# 2023 HAZARDOUS WASTE COMPLIANCE CALENDAR











Facility:	EPA I.D.:
<b>Emergency Coordinator:</b>	
Phone #:	Generator Category:

## **JANUARY WEEKLY INSPECTION LOG**

Date					
Time					
Inspected by					
Labeled as "Hazardous Waste"	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with EPA waste code	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with description of hazard	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with accumulation start date	Y   N	Y   N	Y   N	Y   N	Y   N
Containers closed, no leaks/corrosion	Y   N	Y   N	Y   N	Y   N	Y   N
Notes on corrective actions taken					



Contact BEP for free confidential assistance on environmental regulations, air quality permitting, hazardous waste management, sustainability, and more:

1-800-882-3233 or www.unrbep.org



Notify NDEP of spills of reportable quantities: 1-888-331-NDEP (6337)



Don't forget to document your training! Training records must be maintained for 3 years.

After training is complete, make sure your training is well understood by your employees. Management should periodically monitor compliance with hazardous waste procedures for their facility as a best practice.

Although training is only required upon hire and annually thereafter, consider providing more training opportunities for employees if needed.

## JANUARY 2023

Sun	Mon	Tues	Wed	Thur	Fri	Sat
1	2	3	4	5	6	7
New Year's Day						
8	9	10	11	BEP Hazardous Waste 101 - Reno	13	14
15	Martin Luther King Jr. Day; Nevada Peace Week Begins	17	18	BEP Hazardous Waste 101 - Las Vegas	20	21
22	23	24	25	26	27	28
29	30	31				

#### Mark your calendar with:

- hazardous waste storage inspection days
- hazardous waste shipping days
- episodic generation event

- training days
- inventory days
- equipment maintenance days

### **Personnel Training**

Personnel training is required for both small (SQGs) and large quantity generators (LQGs). January is an ideal time to train personnel and set them up for a successful year.

SQGs must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies (40 CFR § 262.16(b)(9)(iii)).

LQGs must ensure new employees receive training within 6 months of hire or assignment to a hazardous waste role, and then annually thereafter. The training program must be designed to ensure that personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems (40 CFR § 262.17(a)(7)).



Need training resources? The EPA has online training modules that can supplement on-site training.

Training topic:	
Date:	Time:
Employee	e attendance

Total waste generated this month:

## **FEBRUARY WEEKLY INSPECTION LOG**

Date					
Time					
Inspected by					
Labeled as "Hazardous Waste"	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with EPA waste code	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with description of hazard	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with accumulation start date	Y   N	Y   N	Y   N	Y   N	Y   N
Containers closed, no leaks/corrosion	Y   N	Y   N	Y   N	Y   N	Y   N
Notes on corrective actions taken					

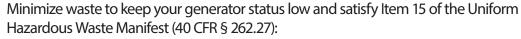


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- Use this calendar to create a schedule for routinely managing your inventory and minimize expired products by practicing First In First Out
- Design your processes and train employees to use hazardous materials as efficiently as possible
- Research and purchase alternative materials that are less hazardous such as Safer Choice products
- Review and change your processes to eliminate hazardous materials entirely
- Make sure your facility is managing certain hazardous wastes as universal wastes: batteries; lamps; mercury-containing equipment; and some pesticides



## FEBRUARY 2023

Mon	Tues	Wed	Thur	Fri	Sat
		1	2	3	4
			Groundhog Day		
6	7	8	9	10	11
13	14	15	16	17	18
	Valentine's Day				
20	21	22	23	24	25
President's Day					
27	28				
	6 13 20 President's Day	6 7  13 14  Valentine's Day  20 21  President's Day	6 7 8  13 14 15  Valentine's Day  20 21 22	1 2 Groundhog Day  6 7 8 9  13 14 15 16  Valentine's Day  20 21 22 23	1 2 3 3 Groundhog Day 6 7 8 9 10 13 14 15 16 17 Valentine's Day 20 21 22 23 24 President's Day

#### Mark your calendar with:

- hazardous waste storage inspection days
- hazardous waste shipping days
- episodic generation event

- training days
- inventory days
- equipment maintenance days

### **Plan Ahead: Episodic Event**

An episodic event is "an activity that does not normally occur during a generator's operations and that causes the generator to exceed the threshold for its normal generator category for that month." (40 CFR § 262.231).

