Illinois Small Quantity Generators’ Manual:

How to Effectively Comply with State and Federal Regulations

A WMRC Staff Publication
This report is part of WMRC's Research Report Series. Mention of trade names or commercial products does not constitute endorsement or recommendation for use.
Illinois Small Quantity Generators’ Manual: How to Comply Effectively with State and Federal Regulations

The Illinois Waste Management and Research Center

One E. Hazelwood Dr.
Champaign, IL 61820

www.wmrc.uiuc.edu

Sixth Edition

Printed by the Authority of the State of Illinois
2002/50
Table of Contents

Chapter 1
introduction ................................................................................................................ 1

Chapter 2
Current Laws and Regulations ........................................................................... 5
Resource Conservation and Recovery Act ......................................................... 5
Comprehensive Environmental Response, Compensation, and Liability Act ... 6
Department of Transportation Regulations ..................................................... 6
Illinois Special Waste Regulations .................................................................... 7
Other Requirements .............................................................................................. 8
Clean Air Act Amendments .................................................................................. 8

Chapter 3
SGG Regulatory Requirements ......................................................................... 11
Quantity Determination ..................................................................................... 11
Notification Requirements ................................................................................ 12
Storage and Accumulation Requirements ......................................................... 12
Transporters and Disposal Facilities .................................................................. 13
DOT Regulations and Shipping Regulations Under RCRA ............................. 13
Manifesting Requirements ................................................................................ 14
Record-Keeping Requirements ......................................................................... 15
Preparing for and Preventing Accidents ............................................................ 15
Planning for Emergencies .................................................................................. 16
Guidelines for Generators of Special Waste .................................................... 17
Solid (non-liquid) Nonhazardous Special Waste Regulation Revisions ........ 22
Universal Waste Rules ....................................................................................... 23

Chapter 4
Pollution Prevention ............................................................................................. 27

Chapter 5
Other Waste Management Options .................................................................... 31
Off-Site Recycling ............................................................................................... 31
Waste Exchanges ................................................................................................. 31
Chemical Treatment ............................................................................................. 32
Incineration .......................................................................................................... 32
Landfills ............................................................................................................... 32

Chapter 6
Choosing a Waste Management Firm ................................................................. 35
Evaluating a Disposal Facility ............................................................................ 35
List of Tables

Table 1. Generator Status and Requirements .......................................................... 2
Table 2. Typical Small Quantity Generators .......................................................... 3
Table 3. Five Laws Affecting Waste Management ............................................... 5
Table 4. Two Laws Affecting Hazardous Materials Management ...................... 5
Table 5. Toxicity Characteristic Leaching Procedure Constituents ......................... 7
Table 6. Pollution Prevention ............................................................................. 27
Table 7. TSDF Checklist .................................................................................... 34
Table 8. Transporters’ Checklist ......................................................................... 34

List of Figures

Figure 1. Typical Hazardous Waste Label ............................................................ 14
Figure 2. Typical DOT Labels ............................................................................ 14
Figure 3. Excerpt from List of Hazardous Substances and Reportable Quantities ... 18
Figure 4. Waste Regulatory Requirement Flow Chart ......................................... 19
Figure 5. Non-Hazardous Special Waste Label .................................................... 21
Figure 6. Waste Management Hierarchy ............................................................... 31
Figure 7. Sample Listing for the Illinois Material Exchange Service .................... 33
**List of Abbreviations**

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>BOA</td>
<td>Illinois EPA Bureau of Air</td>
</tr>
<tr>
<td>BOL</td>
<td>Illinois EPA Bureau of Land</td>
</tr>
<tr>
<td>BOW</td>
<td>Illinois BOW Bureau of Water</td>
</tr>
<tr>
<td>CAAA</td>
<td>Clean Air Act Amendments</td>
</tr>
<tr>
<td>CE</td>
<td>Conditionally Exempt</td>
</tr>
<tr>
<td>CERCLA</td>
<td>Comprehensive Environmental Response, Compensation, and Liability Act</td>
</tr>
<tr>
<td>CESQG</td>
<td>Conditionally Exempt Small Quantity Generator</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>DCCA</td>
<td>Department of Commerce and Community Affairs</td>
</tr>
<tr>
<td>DOT</td>
<td>Department of Transportation</td>
</tr>
<tr>
<td>EPCRA</td>
<td>Emergency Planning and Community Right-to-Know ACT</td>
</tr>
<tr>
<td>FEMA</td>
<td>Federal Emergency Management Agency</td>
</tr>
<tr>
<td>HCS</td>
<td>Hazardous Communication Standard</td>
</tr>
<tr>
<td>HID</td>
<td>High-intensity Discharge</td>
</tr>
<tr>
<td>HSSDS</td>
<td>Hazardous Solvent Substitution Data System</td>
</tr>
<tr>
<td>HSWA</td>
<td>Hazardous and Solid Waste Amendments</td>
</tr>
<tr>
<td>IAC</td>
<td>Illinois Administrative Code</td>
</tr>
<tr>
<td>IEMA</td>
<td>Illinois Emergency Management Agency</td>
</tr>
<tr>
<td>IEPA</td>
<td>Illinois Environmental Protection Agency</td>
</tr>
<tr>
<td>IMES</td>
<td>Industrial Materials Exchange Service</td>
</tr>
<tr>
<td>IPW</td>
<td>Industrial Process Wastes</td>
</tr>
<tr>
<td>LEPC</td>
<td>Local Emergency Planning Commission</td>
</tr>
<tr>
<td>LQG</td>
<td>Large Quantity Generator</td>
</tr>
<tr>
<td>LQHUW</td>
<td>Large Quantity Handler of Universal Waste</td>
</tr>
<tr>
<td>LUST</td>
<td>Leaking Underground Storage Tank</td>
</tr>
<tr>
<td>MSDS</td>
<td>Material Safety Data Sheets</td>
</tr>
<tr>
<td>NRC</td>
<td>National Response Center</td>
</tr>
<tr>
<td>OPP</td>
<td>Office of Pollution Prevention</td>
</tr>
<tr>
<td>OSHA</td>
<td>Occupational Safety and Health Administration</td>
</tr>
<tr>
<td>P2</td>
<td>Pollution Prevention</td>
</tr>
<tr>
<td>PCW</td>
<td>Pollution Control Wastes</td>
</tr>
<tr>
<td>PIMW</td>
<td>Potentially Infectious Medical Wastes</td>
</tr>
<tr>
<td>PIPP</td>
<td>Partners in Pollution Prevention Program (IEPA)</td>
</tr>
<tr>
<td>PPIC</td>
<td>Pollution Prevention Information Clearinghouse</td>
</tr>
<tr>
<td>PRP</td>
<td>Potentially Responsible Parties</td>
</tr>
<tr>
<td>RCRA</td>
<td>Resource Conservation and Recovery Act</td>
</tr>
<tr>
<td>RQ</td>
<td>Reportable Quantity</td>
</tr>
<tr>
<td>RRT</td>
<td>Recycling and Reduction Techniques</td>
</tr>
<tr>
<td>SAGE</td>
<td>Solvent Alternatives Guide</td>
</tr>
<tr>
<td>SQG</td>
<td>Small Quantity Generator</td>
</tr>
<tr>
<td>SQHUW</td>
<td>Small Quantity Handler of Universal Waste</td>
</tr>
<tr>
<td>SW</td>
<td>Special Waste</td>
</tr>
<tr>
<td>Abbreviation</td>
<td>Description</td>
</tr>
<tr>
<td>--------------</td>
<td>-------------</td>
</tr>
<tr>
<td>SWH</td>
<td>Special Waste Hauling Permit</td>
</tr>
<tr>
<td>STRIP</td>
<td>USEPA Storage, Treatment, Recycling, Incinerating, and Processing Facilities List</td>
</tr>
<tr>
<td>TCLP</td>
<td>Toxicity Characteristic Leaching Procedure</td>
</tr>
<tr>
<td>TPQ</td>
<td>Threshold Planning Quantity</td>
</tr>
<tr>
<td>TSDF</td>
<td>Treatment, Storage and Disposal Facility</td>
</tr>
<tr>
<td>UHWM</td>
<td>Uniform Hazardous Waste Manifest</td>
</tr>
<tr>
<td>URL</td>
<td>Uniform Resource Locator</td>
</tr>
<tr>
<td>USEPA</td>
<td>United States Environmental Protection Agency</td>
</tr>
<tr>
<td>UST</td>
<td>Underground Storage Tanks</td>
</tr>
<tr>
<td>UWR</td>
<td>Uniform Waste Rules</td>
</tr>
<tr>
<td>VOC</td>
<td>Volatile Organic Compound</td>
</tr>
<tr>
<td>WMRC</td>
<td>Waste Management and Research Center</td>
</tr>
<tr>
<td>WRAS</td>
<td>Waste Reduction Advisory System</td>
</tr>
<tr>
<td>WWW</td>
<td>World Wide Web</td>
</tr>
</tbody>
</table>
Chapter 1: Introduction

Over the past 50 to 75 years, industries have developed new products and conveniences that make our everyday lives easier. Production and maintenance of these commodities have also produced new types of byproducts and wastes. Disposal of these wastes can lead to contamination of land, water, and air.

In 1976, Congress passed into law the Resource Conservation and Recovery Act (RCRA) which gave the United States Environmental Protection Agency (USEPA) the power to write regulations that would precisely define a hazardous waste and regulate the generation, transportation, and disposal of such wastes. These regulations were finalized on May 19, 1980 and appear in the Code of Federal Regulations under Subchapter I and J. They regulate three different groups associated with hazardous waste: generators, transporters, and treatment, storage, and disposal facilities (TSDFs).

These regulations require generators to:

- Ship their hazardous waste to an approved TSDF using licensed waste haulers
- Fill out a manifest and land ban forms (where required) to accompany each shipment of hazardous waste
- Store their wastes for less than 90 days in accordance with regulations, train their personnel in proper handling and emergency procedures, and maintain an emergency preparedness plan outlining procedures to be followed in case of accident
- Keep records documenting the fact that they have done all these things.

On November 8, 1984, the President signed into law the Hazardous and Solid Waste Amendments (HSWA) of 1984 [40 CFR Part 261.5 and Illinois Administrative Code (IAC) Title 35 Part 721.105]. Among other things, this law required that small quantity generators (SQGs) of hazardous waste be regulated. SQGs are not easily categorized. Many are small businesses, such as automotive shops, printing shops, commercial laundries, and dry cleaners. Table 1 lists the definitions and requirements for generator status. Table 2 lists types of companies that fit this classification and some of the hazardous wastes they generate.

Where to Look for the Legal Documentation

Throughout this document you will see references to the legal codes. Due to the length of these codes, we cannot include them within this document. You can find them easily on the Internet at the following addresses:

http://www.epa.gov/epaoswer/osw/laws-reg.htm

Illinois Laws (Illinois Administrative Code (IAC) Title 35)
http://www.ipcb.state.il.us/title35/35conten.htm
On March 24, 1996, USEPA finalized regulations that specifically state what SQGs must do to comply with the law [40 CFR 261.5]. The State of Illinois has also addressed the problem through hazardous waste regulations and through the Illinois Special Waste Regulations, which also impact SQGs [IAC Title 35 722.144].

Firms that generate less than 220 lbs./month of RCRA hazardous waste are considered Conditionally Exempt Small Quantity Generators (CESQGs) and are required to comply with 40 CFR Part 261.5. In Illinois they are subject to the Illinois Special Waste regulations. These requirements will be discussed in a later chapter.

A regulated small quantity generator of hazardous waste is defined in HSWA as anyone who generates between 220 lbs./month and 2200 lbs./month of hazardous waste (about ¼ of a 55 gal drum to five drums of waste with the density of water which is 8.3 lbs/gal). Previously, such generators were exempt from most requirements of existing federal hazardous waste regulations.

Large quantity generators (LQG) are defined as anyone who generates 2200 lbs/month or more of hazardous waste during any given month of a calendar year (about five 55 gal drums of a waste with the density of water (8.3 lbs/gal)).

Transporters are subject to many USEPA and Illinois EPA (IEPA) requirements under the hazardous waste regulations, as well as Illinois and U.S. Department of Transportation (DOT) regulations. TSDFs are also subject to extensive requirements under RCRA. A TSDF is defined as a facility that treats a hazardous waste to render it nonhazardous, stores a hazardous waste for longer than 90 days or disposes of a hazardous waste on-site (e.g. in a landfill or incinerator). A detailed description of the requirements for these groups is beyond the scope of this manual. Methods for choosing transporters and disposers are given in Chapter 6.

This manual outlines the regulations and suggests pollution prevention (P2) and disposal alternatives for SQGs so they may comply with the letter and intent of the regulations in ways that are reasonably cost effective. It also provides generators with information on where to get help on a variety of waste management issues.

<table>
<thead>
<tr>
<th>Generator Status</th>
<th>Monthly Waste Generation</th>
<th>Storage Limit</th>
<th>ID# Required</th>
<th>Manifest Required</th>
<th>Reporting Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>LQG</td>
<td>&gt;2200 lbs/mo</td>
<td>80 days</td>
<td>US EPA ID#</td>
<td>Manifest</td>
<td>Annual Report-IEPA</td>
</tr>
<tr>
<td></td>
<td>&gt;1000 kg/mo</td>
<td></td>
<td>IEPA ID # DOT#</td>
<td></td>
<td>Biennial Report-USEPA</td>
</tr>
<tr>
<td>SQG</td>
<td>220 lb-2200 lbs/mo</td>
<td>180 days</td>
<td>US EPA ID#</td>
<td>Manifest</td>
<td>Not Required</td>
</tr>
<tr>
<td></td>
<td>100-1000 kg/mo</td>
<td></td>
<td>IEPA ID # DOT#</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CESQG</td>
<td>&lt;220 lbs/mo</td>
<td>No limit</td>
<td>IEPA ID #</td>
<td>Not Required</td>
<td>Not Required</td>
</tr>
<tr>
<td></td>
<td>&lt;100 kg/mo</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Table 2. Typical Small Quantity Generators
(Generate 220 lbs/mo-2200 lbs/mo)

<table>
<thead>
<tr>
<th>Type</th>
<th>Wastes Generated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chemical Laboratories</td>
<td>High school, college, and commercial labs may have residues from experiments or off-spec/expired chemicals still on shelves.</td>
</tr>
<tr>
<td>Printing Shops</td>
<td>Photographic wastes, Containers, Waste inks, Waste solvent solutions, Disposable shop towels, Pallets</td>
</tr>
<tr>
<td>Commercial Pesticide Users</td>
<td>Expired or off-spec pesticides, Pesticide residues, Containers not triple rinsed</td>
</tr>
<tr>
<td>Construction Contractors</td>
<td>Paint wastes and waste thinners, Spent solvents from cleaning and degreasing operations, Strong acid or alkali cleaners</td>
</tr>
<tr>
<td>Furniture and Wood Finishes</td>
<td>Paint, varnish, and shellac removers, Wood cleaners, petroleum distillates, white spirits, Stains, paints, varnishes, shellacs, etc., Cleaning residues from spray gun or brush cleaning, Disposable shop towels</td>
</tr>
<tr>
<td>Laundries and Dry Cleaners</td>
<td>Starch residues, filter cartridges, spent filter powders, Stoddard solvent operations</td>
</tr>
<tr>
<td>Vehicle Maintenance Shops</td>
<td>Degreasers, Carburetor cleaners, Parts cleaner solvents, Paints containing heavy metals, Paint thinners, Lacquer thinners, Cleaning residues, Lead-acid batteries (exempt if sent to recycler), Disposable shop towels</td>
</tr>
<tr>
<td>Metal Working Shops</td>
<td>Spent solvents and still bottoms, Plating wastes, Spent pickling liquors, Spent cutting oils, Disposable shop towels</td>
</tr>
</tbody>
</table>
Chapter 2: Current Laws and Regulations

The laws that govern the generation and disposal of hazardous waste and their accompanying regulations were meant to regulate hazardous waste from "cradle to grave." What this means to a generator is they are responsible for their waste forever. Even if the method of waste disposal was legal at the time, a generator can be held liable for contamination from their waste if the laws later change or the waste later impacts the environment. There are five sets of laws and regulations that a SQG needs to be aware of when considering disposal of a waste. The titles of these state and federal regulations and a brief description of their contents are provided in Table 3. Two additional laws may affect how SQGs handle hazardous materials. These are listed in Table 4. The aspects of these regulations that are relevant to SQGs are provided in this chapter.

Resource Conservation and Recovery Act

RCRA defines hazardous wastes [40 CFR 261; IAC Title 35 Section 721.120-124]. The definitions can be broken down into eight categories. The first four are called characteristic categories. Any waste having one of these characteristics is considered a RCRA hazardous waste and is assigned a hazardous waste number (listed in parentheses):

Ignitability (D001)—anything that has a flash point of less than 140 degrees Fahrenheit or which burns readily

<table>
<thead>
<tr>
<th>Table 3. Five Laws Affecting Waste Management</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Resource Conservation and Recovery Act (RCRA)</strong></td>
</tr>
<tr>
<td>Gives EPA authority to regulate hazardous waste.</td>
</tr>
<tr>
<td><strong>Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)</strong></td>
</tr>
<tr>
<td>Also known as &quot;Superfund.&quot; Pays for cleaning up old hazardous waste sites.</td>
</tr>
<tr>
<td><strong>Department of Transportation Regulations (DOT)</strong></td>
</tr>
<tr>
<td>Governs methods by which hazardous wastes are shipped.</td>
</tr>
<tr>
<td><strong>Illinois Special Waste Regulations</strong></td>
</tr>
<tr>
<td>Governs management and disposal of hazardous and many nonhazardous wastes in Illinois.</td>
</tr>
<tr>
<td><strong>Hazardous and Solid Waste Amendments of 1984 (HSWA)</strong></td>
</tr>
<tr>
<td>Expand scope of RCRA including the establishment of SQG regulations.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Table 4. Two Laws Affecting Hazardous Waste Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>This law is better known as the Workers Right-to-Know Law and gives the Occupational Health and Safety Administration (OSHA) authority to regulate hazardous chemical use in the workplace.</td>
</tr>
<tr>
<td><strong>Emergency Planning and Community Right-to-Know Act (EPCRA) 40 CFR Subchapt J</strong></td>
</tr>
<tr>
<td>This law revises and expands the earlier Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980. Governs emergency planning measures generators of hazardous waste must undertake.</td>
</tr>
</tbody>
</table>
**Corrosivity (D002)**—anything with a pH of less than 2 or greater than 12.5 or which corrodes steel at a rate greater than 1/4 inch per year.

