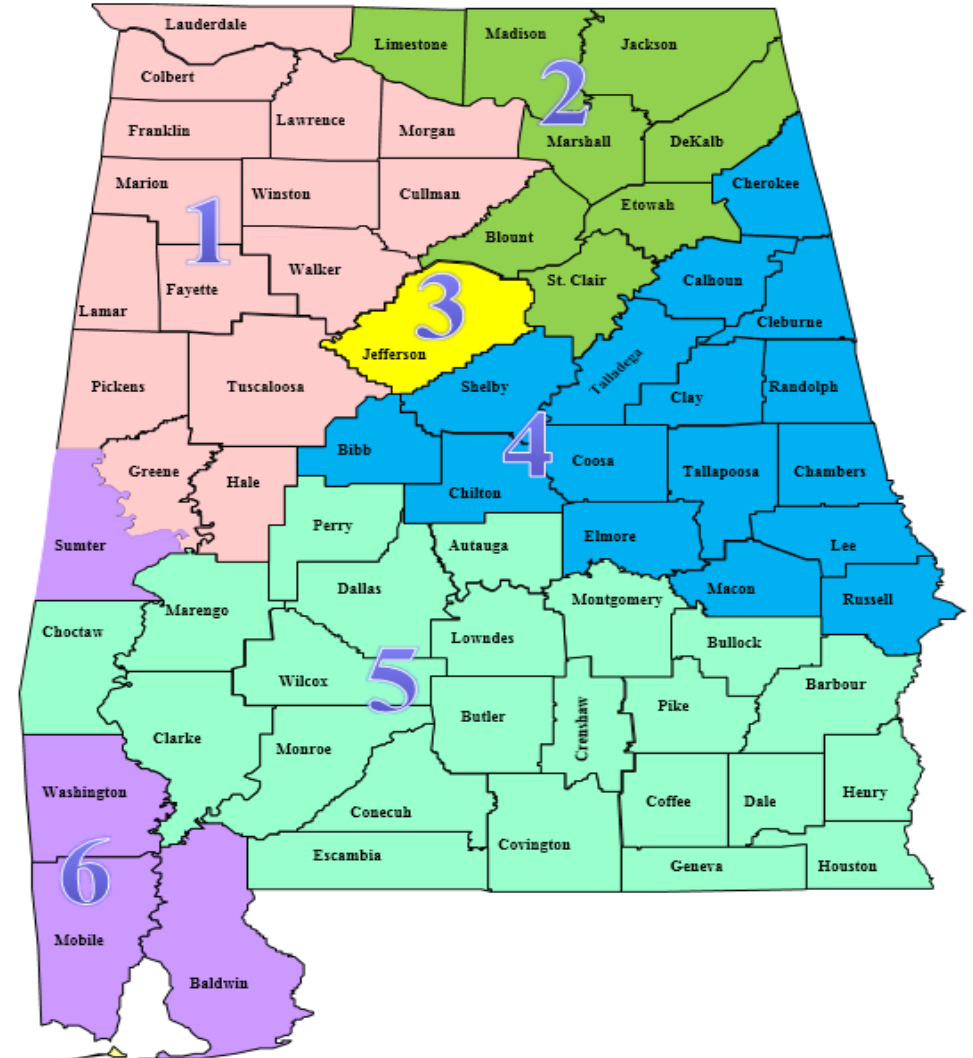




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Industrial Hazardous Waste Branch Areas of Responsibility

Area 1	Andrea Slay	(334) 271-7758
Area 2	Corey Holmes	(334) 270-7852
Area 3	Paul Searcy	(334) 271-7896
Area 4	Steven Phillips	(334) 270-5630
Area 5	Craig Schimmer	(334) 271-7720
Area 6	Lanny Sasser	(334) 271-7768