Nevada allows Very Small Quantity Generators (VSQGs) and SQGs to maintain their existing generator status during temporary events that increase hazardous waste generation, such as annual clean-outs or accidental spills. These events can be planned or unplanned. Episodic event relief is allowed only once per calendar year unless a facility petitions NDEP for relief a second time. Additionally, the second event cannot be of the same type as the first. For example, if the first event was a planned clean-out, the second event must be unplanned. Both types of events require NDEP notification and an EPA ID Number.

It is important to note that many facilities are routinely failing to give proper notice of their episodic events. Your facility must give 30 days notice prior to a planned event. An unplanned event must give notice within 72 hours.



Are you a VSQG without an EPA ID Number? Sign up for one online using myRCRAid through the RCRAInfo Industry Application.

Training topic:	
Date:	Time:
Employe	e attendance

Total waste generated this month:

### **MARCH WEEKLY INSPECTION LOG**

Date					
Time					
Inspected by					
Labeled as "Hazardous Waste"	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with EPA waste code	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with description of hazard	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with accumulation start date	Y   N	Y   N	Y   N	Y   N	Y   N
Containers closed, no leaks/corrosion	Y   N	Y   N	Y   N	Y   N	Y   N
Notes on corrective actions taken					



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Are you using knowledge of the process to make waste determination at your facility? Follow these steps :

- 1. Document all your waste streams and quantities generated each month
- 2. Determine if the waste meets the definition of a solid waste (40 CFR § 261.2)
- 3. If the waste meets the definition of a solid waste, use process knowledge and the Safety Data Sheet (SDS) to determine if the waste is a listed waste or a characteristic waste (corrosive, reactive, ignitable, or toxic)
- 4. Prepare written documentation that includes supporting information
- 5. Keep all documentation on file for hazardous and non-hazardous waste

## **MARCH 2023**

Sun	Mon	Tues	Wed	Thur	Fri	Sat
			1	2	3	4
5	6	7	8	9	10	11
Daylight Savings Time Begins	13	14	15	16	17 St. Patrick's Day	18
19	20 First Day of Spring	21	22	23	24	25
26	27	28	29	30	31 Cesar Chavez Day	

#### Mark your calendar with:

- hazardous waste storage inspection days
- hazardous waste shipping days
- episodic generation event

- training days
- inventory days
- equipment maintenance days

## Hazardous Waste Determination

Hazardous waste determinations must be made at the point of generation for each waste generated at your facility. Supporting documentation, such as safety data sheets, labratory analyses, TCLP tests, process flow diagrams, description of the process, or other sources of information must be maintained with the determination. Documentation can be stored electronically as long as it is accessible upon request during an inspection. Use the Waste Determination Tool at the end of this calendar to help you and your employees identify if your waste streams are hazardous.

Remember, waste determinations may change. If new raw materials are used or your processes change, that information must be updated. Review your hazardous waste determinations at least annually to ensure updates are included.



Need help with waste determinations? BEP has a fact sheet with more detail on how to identify your waste. Contact us for further assistance.