**Reactivity (D003)**—unstable compounds, compounds that react violently with water, or compounds that give off toxic gases when mixed with water.

**Toxicity Characteristic Leaching Procedure (TCLP) (D004-D043)**—The TCLP test is intended to simulate the placement of wastes in a landfill and test their tendency to leach hazardous constituents into the groundwater. There are currently 40 different toxic constituents for which a sample can be tested. If any constituent is present in concentrations greater than threshold amounts, the waste is considered hazardous (see Table 5).

The TCLP test replaces the Extraction Procedure Toxicity test which was used previously. All existing and new waste streams must be tested using TCLP.

The other four categories are wastes included on special USEPA lists of hazardous wastes. The classification follows and the full lists of wastes included in each category are provided in Appendix A.

**Acutely Hazardous Wastes**—These are extremely dangerous wastes. They are regulated to a lower generation level of 2.2 lbs./month (1 kg) and include anything on the USEPA's "P" list.

**Toxic Wastes**—anything on the USEPA's "U" list

**Wastes from Specific Production Processes**—anything on the USEPA's "K" list

**Wastes from Nonspecific Sources**—anything on USEPA's "F" list

---


The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) is known more readily by its nickname, "Superfund." CERCLA established a fund to pay for the clean up of hazardous waste sites with serious environmental problems beyond the skills and finances of the site's owner and/or operator. In many cases these sites are abandoned or no longer have hazardous wastes stored or generated on site. Superfund also establishes a system for obtaining funds from potentially responsible parties (PRP).

Under CERCLA, anyone who has ever had anything to do with a particular hazardous waste site could be considered a PRP and could be held responsible for all or part of the cleanup expense. This could include not only the site's operators, but also anyone who has ever transported hazardous material to or generated material that was sent to the site. It does not matter whether the past disposal practices were legal at the time (cradle-to-grave).

Many times small businesses have sent small quantities of wastes for legal and what they thought was proper disposal only to find later they were ordered by the court to contribute thousands of collars to the cleanup of that facility. A complete discussion of CERCLA is beyond the scope of this manual, but it is easy to see that it is intended to encourage responsible waste disposal.

**Department of Transportation Regulations (49 CFR 172; IAC Title 35 Part 722.133)**

The transport of hazardous substances, including wastes, is regulated by USEPA, IEPA, DOT, and IDOT. Both DOT and IDOT require a
<table>
<thead>
<tr>
<th>Haz. Waste No.</th>
<th>Constituents</th>
<th>Reg. Threshold Level (mg/l)</th>
</tr>
</thead>
<tbody>
<tr>
<td>D004</td>
<td>Arsenic</td>
<td>5.0</td>
</tr>
<tr>
<td>D005</td>
<td>Banum</td>
<td>100.0</td>
</tr>
<tr>
<td>D018</td>
<td>Benzene</td>
<td>0.5</td>
</tr>
<tr>
<td>D006</td>
<td>Cadmium</td>
<td>1.0</td>
</tr>
<tr>
<td>D019</td>
<td>Carbon tetrachloride</td>
<td>0.5</td>
</tr>
<tr>
<td>D020</td>
<td>Chlordane</td>
<td>0.03</td>
</tr>
<tr>
<td>D021</td>
<td>Chlorobenzene</td>
<td>100.0</td>
</tr>
<tr>
<td>D022</td>
<td>Chloroform</td>
<td>6.0</td>
</tr>
<tr>
<td>D007</td>
<td>Chromium</td>
<td>5.0</td>
</tr>
<tr>
<td>D023</td>
<td>o-Cresol</td>
<td>200.0</td>
</tr>
<tr>
<td>D024</td>
<td>m-Cresol</td>
<td>200.0</td>
</tr>
<tr>
<td>D025</td>
<td>p-Cresol</td>
<td>200.0</td>
</tr>
<tr>
<td>D026</td>
<td>Cresol</td>
<td>200.0</td>
</tr>
<tr>
<td>D016</td>
<td>2,4-D</td>
<td>10.0</td>
</tr>
<tr>
<td>D027</td>
<td>1,4-Dichlorobenzene</td>
<td>7.5</td>
</tr>
<tr>
<td>D028</td>
<td>1,2-Dichloroethane</td>
<td>0.5</td>
</tr>
<tr>
<td>D029</td>
<td>1,1-Dichloroethylene</td>
<td>0.7</td>
</tr>
<tr>
<td>D030</td>
<td>2,4-Dinitrotoluene</td>
<td>0.13</td>
</tr>
<tr>
<td>D012</td>
<td>Endrin</td>
<td>0.02</td>
</tr>
<tr>
<td>D031</td>
<td>Heptachlor</td>
<td>0.008</td>
</tr>
<tr>
<td>D032</td>
<td>Hexachlorobenzene</td>
<td>0.13</td>
</tr>
<tr>
<td>D033</td>
<td>Hexachlorobutadiene</td>
<td>0.5</td>
</tr>
<tr>
<td>D034</td>
<td>Hexachloroethane</td>
<td>3.0</td>
</tr>
<tr>
<td>D008</td>
<td>Lead</td>
<td>5.0</td>
</tr>
<tr>
<td>D013</td>
<td>Lindane</td>
<td>0.4</td>
</tr>
<tr>
<td>D009</td>
<td>Mercury</td>
<td>0.2</td>
</tr>
<tr>
<td>D014</td>
<td>Methoxychlor</td>
<td>10.0</td>
</tr>
<tr>
<td>D035</td>
<td>Methyl ethyl ketone</td>
<td>200.0</td>
</tr>
<tr>
<td>D036</td>
<td>Nitrobenzene</td>
<td>2.0</td>
</tr>
<tr>
<td>D037</td>
<td>Pentachlorophenol</td>
<td>100.0</td>
</tr>
<tr>
<td>D038</td>
<td>Pyridine</td>
<td>5.0</td>
</tr>
<tr>
<td>D010</td>
<td>Selenium</td>
<td>1.0</td>
</tr>
<tr>
<td>D011</td>
<td>Silver</td>
<td>5.0</td>
</tr>
<tr>
<td>D039</td>
<td>Tetrachloroethylene</td>
<td>0.7</td>
</tr>
<tr>
<td>D015</td>
<td>Toxaphene</td>
<td>0.5</td>
</tr>
<tr>
<td>D040</td>
<td>Trichloroethylene</td>
<td>0.7</td>
</tr>
<tr>
<td>D041</td>
<td>2,4,5-Trichlorophenol</td>
<td>400.0</td>
</tr>
<tr>
<td>D042</td>
<td>2,4,6-Trichlorophenol</td>
<td>2.0</td>
</tr>
<tr>
<td>D017</td>
<td>2,4,5-TP (Silvex)</td>
<td>1.0</td>
</tr>
<tr>
<td>D043</td>
<td>Vinyl Chloride</td>
<td>0.2</td>
</tr>
</tbody>
</table>

labeling system (shipment name and number) be used that is different from RCRA classifications. The size of a waste shipment, the manner it is being transported, and equipment carrying the waste are regulated. The DOT regulations that apply to SQGs are discussed in Chapter 3.

**Illinois Special Waste Regulations (IAC Title 35 Part 721-723, 808, 809)**

The term special waste (SW) in Illinois refers to a broad category of wastes, mostly generated by industry, that may cause environmental problems when managed and disposed of.
with traditional municipal wastes. Special wastes are subject to manifesting, registration by generators and transporters, and special permitting and licensing requirements by treatment and disposal facilities. Special wastes are comprised of four subsets:

- Hazardous wastes as defined by RCRA and its resultant regulations
- Pollution Control Wastes (PCW) as defined in the Illinois Environmental Protection Act and the Illinois Administrative Code (IAC)
- Industrial Process Wastes (IPW) as defined in the Illinois Environmental Protection Act and the IAC
- Potentially Infectious Medical Wastes (PIMW)

Definitions of these different types of wastes are included in Appendix A, Title 35, Part 721. Explanations of the special waste regulatory requirements are given in Chapter 3.

Other Requirements

Two additional laws that may affect SQGs include the Hazard Communication Standard (HCS) [29 CFR 1910.1200] and the Emergency Planning and Community Right-To-Know Law [40 CFR Subchapt J].

The HCS, better known as the Worker Right-To-Know Law, took effect May 23, 1988, for all businesses with one employee or more that use chemicals in the workplace. The four major components of the HCS are: 1) hazard determination: collecting Material Safety Data Sheets (MSDS); 2) labeling and other forms of warning; 3) employee information and training; and 4) a written hazard communication program. For more information contact WMRC or:

Illinois Department of Labor
Toxic Substances Division, Room 300
One W. Old State Capitol Plaza
Springfield, IL 62701-1217
217-782-4102

The Emergency Planning and Community Right-To-Know Act (EPCRA) includes three subtitles. Subtitle A stipulates procedures for emergency planning in states and localities. Subtitle B builds a framework for community awareness concerning potential chemical hazards and outlines requirements for submission of MSDSs, chemical inventory forms, and toxic release forms. Subtitle C focuses on trade secret protection, citizen petitions, and information availability. You may be required to notify community, state, and federal agencies of the chemicals used on-site. For more information about this law contact the Illinois Emergency Management Agency (IEMA) at 217/782-2700 or WMRC at 217/333-8940.

Clean Air Act Amendments Pertinent to This Guide

On November 15, 1990, President Bush signed into law the Clean Air Act Amendments (CAA). This law expanded the authority of USEPA to regulate air pollution sources. It also provided for hazardous material release response planning and risk minimization under Part 68. This code requires facilities who store greater than the TPQ of specified HAPs develop a risk management and minimization plan and submit it to USEPA in electronic format no later than June 21, 1999. New CAAA requirements of most interest to small businesses are:

State and Federal Operating Permits—many small businesses will be required to obtain permits for discharging as little as a few pounds per day of certain pollutants into the atmosphere.
**Ozone Layer Protection**—many chemicals that are in common use today cause damage to the earth’s protective ozone layer. The CAAA will ban the use of most of these chemicals over the next ten to twenty years. Small businesses will find that many of the chemicals that they use to make their products will need to be replaced by new, non-polluting chemicals.

**Toxic Air Pollutants**—many chemicals and raw materials used by small businesses are toxic when released to the atmosphere. The use of several hundred chemicals will be restricted under provisions of the CAAA in order to reduce their releases on a nationwide basis. These restrictions will encourage implementation of pollution prevention and good management practices to reduce emissions and use raw materials more efficiently.

A USEPA publication, *The Clean Air Act Amendments: A Guide for Small Businesses* (450-K-92-001), provides an excellent description of its provisions. In addition, various agencies in Illinois are available to assist businesses with complying with Clean Air Act regulations. For example, the Illinois Department of Commerce and Community Affairs (DCCA) has established a small business assistance program; IEPA employs a Clean Air Act Ombudsman to assist small companies with CAAA issues; and, WMRC has staff with industry specific experience who are knowledgeable about CAAA compliance requirements.
Chapter 3: SQG Regulatory Requirements

With the passage of the Hazardous and Solid Waste Amendments, USEPA was required to write a set of regulations governing the disposal of hazardous waste by SQGs. These regulations became effective on September 22, 1986, and require SQGs to comply with the requirements described in this chapter.

Quantity Determination

If a generator exceeds the waste generation rate for its classification in any given month, it is considered to be in the next larger classification for the calendar year. If a generator becomes a LQG for even one month during a calendar year, it must file a generator annual report with IEPA by March 1st for that year and a biennial report must be filed with USEPA [40 CFR 262.41]. For assistance with completing this report contact WMRC.

A good way to determine the pounds of hazardous waste your facility generates is to assume that 220 lbs. is about ½ of a 55-gallon drum. Solid or semi-solid wastes will be somewhat heavier (220 lbs. will take up less than half of a 55-gallon drum), and some petroleum products and solvents will be lighter (220 lbs. will take up more than half of a 55-gallon drum). If there is any doubt about the density of the waste, or if the generation rate is very close to either of the cutoff points, weigh the materials or consult the MSDSs to calculate weight based on the density of liquid materials. This is because the regulations are written in terms of weight and not volume.

Determining whether a hazardous waste is generated is not always easy. Table 2 (Chapter 1) lists some hazardous wastes produced by small quantity generators, but it is not all-inclusive. In general, the following steps can be taken (in any order) to determine whether a waste is hazardous.

Read the label or instructions—raw material containers may be labeled as being hazardous in some way. If the raw material is hazardous the product and process wastes that result from its use may also be hazardous. To determine if these materials are hazardous refer to Chapter 2 where hazardous wastes are defined.

Read the Material Safety Data Sheet (MSDS)—all commercial products and chemicals are required to have a MSDS that gives safe handling instructions and information on the materials hazard classification and proper disposal. However, this section is typically very general because state regulations can vary.

Consult the vendor or manufacturer—the sellers of the material in many cases should be able to advise you and provide MSDSs on the products they sell. The MSDS will provide information on pH, flash point, etc. to help determine if the waste is hazardous.

Look for the waste on the lists provided in IAC Title 35, Part 721, Subpart D—although these lists are somewhat difficult to use since they are extremely long and complex, they do contain a comprehensive list of chemicals considered hazardous.

Consult the Waste Management and Research Center—WMRC staff keep extensive lists of various types of hazardous wastes and are experienced in determining whether a waste is hazardous under these regulations. Call 217/333-8940.
Consult IEPA or USEPA—they can provide assistance and are the ones who ultimately interpret the regulations; for IEPA call 217/782-5565; for USEPA call 312/353-2000.

Have the waste tested—in many cases, a complex waste must be tested to see if it fits any of the characteristics described in Chapter 2. Many disposal firms require that all the wastes they handle be tested. For advice on what specific test should be run on the waste, ask the disposal facility or contact WMRC. Testing can cost up to $2,000 per waste stream, but it generally will only be required at permit renewal time (usually every three years).

Notification Requirements

If a firm determines that it generated hazardous waste, USEPA and IEPA must be notified by completing USEPA Form 8700-12, and sending it to IEPA [http://www.epa.gov/epaoswer/hazardwaste/data/form8700/forms.htm]. An additional notification must be made to IEPA for disposal of a special waste. This notification is normally made to IEPA by the TSDF but will often involve the generator providing additional information to the TSDF and acquiring an IEPA generator ID number.

Storage and Accumulation Requirements

A SQG may accumulate hazardous waste on-site for up to 180 days, or 270 days if the nearest TSDF is more than 200 miles away. The total quantity stored cannot exceed 13,200 lbs. When hazardous wastes are stored on-site, the following precautions must be taken.

- Hazardous wastes must be stored in containers that meet DOT specifications and must be compatible with the waste being stored (for example, strong acids should not be stored in unlined steel drums).

- Containers must be clearly labeled with the words hazardous waste and the date when wastes were first put into the container. Commercial labels that satisfy this requirement are available (see Fig. 1).

- Once the waste is moved into storage from the point of generation or the satellite access point, they must be dated to track the accumulation time.

- Containers must be inspected by the generator at least weekly. If a container begins to leak, the contents must be transferred immediately to another container. In some cases, spills need to be reported to appropriate state and federal agencies (see the section Planning for Emergencies later in this chapter).

- Containers should be kept closed during storage, except when adding or removing waste.

- Incompatible wastes must not be placed in the same container.

- The storage area must have an evacuation map which also includes the location of the closest communication device (intercom or phone), spill control materials, a fire extinguisher, and a sign posting the area.

- The facility must have an alarm system, a telephone, and as many portable fire extinguishers as required by law. This is specified by the standards of the National Fire Protection Association or by local fire code.
There must be a minimum of 24 inches of aisle space between the containers in order to accommodate inspections and emergency spill control equipment.

The owner or operator must attempt to make arrangements with local authorities (police, fire departments, etc.) to familiarize them with the types of materials stored and the layout of the facility (see SARA regulations).

The generator must have at least one employee designated as an "emergency coordinator," either on the premises or on call at all times. In the case of a small shop, that person might be the owner, foreman, etc. In the case of a larger operation, such as a three-shift factory, it is advisable to have an emergency coordinator on each shift. In most cases, it would be the foreman or main person in charge on that shift.

The facility must post next to the telephone the name and number of the emergency coordinator, emergency evacuation maps, and the telephone number of the fire department. Much of this information must be posted throughout the facility to comply with OSHA standards as well.

Waste must be stored at least 50 feet from the property line inside or outside the facility.

The owner/operator of the facility must ensure that all employees are familiar with proper waste handling and emergency procedures. This is not as stringent a requirement as the formalized training requirements for large quantity generators. Employees must know where the telephone is, where the spill control materials are, how to use the fire extinguishers, etc.

If a fire or spill spreads beyond the property, IEPA, the LEPC and the National Response Center (800/424-8802) must be notified.

In general, fire safety standards must meet National Fire Protection Association codes or local fire code. Information on this topic can usually be obtained from local fire departments.

Transporters and Disposal Facilities

Generators must use transporters and disposal facilities that have USEPA and IEPA ID numbers and are permitted to handle the type of waste that the generator produces. In Illinois the facility must have a Part A RCRA permit and a Part B RCRA permit. Chapter 6 discusses in detail how to select these services.

DOT Regulations and Shipping Regulations Under RCRA (49 CFR 172, 178; IAC 35 Part 722.133)

The DOT has adopted regulations separate from the USEPA regulations to ensure safe transportation of all hazardous materials (not just hazardous waste). These rules regulate how materials should be labeled and packaged for shipment to the TSDFs. A shipping name and an ID number that are different from the name and number required by the hazardous waste regulations are assigned to the waste.

Although a complete explanation of the DOT regulations is beyond the scope of this manual, five considerations need to be emphasized.

- Employee training
- Two types of labels will be required: the
EPA label marks the material as being a hazardous waste (Figure 1), and the other label identifies the material's DOT hazard class (Figure 2).

- The appropriate shipping name and DOT ID number must be determined by the generator (the transporter or WMRC can assist you).

- Approved shipping containers must be used. Most SQGs will use 55-gallon drums in which the raw material was stored. No container that previously held hazardous waste may be reused without being reconditioned and certified according to DOT requirements. Other containers and packaging are acceptable.

- All reconditioned containers must bear the DOT certification number that indicates the date and facility that reconditioned the container.

- Incompatible wastes must not be shipped together in the same vehicle.

It is essential that accurate information be supplied and that requirements be met to ensure proper handling of the waste and to avoid legal liabilities. The sources listed in Chapter 7 should be helpful in meeting these requirements. In many cases, the transporter can also be of assistance.