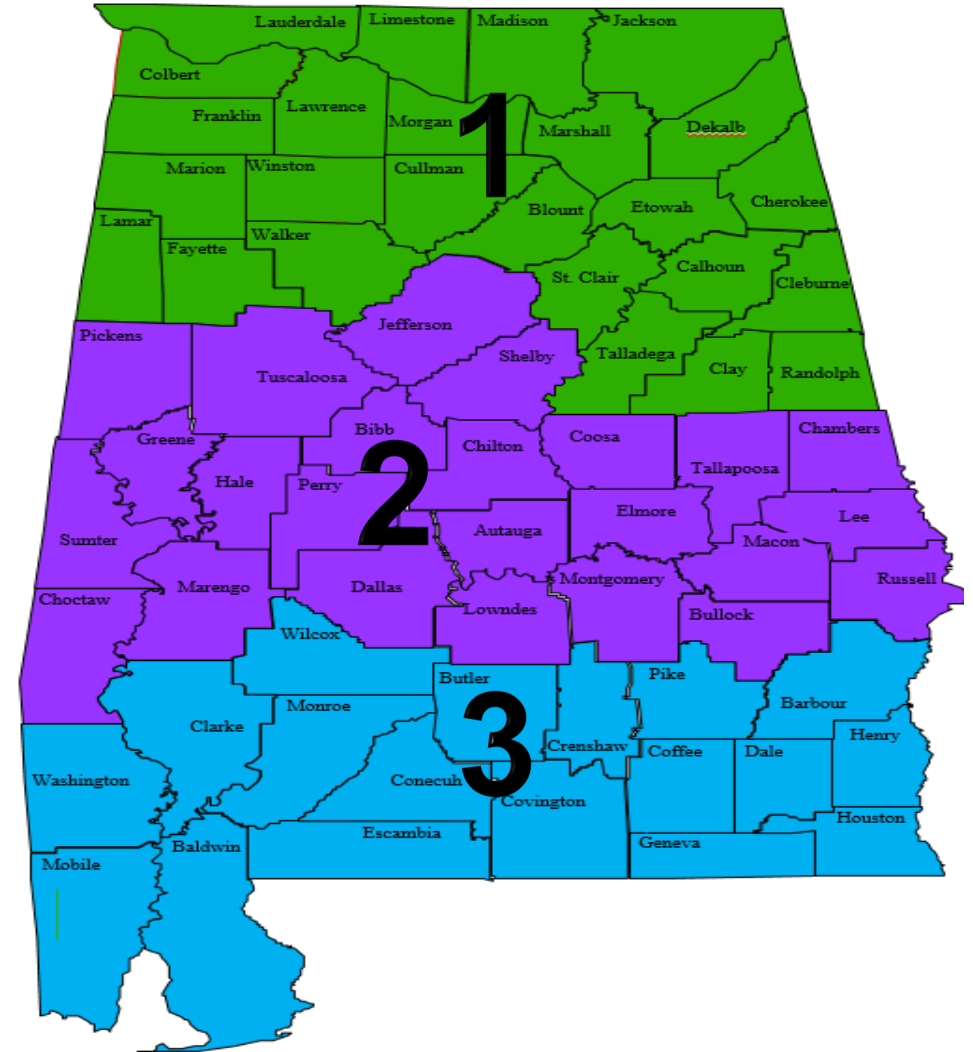




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Governmental Hazardous Waste Branch Areas of Responsibility

Area 1	Adrian Corbitt	(334) 274-4163
Area 2	Jazz Huff	(334) 271-7837
Area 3	Lee Gunter	(334) 271-7744



The Hazardous Waste Inspection



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Common Areas of Concern

- Container Storage / Labeling
- Facility Records
- Waste Determinations

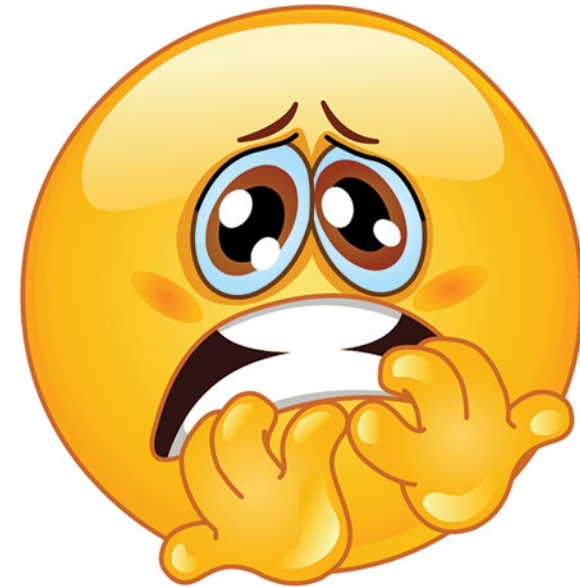


“We only have a few rules around here,
but we really enforce them.”