Training topic:	
Date:	Time:
Employe	e attendance

Total waste generated this month:

## **APRIL WEEKLY INSPECTION LOG**

Date					
Time					
Inspected by					
Labeled as "Hazardous Waste"	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with EPA waste code	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with description of hazard	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with accumulation start date	Y   N	Y   N	Y   N	Y   N	Y   N
Containers closed, no leaks/corrosion	Y   N	Y   N	Y   N	Y   N	Y   N
Notes on corrective actions taken					



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Consider these environmental sustainability strategies for your business:

- Incorporate sustainability initiatives into internal policies and goal setting
- Conduct energy audits in all departments to identify where and how you can improve
- Implement energy and water conservation practices
- Revise internal processes to use resources as efficiently as possible
- Switch to non-toxic or less hazardous products for janitorial products and other maintenance chemicals, using Safer Choice products where possible
- Prevent pollution and eliminate waste with the 4 Rs: refuse, reduce, reuse, and recycle
- Incentivize carpooling, biking, or public transportation services for staff
- Contact BEP for help with: creating a sustainability plan, expanding on current initiatives, connecting to available resources, planning for climate change resiliency, and more



## **APRIL 2023**

Sun	Mon	Tues	Wed	Thur	Fri	Sat
						1
						April Fool's Day
2	3	4	5	6	7	8
				Nevada Tartan Day		
9	10	11	12	13	14	15
Easter Sunday						Tax Day
16	17	18	19	20	21	22
Nevada Healthcare Decisions Day; Nevada						
Shaken Baby Syndrome Awareness Week						Earth Day
23	24	25	26	27	28	29
30					Nevada Arbor Day	
				1	<u> </u>	

#### Mark your calendar with:

- hazardous waste storage inspection days
- hazardous waste shipping days
- episodic generation event

- training days
- inventory days
- equipment maintenance days

### **Environmental Sustainability**

April 22nd is Earth Day, so it's a great time to create and implement environmental sustainability strategies for your business.

Operating in a manner that protects Nevada's water, air, and soil can lower costs, reduce risks, improve operational efficiency, and increase employee and customer loyalty. It will also prepare your business to be more resilient to the effects of climate change, such as extreme drought, heat, and wildfire smoke. It simply makes good business sense to explore sustainability strategies for your organization. Let BEP help your organization chart your path forward.

Learn from the experiences and advice of global leaders in sustainability by listening to the Sustainable Nation Podcast. Available through a partnership with BEP.





Wasted energy is wasted money. Download BEP's ENERGY STAR Action Workbook for Small Business to get you on the path toward improved efficiency and sustainability.

Training topic:				
Date:	Time:			
Employee attendance				

Total waste generated this month:

## **MAY WEEKLY INSPECTION LOG**

Date					
Time					
Inspected by					
Labeled as "Hazardous Waste"	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with EPA waste code	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with description of hazard	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with accumulation start date	Y   N	Y   N	Y   N	Y   N	Y   N
Containers closed, no leaks/corrosion	Y   N	Y   N	Y   N	Y   N	Y   N
Notes on corrective actions taken					



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Preparing for an inspection can be stressful, but there are actionable steps your facility can take to be ready for an inspection at any time.

- Keep records up to date and in one spot for easy access
- Regularly review waste streams to see where waste can be minimized
- Invest in updates in technology and materials
- Create written standard operating procedures to ensure consistency among staff
- Assign staff responsibility for inspecting hazardous waste storage areas
- Contact BEP to schedule a free site visit we will walk through your facility with you and share ideas on how you can prepare for an inspection

## **MAY 2023**

Sun	Mon	Tues	Wed	Thur	Fri	Sat
	1	2	3	4	5	6
	Law Day				Cinco de Mayo	
7	8	9	10	11	12	13
Mother's Day; Nevada Osteoporosis Prevention Week	15	16	17	Nevada Asian Culture Day	19	20
21	22	23	24	25	26	27
28	29	30	31			
	Memorial Day					

#### Mark your calendar with:

- hazardous waste storage inspection days
- hazardous waste shipping days
- episodic generation event

- training days
- inventory days
- equipment maintenance days

### **Key in on Compliance**

Some of the most common violations observed during hazardous waste inspections are the failure to:

- determine if your waste is hazardous or non hazardous;
- store waste properly by keeping containers closed, labeled, in good condition, and separated from incompatible wastes;
- conduct weekly inspections on hazardous waste storage areas;
- dispose of waste properly and safely; and
- maintain proper records and have them readily available during inspection, such as manifests or waste determinations.