Figure 1. Typical EPA Hazwaste Label

Figure 2. Typical DOT Labels

Manifesting Requirements (40 CFR Part 262 Subpart B and D)

A manifest is a one-page multi-part form with at least five duplicate copies. It must accompany the hazardous waste shipment from its point of origin (the generator) to its point of disposal (the TSDF). Its purpose is to track the shipment from "cradle to grave" to ensure that shipments of hazardous waste reach their intended destination. As the shipment makes its way to its final disposal point, carbon copies are torn off and either kept by generators, transporters, TSDFs, and sent to the state environmental control agencies according to manifest instructions. Federal regulations require that a certain type of manifest, called the Uniform Hazardous Waste Manifest (UHWM), be used.

Many state environmental agencies have their own versions of the UHWM which have been approved by USEPA. Illinois has required manifest for all special wastes since 1979 (see Appendix A, Title 35, Part 722, Subpart B). State
UHWMs are similar to the federal manifest, but may contain additional information required by the environmental control agency of the state that receives the waste. If waste is to be shipped out of state, the receiving state's manifest should be used. Always check with the environmental agency of the state receiving the waste to find out about any special requirements in that state. Also note, even when waste is shipped out of Illinois, you must supply the IEPA with a copy of the manifest.

Although UHWMs may be confusing the first time a generator completes one, it should be about the same each time, and many parts of the form can be pretyped and simply kept waiting for waste descriptions, amounts, dates, and signatures. A copy of an Illinois manifest, which meets the UHWM requirements and has some additional information required by IEPA is shown in Appendix C.

**Record-Keeping Requirements**

The SQG regulations require that generators keep their copies of each manifest and Land Ban form for at least three years in their current files. It is recommended that manifests dating beyond three years be kept, however moving them to archives is advised. SQGs should maintain well-organized records on every aspect of your hazardous wastes activities, including:

- A detailed description of the waste and how it is generated.
- Written documentation of the procedure used to determine quantity of waste generated annually.
- A copy of the original notice of hazardous waste activity that must be submitted to IEPA's Bureau of Land.
- A copy of the acknowledgement of receipt and waste generator ID number assignment received from USEPA.
- Contracts with haulers and TSDFs.
- Copies of maps and written description of transportation routes the hauler travels while carrying your waste to the TSDF.
- Records that indicate compliance with storage requirements (inspection logs, evacuation maps, emergency equipment, etc.).
- Copies of all manifests and Land Ban forms for shipments that have been sent out in the last 3 years.
- Emergency policies and procedures.
- A list of the people to contact in case of a spill or release of some kind.
- Copies of all training records.

It is also advisable to keep these records well organized and in a place that can be reached quickly should an IEPA or USEPA inspection occur (and they do occur). Good record keeping will help an inspection go much more smoothly.

**Preparing for and Preventing Accidents**

Whenever you generate hazardous waste and store it on-site, you must take precautions necessary to prevent any sudden or accidental release to the environment. This means that you must carefully operate and maintain your facility to reduce the possibility of fire, explosion, or release (inside or outside your facility) of hazardous waste. Some steps you must take to prepare for emergencies at your facility include:

- Communicate with local fire, police, hospital officials, and state or local emergency response organizations explaining the types of hazardous materials and wastes you handle to assure their cooperation and assistance in handling emergency situations.
Install and maintain emergency communication equipment including an alarm, a telephone and/or two-way portable radio.

Install and maintain fire extinguishers (using water, foam, inert gas, or dry chemicals as appropriate to your waste type). Hoses, automatic sprinklers, or spray equipment may also be necessary. Local fire departments can usually assist in determining appropriate equipment.

Provide enough room for emergency equipment and response teams to access any area of the facility in the event of an emergency. This includes appropriate aisle spacing in waste storage areas and throughout the facility.

Planning for Emergencies

A contingency plan attempts to look ahead to prepare for a worst case scenario as well as any other accidents related to hazardous materials that could occur. It can be thought of as a set of answers to a series of "what if" questions. For example, "What if I have a spill of hazardous waste or one of my containers leaks?" Emergency procedures are the steps you should follow if you have an emergency, that is, if one of the "contingencies" or "what ifs" occurs, or if any other event occurs that could pose a potential threat to workers, people outside the plant, or the environment. While a specific written contingency plan is not required for SQGs (LQGs are required to have a plan), it is a good idea to develop a basic written emergency response plan. This should also include assigning and informing your employees about their responsibilities in the event of an emergency.

Emergency phone numbers and locations of emergency equipment must be posted near telephones, and all employees must know proper waste handling and emergency procedures. You must appoint an employee to act as emergency coordinator to ensure that the proper procedures are carried out in the event of an emergency. The responsibilities of the emergency coordinator are generally that he/she is available 24 hours a day (at the facility or by phone), and know whom to contact and what steps to follow in an emergency. For most small businesses, the owner or operator may already perform these functions. It is not intended nor is it likely that you will need to hire a new employee to fill this role. If no plan is available, following two simple procedures will be effective in most emergency situations.

In the event of a fire, call the fire department, then if possible attempt to extinguish it using the appropriate type of fire extinguisher.

In the event of a spill, stop the source of hazardous material or waste; contain the flow of material to the extent possible. In some cases, depending on the type and amount of materials spilled, it may be necessary to report the spill to the National Response Center (NRC) in Maryland. Any spill that could leave the plant or get into the environment is of concern. Hazardous substances listed under CERCLA have threshold quantities above which a spill must be reported. Depending upon the material, the reportable quantity (RQ) may be 1, 10, 100, 1000, or 5000 lbs. A sample of RQs is shown in Figure 4, but generators and firms who handle hazardous substances need to be aware of the substances on-site, their RQs, and how to determine (calculate) whether a RQ has been spilled or released. The NRC operates a 24-hour toll free number: 800-424-8802. The Illinois Emergency Management Agency (IEMA): 800-782-7860; and the Illinois EPA: 217-782-3637 should also be contacted.
If you have a serious emergency involving hazardous substances or you have a spill that extends outside your plant or that could reach surface waters (lakes, streams, rivers, wetlands, etc.) and there is any possibility that a reportable spill may have taken place, immediately call the Local Emergency Planning Committee’s Office and/or IEMA. Give them the information they request. They will be able to advise you if the National Response Center and IEPA must be notified as well. However, anyone who should call and does not is subject to a $10,000 fine, a year in jail, or both. In addition, the owner or manager of the business may have to pay for the entire cost of repairing any damage resulting from the spill, even if the facility was not the single or main cause of the damage. You may also be obligated to contact other agencies such as the local sewer authority. For example, if you have a wastewater discharge permit, most permits specifically spell out situations that would necessitate notification.

Guidelines for Generators of Special Waste
(IAC Title 35 Part 808)

The category of waste referred to as Illinois Special Waste consists of four subsets: 1) RCRA hazardous waste; 2) Industrial Process Waste (IPW); 3) Pollution Control Waste (PCW); and, 4) Potentially Infectious Medical Wastes (PIMW). RCRA hazardous wastes are subject to both the RCRA regulations and the Illinois Special Waste Regulations. PIMW are subject to the special waste regulations and a set of regulations applicable only to them (PIWM regulations are beyond the scope of this manual), and IPW and PCW are subject only to the special waste regulations. They are not subject to the USEPA RCRA regulations.

The following paragraphs should be read in conjunction with the flow chart shown in Figure 4.

1. Determine first if the waste being generated is a solid waste. This is a term that can be very confusing to the first time generator or to a person new to environmental regulations. The term solid waste, in RCRA terminology, does not refer to the physical state of the waste, but rather to the regulations it is subject to. A waste is a solid waste if it is shipped off-site by truck or some other means to be disposed at another location. This may include solids, liquids, and pressurized gases. An aqueous liquid waste, electroplating rinse water for example, is considered to be a RCRA solid waste if it is disposed of by shipping it to a treatment firm off-site. If, on the other hand, it is disposed of by discharging it to a sanitary sewer, it is governed by Clean Water Act (CWA) regulations and is not a solid waste, but rather a CWA industrial waste water.

In most cases a waste is considered to be a solid waste any time that it is shipped off-site. However, determining whether the material must be shipped off-site may be a bit complicated. For instance, in the case of aqueous-based liquids, the material must meet specific parameters in order for the generator to discharge the waste into the sanitary sewer. Also, a waste may be prohibited from discharging into the sanitary sewer or landfill if it was generated from specific processes. Generators should seek guidance if the regulatory status of their waste is unclear.

There are some wastes that are excluded by law from hazardous waste regulations even though they may fit some of the hazardous waste characteristics (e.g. used lead-acid batteries are excluded from these regulations only if they are recycled). These wastes are listed in Illinois Administrative Code, Title 35, Part 721. Generators should
<table>
<thead>
<tr>
<th>Hazardous substance</th>
<th>CASRN</th>
<th>Regulatory synonyms</th>
<th>Statutory</th>
<th>Final RO</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,2-Benzenedicarbonylic acid, bis(2-ethylhexyl) ester</td>
<td>117817</td>
<td>Bis(2-ethylhexyl)phthalate</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3,4</td>
<td>RO28</td>
</tr>
<tr>
<td>1,2-Benzenedicarbonylic acid, dibutyl ester</td>
<td>84742</td>
<td>Diethyl phthalate</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3,4</td>
<td>RO69</td>
</tr>
<tr>
<td>1,2-Benzenedicarbonylic acid, diethyl ester</td>
<td>84862</td>
<td>Diethyl phthalate</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3,4</td>
<td>RO122</td>
</tr>
<tr>
<td>Benzene, 1,2-dichloro</td>
<td>95521</td>
<td>1,2-Dichlorobenzene</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3,4</td>
<td>RO70</td>
</tr>
<tr>
<td>Benzene, 1,3-dichloro</td>
<td>54173</td>
<td>1,3-Dichlorobenzene</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3,4</td>
<td>RO71</td>
</tr>
<tr>
<td>Benzene, 1,4-dichloro</td>
<td>105457</td>
<td>1,4-Dichlorobenzene</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3,4</td>
<td>RO72</td>
</tr>
<tr>
<td>Benzene, 1.1'-(2,2-dichloroethylidene)bis(4-chloro-</td>
<td>72548</td>
<td>DD</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,4</td>
<td>RO70</td>
</tr>
<tr>
<td>Benzene, dichloromethyl</td>
<td>98975</td>
<td>Benzal chloride</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,4</td>
<td>RO17</td>
</tr>
<tr>
<td>Benzene, 1,3-dicyclohexylmethyl</td>
<td>91087</td>
<td>Toluene diisocyanate</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,4</td>
<td>RO23</td>
</tr>
<tr>
<td>Benzene, dimethyl</td>
<td>264716207</td>
<td>Xylenes (mixed)</td>
<td>1000 1,3,4</td>
<td>RO39</td>
</tr>
<tr>
<td>Benzene, m-dimethyl</td>
<td>108383</td>
<td>m-Xylenes (isomers and mixture)</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3</td>
<td>RO68</td>
</tr>
<tr>
<td>Benzene, o-dimethyl</td>
<td>95476</td>
<td>o-Xylenes</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3</td>
<td>RO68</td>
</tr>
<tr>
<td>Benzene, p-dimethyl</td>
<td>106423</td>
<td>p-Xylenes</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3</td>
<td>RO68</td>
</tr>
<tr>
<td>1,2-Benzadiene</td>
<td>128463</td>
<td>Resorcinol</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3</td>
<td>RO201</td>
</tr>
<tr>
<td>1,2-Benzadione, 4-[1-hydroxy-2-(methylamino)ethyl]</td>
<td>61434</td>
<td>Epinephrine</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,4</td>
<td>RO42</td>
</tr>
<tr>
<td>Benzeneethanamine, alpha,alpha-dimethyl</td>
<td>122098</td>
<td>Alpha,alpha-Dimethylphenylethylamine</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,4</td>
<td>RO46</td>
</tr>
<tr>
<td>Benzene, hexachloro</td>
<td>118741</td>
<td>Hexachlorobenzene</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3,4</td>
<td>RO127</td>
</tr>
<tr>
<td>Benzene, hexafluoro</td>
<td>110027</td>
<td>Cyclohexane</td>
<td>1000 1,4</td>
<td>RO66</td>
</tr>
<tr>
<td>Benzene, hydroxy</td>
<td>108952</td>
<td>Phenol</td>
<td>1000 1,2,3,4</td>
<td>RO188</td>
</tr>
<tr>
<td>Benzene, methyl</td>
<td>109893</td>
<td>Toluene</td>
<td>1000 1,2,3,4</td>
<td>RO220</td>
</tr>
<tr>
<td>Benzene, 2-methyl-1,3-dinitro</td>
<td>652602</td>
<td>2,6-Dinitrotoluene</td>
<td>1000 1,2,3,4</td>
<td>RO106</td>
</tr>
<tr>
<td>Benzene, 1-methyl-2,4-dinitro</td>
<td>121142</td>
<td>2,4-Dinitrotoluene</td>
<td>1000 1,2,3,4</td>
<td>RO105</td>
</tr>
<tr>
<td>Benzene, (1-methylhexyl)</td>
<td>98828</td>
<td>Cumene</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3</td>
<td>RO55</td>
</tr>
<tr>
<td>Benzene, nitro</td>
<td>98853</td>
<td>Nitrobenzene</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3,4</td>
<td>RO19</td>
</tr>
<tr>
<td>Benzene, pentachloro</td>
<td>602535</td>
<td>Pentachlorobenzene</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; 2,3,4</td>
<td>RO13</td>
</tr>
</tbody>
</table>
Figure 4. Waste Regulatory Requirements Flow Chart
seek guidance if they believe that their waste is one that is excluded.

If a facility discharges waste water to a septic system versus a sanitary sewer system NO industrial process water may be discharged directly into the septic system. Only sanitary waste water from wash basins, etc., may be discharged. Your county health department oversees enforcement of regulations affecting septic systems and can provide additional information regarding allowed and prohibited discharges.

2. Determine if the waste is regulated as a hazardous waste under RCRA (see Chapter 2). This can be accomplished one of two ways, or a combination thereof. The first is based on "generator knowledge" or information provided on the MSDSs and concentration of hazardous ingredients actually in the waste. If the determination cannot be made based on MSDS information, you may need to have a waste analysis performed by an EPA-approved laboratory to make this determination. See Appendix D for a list of tests you may need to have performed on the waste. If the waste is not hazardous, go to #3. If it is, you must follow steps A-G

A. You must complete EPA Form 8700-12, "Notification of Regulated Waste Activity," and an "IEPA Inventory Identification Number Application" (see Appendix B) and submit them to the IEPA. Both a USEPA generator number (12 digit, beginning IL) and an IEPA (10 digit) number will be assigned, and Illinois manifests will be sent to you.

B. You must contact a TSDF that is permitted to accept RCRA hazardous waste. Often the waste hauler or broker you hire will do this as part of their service. TSDFs in Illinois must also have an Illinois permit (authorization number) to accept the waste from your company. This number must be included on the manifest when shipping waste to that facility.

C. If your waste is being sent to an out-of-state TSDF, Illinois does not require a special permit, but the receiving state may. In some cases, the receiving state, such as Missouri, will require you to obtain a state ID number from them as well.

D. If the waste is sent out of state, request UHWM forms from the receiving state.

E. The hauler must notify IEPA of their activity as a transporter, using Form 8700-12 "Notification of Regulated Waste Activity." The hauler must have a Special Waste Hauling (SWH) Permit from the State of Illinois (required of haulers picking up from or delivering to an Illinois location), and the vehicle must be placarded [IAC Title 35, Parts 723 and 809].

If you generate/produce less than a total of 220 lbs/month of hazardous waste, you are allowed by regulation to
transport the waste to a permitted TSDF in your own vehicle without having an Illinois SWH Permit or using a manifest. However, many TSDFs do not have the appropriate supplemental permit, or will not accept the waste without the SWH permit or manifest. If you do transport your waste the vehicle must be placarded [IAC Title 35 Part 722.133].

F. If you generate more than 2,220 lbs. in any month during the calendar year, you must complete an Annual Report for waste shipped off-site in the previous year by March 1. If you have notified as an SQG and subsequently exceed that amount during any calendar month, you must re-notify and submit the annual report. See Appendix E for a sample form ([IAC Title 35 Part 722.140-141].

Figure 5. Non-hazardous Waste Label

G. All requirements for generators must be complied with. Note especially the requirements for storage and the accumulation time limitations. If you are unable to have the waste removed in a timely manner because of problems in analysis or permit time requirement, extensions may be requested from the IEPA regional office.

3. If the waste is not a listed as a hazardous waste as defined by RCRA, it still may be regulated under the Illinois Special Waste regulations as an Industrial Process Waste (IPW), Pollution Control Waste (PCW), or Potentially Infectious Medical Waste (PIMW). Most wastes generated by small manufacturers or other businesses are considered to be IPW unless specifically excluded. The definition of IPW is shown in IAC Title 35, Part 809, Subpart A and should be read carefully by anyone who feels that their waste may be excluded from these regulations.

A. You must contact a TSDF that is permitted to accept Illinois Special Waste. Often the waste hauler or broker you hire will do this as part of their service. TSDFs in Illinois must also have an Illinois permit (authorization number) to accept the waste from your company. IEPA has up to 90 days to review the application before using a permit.

B. If your waste is being sent to an out-of-state TSDF, no Illinois authorization number is necessary. Many states have similar permit requirements, however. All generators of non-hazardous special waste that send waste out of state must complete a report to IEPA by February 1 for the previous calendar year. Contact IEPA for these forms (see Appendix E for sample form).

C. If your waste is being sent to an out-of-state TSDF, Illinois does not require a permit, but the receiving state may.
D. The hauler must have a SWH Permit from the State of Illinois (required for haulers picking up from or delivering to an Illinois location), and the vehicle must be placarded (see exemptions in IAC Title 35, Part 809, Subpart B).

If you generate/produce less than 220 lbs/month of waste, you may legally transport the waste to the TSDF in your own vehicle without having an Illinois SWH Permit or using a manifest. However, many TSDFs do not have the appropriate supplemental permits or will not accept the waste without the SWH permit or manifest, so check first.

4. Illinois Special Waste is a broad category of wastes that includes materials that is some cases may pose a significant threat to human health and the environment, and in other cases are nearly innocuous. It is not always appropriate to impose the same management and regulatory standards on all types of Special Waste. For this reason the State of Illinois has established a declassification procedure to separate SW into four categories based on its physical characteristics. Those categories are Class A Waste, Class B Waste, Special Handling Waste, and declassified (non-special) waste.