Common Areas of Concern

- Containers of Hazardous Waste, Universal Waste and Used Oil
 - ❑ Closed
 - ❑ Labeled appropriately
 - ❑ Compatible with the material it is holding
 - ❑ Good condition
- Contingency Plan
 - ❑ Emergency Coordinators are up to date
 - ❑ Proof of attempts of submission to Local Authorities
 - ❑ Quick Reference Guide

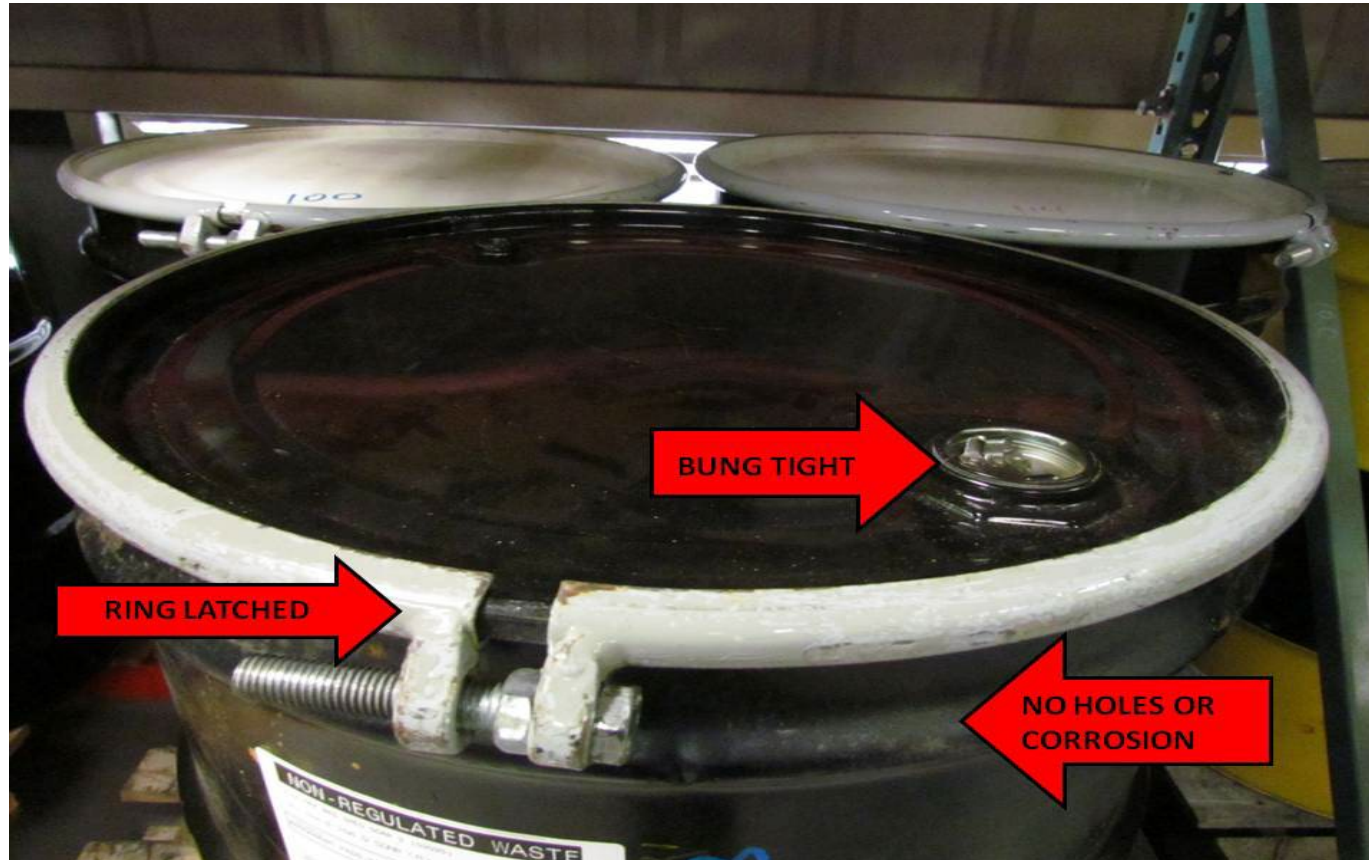
<http://www.adem.alabama.gov/programs/land/landforms/ContingencyPlanQuickReferenceGuide.pdf>
- Waste Determinations
- Address Violations in a Timely Manner



Open Containers / Waste Determinations



Proper Drum Closure





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Common Areas of Concern

Hazardous Waste / Used Oil Container Labeling



Common Areas of Concern

Proper Used Oil

HAZARDOUS WASTE

STATE AND FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.