Check out the EPA's handbook, Managing Your Hazardous Waste: A Guide For Small Businesses, for an overview on how small businesses can best comply with hazardous waste regulations.

Training topic:					
Date:	Time:				
Employe	Employee attendance				

Total waste generated this month:

### JUNE WEEKLY INSPECTION LOG

Date					
Time					
Inspected by					
Labeled as "Hazardous Waste"	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with EPA waste code	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with description of hazard	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with accumulation start date	Y   N	Y   N	Y   N	Y   N	Y   N
Containers closed, no leaks/corrosion	Y   N	Y   N	Y   N	Y   N	Y   N
Notes on corrective actions taken					



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It is your responsibility to know which generator category your facility falls into, as there are different regulatory requirements for each category (40 CFR § 262):

- VSQGs generate 220 lbs. or less of hazardous waste monthly, can store no more than 2,200 lbs of hazardous waste on site, and have no storage time limits
- SQGs generate between 220 to 2,200 lbs of hazardous waste monthly, can store no more than 13,200 lbs of hazardous waste on site, and can store waste up to 180 days
- LQGs generate 2,200 lbs or more of hazardous waste monthly, can have no waste storage quantity limits, and can store waste up to 90 days

The quantities listed are for non-acute hazardous waste only. Note that there are different limits for acute hazardous waste.



## **JUNE 2023**

Sun	Mon	Tues	Wed	Thur	Fri	Sat
				1	2	3
4	Nevada Mineral Industry Week Begins	6	7	8	9	10
11	12	13	14 Flag Day	15	16	17
18 Father's Day	19 Juneteenth	20	21 Summer Solstice	22	23	24
25	26	27	28	29	30	

#### Mark your calendar with:

- hazardous waste storage inspection days
- hazardous waste shipping days
- episodic generation event

- training days
- inventory days
- equipment maintenance days

### **Recordkeeping Requirements**

Keeping records organized and well maintained on site is essential to demonstrating proper management of your hazarous waste. Records can be digital or on paper, must be kept for a minimum of 3 years, and must be readily available for an inspector upon request during an inspection. BEP advises maintaining manifests indefinitely as a best practice. Records should include training records, inspection logs, manifests, safety data sheets, emergency preparedness documents, waste testing, exception reports and more. LQGs are specifically required to have a contingency plan in their records. Storing records together in a folder or binder will help keep them accessible. This calendar can be used as a tool for many of these recordkeeping requirements.



There are no recordkeeping requirements for VSQGs, although it is best practice. Check out the EPA's Summary Table for a guide on different generator requirements.

Training topic:				
Date:	Time:			
Employee attendance				

Total waste generated this month:

## **JULY WEEKLY INSPECTION LOG**

Date					
Time					
Inspected by					
Labeled as "Hazardous Waste"	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with EPA waste code	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with description of hazard	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with accumulation start date	Y   N	Y   N	Y   N	Y   N	Y   N
Containers closed, no leaks/corrosion	Y   N	Y   N	Y   N	Y   N	Y   N
Notes on corrective actions taken					



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In order to use e-Manifest, you must have an EPA ID Number and register with the system. Once registered, a "Site Manager" will need to be assigned.

Switching to digital recordkeeping by using e-Manifest allows your facility to have access to long-term records. BEP recommends keeping manifest records indefinitely for your facility and e-Manifest is a helpful tool to use for that goal.

If you do not register with e-Manifest, you need to make arrangements with your receiving facility to get paper copies so that your recordkeeping is compliant.

## **JULY 2023**

Sun	Mon	Tues	Wed	Thur	Fri	Sat
						1
2	3	4 Independence Day	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23 30	24 31	25	26	27	Nevada Buffalo Soldiers Day	29

#### Mark your calendar with:

- hazardous waste storage inspection days
- hazardous waste shipping days
- episodic generation event

- training days
- inventory days
- · equipment maintenance days

### Go Digital: e-Manifest

Hazardous waste generators, transporters, and receiving facilities can use e-Manifest as a single hub for reporting manifest data. This web-based system reduces the burden of preparing and tracking paper manifests, enables faster notification of issues related to hazardous waste shipments, and saves money for industry and state stakeholders. e-Manifests are administered through the RCRAInfo Industry Application, so if your facility has already registered through that platform, it will be a seamless transition. Although paper manifests are still accepted on US EPA form 8700-22, using e-Manifest is highly encouraged by the agency and can cost less.



