

2024
Nevada

HAZARDOUS WASTE COMPLIANCE CALENDAR



BUSINESS
ENVIRONMENTAL
PROGRAM
NEVADA

Facility:

EPA I.D.:

Emergency Coordinator:

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 hazardous waste 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.

Check the BEP website for our annual Hazardous Waste 101 classes typically offered in November or December.

JANUARY 2024

Sun Mon Tues Wed Thur Fri Sat

	1 New Year's Day	2	3	4	5	6
7	8	9 BEP Biennial Reporting Workshop in Reno	10	11 BEP Biennial Reporting Workshop in Las Vegas	12	13
14	15 Martin Luther King Jr. Day; Nevada Peace Week Begins	16	17	18	19	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 attendance	

Total waste generated this month: Generator category:

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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Minimize waste to keep your generator status low and satisfy Item 15 of the Uniform Hazardous Waste Manifest (40 CFR § 262.27):

- 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

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 determinations 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. If you are inspected later and there are questions about wastes you dispose as non-hazardous, you can share this documentation with the inspectors.



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



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 and confidential site visit - we will walk through your facility with you and share ideas on how you can prepare for an inspection

MAY 2024

Sun Mon Tues Wed Thur Fri Sat

			1 Law Day	2	3	4
5 Cinco de Mayo	6	7	8	9	10	11
12 Mother's Day; Nevada Osteoporosis Prevention Week	13	14	15	16	17	18 Nevada Asian Culture Day
19	20	21	22	23	24	25
26	27 Memorial Day	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

Key in on Compliance

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

- determine if a 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, weekly inspections 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:
Employee attendance	

Total waste generated this month: Generator category:

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):

- Very Small Quantity Generators 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
- Small Quantity Generators 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
- Large Quantity Generators generate 2,200 lbs or more of hazardous waste monthly, have no waste storage quantity limits but can only store waste up to 90 days

The quantities listed above are for non-acute hazardous waste only. Note that acute hazardous waste generation quantities are 2.2 lbs. or less per month for VSQGs and more than 2.2 lbs. per month for LQGs.

JUNE 2024

Sun Mon Tues Wed Thur Fri Sat

						1
2	3 Nevada Mineral Industry Week Begins	4	5	6	7	8
9	10	11	12	13	14 Flag Day	15
16 Father's Day	17	18	19 Juneteenth	20 Summer Solstice	21	22
23 30	24	25	26	27	28	29

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 hazardous 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 organized and 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: Generator category:

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 online 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.

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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How does environmental justice 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? BEP is available to help you evaluate your compliance status.

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 and benefits 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 that facilities 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 hazardous waste generator status

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

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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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 containers 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.

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					



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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

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 waste meet the definition of solid waste (40 CFR § 261.2)? Yes No

Is this waste excluded from the definition of solid waste (40 CFR § 261.4(a)) or hazardous waste (40 CFR § 261.4(b))? Yes No

Is the waste generated in an industrial, construction, manufacturing, repair or similar setting and subject to hazardous waste determination requirements (40 CFR § 262.11)? Yes No

Is this waste a listed hazardous waste (40 CFR § 261)? Yes No Waste code: _____

Is this waste a characteristic hazardous waste (40 CFR § 261)? Yes No Characteristic & code: _____

Was laboratory analysis (e.g. TCLP) used to make this determination? Yes No If yes, attach or file a copy of the results.

Name & certificate number for the laboratory: _____ Test performed: _____

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.) reviewed and/or attach them to this sheet:

After using this tool, is the waste determined to be non-hazardous? Yes No

Determination made by: _____ Title: _____ Date: _____

Copy this page and use it for all your waste streams, or scan the QR code to download and use a digital waste determination tool from BEP's website.



Hazardous Waste Emergency Response

Emergency Coordinator: _____

Title: _____

Phone Number: _____

Alternate Contact: _____

Title: _____

Phone Number: _____

Fire Department: _____

Police Department: 911 or _____

Equipment Location

Fire Extinguishers: _____

Spill control: _____

Alarm system: _____

Other fire control equipment: _____

Decontamination control: _____

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. Have only trained staff 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

**Nevada Department of
Environmental Protection - Carson City**
(775) 687-4670
www.ndep.nv.gov
www.ndep.nv.gov/contact-us

**Northern Nevada Public Health
Environmental Health Services**
(775) 328-2434
www.nnph.org
healthes@nnph.org

**Northern Nevada Public Health
Air Quality Management Division**
(775) 784-7200
www.nnph.org

**Nevada Department of
Environmental Protection - Las Vegas**
(702) 668-3900
www.ndep.nv.gov
www.ndep.nv.gov/contact-us

**Southern Nevada Health District
Environmental Services**
(702) 759-0588
www.southernnevadahealthdistrict.org
environmentalhealth@snhd.org

**Clark County Department of
Environment and Sustainability**
(702) 455-5942
www.clarkcountynv.gov
airquality@clarkcountynv.gov

**Nevada Small Business
Development Center**
(800) 240-7094
www.nevadasbdc.org
admin@nevadasbdc.org

EPA Region 9
(415) 947-8000
(866) EPA-WEST (toll free in Region 9)
www.epa.gov/nv



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

BEP is based in the College of Business at the University of Nevada, Reno and is affiliated with the Nevada Small Business Development Center (SBDC) and receives funding support from the Nevada Division of Environmental Protection (NDEP) and Northern Nevada Public Health (NNPH). Additional support is provided by NV Energy.

1-800-882-3233

www.unrbep.org

help@unrbep.org