Class A Waste is subject to full management standards of the Illinois Special Waste regulations, with the other classes of waste being subject to decreasing standards in order of their classification. In almost all cases, non-hazardous special waste produced by small quantity generators is considered Class A waste. The declassification system involves analyzing the waste for nearly 100 different chemicals and, in some cases, toxicity testing is also necessary. Generally large volume wastes with low toxicity are the most likely to be declassified.

Class A wastes are wastes which either have not been evaluated for potential declassification or that have been found to pose too great a threat to human health or the environment to allow a reduced level of care.

Class B wastes are wastes which have been determined to pose a low or moderate threat to human health or the environment during the course of their transportation, storage, treatment, or disposal.

Special Handling wastes are wastes that although declassifiable, present management problems during transportation, treatment, storage, or disposal.

Declassified wastes are wastes that have been fully exempted from the Special Waste regulations. They can be disposed as regular municipal waste.

Passages from the Illinois Administrative Code that describe the declassification system are included in Appendix A, Title 35, Part 808. Generators that believe a waste they generate could be declassified should contact WMRC or IEPA.

5. If the waste meets none of the definitions or criteria for a Special Waste or has been completely declassified, it can be sent to a solid waste (sanitary) landfill.

Solid (non-liquid) Nonhazardous Special Waste Regulation Revisions (IAC Section 22.48)

On August 19, 1997 the rules covering disposal of solid (non-liquid), non-hazardous special wastes and pollution control wastes were
amended to exclude them in the definition of special waste. This eliminated the need to manifest, label and dispose of these wastes at a special waste disposal facility and eliminated the need to have these materials transported by a licensed special waste hauler.

Prior to changing the manner in which these wastes are disposed of the generator must certify that these wastes meet all the requirements of the legislative amendments. The certification must be signed, dated, and retained in your files. The generator can write the certification on ordinary business stationery (no forms required) and must contain the following:

- the waste is non-liquid (as determined by paint-filter test SW-846, Method 9095) and is non-hazardous;
- is not regulated asbestos containing material as defined in 40CFR, Section 61.141;
- does not contain PCBs regulated in accordance with 40CFR, Part 761;
- is not formerly hazardous waste rendered nonhazardous;
- and does not result from shedding recyclable metals (e.g. auto fluff).

The certification must also include:

- a statement explaining how the generator determined the waste is neither hazardous nor liquid;
- a description of the process that generated the waste;
- any relevant material safety data sheets (MSDS);
- results from any analytical testing or an explanation why testing was not needed (MSDS/generator knowledge).

Certifications must be provided to the IEPA, the waste hauler or receiving facility upon request. Each waste stream must have a separate certification and any changes in process or raw materials will require new certification. For example certifications, contact IEPA Bureau of Land’s Permit Section at 217-524-3300.

Examples of waste materials or waste streams that may be covered by this new rule may be chemical catalysts, paint sludges, incinerator ashes, metallic dust sweepings, and unspecified, contaminated, or recalled wholesale and retail products. It may also include pollution control waste including wastewater treatment plant sludges, baghouse dusts, landfill waste, scrubber sludges, and chemical spill cleaning-up materials.

Universal Waste Rules

The Universal Waste Rules (UWRs) were promulgated by U.S. EPA on May 11, 1995. The UWRs regulate and encourage recycling of hazardous waste nickel-cadmium and other batteries, certain types of waste pesticides, mercury containing thermostats and high-intensity discharge (HID) lamps (mercury vapor, metal halide, and high pressure-sodium).

The goal of the UWRs is to encourage resource conservation while adequately protecting human health and the environment; improving the EPA’s current hazardous waste regulatory program and provide individuals and organizations incentives to collect unregulated portions of these waste streams and manage them the same way the regulated wastes are, thereby removing these wastes from the municipal waste stream (keep them out of the landfills).

There are two types of universal waste handlers - large quantity handlers and small quantity handlers of universal waste. These classifications are similar to the hazardous waste generator classifications. A small quantity handler of universal waste (SQH/UW) is one that stores less than 5,000 kg or about 11,000 lbs of universal waste (all types combined) on any given day during the calendar year; a large quantity handler of universal waste is one that stores greater than 5,000 kg of universal waste on site. For the purpose of this manual,
only requirements applicable to "Small Quantity Handlers of Universal Waste (SQHUW) rules will be discussed. Meaning a person who uses batteries, pesticides, thermostats, and HID lamps, and who eventually decides they are no longer usable and thus are waste. Contractors or repair people who decide that these items are no longer usable and remove them from service are also considered handlers of universal waste.

SQHUWs are not required to notify EPA of their universal waste activities (no initial, annual, or biannual report required) and they are not required to obtain an EPA waste generator identification number as long as they do not store > 5,000 Kg (~11,000 lbs) of universal waste on site at any given time. (40 CFR 273.32 and IAC Title 35, Subtitle G, Chapt I, Subchapt. c - Part 733) Note, if a facility is generating other types of hazardous wastes they are still required to notify EPA and obtain an I.D. #.

SQHUWs are required to provide basic handling and emergency action information/training to employees who handle universal wastes. In the case of a release, handlers are required to immediately contain (prevent spread or additional spillage) and handle/neutralize residues appropriately. They are also required to comply with all OSHA employee handling and exposure regulations. These requirements are analogous to those currently required for small quantity generators of hazardous waste. Any training provided under other programs that meets any or all of the training requirements of Part 273 of RCRA regulations may be used to fulfill this requirement. You need only add a reference to 40 CFR Part 273 to the training documentation.

The amount of universal waste a facility generates does not count towards their monthly quantity of RCRA hazardous waste determination. In other words the amount of universal waste generated should not be counted towards the total amount of hazardous waste generated monthly. Universal waste does not impact your hazardous waste generator status. See Chapter 1 of this manual for definition of hazardous waste generators.

Labeling Requirements—Universal waste is subject to DOT packaging and shipping label requirements, however when the waste does not require a hazardous waste manifest many of the DOT labeling requirements do not apply.

Universal waste and/or containers of universal waste must be labeled at all times. The waste must be labeled as follows depending on the type of universal waste:

- **Fluorescent Lamps (mercury-vapor, metal halide & high-pressure sodium)** - "Universal Waste - Mercury Containing Lamps"
- **Batteries** - "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)"
- **Pesticide** - "Universal Waste - Pesticide(s)" or "Waste Pesticide(s)"
- **Thermostats** - "Universal Waste - Mercury Thermostat(s)," "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)"

Storage and Accumulation—Generators can accumulate waste on site for up to one year. Beyond one year the generator must prove to the Agency that the reason for storing the waste longer is for the sole purpose of facilitating proper recovery, treatment, or disposal of the waste (see 40 CFR 273.15(b) & 273.35(b)).

Off-site Shipments—Generators (SQHUWs) can take/send their universal waste only to a consolidation point, destination facility, or foreign destination. The SQHUW also must receive confirmation/approval from
the receiving facility prior to sending the universal waste to their facility. (See 40 CFR 237.18(a) and 273.38(a)).

The facility the universal waste is sent to (destination facility) whether it be for recycling or treatment and disposal, must be in compliance with 40 CFR parts 264, 270, and 261.6(c)(2). In other words the destination facility must be properly permitted to accept the specific universal waste you are sending for treatment or recycling.

If a shipment of hazardous waste, which is not considered universal waste, is shipped to another handler or destination facility, the receiving facility is required to notify the regional EPA office immediately. The receiver is required to provide the name, address, & phone number of the shipper. The EPA will provide instructions for managing the hazardous waste should this occur.

**Record Keeping and Tracking—**
SQHUWs offsite shipments of universal waste do not require a hazardous waste manifest or other record keeping. Record keeping is required for LQHUWs. (See 40 CFR 273.39 & 273.62) In general, it is recommended that simple documentation of quantities of universal waste shipped off site be maintained by SQHUWs in order to track/document your generator status. Under the universal waste regulations generators of universal waste still must comply with all of the land disposal restriction regulations found in 40 CFR 268.

**CESQGs and Universal Waste—** Facilities who generate 220 lbs/month (<100 Kg) or less of universal waste have the option to manage their waste under the Conditionally Exempt Small Quantity Generator provisions of 40 CFR 261.5 rather than the universal waste regulations (or the full Subtitle C regulations).
Industrial waste generation in the United States has reached daily averages in the billions of pounds. Toxic chemicals released by 1,185 Illinois facilities reporting under the Superfund Amendments and Reauthorization Act (SARA) totaled 139.3 million pounds for 1995 (IEPA, 1997a). About 71.4 million pounds were air releases through stacks or fugitive emissions statewide; 5.8 million pounds were released into the water; and 22.5 million pounds were released to the land. The total non-hazardous solid waste disposed in Illinois during 1995 was 47.1 million cubic yards (IEPA, 1997b).

This waste, discharged to our air, water and land, represents a significant loss of raw materials and a potential threat to human health and the environment. To increase competitiveness and be responsible guardians of environmental quality, companies must review their production processes and operations as well as consider both the economic and the environmental benefits of implementing a pollution prevention program.

Pollution prevention is a leading business strategy that emphasizes changes in operational practices, technologies, products, and raw materials so that wastes are not generated in the first place or, if they are, they are reduced in volume and/or toxicity. Included in the definition of pollution prevention (Table 6) are waste elimination, toxics reduction or elimination, source reduction, and in-process recycling. Specifically excluded are waste treatment after generation, volume reduction that does not reduce overall toxicity or recover raw materials, off-site recycling, and the burning of wastes for energy recovery.

Adopting a pollution prevention program as a way of doing business can provide a number of significant benefits to a company. By decreasing the amount of waste generated or released, a company can reduce waste disposal costs, improve worker safety, and reduce long-term liability. In addition, pollution prevention methods may increase the efficiency of the production line and decrease costs associated with the purchase of raw materials, inventory control, etc. Any resulting changes in efficiency or expenditures may help the company to retain or improve its competitiveness in the marketplace.

Industry has traditionally evaluated industrial processes in terms of optimizing production, but times have changed. Due to ever increasing

Table 6. Pollution Prevention

<table>
<thead>
<tr>
<th>Pollution Prevention IS:</th>
<th>Pollution Prevention IS NOT:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Reduction</td>
<td>End-of-pipe Technologies</td>
</tr>
<tr>
<td>In-Process Recycling</td>
<td>Pollution Control</td>
</tr>
<tr>
<td>Clean Technology</td>
<td>Off-site Waste Recycling</td>
</tr>
<tr>
<td>Raw Material Substitution</td>
<td>Out-of-Process Waste Recycling</td>
</tr>
<tr>
<td>Preventive Maintenance</td>
<td></td>
</tr>
</tbody>
</table>
liability associated with industrial waste, companies are now looking to incorporate prevention and sound management practices into their business strategy. Companies are reexamining their production lines with the goal of reducing waste generation by increasing efficiency of their operation. Cost savings are realized as more raw materials go into products rather than ending up as waste.

Although implementing a pollution prevention program is very important for a facility, it is the actual pollution prevention projects/techniques that will result in waste reductions and cost savings. Some specific examples of pollution prevention techniques are: process modifications, installation of more efficient equipment, substitution of safer or less toxic raw materials, in-process or on-site recycling, improved housekeeping, and packaging reduction.

Process modifications may result in a reduction of raw materials used, a reduction in waste volume and recovery of components for reuse, and reduced labor costs. For example, a metal fabricator using an aqueous degreasing/surface treating system could install an ultrafiltration unit to clean the oil-contaminated degreasing/treating bath. This could eliminate the frequent disposal of the aqueous bath (often as a hazardous waste) by producing a clean water stream containing the recovered surface cleaning and treating agents. This process modification not only reduces the associated disposal costs but also results in raw materials cost savings.

By installing more modern equipment, manufacturers can increase productivity as well as reduce emissions to the environment. More efficient valves can significantly reduce fugitive emissions, such as volatile organic emissions, and possibly reduce permitting and reporting requirements for these compounds. Solvent condensing systems can be installed on tanks to reduce volatile organic compound (VOC) emissions and recover solvent vapor for reuse. More energy efficient pumps can reduce energy costs while indirectly reducing SO₂ & NOₓ emissions (at the utility plant).

Raw material substitutions can result in significant cost savings in waste disposal costs and can also improve the safety of the working environment. For example, traditional painting and coating systems can be replaced with powder coating. This not only eliminates the generation of hazardous paint sludge and volatile organic compound emissions from overspray and solvents (and the costs and reporting requirements associated with these wastes), but it can also improve product quality. Electroplaters may also find that substituting new raw materials for plating, such as zinc hydroxide in place of zinc cyanide for zinc plating, can reduce their disposal costs by producing a less toxic electroplating sludge. It can also greatly improve worker safety and reduce the risk to the environment posed by cyanide compounds. Metal fabricators can substitute aqueous cleaners for the solvents they currently use to clean metal parts prior to coating.

In-process or on-site recycling not only decreases the amount of waste being disposed but also decreases the amount of new raw materials required for manufacturing. For example, manufacturers who use solvents in their products and to clean their mixing equipment can employ a system to reuse the solvent used to clean equipment as the vehicle solvent for the next batch of the same or similar product. Automotive shops and other operations that use solvent as a cleaning agent can also recycle the solvent on-site using a solvent distillation unit (note: this unit requires an air permit for construction and operation). Solvents used for cleaning can also be reused as a first-cleaning step in other applications where the cleanliness requirements are not as stringent. Rinsewaters
used in electroplating operations can be reused as makeup water for the plating operations. Other wastewaters generated during manufacturing processes can also be filtered or cycled through a membrane filtration unit and then reused in the process.

Improving housekeeping procedures is one of the simplest ways to reduce waste in a facility. For example, frequent inspections of lines and pumps can identify leaks which could result in significant loss of product or contamination of the work area. Preventive maintenance of equipment can reduce unscheduled shut downs which often result in wasted materials (off-spec or incomplete product, wastes generated during clean out and start-up) and loss of valuable production time. Waste segregation procedures can also reduce the amount of hazardous waste by preventing streams that are not hazardous from being mixed with the hazardous waste (the entire mixture would then be handled as hazardous waste). Other housekeeping improvement might include installing nozzles on hoses to reduce water losses and accurately estimating the paint needed to complete a paint job to avoid having large amounts of paint leftover (to be disposed of as waste).

By reducing packaging materials, many facilities can reduce their solid waste stream significantly. In fact, many facilities may find that their solid waste disposal costs far exceed their hazardous waste disposal costs. Purchasing raw materials in bulk and, where possible in reusable containers, can eliminate waste packaging, such as drums, bags, plastic wrap, etc. Using returnable, reusable containers for shipping materials can eliminate two of the largest contributors to the waste stream: corrugated materials and wooden pallets. Cost savings can also result by bulk purchase (discounts from suppliers) and use of returnable containers (no repeated charged for shipping materials). Facilities should contact their suppliers to determine which materials can be purchased in bulk and/or in reusable containers and what cost breaks can be negotiated. Suppliers can also be asked to eliminate unnecessary packing materials or to redesign packaging to reduce the solid waste left to the end user.

Although the benefits of incorporating pollution prevention into business practices speak for themselves, there are also some regulatory driving forces which are encouraging, and even requiring, that businesses reduce the amount of waste they generate. For example, large quantity generators of hazardous wastes and those facilities required to report releases under the Toxics Release Inventory form R (this includes many SQGs), are now also required to certify that they have a pollution prevention program in place. This means that the USEPA wants businesses to start looking at their processes to determine where wastes can be reduced or eliminated. The new Clean Air Act Amendments call for the phasing out of many commonly used organic solvents. This will force many companies to find alternatives to the solvents they currently use. The USEPA will also be finalizing its Waste Minimization Guidance and will be requiring all large quantity generators to certify that they have waste minimization plans in place. The USEPA may also eventually extend such a requirement to SQGs [40 CFR Part 372].
Chapter 5: Other Waste Management Options

In many cases it will not be possible to reduce or recycle wastes on-site. In such cases the generator must decide how the waste will be managed and by whom. It is important that a generator follow the waste management hierarchy outlined in Figure 6, attempting to use more environmentally protective management methods first.

Choosing an appropriate disposal method is essential. Generators are ultimately responsible for the safe and proper disposal of their own wastes and cannot pass that responsibility on to someone else. If a dishonest hauler accepts wastes from generators and then dumps the wastes illegally, or if a poorly operated TSDF is the cause of environmental contamination, the generators of the waste can be held liable for cleanup costs along with the hauler and disposer. This chapter will describe the various waste management alternatives available to generators in Illinois and some of the services they can obtain commercially.

Off-Site Recycling

In many cases generators lack the equipment or personnel to recycle raw materials on-site, but they can still derive benefit from recycling and reusing these raw materials off-site. There are several commercial firms, for example, which will redistill solvents for a generator or sell them to someone else as a raw material. Off-site recycling has a disadvantage. The generator must still register with the government and fill out manifests for shipments of hazardous wastes sent to the recycler.

Waste Exchanges

Using waste exchanges is another possibility for recycling hazardous and non-hazardous wastes.
industrial wastes. In Illinois, the Industrial Material Exchange Service (IMES) is run jointly by IEPA and the Illinois State Chamber of Commerce. IMES has two lists: one includes firms and the materials they wish to get rid of and the other is firms looking for excess or waste materials to use as raw materials in their own processes. All listings are confidential. A sample is shown in Figure 7. For further information about IMES and how to get on their mailing list, call the IMES office at 217/782-0450. There are many on-line waste exchanges on the internet that may be useful as well (see Chapter 8).

Chemical Treatment

Many hazardous wastes can be treated chemically to render them nonhazardous. Several firms do this commercially. One example is the treatment of plating wastes that contain cyanide. These wastes are treated chemically to oxidize the cyanide, which renders them nonhazardous. Commercial facilities that do this are subject to many of the same requirements as hazardous waste landfills and incinerators, and generators who send wastes to them must notify EPA and manifest their waste.

In some cases, wastes can be treated on-site. This practice must be approached carefully. Generators may be subject to the extremely complex TSDF regulations if they attempt to treat their own wastes.

Incineration

Incineration of a hazardous waste to recover its energy value is another way to use a waste. Commercial fuel blenders mix wastes together to make fuels for operations such as cement kilns and blast furnaces. USEPA has enacted stringent regulations designed to control the manner in which these fuels are prepared and subsequently burned. Consequently, this disposal option will not be as inexpensive as it has been in the past.