NDEP has online resources available on accessing and using the e-Manifest system.

Training topic:					
Date:	Time:				
Employee attendance					

Total waste generated this month:

### **AUGUST WEEKLY INSPECTION LOG**

Date					
Time					
Inspected by					
Labeled as "Hazardous Waste"	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with EPA waste code	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with description of hazard	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with accumulation start date	Y   N	Y   N	Y   N	Y   N	Y   N
Containers closed, no leaks/corrosion	Y   N	Y   N	Y   N	Y   N	Y   N
Notes on corrective actions taken					



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It is widely recognized that people of color, low-income communities, and other historically marginalized groups are disproportionately impacted from the effects of climate change, pollution, and other environmental issues. Environmental Justice (EJ) initiatives can be implemented at the local level too.

How does EJ and small business overlap? The EPA has set a goal to increase inspections in overburdened communities with potential EJ concerns. Is your business located in an area with EJ concerns? Is your business owned by or does it employ members of marginalized communities that may have increased exposure to environmental risks such as hazardous chemicals?

## **AUGUST 2023**

Sun	Mon	Tues	Wed	Thur	Fri	Sat
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	Nevada Environmental Justice Day	30	31		

#### Mark your calendar with:

- hazardous waste storage inspection days
- hazardous waste shipping days
- episodic generation event

- · training days
- inventory days
- equipment maintenance days

#### **Environmental Justice**

The EPA defines Environmental Justice (EJ) as "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation and enforcement of environmental laws, regulations, and policies."

The Federal Government's Justice40 Initiative is leading the way in expanding resources for EJ concerns. Justice 40 has established historic investments in disadvantaged communities that are marginalized, underserved, and overburdened by pollution. Existing and new federal programs are being reformed to ensure that 40% of overall benefits reach disadvantaged communities in the areas of: climate change, clean energy, energy efficiency, clean transit, affordable and sustainable housing, training and workforce development, remediation and reduction of legacy pollution, and the development of critical clean water and wastewater infrastructure.



The EPA's EJ Screening and Mapping Tool can bring awareness to where EJ concerns may be located.

Training topic:					
Date:	Time:				
Employee attendance					

Total waste generated this month:

## SEPTEMBER WEEKLY INSPECTION LOG

Date					
Time					
Inspected by					
Labeled as "Hazardous Waste"	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with EPA waste code	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with description of hazard	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with accumulation start date	Y   N	Y   N	Y   N	Y   N	Y   N
Containers closed, no leaks/corrosion	Y   N	Y   N	Y   N	Y   N	Y   N
Notes on corrective actions taken					



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Universal waste considerations include:

- No EPA ID # is required
- Employees must be trained on proper handling and emergency procedures for universal waste
- Containers must be compatible with the waste and properly labeled.
- No manifesting is required
- Paperwork retention is not required, although it is recommended to save receipts, quantities, and bills as a best practice
- Universal wastes have a 1 year storage time limit
- Universal waste does not count toward your generator status



## **SEPTEMBER 2023**

Sun	Mon	Tues	Wed	Thur	Fri	Sat
					1	2
3	4 Labor Day	5	6	7	8	9
10	11 Patriot Day	12	13	14	15	16
Nevada Constitution Day	National Pollution Prevention Week Begins	19	20	21	Nevada Native American Day	First Day of Autumn
24	25	26	27	28	29	30 Public Lands Day

#### Mark your calendar with:

- hazardous waste storage inspection days
- hazardous waste shipping days
- episodic generation event

- training days
- inventory days
- · equipment maintenance days

#### **Universal Waste**

Certain hazardous wastes can be managed as universal wastes: batteries (40 CFR § 273.2), pesticides (40 CFR § 273.3), mercury-containing equipment (40 CFR § 273.4), and lamps (40 CFR § 273.5). Note that the State of Nevada does not recognize aerosol cans as a universal waste.