GENERATOR INFORMATION:

NAME _____

ADDRESS _____ PHONE _____

CITY _____ STATE _____ ZIP _____

EPA IDENTIFICATION NO. / MANIFEST TRACKING NO. _____

EPA WASTE NO. _____ CA WASTE NO. _____ ACCUMULATION START DATE _____

CONTENTS, COMPOSITION: _____

PHYSICAL STATE: SOLID LIQUID

HAZARDOUS PROPERTIES: FLAMMABLE TOXIC CORROSIVE REACTIVITY OTHER _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

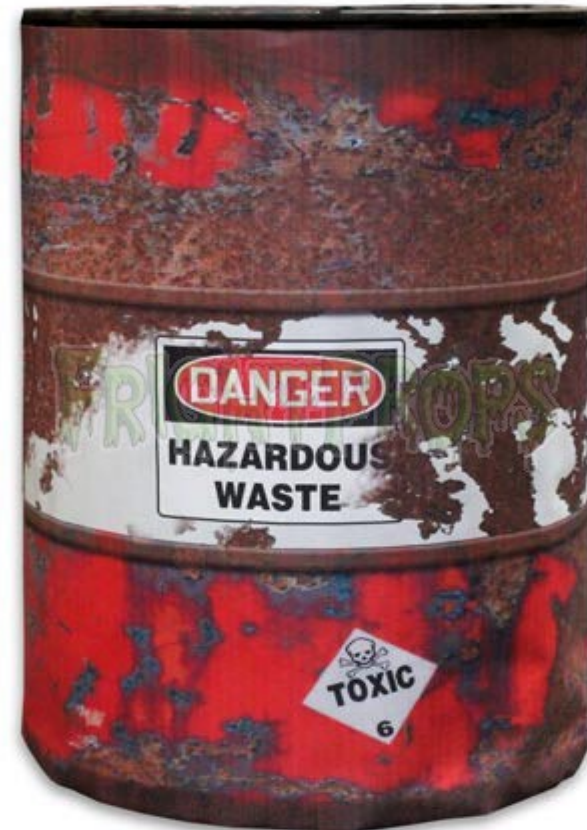


Common Areas of Concern

Indication of the Hazard in Satellite and Central Accumulation



Condition of Containers



Universal Waste



Proper Universal Waste Labeling

**UNIVERSAL
WASTE**

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

CONTENTS _____

ACCUMULATION START DATE _____

“Universal Waste”, “Waste”, or “Used”:

- Batteries
- Lamps
- Mercury Containing Equipment
- Thermostats
- Aerosol Cans
- Pesticides

Common Areas of Concern

Aisle Space



Stacking





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Top 10 Violations

10. CAA Aisle Space & Stacking

9. Contingency Plan

8. Documenting Required Inspections

7. Proper Security

6. Universal Waste Requirements

5. Satellite Accumulation Requirements

4. Hazardous Waste Determinations

3. Container Requirements

2. Secondary Containment Requirements

1. Storage of Hazardous Waste over 180/90 Days



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More Information

Factsheets and other information regarding HW Topics may be found at:

<http://adem.alabama.gov/programs/land/guidanceReports.cnt>

&

<http://adem.alabama.gov/MoreInfo/compAssistance.cnt>

Telephone: (334) 270-5637

HW Incinerator Backlog

- On-going nationwide backlog for containerized HW
 - COVID-19, Trucking Issues, Supply Chain Issues, Waste Production Increase, Incinerator Maintenance
- August 10, 2021, EPA Memo outlined options
 - <https://www.epa.gov/hwgenerators>
- Obtaining an extension for accumulating HW on-site
 - <http://adem.alabama.gov/MoreInfo/compAssistance.cnt>
 - Extensions only granted for up to 30 days at a time
 - Some States not granting more than one extension



HW Accumulation Time Extension Requests

- Written request for an extension must include:
 - Description of the type of waste affected by the delay
 - All applicable waste codes
 - Number and size of containers
 - Estimated volume/weight of the waste
 - Date on which the accumulation time limit will be reached
 - Extensions not granted if time limit exceeded already
 - Description detailing the reason for the extension



Exception Reporting

- Required for waste shipments that do not reach the designated facility in a timely manner
 - LQG - must receive final manifest from the designated facility within 45 days of initial waste shipment.
 - SQG - must receive final manifest from the designated facility within 60 days of initial waste shipment.
- Manifests not received within timeframes require exception reporting by the generator.

- Significant increase in days in transit for HW shipments
 - LQG shipments exceeding 45 days in transit
 - 2019 = 2,587 2022 = 10,331
 - SQG shipments exceeding 60 days in transit
 - 2019 = 1,385 2022 = 3,687
- Bottom line = HW is being moved from transfer facility to transfer facility due to incinerator backlog
- Incinerator backlog not forecast to end soon



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Questions?



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