Incineration may be the best management option for some wastes, e.g. organic waste and wastes not containing heavy metals. As land disposal options are closed or become less available, incineration may increase in significance although there is public opposition to it and the residues still need to be disposed.

Landfills

Landfilling may be the only practical option in some cases, but it should be the last option. Although it is generally not as expensive as some of the other options in the short term, the potential liability is great.

As discussed in the previous chapter, one way to minimize waste management problems is to produce less waste. The most important first step when attempting to reduce waste production is making an inventory of all materials entering and leaving the facility and scrutinizing housekeeping practices. In many cases pollution prevention and cost savings go hand-in-hand.
### ACIDS AVAILABLE

<table>
<thead>
<tr>
<th>Description</th>
<th>IM:</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>13% Chrome, 4.6% Cu in H₂O, 8.75% hexavalent chromium, drums, 55 gal/day, no restrictions on amounts, sample.</td>
<td>A01/6093</td>
<td>Huntsville, AL</td>
</tr>
<tr>
<td>.65% Chrome, .19% Cu, .11% Zn, % by dry weight, .18% hexavalent chromium, 400 gal. in drums available then 200 gal/mo, no restrictions on amounts, sample, independent analysis available.</td>
<td>A01/6094</td>
<td>Huntsville, AL</td>
</tr>
<tr>
<td>Less than 50% chromic acid and mineral acid in water, wet weight, dark orange liquid, pH (5% solution), 1.2, specific gravity 1.224, drums, 300 gal/yr variable, sample available.</td>
<td>A01/6092</td>
<td>Orland Park, IL</td>
</tr>
<tr>
<td>77% Iron chloride in H₂O, 1.4% copper, .3% zinc, drums, 15 gal/qtr, sample, independent analysis available.</td>
<td>A01/6079</td>
<td>Peoria, IL</td>
</tr>
</tbody>
</table>

### ACIDS WANTED

<table>
<thead>
<tr>
<th>Description</th>
<th>IM:</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>No acid mixes, heavy metal concentrations acceptable, in bulk, drums, no restrictions on amounts, wanted from Canada, Eastern and Midwest USA.</td>
<td>W01/6100</td>
<td>Port Colborne, Ontario</td>
</tr>
<tr>
<td>Will regenerate waste hydrochloric acid for generator’s rescue.</td>
<td>W01/6126</td>
<td>Alabama</td>
</tr>
<tr>
<td>Acid in any concentration with less than 1% total heavy metal concentration, bulk drums, no restriction on amount, from Wisconsin, Illinois, Indiana, Michigan, Iowa, Missouri.</td>
<td>W01/6010</td>
<td>Harvey, IL</td>
</tr>
<tr>
<td>Acid in any concentration with less than 1% total heavy metal concentration, bulk drums, no restrictions on amount, from Wisconsin, Illinois, Indiana, Michigan, Iowa, Missouri.</td>
<td>W01/6056</td>
<td>Harvey, IL</td>
</tr>
</tbody>
</table>

Figure 7. Sample Listing for the Illinois Material Exchange Service
Table 7. TSDF Checklist

<table>
<thead>
<tr>
<th>Item</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the site have current federal permit numbers?</td>
</tr>
<tr>
<td>Does the site have current state permit numbers?</td>
</tr>
<tr>
<td>Is the site permitted to handle your type of waste?</td>
</tr>
<tr>
<td>Do records appear to be in order?</td>
</tr>
<tr>
<td>Is there a personnel training program?</td>
</tr>
<tr>
<td>Does the site have required insurance?</td>
</tr>
<tr>
<td>Are there records of past violations?</td>
</tr>
<tr>
<td>What is the ultimate disposal method?</td>
</tr>
<tr>
<td>Are all storage areas clearly marked?</td>
</tr>
<tr>
<td>Are all containers marked?</td>
</tr>
<tr>
<td>Are incompatible wastes separated?</td>
</tr>
<tr>
<td>What type of spill preparedness is present?</td>
</tr>
<tr>
<td>Are storage areas kept clean?</td>
</tr>
<tr>
<td>Is there evidence of previous spills?</td>
</tr>
<tr>
<td>Are these people trustworthy? (You need to use your judgment!)</td>
</tr>
</tbody>
</table>

Table 8. Transporters' Checklist

<table>
<thead>
<tr>
<th>Item</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the firm have federal permit numbers?</td>
</tr>
<tr>
<td>Does the firm have state permit numbers?</td>
</tr>
<tr>
<td>Is the firm permitted to handle your type of waste?</td>
</tr>
<tr>
<td>Do records appear to be in order?</td>
</tr>
<tr>
<td>Is there a personnel training program?</td>
</tr>
<tr>
<td>Does the firm have required insurance?</td>
</tr>
<tr>
<td>Are there records of past violations?</td>
</tr>
<tr>
<td>What is the ultimate disposal method?</td>
</tr>
<tr>
<td>Are vehicles clearly marked?</td>
</tr>
<tr>
<td>Are containers handled carefully?</td>
</tr>
<tr>
<td>Are incompatible wastes separated?</td>
</tr>
<tr>
<td>What type of spill preparedness is present?</td>
</tr>
<tr>
<td>Are vehicles kept clean?</td>
</tr>
<tr>
<td>Is there evidence of previous spills?</td>
</tr>
<tr>
<td>Are these people trustworthy? (You need to use your judgment!)</td>
</tr>
</tbody>
</table>
Chapter 6: Choosing a Waste Management Firm

What to Look For—Where to Find It

There are three different types of firms SQGs may deal with: 1) transporters who pick up and haul the waste; 2) transfer and storage facilities (also known as waste brokers) that take a generator’s waste and combine it with other wastes of similar type to make shipments big enough to take to large disposal firms; and 3) TSDFs that ultimately dispose of the waste.

Most SQGs will deal with one of the first two groups. While large disposal firms often offer services in all three areas, they seldom cater to small customers; they prefer to concentrate on those facilities with larger quantities of waste.

Waste management firms are listed in the IEPA Storage, Treatment, Recycling, Incinerating, and Processing Facilities (STRIP) list, trade magazines such as *Pollution Engineering* or *Environmental Solutions*, and, in larger cities, the telephone book (the Chicago Business-to-Business Yellow Pages has three pages of listings). WMRC personnel can also help with the selection process.

Evaluating a Disposal Facility

Before selecting a disposal option and firm, SQGs can ask some basic questions to be sure that the company is legally qualified to handle their wastes.

- TSDFs must have a hazardous waste ID number similar to the number received by the generator from the USEPA. TSDFs in Illinois must also have a state permit number. When shipping to out-of-state TSDFs, generators should check the permit requirements of the state receiving the waste.

- TSDFs must be permitted to dispose or treat the particular type of wastes the generator produces. Each facility must have a Part A and Part B RCRA Permit. The generator should examine copies of the TSDF’s permits.

- The generator should thoroughly inspect the site receiving the waste. He or she should use a common-sense approach and focus on good housekeeping conditions. Check the general condition of the site, look for evidence of prior leaks or spills, and see if the number of drums on-site is kept to a minimum (too many drums sitting around could be a sign of trouble). It is a good idea to randomly check the labels on some of the drums to see how long they have been at the site. All equipment should be in good condition.

Generators should also examine the facility’s operating records, such as inspection and training records. Look at manifest records to determine if they are properly kept. Waste analysis data should be examined to see if incoming wastes are routinely screened.

- Records of previous violations should be carefully examined. This can be done either through WMRC or IEPA, as these records are open for public scrutiny. Most TSDFs will have been cited for some violation at one time or another, but consistent or serious violation or violations that continue to be unresolved may be a sign of trouble. It is also a good idea
to talk to IEPA personnel who actually conduct TSDF inspections.

- TSDFs must have the ability to pay for closure of the disposal site at the end of its useful life and must also have insurance to cover damages resulting from sudden accidents or chronic environmental leaks causing longer-term damage. Always ask to see proof of insurance and financial stability and obtain a current copy of their certificate of liability insurance.

A checklist to use when selecting a TSDF is provided in Table 7. It should not be considered all-inclusive. You may wish to add items specific to your wastes.

Transporters

Most of the selection criteria that apply to TSDFs also apply to transporters. In addition, generators should inspect the transporter’s trucks to make sure they are in good working order, and they should determine in advance what services are provided by the hauler (loading drums, pumping tanks, labeling containers, filling out manifests, etc.). The destination of the shipment should be clear before it leaves the premises (see Table 8).

Transfer Stations

If a transfer station is used, the facility should be thoroughly inspected before any shipment are sent there. In some cases, the facility will require a TSDF permit, but not always.

In all cases, it is important to use a common-sense approach in evaluating these facilities. Many facilities have operated with all appropriate permits in place, but have operated poorly and have ended up being Superfund sites. Generators must evaluate their options carefully and use only facilities that they feel are trustworthy.

It is equally important to know where to get help with your selection. Assistance is available from WMRC, IEPA, trade organizations such as the Illinois Manufacturers’ Association, the Chamber of Commerce, and many consulting firms in the state.
Chapter 7: Tips for Avoiding Regulatory Troubles

There are many potential pitfalls in hazardous waste management. Many SQGs have not had to previously comply with the complexities, and at times peculiarities, of hazardous waste management. In a rapidly expanding market like waste management, there are going to be a certain number of fly-by-night operations, poor businessmen who get into a bad situation, and people who want to make a quick dollar in a field for which they are not really qualified. The following tips may help generators establish a successful waste management operation for their facility.

- Find and check out a hauler/disposer you can trust (Chapter 5). Remember, if they get in trouble, you get in trouble.

- Always have a second hauler/disposer lined up in case the first one has a problem.

- Always make sure the terms of the contract between you and the hauler/disposer are clear. Know who is required to do what and when, and have it in writing.

- Shop around for the best prices and services. Many waste management firms will try to give the impression that they are the only ones in the business. This is not true.

- When in doubt about "the facts" a vendor, hauler or disposer tell you, call WMRC or IEPA to confirm the information. Don't get misled because of a convincing sales pitch.

- Always start early when handling a potential storage time problem because 180 days is not very long!

- Segregate the various types of waste you generate, and never mix hazardous wastes with non-hazardous wastes. Many hazardous wastes, solvents for instance, are easily recyclable and, in fact, have value when kept out of general refuse.

- Keep hazardous wastes storage areas in neat, clean condition. It makes finding leaks easier and makes inspections easier.

- If you should be inspected by a state, federal or local agency, cooperate fully. Be ready with well-organized files, and be honest and forthright. Be polite to the inspector. Grin and bear it when necessary!

- Recognize when you lack the expertise to handle a particular problem and have sources to help to go to, such as those listed in Chapter 8. Many environmental problems are actually caused by honest people who try to handle a problem when they aren't qualified to do so.

- Use good business sense in all your dealings. Be as careful, or more so, with the people you choose to handle your waste as you are with your customers and the people who supply your raw materials.
Chapter 8: Additional Sources of P2 Information

Waste Management and Research Center

The Waste Management and Research Center (WMRC) is a division of the Illinois Department of Natural Resources with offices in Champaign, Oak Brook, Peoria and St. Louis. WMRC is a non-regulatory agency which combines research, information collection, and analysis to provide Illinois citizens, businesses, and other organizations with direct technical assistance and literature on matters of pollution prevention compliance and waste management.

WMRC programs that can assist the small quantity generator are:

Information Services Program

The library and clearinghouse provide a wide range of books, reports, articles, and pamphlets on hazardous waste, pollution prevention and waste management topics. Staff can also search databases for technical literature relating to clients' problems and assist in locating sources of documents that may not be readily available in local public libraries.

Pollution Prevention and Technical Assistance

The Pollution Prevention program is central to WMRC's efforts to help Illinois industries better manage their wastes. Illinois businesses, educational institutions, governmental bodies, communities and citizens who request assistance with waste management, pollution prevention, regulatory affairs, and other environmental problems are helped in various ways by WMRC's technical assistance staff. This may include on-site technical assistance and help in developing a pollution prevention program, environment management system (EMS), or written plan. WMRC also administers the Governor's Pollution Prevention Awards to recognize the successful pollution prevention efforts of Illinois industrial facilities, vendors, trade organizations, community groups, and educational institutions.

For more information contact:
WMRC
1 East Hazelwood Drive
Champaign, IL 61820
217/333-8940
217/333-8944 (FAX)
www.wmrc.uiuc.edu

Illinois Environmental Protection Agency

The Illinois Environmental Protection Agency is the regulatory arm of state government which enforces state and federal environmental protection laws.

Office of Pollution Prevention

IEPA's Office of Pollution Prevention (OPP) promotes a spirit of cooperation between government and industry through the Partners in Pollution Prevention (PiPP) Program. Partner companies receive expedited permits for pollution prevention projects and an enhanced "Good Neighbors" community image. Companies must first designate a pollution prevention facilitator and adopt a policy statement with management support, and then design their own programs and schedules for implementation. Under the Toxic Pollution Prevention Act, IEPA provides variance support for innovation plans. For more information call 217/782-8700.
Clean Air Act Ombudsman

The Illinois EPA Small Business Ombudsman is a liaison between the Illinois EPA Bureau of Air and small business owners and managers. Assistance is provided with understanding air quality regulations and compliance issues; mediation in resolving complaints or disputes; help in identifying financial sources for pollution control investments; and, representing small business concerns during new air quality rule development.

For more information contact Don Squires at 217/785-1625.

Pollution Prevention Internship Program

This program places engineering students as interns at Illinois industries on targeted pollution prevention projects. Interns receive training and technical support from OPP support staff. They report and work at the cooperating industry under that company's direct supervision. Pollution prevention goals are mutually determined and company confidentiality requirements are respected. The program has saved Illinois industries over $2 million to date. For more information call 217/782-8700.

Department of Commerce and Community Affairs

Small Business Assistance Program

As a result of the Clean Air Act Amendment of 1990, each state is required to provide a Small Business Assistance Program. DCCA will operate this program for Illinois. The purpose of the program is to provide compliance information to small businesses. This includes their rights and obligations to meet the requirements under the Act. Additional information must also be provided in the areas of pollution prevention, accidental release detection, process technologies available and a referral system for assistance.

For more information contact:

Dept. of Commerce and Community Affairs
Environmental Assistance Program
620 E. Adams St
Springfield, IL 62701
217/785-0169
217/524-6328
800/252-3998 (Illinois only)
www.commerce.state.il.us
United State Environmental Protection Agency

Pollution Prevention Information Clearinghouse (PPIC)

USEPA's PPIC was established in 1988 to promote source reduction and recycling through information exchange and technology transfer. The PPIC is a free clearinghouse service containing technical, policy, programmatic, and legislative information relating to pollution prevention and recycling. The PPIC utilizes the following information exchange mechanisms: a repository containing the most current pollution prevention literature, such as case studies, fact sheets, training, videotapes, outreach efforts including workshops, training, and industry-specific pollution prevention materials.

The USEPA publishes a document each year which provides information on pollution prevention resources available from both federal and state agencies. It includes listings of documents, videos, and university programs, USEPA resources, libraries, and clearinghouses. Entitled Pollution Prevention Resources and Training Opportunities in 1993 (EPA/560/8-92-002), this document is available from USEPA PPIC.

For more information contact:

PPIC
USEPA, PM 211-A
401 M Street, SW
Washington, DC 20460
202/260-1023
202/260-0178 FAX
www.epa.gov

EnviroSense

EnviroSense is a World Wide Web (WWW) source developed by USEPA. It includes contact information for federal, state, local and international programs involved with pollution prevention. EnviroSense also provides access to P2 factsheets and case studies, environmental compliance information, and P2 research and development information. In addition, users can access the Integrated Solvent Substitution Data System, which includes the Solvent Alternative Guide (SAGE), the Hazardous Solvent Substitution Data System (HSSDS), several Department of Defense databases, the Solvent Handbook Database System, and two databases from the National Center for Manufacturing Sciences. To access EnviroSense, use a WWW browser and the URL http://es.epa.gov

For additional information or assistance contact Myles Morse at 202/260-3161.

Other Information Resources

Great Lakes Pollution Prevention Roundtable
www.glrppr.uiuc.edu
For additional information or assistance contact Debra Jacobson at 630/472-5019.

Pollution Prevention Resource Exchange (P2Rx)
www.p2rx.org
The Pollution Prevention Resource Exchange (P2Rx) is a network of nine regional pollution prevention centers that offer a variety of resources, including information for specific industry sectors, trainings, libraries, referrals, and research. Through P2Rx, the nine centers are laying the groundwork for a seamless national network of easily accessible, high-quality P2 information.

For more information about these projects please contact Jini Cook, 217/244-6553 jcook@wmic.uiuc.edu.
Printers' National Environmental Assistance Center (PNEAC)

The Printers’ National Environmental Assistance Center site provides one-stop shopping to obtain compliance, pollution prevention and technical assistance to the printing industry. The Center’s web site and fax-back service contain federal printing rules, summaries, fact sheets, and P2 case studies as well as links to state, regional, national and international programs and resources.

www.pneac.org

For additional information or assistance contact Debra Jacobson at 630/472-5019.

National Metal Finishing Resource Center (NMFRC)

This site includes environmental compliance, technical assistance, pollution prevention, and informational sources in the metal finishing industry. It includes information on the NMFRC, National Metal Finishing Resource Center, and offers new membership.

www.nmfrc.org

For additional information or assistance contact Sherman Titens at 816/561-8388.

Auto Service Repair Compliance Assistance Center—CCAR Greenlink

www.ccar-greenlink.org

Contains simple explanations of federal rules that apply to the auto service repair industry. Also provides information on the proper disposal of hazardous wastes, emissions, emergency spill procedures, oils, coolants, solvents, paints, refrigerants, filters, used tires, and used batteries.

Agriculture Compliance Assistance Center

http://es.epa.gov/oeca/ap

This site provides one-stop shopping for the agricultural community. It also provides information about compliance that is environmentally protective and agriculturally sound.

For additional information contact Ginah Mortensen at 913/551-7207.

Printing Wiring Board Resource Center

http://pwbrc.org

This site includes environmental compliance, technical assistance, pollution prevention, and informational sources in the metal finishing industry. It includes information on the NMFRC, National Metal Finishing Resource Center, and offers new memberships.

Chemical Alliance Center

http://es.epa.gov/oeca/ccsmd/ogp/ogp.html

A compliance assistance center for the chemical industry, which opened in the fall of 1998. This site includes an expert help desk to assist the user.