The intent of universal waste management is to encourage recycling. To incentivize this, universal wastes have less stringent management requirements, reducing the regulatory and management buden on these wastes. Managing hazardous wastes as universal wastes also ensures they are not counted toward your facility's generator status.

If universal waste items break or leak, they are no longer considered universal waste. You must now make a determination to verify if they are hazardous waste and dispose accordingly.



The EPA has a quick reference summary table for comparing generator requirements to universal waste requirements.

Training topic:				
Date:	Time:			
Employee attendance				

Total waste generated this month:

## **OCTOBER WEEKLY INSPECTION LOG**

Date					
Time					
Inspected by					
Labeled as "Hazardous Waste"	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with EPA waste code	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with description of hazard	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with accumulation start date	Y   N	Y   N	Y   N	Y   N	Y   N
Containers closed, no leaks/corrosion	Y   N	Y   N	Y   N	Y   N	Y   N
Notes on corrective actions taken					



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Preparedness and prevention are requirements under "General Facility Standards", designed to prevent releases, hazards, or other events that can compromise human health or the environment. There are six components that must be demonstrated, documented, or both:

- 1. Maintenance and operation of facility
- 2. Required equipment
- 3. Testing and maintenance of equipment
- 4. Access to communication or alarm system
- 5. Required aisle space
- 6. Arrangements with local authorities

## OCTOBER 2023

Sun	Mon	Tues	Wed	Thur	Fri	Sat
1	2	3	4	5	6	7
Nevada Week of Respect						
8	Indigenous People's Day; Columbus Day	10	11	12	13	14
15	Nevada Sarah Winnemucca Day	17	18	19	20	21
22	23	24	25	26	27	28  Nevada Day
29	30	31				
		Halloween				

#### Mark your calendar with:

- hazardous waste storage inspection days
- hazardous waste shipping days
- episodic generation event

- training days
- inventory days
- equipment maintenance days

### **Emergency Preparedness**

It is a requirement to post emergency information next to the telephone closest to where hazardous waste is stored. This information includes the name and contact information of the emergency coordinator, location of fire extinguishers and spill control supplies, and contact information for the fire department unless the facility has an alarm. This calendar includes space for this information on the back page that can be quickly flipped to in case of an emergency. For LQGs, a contingency plan is also required and, as of August 2020, the plan must include a quick reference guide for emergency response information.

Emergency preparedness is a team effort. It is important for all staff, not just hazardous waste handlers, to be informed on what to do during an emergency. At all times, there must be one person on site or on call with the responsibility of coordinating the emergency response.



When updating or creating a contingency plan, LQGs must prepare a quick reference guide. Check out BEP's factsheet for more details.

Training topic:				
Date:	Time:			
Employee attendance				

Total waste generated this month:

### **NOVEMBER WEEKLY INSPECTION LOG**

Date					
Time					
Inspected by					
Labeled as "Hazardous Waste"	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with EPA waste code	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with description of hazard	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with accumulation start date	Y   N	Y   N	Y   N	Y   N	Y   N
Containers closed, no leaks/corrosion	Y   N	Y   N	Y   N	Y   N	Y   N
Notes on corrective actions taken					



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1-800-882-3233 or www.unrbep.org



Notify NDEP of spills of reportable quantities: 1-888-331-NDEP (6337)



If your container is "RCRA empty" it does not have to be managed as hazardous waste, meaning the residues remaining are exempt from regulation (40 CFR § 261.7). To be considered "RCRA empty", the contents of the container must have been removed using common practices, such as pumping, pouring, aspirating, or draining. There must be less than one inch, or no more than three percent by weight of the container remaining.

If your facility has a scheduled shut-down coming up where employees won't regularly be onsite, BEP advises shipping off all hazardous waste so employees don't have to come in just to inspect the central accumulation area. Note the shut down on your calendar to explain why the area was not inspected.

## **NOVEMBER 2023**

Sun	Mon	Tues	Wed	Thur	Fri	Sat
			1	2	3	4
5  Daylight Savings Time End	6	7	8	9	10	11  Veterans Day
12	13	14	15	16	17	18
19	20	21	22	Thanksgiving Day	Nevada Family Day	25
26	27	28	29	30		

#### Mark your calendar with:

- hazardous waste storage inspection days
- hazardous waste shipping days
- episodic generation event

- training days
- inventory days
- · equipment maintenance days

#### **Hazardous Waste Containers**

Prior to moving waste to your central accumulation area, waste can be collected in in a satellite accumulation area container at the point of waste generation if it is under conrol of the generator. Satellite containers must not exceed 55 gallons and have to be marked with "hazardous waste". Once the container is full, it is considered a "storage container". The storage container must be labeled with the accumulation start date and moved to your central accumulation area within three days.

If using funnels to fill or transfer hazardous waste containers, don't forget to remove the funnels when finished! This is a common violation noted during inspections.

Satellite containers do not have to be inspected, unlike the required weekly inspections for storage containers in central accumulation areas.



Don't know what to do with those empty containers? BEP has a factsheet for that! Check out tips on recycling and disposal.

Training topic:					
Date:	Time:				
Employee attendance					

Total waste generated this month:

## **DECEMBER WEEKLY INSPECTION LOG**

Date					
Time					
Inspected by					
Labeled as "Hazardous Waste"	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with EPA waste code	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with description of hazard	Y   N	Y   N	Y   N	Y   N	Y   N
Labeled with accumulation start date	Y   N	Y   N	Y   N	Y   N	Y   N
Containers closed, no leaks/corrosion	Y   N	Y   N	Y   N	Y   N	Y   N
Notes on corrective actions taken					



Contact BEP for free confidential assistance on environmental regulations, air quality permitting, hazardous waste management, sustainability, and more:

1-800-882-3233 or www.unrbep.org



Notify NDEP of spills of reportable quantities: 1-888-331-NDEP (6337)

SOPs are not required, but are a best practice. SOPs can include:

- Clear responsibilities for different roles
- PPE requirements
- Storage and labeling requirements
- Information on compatible and incompatible wastes
- Emergency procedures
- Disposal instructions
- Universal waste management
- Other best practices



## **DECEMBER 2023**

Sun	Mon	Tues	Wed	Thur	Fri	Sat
					1	2
3	4	5	6	7	8	9
				Pearl Harbor Remembrance Day		
10	11	12	13	14	15	16
17	18	19	20	21	22	23
				Winter Solstice		
24	25	26	27	28	29	30
Christmas Eve						
New Year's Eve						
31	Christmas Day					

#### Mark your calendar with:

- hazardous waste storage inspection days
- hazardous waste shipping days
- episodic generation event

- training days
- inventory days
- equipment maintenance days

### **Managerial Control**

Want to set your staff up for success in 2024? Start striving toward managerial control over your hazardous waste operations by creating standard operating procedures (SOPs) specific to your facility, committing to routine training for your staff, and periodically monitoring your staff throughout the year to ensure their continued understanding of responsibilities.

Having written SOPs available to staff will promote consistency, help them feel confident in maintaining compliance, and ensure they are ready at any time for an inspection.

BEP offers annual trainings and workshops on hazardous waste to help fulfill training expectations. Call BEP for a walk-through to assess your operations and offer new ideas for 2024!



BEP has an online resource library full of fact sheets, archived webinars, newsletters, and more to educate your staff and help you stay in compliance.