Local Government Environmental Assistance Network (LEGAN)

http://www.epa.gov/oeca/

The local government environmental assistance network will serve local government municipalities to exchange information on compliance experiences and pollution prevention to enable input into the federal rules and will be opening in the Fall of 1998.
Transportation Center

http://www.transource.org

This virtual center will enable the transportation industry—railroad, trucking pipelines, shipping, and airports—to keep up to date on federal regulations that affect them. This site will be open in the fall of 1998.

Paints and Coating Center

http://www.paintcenter.org

This site provides environmental and other information to the paints and coatings sector similar to the National Metal Finishing Resource Center.

Recycling and Materials Exchanges

Environmental Hotline Earth's 911

http://www.1800cleanup.org/

This network and database contain recycling information for all 50 states. It gives the option to add a site if one isn't listed for your organization.

Global Recycling Network

http://grn.com/index.html

This site offers a one-stop solution to recycling information for business users, researchers, publishers, and purchasing agents.

King County Recycles Procurement Program

http://www.metrokc.gov/

This program describes the tools and techniques developed by King County agencies for purchasing recycled products. This site gives information on construction and landscaping materials, office and automotive products, and environmental/recycling links.

Illinois Industrial Materials Exchange System (IMES)

http://www.epa.state.il.us/imes.html

IMES publishes a bi-monthly directory that goes to 14,000 subscribers nationwide. It lists both materials that are available and materials industries are seeking. Request forms are included in the front of each directory. To respond, or to list a material, firms can send phone or fax requests to the IMES office. Copies of the most recent IMES directory can be obtained, or firms can be added to the mailing list, by calling 217-782-0450.

After a firm responds to a listing, IMES puts the potential user in contact with the generator, with the final transaction and transportation of materials left to the companies involved. Materials listings stay in the directory for a minimum of one year, unless the listing is withdrawn. If firms prefer to list their materials confidentially, IMES will not release a company name or phone number without permission.

Focus of the IMES program is on services to industrial clients, so the program does not have direct involvement with regulatory bureaus or the Illinois EPA's compliance programs, and does not allow access to its files, or discuss client companies' needs with Agency bureaus.

Recycler's World

http://www.recycle.net/recycle/index.htm

A world-wide trading site for information related to secondary or recyclable commodities, by-products, used and surplus items or materials. It includes information on automotive, metals, plastics, rubber, paper, wood, oils, and many others.
Appendix A

State of Illinois Manifest
Dear Generator:

To obtain Illinois Uniform Hazardous waste Manifests which are required for all Special Waste shipments coming into Illinois, within Illinois, and from Illinois to states not providing their own manifests, complete the below information. The cost is $1.00 per manifest and must be paid by check, cashier's check, or money order made payable to Treasurer, State of Illinois. Any questions should be directed to 217/782-9293, 217/782-6762, or 217/524-6175. Allow 2 weeks for processing. ABSOLUTELY NO PHONE ORDERS ACCEPTED. FEE MUST ACCOMPANY EACH MANIFEST ORDER. FAILURE TO COMPLETE THIS FORM ACCURATELY AND COMPLETELY WILL RESULT IN REJECTION OF THE MANIFEST REQUEST, AND POSSIBLE FORFEITURE OF THE MANIFEST FEE.

Generator Name: ____________________________  Contact ____________________________
Generator Phone: ____________/____ _______ Fax Number: ____________/____ _______
IL Generator # (not Federal) ____________ ______ ______ ______ ______ ______
Receiving facility IEPA # ______ ______ ______ ______
Generator Location (NO P.O. BOX!)

(City) (State) (Zip)
Shipping address, if different from above. (NO P.O. BOX!)

(City) (State) (Zip)

GENERATOR NUMBERS ARE ISSUED TO A SPECIFIC FACILITY LOCATION. MANIFESTS WILL BE ISSUED TO THE GENERATOR NUMBER IDENTIFIED ON THIS FORM. RECORDS ARE KEPT OF THE SPECIFIC MANIFEST NUMBERS ISSUED TO EACH GENERATOR AND THE MANIFESTS MUST BE USED ONLY BY THE GENERATOR IDENTIFIED ON THIS FORM.

Manifests are $1.00 each for first $500.00 per calendar year. Quantities over $500.00 per year are fee exempt. If this manifest order is "fee exempt" ($500.00 paid during the current year), check here _________.

Indicate quantity and type of manifest:

_____ Pin-Fed (Computer feed)
_____ Snap-Top

Total Quantity @ $1.00 Each = $ ________________00  Check # __________

TYPE OF PRINT CLEARLY ON THE ENCLOSED LABEL THE NAME AND ADDRESS (POST OFFICE BOX NOT ACCEPTABLE) TO WHICH THE MANIFESTS SHOULD BE SENT. THIS WILL BE YOUR SHIPPING LABEL!

Use the enclosed preprinted label and return this form to:

*MANIFEST REQUEST ENCLOSED*
Illinois EPA LPC #24
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois  62794-9276

This Agency is authorized to require this information under Illinois Revised Statutes, 1987, as amended by Public Act 85-1343. Section 22.8. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $1,000.00 and an additional civil penalty up to $1,000.00 for each day the failure continues, a fine up to $1,000.00 and imprisonment up to one year. This form has been approved by the Forms Management Center.

IL 532 0733
LPC 084 Rev. Jun-99
<table>
<thead>
<tr>
<th>UNIFORM HAZARDOUS WASTE MANIFEST</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th>Information in the shaded areas is not required by Federal law, but is required by Illinois law.</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Illinois Manifest Document Number</td>
<td>B. Generator's II. ID Number</td>
<td>C. Transporter's II. ID Number</td>
<td>D. Transporter's Phone ()</td>
<td>E. Transporter's ID Number</td>
<td>F. Transporter's Phone ()</td>
<td>G. Facility's II. ID Number</td>
<td>H. Facility's Phone ()</td>
</tr>
<tr>
<td>15. Special Handling Instructions and Additional Information</td>
<td>K. Handling Codes for Waste Listed Above In Item #14</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economical and practical and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.</td>
<td>Date</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Printed/Typed Name</td>
<td>Signature</td>
<td>Month</td>
<td>Day</td>
<td>Year</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17. Transporter 1 Acknowledgement of Receipt of Materials</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Printed/Typed Name</td>
<td>Signature</td>
<td>Month</td>
<td>Day</td>
<td>Year</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18. Transporter 2 Acknowledgement of Receipt of Materials</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Printed/Typed Name</td>
<td>Signature</td>
<td>Month</td>
<td>Day</td>
<td>Year</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19. Discrepancy Indication Space</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except as noted in Item 15</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Printed/Typed Name</td>
<td>Signature</td>
<td>Month</td>
<td>Day</td>
<td>Year</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

This Agency is authorized to require pursuant to Illinois Revised Statutes, 1998, Chapter 111-12, Section 1004 and 1005, that the information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator of $100 per day of violation. Submission of this information may result in a fine up to $5,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Illinois Pollution Control Commission.
The Illinois Uniform Manifest must be used for all shipments of special waste (hazardous and nonhazardous) stored, disposed of, treated or reclaimed in Illinois; and for all shipments originating in Illinois and destined for states that do not print and supply the form. Potentially Infectious Medical Waste (PIMW) requires a PIMW manifest. For shipments not originating in Illinois, if the generator's state requires copies of the manifest, a photocopy of CTP-1 should be used.

INSTRUCTIONS TO GENERATORS (Please type)

1. Enter generator's USEPA twelve digit identification number* and the unique five digit document number assigned to this Manifest (e.g. 00001) by the generator.
2. Enter total number of pages comprising this Manifest.
3. Enter generator's name and mailing address. If location of waste generation is different from mailing address, enter location to the right of mailing address.
4. Enter telephone number where an authorized agent of the generator, who has knowledge of the waste, may be reached in the event of an emergency.
5. Enter the Illinois EPA ten digit identification number.
6. For the first transporter who will transport the waste, enter the company name. USEPA ID number* Illinois EPA four digit Special Waste Hauling (SWH) Permit number or the Uniform Program I.D. number issued by the participating state, and telephone number where an authorized agent of the transporter may be reached in the event of an emergency.
7. If applicable, enter the information requested for the second transporter who will transport the waste.
8. For the facility designated to receive the waste, enter company name, address, USEPA ID Number*, Illinois EPA ten digit identification number, and telephone number where an authorized agent of the receiving facility may be reached.
9. Enter the US DOT Proper Shipping Name, Hazard Class, and ID number (NA/UN number) for each waste as identified in 49 C.F.R. 171 through 177. For wastes not regulated as Hazardous Materials by DOT, enter a description of the waste and the generic name of the waste, plus the phrase "not hazardous by DOT", REQUIRED ONLY FOR HAZARDOUS WASTE.
10. Enter the number of containers for each waste and the appropriate abbreviations for the type of container:
   CM = Metal boxes or roll offs
   CW = Wooden boxes
   CF = Fiberboard or plastic bags
   DF = Fiberboard or plastic drums
   BA = Burlap, cloth, paper or plastic bags
   CY = Cylinders
   DT = Dump trucks
   TP = Tank portable
   TC = Tank cars
11. Enter the total quantity of each waste.
12. Enter unit of measure from list below:
    G = Gallons
    T = Tons
    L = Liters
    M = Metric tons
    P = Pounds
    Y = Cubic Yards
    K = Kilograms
    N = Cubic meters
13. Enter the EPA 4 digit Hazardous Waste Number; if waste is a mixture of listed and characteristic wastes, the listed waste must be entered, additional numbers should be listed in Section J.
14. Enter unit of measure from list below:
15. If needed, enter additional description or information/instructions for the material listed in Item 11.
16. Enter the US DOT Proper Shipping Name. Hazard name, address, or disposal information, or Bill of Lading information. For international shipments, generators must enter the point of departure (City and State) for shipments destined for treatment, storage, or disposal outside the jurisdiction of the United States in this space.
17. The generator must read, sign (by hand), and date the certification statement. If a mode other than highway is used, the word "highway" should be lined out and the appropriate mode (rail, water, or air) inserted in the space below. If another mode in addition to highway is used, enter the appropriate additional mode.
18. GENERATOR: RETAIN COPY 6, MAIL COPY 5 TO IEPA WITHIN 2 DAYS OF THE SHIPMENT IF WASTE IS RCRA HAZARDOUS OR PCB WASTE.
19. The authorized representative of the designated (alternate) facility's owner or operator must note in Item 19 any significant discrepancy that is defined in 35 Ill. Adm. Code 725.17(2) between the waste described on the Manifest and the waste actually received at the facility. Reference the discrepancy by line A, B, C, or D.
20. Print or type name of the person accepting the waste on behalf of the owner or operator of the facility. That person must acknowledge acceptance of the waste by signing and entering the date of receipt. RETAIN COPY 3, SEND COPY 1 TO THE GENERATOR, AND SEND COPY 2 TO ILLINOIS EPA WITHIN 30 DAYS OF THE DELIVERY OF RCRA HAZARDOUS OR PCB WASTE.

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden to: Chief Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street SW, Washington, D.C. 20460; and the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.
Appendix B

List of Analyses

The following is a sampling of the chemical analysis procedures that are suggested to be run on waste samples in order to determine if the waste is hazardous or non-hazardous. This list is not intended to be all inclusive or comprehensive. Based on MSDS and process information, if you know specific regulated metals or materials are not in the waste material you should specify that these tests do not have to be run. For specific regulated hazardous materials and the specific limits see the U.S. EPA or IEPA list of hazardous materials.

Characteristic Hazardous Waste Determination:
- Ignitability or Flash Point < 140° F D001 Waste Classification
- pH (corrosive pH =‘s <2 or >12.5) D002 Waste Classification
- Reactive D003 Waste Classification
- Toxicity Characteristic Leaching Procedure (a.k.a. TCLP) - Metals
- Toxicity Characteristic Leaching Procedure (a.k.a. TCLP) - Volatiles
- Toxicity Characteristic Leaching Procedure Method 1311 (a.k.a. TCLP) - Toxics
  See IAC Section 721 124 D004 - D0040 Waste Classification
- Acutely Hazardous Materials

Listed Hazardous Waste Determination
- U Toxic Wastes
- K Wastes from Specific Production Processes
- P Acutely Hazardous Wastes
- F Wastes from Non-Specific Sources which contain “listed” solvent mixtures/blends

If you have determined your liquid waste is non-hazardous and are attempting to determine whether it can be discharged into the sewer system (note exceptions about septic tanks) you may consider the following analyses. Reference your local discharge regulations for limits. You should contact your municipality (POTW).

pH
Fats, Oils, & Greases (a.k.a. FOG)
Suspended Solids
Biological Oxygen Demand (BOD)
Chemical Oxygen Demand (COD)

Reference -
Waste Manifests

Uniform Hazardous Waste Manifest

The Uniform Hazardous Waste Manifest is a six-part tracking document required for both special nonhazardous waste and hazardous waste. It must be the Illinois version of the manifest purchased from the State of Illinois for $1.00 if the waste is generated in Illinois or destined for Illinois.

Potentially Infectious Medical Waste Manifests

A fee of $2.00 per manifest is charged for potentially infectious medical waste (PIMW) manifests. A PIMW manifest must accompany all PIMW waste for disposal.

If you need further information on manifests including ordering a supply, please visit the IEPA web site at and select land pollution or topical telephone listing.
Appendix C
State and Federal Notification Forms
Dear Notifier:

We are sending you the forms "Notification of Regulated Waste Activity." These forms and instructions contain the information necessary to obtain a United States Environmental Protection Agency (U.S. EPA) Identification (ID) number required under Section 3010 of the Resource Conservation and Recovery Act (RCRA).

Please read the instructions carefully before you fill out the form. Installations that ship hazardous waste off-site are defined as "generators." You must determine which size generator is correct for you installation. Please note that if you check Box 1A "Generator Greater than 1000 kg/mo (2200 lbs) you are subject to all applicable regulations under Subtitle C of RCRA including the Annual/Biennial Report. Small quantity generators (100-1000 kg/mo) and conditionally exempt small quantity generators (less than 100 kg/mo) are not required to file the Annual/Biennial Report. However, you should check with the appropriate State Agency for any applicable requirements. It is to your advantage to reduce the amount of waste that you generate. In 1984, Congress established a national policy for U.S. EPA to encourage generators to reduce or eliminate their hazardous waste.

The U.S. EPA ID number is site-specific. If your installation changes locations, a new notification is required for a new ID number. If your installation has changed ownership, a subsequent notification must be filed to allow the new owner to use the ID number.

If the purpose of your notification is a one-time disposal for an underground storage tank removal or any other one-time occurrence please note "one-time disposal" in the comments section of the form under the signature box. Once this disposal is completed and the U.S. EPA ID number is no longer needed you can notify U.S. EPA in writing to deactivate the ID number.

If you have any further questions regarding either the notification form or hazardous waste activity, please contact the Region 5 Notification Hotline at (312) 886-4001.

Sincerely,

[Signature]
Sharon J. Kiddon
RCRA Notifications Coordinator
Waste Management Division
IV. Line-by-Line Instructions for Completing EPA Form 8700-12

Type or print in black ink all items except Item X. “Signature,” leaving a blank box between words. The boxes are spaced at 1/4" intervals which accommodate elite type (12 characters per inch). When typing, hit the space bar twice between characters. If you print, place each character in a box. Abbreviate if necessary to stay within the number of boxes allowed for each Item. If you must use additional sheets, indicate clearly the number of the Item on the form to which the information on the separate sheet applies.

(NOTE: When submitting a subsequent notification form, notifiers must complete in their entirety Items I, II, III, VI, VII, VIII and X. Other sections that are being added to (i.e., newly regulated activities) or altered (i.e., installation contact) must also be completed. All other sections may be left blank.)

Item I — Installation’s EPA ID Number:
Place an “X” in the appropriate box to indicate whether this is your first or a subsequent notification for this site. If you have filed a previous notification, enter the EPA Identification Number assigned to this site in the boxes provided. Leave EPA ID Number blank if this is your first notification for this site.

Note: When the owner of a facility changes, the new owner must notify U.S. EPA of the change, even if the previous owner already received a U.S. EPA Identification Number. Because the U.S. EPA ID Number is “site-specific,” the new owner will keep the existing ID number. If the facility moves to another location, the owner/operator must notify EPA of this change. In this instance a new U.S. EPA Identification Number will be assigned, since the facility has changed locations.

Items II and III — Name and Location of Installation:
Complete Items II and III. Please note that the address you give for Item III, “Location of Installation,” must be a physical address, not a post office box or route number.

County Name and Code: Give the county code, if known. If you do not know the county code, enter the county name, from which EPA can automatically generate the county code. If the county name is unknown contact the local Post Office. To obtain a list of county codes, contact the National Technical Information Service, U.S. Department of Commerce, Springfield, Virginia. 22161 or at (703) 487-4650. The list of codes is contained in the Federal Information Processing Standards Publication (FIPS PUB) number 6-3.

Item IV — Installation Mailing Address:
Please enter the Installation Mailing Address. If the Mailing Address and the Location of Installation (Item III) are the same, you can print “Same” in box for Item IV.

Item V — Installation Contact:
Enter the name, title, and business telephone number of the person who should be contacted regarding information submitted on this form.

Item VI — Installation Contact Address:
A) Code: If the contact address is the same as the location of installation address listed in Item III or the installation mailing address listed in Item IV, place an “X” in the appropriate box to indicate where the contact may be reached. If the location of installation address, the installation mailing address, and the installation contact address are all the same, mark the “Location” box. If an “X” is entered in either the location or mailing box, Item VI. B. should be left blank.

B) Address: Enter the contact address only if the contact address is different from either the location of installation address (Item III) or the installation mailing address (Item IV), and Item VI. A. was left blank.