Training topic:				
Date:	Time:			
Employee attendance				

Total waste generated this month:

## **Waste Determination Tool**

Facility Name:	EPA ID Number:			
Waste name:	Solid	Liquid	Gas	Sludge
Description of waste generating process:				
Pounds of waste generated monthly: Does this was	te meet the defi	nition of solid waste (40 C	FR § 261.2)?	Yes No
Is this waste excluded from the definition of solid waste or hazardous wa	aste (40 CFR § 26	1.4(a) and 261.4(b))?	Yes	☐ No
Is the waste generated in an industrial, construction, manufacturing, represented in the contract of the contr	oair or similar set	ting and subject to hazar	dous waste deter	mination
Is this waste a listed hazardous waste?	Waste co	ode:		
Is this waste a characteristic hazardous waste?	No Characte	eristic & code:		
Was laboratory analysis (e.g. TCLP) used to make this determination?	Yes	☐ No If yes, attacl	n or file a copy of	the results.
Name & certificate number for the laboratory:		Test perforr	ned:	
Was knowledge of the process used to make this determination?	Yes	☐ No		
If yes, describe the process used. List each document (SDS, process flow	diagrams, etc.) r	eviewed and/or attach th	em to this sheet:	
After using this tool, is the waste determined to be non-hazardous?	Yes	☐ No		
Determination made by:	Title:		Date:	

Need assistance with your waste determination? Contact BEP.
1-800-882-3233 or www.unrbep.org

## **Hazardous Waste Emergency Response**

Emergency Coordinator:		
Title:	Title:	
Phone Number:		
Fire Department:	Police Department: 911 or	
	Equipment Location	
Fire Extinguishers:	Other fire control equipment:	
Spill control:	Decontamination control:	
Alarm system:	Communication device(s):	

#### **Take Action**

Fire: Call the fire department or attempt to extinguish it using a fire extinguisher

**Spill:** Contain the flow of hazardous waste. Clean up the hazardous waste and any contaminated materials or soil as soon as possible. Notify NDEP of the spill by the end of the first working day of the release.

**Fire, explosion, or other release which could threaten human health or surface water:** immediately notify the National Response Center with the following information:

- Name, address, and U.S. EPA Identification Number of generator
- Date, time, and type of incident (e.g., spill or fire)
- Quantity and type of hazardous waste involved
- Extent of any injuries
- Estimated quantity and disposition of any recovered materials

National Response Center: 1-800-424-8802

**Nevada Department of Environmental Protection Spill Hotline: 1-888-331-NDEP (6337)** 

## Helpful Contacts

Air Quality Management Division Washoe County Health District

www.washoecounty.gov/health 0027-487(277)

(207) 422-2845 Environment and Sustainability Clark County Department of

airquality@clarkcountynv.gov www.clarkcountynv.gov

> Environmental Health Services Washoe County Health District

> healthehs@washoecounty.gov www.washoecounty.gov/health 775) 328-2434

8850-657 (207) **Environmental Services** Southern Nevada Health District

environmentalhealth@snhd.org www.southernnevadahealthdistrict.org

> Environmental Protection - Carson City Nevada Department of

www.ndep.nv.gov/contact-us vog.vn.qsbn.www 0.497 - 489 (244)

0068-899 (207) Environmental Protection - Las Vegas Nevada Department of

www.ndep.nv.gov/contact-us vog.vn.qsbn.www

**EPA Region 9** 

www.epa.gov/nv (6 noigeA ni earl Ital) TSEW-A9E (608) 0008-746 (214)

admin@nevadasbdc.org www.nevadasbdc.org **4607-042 (008)** Development Center Nevada Small Business

become more sustainable, and save money on your bottom line. services on environmental regulations, how to prevent pollution, advisor since 1988. Contact us for free confidential advisory Environmental Program, working as your trusted business This calendar is provided by the Nevada Business

provided by NV Energy. vision of Environmental Protection (NDEP). Additional support is Center (SBDC) and receives funding support from the Nevada Di-BEP is affiliated with the Nevada Small Business Development

NEVADA **MAADOA9 ENVIRONMENTAL BOSINESS** 

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help@unrbep.org

www.unrbep.org

I-800-882-3233