Item VII — Ownership:
A) Name: Enter the name of the legal owner(s) of the installation, including the property owner. Also enter the address and phone number where this
### U.S. EPA Regional Offices

<table>
<thead>
<tr>
<th>Region</th>
<th>Geographic Area Covered</th>
<th>EPA Regional Offices</th>
</tr>
</thead>
</table>
| I      | Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont | U.S. EPA Region I  
Waste Management Division  
JFK Federal Building  
Boston, MA 02203-2211 |
| II     | New Jersey, New York, Puerto Rico, Virgin Islands | U.S. EPA Region II  
Permits Administration Branch  
26 Federal Plaza, Room 505  
New York, NY 10278 |
| III    | Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia | U.S. EPA Region III  
RCRA Programs Branch  
(3 HW 33)  
841 Chestnut Street  
Philadelphia, PA 19107 |
| IV     | Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee | U.S. EPA Region IV  
Hazardous Waste Management Division  
345 Courtland Street, NE  
Atlanta, GA 30363 |
| V      | Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin | U.S. EPA Region V  
RCRA Activities  
Waste Management Division  
P.O. Box A3587  
Chicago, IL 60690 |
| VI     | Arkansas, Louisiana, New Mexico, Oklahoma, Texas | U.S. EPA Region VI  
RCRA Programs Branch  
First Interstate Bank Tower  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733 |
| VII    | Iowa, Kansas, Nebraska, Missouri | U.S. EPA Region VII  
RCRA Branch  
726 Minnesota Avenue  
Kansas City, KS 66620 |
| VIII   | Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming | U.S. EPA Region VIII  
Hazardous Waste Management Division  
999 18th Street, Suite 500  
Denver, CO 80202-2403 |
| IX     | Arizona, California, Hawaii, Nevada, American Samoa, Guam, Northern Mariana Islands | U.S. EPA Region IX  
Toxics and Waste Management Division  
215 Fremont Street  
San Francisco, CA 94105 |
Waste Management Branch – HW-112  
1200 Sixth Avenue  
Seattle, WA 98101 |

EPA Form 8700-12 (01-96) Previous edition is obsolete.
individual can be reached. Use the comment section in XI or additional sheets if necessary to list more than one owner.

B) Land Type: Using the codes listed below, indicate in VII. B. the code which best describes the current legal status of the land on which the facility is located:

F = Federal
S = State
I = Indian
P = Private
C = County
M = Municipal*
D = District
O = Other

*Note: If the Land Type is best described as Indian, County or District, please use those codes. Otherwise, use Municipal.

C) Owner Type: Using the codes listed below, indicate in VII. C. the code which best describes the legal status of the current owner of the facility:

F = Federal
S = State
I = Indian
P = Private
C = County
M = Municipal*
D = District
O = Other

*Note: If the Owner Type is best described as Indian, County or District, please use those codes. Otherwise, use Municipal.

D) Change of Owner Indicator: (If this is your installation's first notification, leave Item VII. D. blank and skip to Item VIII. If this is a subsequent notification, complete Item VII. D. as directed below.)

If the owner of this facility has changed since the facility's original notification, place an "X" in the box marked "Yes" and enter the date the owner changed.

If the owner of this facility has not changed since the facility's original notification, place an "X" in the box marked "No" and skip to Item VIII.

If an additional owner(s) has been added or replaced since the facility's original notification, place an "X" in the box marked "Yes". Use the comment section in XI to list any additional owners, the dates they became owners, and which owner(s) (if any) they replaced. If necessary attach a separate sheet of paper.

Item VIII — Type of Regulated Waste Activity:

A) Hazardous Waste Activity: Mark an "X" in the appropriate box(es) to show which hazardous waste activities are going on at this installation.

1) Generator: If you generate a hazardous waste that is identified by characteristic or listed in 40 CFR Part 261, mark an "X" in the appropriate box for the quantity of non-acutely hazardous waste that is generated per calendar month. If you generate acutely hazardous waste please refer to 40 CFR Part 262 for further information.

2) Transporter: If you transport hazardous waste, indicate if it is your own waste, for commercial purposes, or mark both boxes if both classifications apply. Mark an "X" in each appropriate box to indicate the method(s) of transportation you use. Transporters do not have to complete Item IX of this form, but must sign the certification in Item X. The Federal regulations for hazardous waste transporters are found in 40 CFR Part 263.

3) Treater/Storer/Disposer: If you treat, store or dispose of regulated hazardous waste, then mark an "X" in this box. You are reminded to contact the appropriate addresssee listed for your State in Section III. C. of this package to request Part A of the RCRA Permit Application. The Federal regulations for hazardous waste facility owners/operators are found in 40 CFR Parts 264 and 265.

4) Hazardous Waste Fuel: If you market hazardous waste fuel, place an "X" in the appropriate box(es). If you burn hazardous waste fuel on-site, place an "X" in the appropriate box and indicate the type(s) of combustion devices in which hazardous waste fuel is burned. (Refer to definition section for complete description of each device).

Note: Generators are required to notify for waste-as-fuel activities only if they market directly to the burner.

"Other Marketer" is defined as any person, other than a generator marketing hazardous waste, who markets hazardous waste fuel.

5) Underground Injection Control: If you generate and/or treat, store or dispose of hazardous waste, place an "X" in the box if an injection well is located at your installation. "Underground Injection" means the subsurface emplacement of fluids through a bored, drilled or driven well, or through a dug well, where the
depth of the dug well is greater than the largest surface dimension.

B) Used Oil Fuel Activities

Mark an “X” in the appropriate box(es) to indicate which used oil fuel activities are taking place at this installation.

1) Off-Specification Used Oil Fuel: If you market off-specification used oil, place an “X” in the appropriate box(es). If you burn used oil fuel place an “X” in the box(es) below to indicate type(s) of combustion devices in which off-specification used oil fuel is burned. (Refer to definition section for complete description of each device).

Note: Used oil generators are required to notify only if marketing directly to the burner.

“Other Marketer” is defined as any person, other than a generator marketing his or her used oil, who markets used oil fuel.

2) Specification Used Oil Fuel: If you are the first to claim that the used oil meets the specification established in 40 CFR 266.40(e) and is exempt from further regulation, you must mark an “X” in this box.

Item IX — Description of Regulated Wastes:

(Only persons involved in hazardous waste activity (Item VIII A.) need to complete this item. Transports requesting a U.S. EPA Identification Number do not need to complete this item, but must sign the “Certification” in Item X.)

You will need to refer to 40 CFR Part 261 (enclosed as Section VII) in order to complete this section. Part 261 identifies those wastes that EPA defines as hazardous. If you need help completing this section, please contact the appropriate addressee for your state as listed in Section III. C. of this package.

A) Characteristics of Nonlisted Hazardous Wastes: If you handle hazardous wastes which are not listed in 40 CFR Part 261, Subpart D but do exhibit a characteristic of hazardous waste as defined in 40 CFR Part 261. Subpart C, you should describe these wastes by the EPA hazardous waste number for the characteristic. Place an “X” in the box next to the characteristic of the wastes that you handle. If you mark “4. EP Toxic,” please list the specific EPA hazardous waste number for the specific contaminant(s) in the box(es) provided.

B) Listed Hazardous Wastes: If you handle hazardous wastes that are listed in 40 CFR Part 261, Subpart D, enter the appropriate 4-digit numbers in the boxes provided.

Note — If you handle more than 12 listed hazardous wastes, please continue listing the waste codes on the extra sheet provided at the end of this booklet. If it is used, attach the additional page to the rest of the form before mailing it to the appropriate EPA Regional or State Office.

C) Other Wastes: If you handle other wastes or State regulated wastes that have a waste code, enter the appropriate code number in the boxes provided.

Item X — Certification:

This certification must be signed by the owner, operator, or an authorized representative of your installation. An “authorized representative” is a person responsible for the overall operation of the facility (i.e., a plant manager or superintendent, or a person of equal responsibility). All notifications must include this certification to be complete.

Item XI — Comments:

Use this space for any additional comments.
V. Definitions

The following definitions are included to help you to understand and complete the Notification Form:


Authorized Representative means the person responsible for the overall operation of the facility or an operational unit (i.e., part of a facility), e.g., superintendent or plant manager, or person of equivalent responsibility.

Boiler means an enclosed device using controlled flame combustion and having the following characteristics:

1) the unit has physical provisions for recovering and exporting energy in the form of steam, heated fluids, or heated gases;

2) the unit’s combustion chamber and primary energy recovery section(s) are of integral design (i.e., they are physically formed into one manufactured or assembled unit);

3) the unit continuously maintains an energy recovery efficiency of at least 60 percent, calculated in terms of the recovered energy compared with the thermal value of the fuel;

4) the unit exports and utilizes at least 75 percent of the recovered energy, calculated on an annual basis (excluding recovered heat used internally in the same unit, for example, to preheat fuel or combustion air or drive fans or feedwater pumps); and

5) the unit is one which the Regional Administrator has determined on a case-by-case basis, to be a boiler after considering the standards in 40 CFR 260.32.

Burner means the owner or operator of any boiler or industrial furnace that burns hazardous waste fuel for energy recovery and that is not regulated as a RCRA hazardous waste incinerator.

Disposal means the discharge, deposit, injection, dumping, spilling, leaking, or placement of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

Disposal Facility means a facility or part of a facility at which hazardous waste is intentionally placed into or on any land or water and at which waste will remain after closure.

EPA Identification (I.D.) Number means the number assigned by EPA to each generator, transporter, and treatment, storage, or disposal facility.

Facility means all contiguous land, structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them).

Generator means any person, by site, whose act or process produces hazardous waste identified or listed in 40 CFR Part 261.

Hazardous Waste means a hazardous waste as defined in 40 CFR 261.3.

Hazardous Waste Fuel means hazardous waste and any fuel that contains hazardous waste that is burned for energy recovery in a boiler or industrial furnace that is not subject to regulation as a RCRA hazardous waste incinerator. However, the following hazardous waste fuels are subject to regulation as used oil fuels:

1) Used oil fuel burned for energy recovery that is also a hazardous waste solely because it exhibits a characteristic of hazardous waste identified in Subpart C of 40 CFR Part 261; and

2) Used oil fuel mixed with hazardous wastes generated by a small quantity generator subject to 40 CFR 261.5.

Industrial Boiler means a boiler located on the site of a facility engaged in a manufacturing process where substances are transformed into new products, including the component parts of products, by mechanical or chemical processes.

Industrial Furnace means any of the following enclosed devices that are integral components of manufacturing processes and that use controlled flame combustion to accomplish recovery of materials or energy: cement kilns, lime kilns, aggregate kilns (including asphalt kilns), phosphate kilns, coke ovens, blast furnaces, smelting furnaces, refining furnaces, titanium dioxide chloride process oxidation reactors.
methane reforming furnaces, pulping liquor recovery furnaces, combustion devices used in the recovery of sulfur values from spent sulfuric acid, and other devices as the Administrator may add to this list.

Marketer means a person who markets hazardous waste fuel or used oil fuel. However, the following marketers are not subject to waste-as-fuel requirements (including notification) under Subparts D and E of 40 CFR Part 266:

(1) Generators and initial transporters (i.e., transporters who receive hazardous waste or used oil directly from generators including initial transporters who operate transfer stations) who do not market directly to persons who burn the fuels; and

(2) Persons who market used oil fuel that meets the specification provided under 40 CFR 266.40(e) and who are not the first to claim the oil meets the specification.

Municipality means a city, town, village, town, county, parish, district, association, Indian tribe or authorized Indian tribal organization, designated and approved management agency under Section 208 of the Clean Water Act, or any other public body created by or under State law and having jurisdiction over disposal of sewage, industrial wastes, or other wastes.

Off-Specification Used Oil Fuel means used oil fuel that does not meet the specification provided under 40 CFR 266.40(e).

Operator means the person responsible for the overall operation of a facility.

Owner means a person who owns a facility or part of a facility, including landowner.

Specification Used Oil Fuel means used oil fuel that meets the specification provided under 40 CFR 266.40(e).

Storage means the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere.

Transportation means the movement of hazardous waste by air, rail, highway, or water.

Transporter means a person engaged in the off-site transportation of hazardous waste by air, rail, highway, or water.

Treatment means any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste nonhazardous, or less hazardous: safer to transport, store or dispose of; or amenable for recovery, amenable for storage, or reduced in volume. Such term includes any activity or processing designed to change the physical form or composition of hazardous waste so as to render it nonhazardous.

Used Oil means any oil that has been refined from crude oil, used, and as a result of such use, is contaminated by physical or chemical impurities. Wastes that contain oils that have not been used (e.g., fuel oil storage tank bottom clean-out wastes) are not used oil unless they are mixed with used oil.

Used Oil Fuel means any used oil burned (or destined to be burned) for energy recovery including any fuel produced from used oil by processing, blending or other treatment, and that does not contain hazardous waste (other than that generated by a small quantity generator and exempt from regulation as hazardous waste under provisions of 40 CFR 261.5). Used oil fuel may itself exhibit a characteristic of hazardous waste and remain subject to regulation as used oil fuel provided it is not mixed with hazardous waste.

Utility Boiler means a boiler that is used to produce electricity, steam or heated or cooled air or other gases or fluids for sale.

Waste Fuel means hazardous waste fuel or off-specification used oil fuel.
An Ounce of Prevention Is Worth a Pound of Cure.

Your most cost effective and desirable approach to sound waste management is to prevent wastes from being produced, and recycling and reusing wastes which are produced. You will minimize the environmental and financial impact of waste by not creating it or by recycling.

The RCRA regulations require certification of waste minimization programs in place on all manifests, biennial reports, operating reports, and permits. By reducing your waste you will meet these requirements. By reducing your waste you can save money on disposal, accounting, bookkeeping, labor, liability, transportation, wasted raw materials and pollution control equipment. By reducing your waste you can improve your public image, increase worker safety, and protect the environment.

There are a number of services available to your company to help you deal with minimizing waste.

Contact your State Agency to find out about technical assistance and workshops:

Illinois Hazardous Waste Research Information Center  (217) 333-8940
Wisconsin Department of Natural Resources  (608) 266-3299
Indiana Department of Environmental Management  (317) 232-8172
Michigan Department of Natural Resources  (517) 335-1178
Minnesota Technical Assistance Program (MnTAP)  (612) 627-4555
Ohio Environmental Protection Agency  (614) 644-2917

Contact a waste exchange:

Great Lakes/Midwest Exchange  (616) 363-3262
Indiana Waste Exchange  (317) 634-2142
Industrial Material Exchange Service  (217) 782-0450
Minnesota Technical Assistance Program  (612) 627-4555

Request Information from the Region V, U.S. EPA, RCRA Program Management Branch, on specific industrial waste minimization techniques:

Susan Swales  (312) 353-4775
Ann Budich  (312) 353-4782

Utilize the U.S. EPA's computer bulletin board, Pollution Prevention Information Clearinghouse (PPIC) to keep up on the latest technology, and review case studies:

(301)-589-8366

You'll need a computer with a telephone modem, the only cost is for the telephone call.
ATTENTION ILLINOIS FACILITIES:

IF YOUR COMPANY IS LOCATED IN ILLINOIS YOU MUST SEND YOUR NOTIFICATION TO THE FOLLOWING ADDRESS:

Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road, #24
Springfield, Illinois 62706

ATTN: JIM PIERCE
# EPA Notification of Regulated Waste Activity

## i. Installation's EPA ID Number (Mark 'X' in the appropriate box)

<table>
<thead>
<tr>
<th>A. First Notification</th>
<th>B. Subsequent Notification</th>
<th>C. Installation's EPA ID Number</th>
</tr>
</thead>
</table>

## ii. Name of Installation (Include company and specific site name)

## iii. Location of Installation (Physical address not P.O. Box or Route Number)

### Street

### Street (continued)

### City of Town

### State ZIP Code

### County/Code County Name

## iv. Installation Mailing Address (See Instructions)

### Street or P.O. Box

### City or Town

### State ZIP Code

## v. Installation Contact (Person to be contacted regarding waste activities at site)

### Name (Last)

### (first)

### Job Title

### Phone Number (area code and number)

## vi. Installation Contact Address (See Instructions)

### A. Contact Address Location

### Mailing Street or P.O. Box

### City of Town

### State ZIP Code

## vii. Ownership (See Instructions)

### A. Name of Installation's Legal Owner

### Street, P.O. Box, or Route Number

### City of Town

### State ZIP Code

### Phone Number (area code and number)

### B. Land Type

### C. Owner Type

### D. Change of Owner Indicated

| Yes | No |

| (Date Changed) Month Day Year |

---

EPA Form 3730-12 (Rev. 6-82) Previous edition is obsolete. --1--
### VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions.)

#### A. Hazardous Waste Activity

- **Generator** (See instructions)
  - a. Greater than 1000 kg/mo (2200 lbs.)
  - b. 100 to 1000 kg/mo (220-2200 lbs.)
  - c. Less than 100 kg/mo (220 lbs.)

- **Transporter** (Indicate Mode in boxes 1-5 below)
  - a. For own waste only
  - b. For commercial purposes

- **Mode of Transportation**
  - 1. Air
  - 2. Rail
  - 3. Highway
  - 4. Water
  - 5. Other - specify

#### B. Used Of Fuel Activities

- **1. Off-Site Specification Used Oil Fuel**
  - a. Generator Marketing to Burner
  - b. Other Marketer

- **2. Position Used Oil Fuel for On-site Burner, Who First Claimed the Off-Site Specified**
  - 1. Utility Boiler
  - 2. Industrial Boiler
  - 3. Industrial Furnace

- **3. Boiler and/or Industrial Furnace**
  - a. Small Quantity Examiner (Indicate Type of Combustion Device)
  - b. Smaller Device

### IX. Description of Regulated Waste (Use additional sheets if necessary)

#### A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

<table>
<thead>
<tr>
<th>Characteristic</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
</tr>
</thead>
<tbody>
<tr>
<td>ignitability</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Corrosive</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reactive</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Toxicity</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

<table>
<thead>
<tr>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>11</th>
<th>12</th>
</tr>
</thead>
</table>

#### C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number. See instructions.)

<table>
<thead>
<tr>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
</tr>
</thead>
</table>

### X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violators.

**Signature**

**Name and Official Title (Type or print)**

**Date Signed**

### XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

EPA Form 8700-12 (Rev. 9-92) Previous edition is obsolete.
### IX. Description of Regulated Wastes Continued (Additional sheet)

**B. Listed Hazardous Wastes**

(See 40 CFR 261.31 - 33. Use this page only if you need to list more than 12 waste codes.)

<table>
<thead>
<tr>
<th>13</th>
<th>14</th>
<th>15</th>
<th>16</th>
<th>17</th>
<th>18</th>
</tr>
</thead>
<tbody>
<tr>
<td>19</td>
<td>20</td>
<td>21</td>
<td>22</td>
<td>23</td>
<td>24</td>
</tr>
<tr>
<td>25</td>
<td>26</td>
<td>27</td>
<td>28</td>
<td>29</td>
<td>30</td>
</tr>
<tr>
<td>31</td>
<td>32</td>
<td>33</td>
<td>34</td>
<td>35</td>
<td>36</td>
</tr>
<tr>
<td>37</td>
<td>38</td>
<td>39</td>
<td>40</td>
<td>41</td>
<td>42</td>
</tr>
<tr>
<td>43</td>
<td>44</td>
<td>45</td>
<td>46</td>
<td>47</td>
<td>48</td>
</tr>
<tr>
<td>49</td>
<td>50</td>
<td>51</td>
<td>52</td>
<td>53</td>
<td>54</td>
</tr>
<tr>
<td>55</td>
<td>56</td>
<td>57</td>
<td>58</td>
<td>59</td>
<td>60</td>
</tr>
<tr>
<td>61</td>
<td>62</td>
<td>63</td>
<td>64</td>
<td>65</td>
<td>66</td>
</tr>
<tr>
<td>67</td>
<td>68</td>
<td>69</td>
<td>70</td>
<td>71</td>
<td>72</td>
</tr>
<tr>
<td>73</td>
<td>74</td>
<td>75</td>
<td>76</td>
<td>77</td>
<td>78</td>
</tr>
<tr>
<td>79</td>
<td>80</td>
<td>81</td>
<td>82</td>
<td>83</td>
<td>84</td>
</tr>
<tr>
<td>85</td>
<td>86</td>
<td>87</td>
<td>88</td>
<td>89</td>
<td>90</td>
</tr>
<tr>
<td>91</td>
<td>92</td>
<td>93</td>
<td>94</td>
<td>95</td>
<td>96</td>
</tr>
<tr>
<td>97</td>
<td>98</td>
<td>99</td>
<td>100</td>
<td>101</td>
<td>102</td>
</tr>
<tr>
<td>103</td>
<td>104</td>
<td>105</td>
<td>106</td>
<td>107</td>
<td>108</td>
</tr>
<tr>
<td>109</td>
<td>110</td>
<td>111</td>
<td>112</td>
<td>113</td>
<td>114</td>
</tr>
<tr>
<td>115</td>
<td>116</td>
<td>117</td>
<td>118</td>
<td>119</td>
<td>120</td>
</tr>
</tbody>
</table>
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
INVENTORY IDENTIFICATION NUMBER APPLICATION

INVENTORY # ISSUED: ____________  TRAN. CODE: ____________  TRANS. DATE: ____________  INITIALS: ____________

Please read the instructions on the reverse side of this form before completing. Please exclude punctuation when completing. Limit information to the amount of blanks provided or we will have to abbreviate for you. The information given is exactly how it will appear in the Bureau of Land's computer inventory system.

E.S.D.A. INCIDENT # (if applicable): ________

LOCATION ADDRESS (exact street location where waste is generated)

Card Type:  COMPANY NAME: ____________
010  ____________

LOCATION (Post Office Box numbers will not be accepted):

Card Type:  CITY: ____________  STATE: ____________  ZIP: ____________  COUNTY: ____________
020  ____________  ____________  ____________  ____________

TELEPHONE: ____________  CONTACT: ____________

MAILING ADDRESS (if same as above, leave blank)

Card Type:  STREET: ____________
030  ____________

P O BOX: ____________  CITY: ____________  STATE: ____________  ZIP: ____________
11 3 ____________  ____________  ____________  ____________

MANIFESTS: You qualify for 20 free Uniform Hazardous Waste Manifests. If you do not need 20 Manifests, please indicate the amount you need. Please check the type you need.

Number of Manifests needed: ____________  Snap–Top ___  Pin–Fed (computer fed) ___

RETURN ADDRESS:  INDICATE THE LOCATION TO WHICH THIS FORM SHOULD BE RETURNED.

Company Name: ____________

Contact Person: ____________

Street: ____________

City: ____________  State: ____________  Zip: ____________

Waste may not be sent to an Illinois facility without an IEPA Supplemental Waste Stream Permit number.

AUTHORIZATION STATEMENT

I authorize this request for assignment of an Illinois Inventory ID number. This company has not previously shipped waste from this location under the Illinois Manifest System. If my waste is a RCRA hazardous waste, I certify this company has or has applied for a USEPA generator ID number.

Signature of Authorized Representative: ___________________________ Date: ___________________________

IL 532 1473
LPC 228 Rev. Dec-93
U.S. DEPARTMENT OF TRANSPORTATION
HAZARDOUS MATERIALS REGISTRATION STATEMENT
REGISTRATION YEAR 19____ - 20____
(Please Type or Print all Responses)

<table>
<thead>
<tr>
<th>Initial Registration</th>
<th>Renewal of Registration</th>
<th>Amendment to Registration</th>
<th>Expedited Follow-up</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current Registration #</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. Registrant ____________________________________________________________
(Company Name)

(Place pre-printed label here if provided and if name and address are correct. Otherwise, provide correct information.)

2. Mailing Address of Principal Place of Business

Street or P.O. Box ____________________________________________ City ____________________________
County ____________________ State __ Zip Code ____________ County ________________________

3. Carrier’s US DOT ID Number, ICC Number, or Reporting Railroad Alphabetic Code (if applicable)

US DOT ID #________________ ICC # ______________ Railroad Alphabetic Code ____________

4. Mode(s) Used to Transport Hazardous Materials:

Highway ____ Rail ____ Water ____ Air ____

5. Industrial Classification: Check the primary industry in which the registrant operates. Mark Only One.

Transportation
☐ Carrier
☐ Warehousing
☐ Freight Forwarding, Agent Services
☐ Transportation Repair & Service Facilities

Manufacturing
☐ Petroleum Refining & Related Industries
☐ Apparel & Other Textile Products
☐ Paper, Wood, & Allied Products
☐ Printing & Publishing
☐ Chemicals & Allied Products
☐ Food & Kindred Products
☐ Rubber & Miscellaneous Plastic Products
☐ Electric & Electronic Equipment

☐ Explosives
☐ Other Manufacturing industries

☐ Other

Agriculture & Support Services
☐ Mining - Metal & Non-Metal
☐ Oil & Gas Extraction
☐ Gasoline, Fuel Oil, Propane Sales & Delivery
☐ Construction - All Types
☐ Wholesale or Retail Trade
☐ Non-Transportation Repair Facilities
☐ Hazardous Waste Services - Transportation, Disposal, Treatment
☐ Other

6. Annual Registration Fee. The combined registration and processing fee is $300.00. (Complete only when submitting initial or renewal registration.)

Total Amount Enclosed: __________________

Make check or money order in U.S. funds, drawn on a U.S. bank, and payable to “U.S. Department of Transportation,” and identified as payment for the “Hazmat Registration Fee.”

Method of Payment

Check ____ Money Order ____ Credit Card: VISA ____ MasterCard ____

Credit Card Users Please Provide the Following Information:

Card Number: ____________ Expiration Date: ____________ YR

Name as it appears on the card __________________________

Authorized Signature ______________________________________

Cardholder acknowledges ordering goods or services in the amount of the total shown hereon and agrees to perform the obligations set forth in the Cardholder's agreement with the issuer. Credit card statement will list this payment as “US DOT Hazmat Regis.”

NOTE: If completing an Expedited Registration, do not resubmit credit card information here.
7. PRIOR-YEAR SURVEY INFORMATION: Hazardous Materials Activities, and States in Which Activity was Conducted. Indicate those activities conducted by the registrant during the previous calendar year (e.g., 1998 for the 1999-2000 Registration Year). Mark "A" through "E," as appropriate, to indicate the category or categories and the activity or activities (shipper, carrier, or other) in which the registrant acted. Check all categories and activities that apply. "Other" may be checked to indicate offeror activities not covered under the heading of shipper or carrier, such as freight forwarder or agent. Carriers should circle all states in which they operated as a hazardous materials carrier. Shippers and others engaged in offering hazardous materials should circle only those states from which they offered hazardous materials. They do not need to indicate to or through which states shipments were sent. A list of the states and their abbreviations appears in the accompanying materials. Circle "48 Contiguous States," if appropriate, to indicate that the activity was conducted in all of the 48 contiguous states. If the registrant did not engage in activities covered by "A" through "E" during the previous year, but plans to do so in the current registration year, mark only "F."

A. _____ Offered or transported in commerce any highway route-controlled quantity of a Class 7 (radioactive) material.
   1. Shipper _____ 2. Carrier _____ 3. Other (Freight Forwarder, Agent, etc.) _____
   AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN MO MS MT NC ND NE NH NJ NM NV NY NY OH OK OR PA RI SC SD TN TX UT VT WA WV WI WY 48 Contiguous States AK AS DC GU HI MI MP PR VI

B. _____ Offered or transported in commerce more than 25 kilograms (55 pounds) of a Division 1.1, 1.2, or 1.3 (explosive) material in a motor vehicle, rail car, or freight container.
   1. Shipper _____ 2. Carrier _____ 3. Other (Freight Forwarder, Agent, etc.) _____
   AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN MO MS MT NC ND NE NH NJ NM NV NY NY OH OK OR PA RI SC SD TN TX UT VT WA WV WI WY 48 Contiguous States AK AS DC GU HI MI MP PR VI

C. _____ Offered or transported in commerce more than 1 liter (1.06 quarts) per package of a material extremely toxic by inhalation (materials poisonous by inhalation that meet one of the defining criteria for Hazard Zone A).
   1. Shipper _____ 2. Carrier _____ 3. Other (Freight Forwarder, Agent, etc.) _____
   AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN MO MS MT NC ND NE NH NJ NM NV NY NY OH OK OR PA RI SC SD TN TX UT VT WA WV WI WY 48 Contiguous States AK AS DC GU HI MI MP PR VI

D. _____ Offered or transported in commerce a hazardous material or hazardous waste in a bulk packaging (see 49 CFR 171.8) having a capacity equal to or greater than 13,248 liters (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids.
   1. Shipper _____ 2. Carrier _____ 3. Other (Freight Forwarder, Agent, etc.) _____
   AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN MO MS MT NC ND NE NH NJ NM NV NY NY OH OK OR PA RI SC SD TN TX UT VT WA WV WI WY 48 Contiguous States AK AS DC GU HI MI MP PR VI

E. _____ Offered or transported in commerce a shipment, in other than a bulk packaging, of 2,268 kilograms (5,000 pounds) gross weight or more of one class of hazardous materials or hazardous waste for which placarding of a vehicle, rail car, or freight container is required.
   1. Shipper _____ 2. Carrier _____ 3. Other (Freight Forwarder, Agent, etc.) _____
   AL AR AZ CA CO CT DE FL GA ID IL IN IA KS KY LA MA MD ME MI MN MO MS MT NC ND NE NH NJ NM NV NY NY OH OK OR PA RI SC SD TN TX UT VT WA WV WI WY 48 Contiguous States AK AS DC GU HI MI MP PR VI

F. _____ Did not engage in any of the activities listed in A through E during the previous calendar year.

8. Certification of Information: I certify that, to the best of my knowledge, the above information is true, accurate, and complete.
   Certifier's Name ____________________________ Date __________________________
   (Print the signer's name) Phone (_______) _______ ______
   Title __________________________________________
   Certifier's Signature ____________________________


MAIL COMPLETED FORM WITH PAYMENT TO:
U.S. Department of Transportation
Hazardous Materials Registration
P.O. Box 740188
Atlanta, GA 30374-0188

Please retain a copy of this form for your records.
DEPARTMENT OF TRANSPORTATION

Research and Special Programs Administration

[Notice No. 99-2]

Hazardous Materials Transportation; Registration and Fee Assessment Program

AGENCY: Research and Special Programs Administration (RSPA), DOT.

ACTION: Notice of filing requirements.

SUMMARY: The Hazardous Materials Registration Program will enter registration year 1999-2000 on July 1, 1999. Persons who transport or offer for transportation certain hazardous materials are required to annually file a registration statement and pay a fee to the Department of Transportation. Persons who registered for the 1998-99 registration year will be mailed a registration statement form and informational brochure in May.

FOR FURTHER INFORMATION CONTACT: David W. Donaldson, Office of Hazardous Materials Planning and Analysis, DHM-60 (202-366-4109), Hazardous Materials Safety, 400 Seventh Street SW, Washington, DC 20590-0001, or by E-mail to REGISTER@rspa.dot.gov.

SUPPLEMENTARY INFORMATION: This notice is intended to notify persons who transport or offer for transportation certain hazardous materials of an annual requirement to register with the Department of Transportation. Each person, as defined by the Federal hazardous materials transportation law (49 U.S.C. 5101 et seq.), who engages in any of the specified activities relating to the transportation of hazardous materials is required to register annually with the Department of Transportation and pay a fee. The regulations implementing this program are in Title 49, Code of Federal Regulations, Secs. 107.601-107.620.

Proceeds from the fee are used to fund grants to State, local, and Native American tribal governments for emergency response training and planning, and to provide related assistance, including the revision, publication, and distribution of the North American Emergency Response Guidebook. Grants were awarded to 50 states, the District of Columbia, four territories, and 15 Native American tribes during FY 1998. By law, 75 percent of the Federal grant monies awarded to the States is further distributed to local emergency response and planning agencies.

Preliminary reports indicate that the FY 1997 funds helped to provide:
(1) Training for approximately 117,000 emergency response personnel;
(2) approximately 400 commodity flow studies and hazard analyses; (3) 7,350 emergency response plans updated or written for the first time;
RSPA-99-5145 (Notice 99-2); Hazardous...ram; Notice of filing requirements;

The persons affected by these regulations are those who offer or transport in commerce any of the following materials:

A. Any highway route-controlled quantity of a Class 7 (radioactive) material;
B. More than 25 kilograms (55 pounds) of a Division 1.1, 1.2, or 1.3 (explosive) material in a motor vehicle, rail car, or freight container;
C. More than one liter (1.06 quarts) per package of a material extremely toxic by inhalation (that is, a "material poisonous by inhalation" that meets the criteria for "hazard zone A");
D. A hazardous material in a bulk packaging having a capacity equal to or greater than 13,248 liters (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids; or
E. A shipment, in other than a bulk packaging, of 2,268 kilograms (5,000 pounds) gross weight or more of a class of hazardous materials for which placarding of a vehicle, rail car, or freight container is required for that class.

The following persons are excepted from the registration requirement:

A. Agencies of the Federal Government;
B. Agencies of States;
C. Agencies of political subdivisions of States;
D. Employees of those agencies listed in A, B, or C with respect to their official duties;
E. Hazmat employees, including the owner-operator of a motor vehicle which transports in commerce hazardous materials if that vehicle, at the time of those activities, is leased to a registered motor carrier under a 30-day or longer lease as prescribed in 49 CFR part 376 or an equivalent contractual relationship; and
F. Persons domiciled outside the United States whose only activity involving the transportation of hazardous materials within the United States is to offer hazardous materials for transportation in commerce from locations outside the United States, if the country in which they are domiciled does not impose registration or a fee upon U.S. companies for offering hazardous materials into that country. However, persons domiciled outside the United States who carry the types and quantities of hazardous materials that require registration within the United States are subject to the registration requirement.

The 1998-99 registration year ends on June 30, 1999. The 1999-2000 registration year will begin on July 1, 1999, and end on June 30, 2000. Any person who engages in any of the specified activities during the 1999-2000 registration year must file a registration statement and pay the associated fee of $300.00 before July 1, 1999, or before engaging in any of the activities, whichever is later. All persons who registered for the 1998-99 registration year will be mailed a registration statement form and an informational brochure in May 1999. Other persons wishing to obtain the form and any other information relating to this program should contact RSPA at the address given above. The brochure and form can also be downloaded from the RSPA registration Internet home page at http://hazmat.dot.gov/register.htm.

The registration requirements have not been amended for the 1999-2000 registration year, nor has the registration statement been revised materially. Registrants should file a registration statement and pay the associated fee at least four weeks before July 1, 1999, in order to ensure that a 1999-2000 certificate of registration has been obtained by that date to comply with the recordkeeping requirements. These include the requirement that the registration number be made available
on board each truck and truck tractor (not including trailers and semi-trailers) and each vessel used to transport hazardous materials subject to the registration requirements. A certificate of registration is generally mailed within ten days of RSPA's receipt of a properly completed registration statement.

Persons who engage in any of the specified activities during a registration year are required to register for that year. Persons who engaged in these activities during registration year 1992-93 (September 16, 1992, through June 30, 1993), 1993-94 (July 1, 1993, through June 30, 1994), 1994-95 (July 1, 1994, through June 30, 1995), 1995-96 (July 1, 1995, through June 30, 1996), 1996-97 (July 1, 1996, through June 30, 1997), 1997-98 (July 1, 1997, through June 30, 1998), or 1998-99 (July 1, 1998, through June 30, 1999) and have not filed a registration statement and paid the associated fee of $300.00 for each year for which registration is required should contact RSPA to obtain the required form (DOT F 5800.2). A copy of the form that will be distributed for the 1999-2000 registration year may be used to register for previous years. Persons who fail to register for any registration year in which they engaged in such activities are subject to civil penalties for each day a covered activity is performed. The legal obligation to register for a year in which any specified activity was conducted does not end with the registration year.

Issued in Washington, DC, on March 22, 1999.
Alan I. Roberts,
Associate Administrator for Hazardous Materials Safety.
[FR Doc. 99-7406 Filed 3-25-99; 8:45 am]
BILLING CODE 4910-60-P
# Appendix D

## Emergency Phone Directory

<table>
<thead>
<tr>
<th>Agency</th>
<th>Phone Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>(City or Municipality Name) Fire Department</td>
<td>911</td>
</tr>
<tr>
<td>(City or Municipality Name) Police Department</td>
<td>911</td>
</tr>
<tr>
<td>(County Name) County Emergency Planning Committee</td>
<td></td>
</tr>
<tr>
<td>Illinois Emergency Service and Disaster Agency</td>
<td>800-782-7860</td>
</tr>
<tr>
<td>Illinois Environmental Protection Agency</td>
<td>217-782-3637</td>
</tr>
<tr>
<td>National Response Center</td>
<td>800-424-8802</td>
</tr>
<tr>
<td>(City or Municipality Name) Public Works 24-hr Response</td>
<td></td>
</tr>
<tr>
<td>Local Hospital</td>
<td></td>
</tr>
<tr>
<td>Local Medical Center</td>
<td></td>
</tr>
<tr>
<td>Name, Title</td>
<td></td>
</tr>
<tr>
<td>Primary Emergency Coordinator</td>
<td></td>
</tr>
<tr>
<td>Name, Title</td>
<td></td>
</tr>
<tr>
<td>Secondary Emergency Coordinator</td>
<td></td>
</tr>
<tr>
<td>Name</td>
<td></td>
</tr>
<tr>
<td>Corporate Environmental Manager</td>
<td></td>
</tr>
<tr>
<td>Name</td>
<td></td>
</tr>
<tr>
<td>Plant Manager</td>
<td></td>
</tr>
</tbody>
</table>