

# HAZARDOUS WASTE MANAGEMENT PROGRAM

## **Program Element R2-10-207(11)(e)**

Each agency loss prevention committee or individuals designated by the agency head shall develop, implement, and monitor procedures for the handling and disposing of hazardous waste.

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If hazardous wastes are being generated or if work practices may expose agency personnel to hazardous wastes, the agency must establish a Hazardous Waste Management Program. The intent of the hazardous waste program is to provide a cradle-to-grave management scheme for hazardous wastes to ensure that these wastes are not mismanaged in a manner that will impact human health or the environment.

Both federal and state statutes regulate hazardous wastes in Arizona. At the federal level, hazardous wastes statutes and regulations are found under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 et seq. and in 40 C.F.R. 260 et seq. Arizona's statutes and regulations are located in A.R.S. § 49-901 to 973 Hazardous Waste Management, and the A.A.C. R-Title 18 Chapter 8 et seq.

The transportation of hazardous wastes is also regulated at the federal level under the Hazardous Material Transportation Act (HMTA), 49 U.S.C. § 1801 et seq. and the Hazardous Materials Transportation Uniform Safety Act, 49 U.S.C. § 5100 et seq., and in 49 C.F.R. Parts 171-180. The Department of Transportation also has authority to regulate the transportation of hazardous materials under numerous other federal laws. Arizona's statutes and regulations are found in A.R.S. § 28-5201 et seq. (Chapter 14), and A.A.C. Title 17 Chapter 4 –Article 435 and 436. Local regulations may also apply to the transportation of hazardous materials.

<b>Definition:</b>	A written program designed to manage waste that poses substantial or potential threats to human health or the environment.
<b>Why do I need this program?</b>	Proper management of hazardous waste minimizes detrimental impacts to human health and the environment. Compliance with federal, state and local regulations related to managing hazardous waste is mandatory.

<p><b>How do I know if this program applies to my agency and my specific job hazards?</b></p>	<p>Hazardous waste generation can be highly variable and should be assessed on a case-by-case basis. Conducting a site-specific assessment is strongly recommended (and is often required) in order to develop a custom plan that fits the particulars of a given location.</p> <p>Some common agency activities that may result in the generation of or exposure to hazardous waste include but are not limited to the following:</p> <ul style="list-style-type: none"> <li>• Vehicle maintenance operations</li> <li>• Laboratory operations</li> <li>• Shooting range operation</li> <li>• Building maintenance operations</li> <li>• Operations involving metal and wood finishing</li> <li>• Medical services</li> <li>• Printing operations</li> <li>• Disposal of rechargeable batteries</li> <li>• Visitation of locations where the storage or disposal of hazardous wastes may occur</li> </ul>
<p><b>What are the minimum required elements and/or best practices for a Hazardous Waste Management Program?</b></p>	<p><b>Guidelines and Criteria:</b> Agencies are required to identify all hazardous wastes and operations or processes that generate, treat, store, or dispose of hazardous wastes. Examples might include laboratory chemical wastes, used solvents, industrial cleaners, pesticides, etc. Product Safety Data Sheets (SDS) should describe disposal requirements and indicate if waste is hazardous.</p> <p>Procedures must be developed for:</p> <ul style="list-style-type: none"> <li>• Identification of hazardous wastes</li> <li>• Determination of generator status</li> <li>• Waste Reduction</li> <li>• Storage, labeling and handling of hazardous wastes</li> <li>• Disposal of hazardous wastes</li> <li>• Reporting of releases</li> <li>• Corrective actions in the event of a release</li> </ul>

	<ul style="list-style-type: none"> <li>• Contingency plan</li> <li>• Required record keeping and reporting</li> <li>• Emergency preparedness and prevention</li> <li>• Personnel training</li> <li>• Closure of hazardous waste accumulation areas</li> <li>• Pollution Prevention</li> </ul>
<p><b>Are there any mandatory training requirements or best practices that must be developed by the agency?</b></p>	<p><b>Yes.</b> OSHA, EPA, ADEQ, and DOT all have requirements for training requirements and best practices. Applicability of these requirements will depend on the type of waste generated, quantity of waste, and extent of employee exposure.</p> <p>Some of these requirements may be found in:</p> <ul style="list-style-type: none"> <li>• 29 CFR 1910.120 (OSHA - HAZWOPER)</li> <li>• 29 CFR 1910.1200 (OSHA - Hazard Communication)</li> <li>• 40 CFR (EPA – CERCLA, RCRA, SARA and Clean Air Act)</li> <li>• 49 CFR 100-199 (USDOT – Hazardous Materials Transportation Regulations)</li> <li>• 49 CFR 300-399 (USDOT – Federal Motor Carrier Safety Administration)</li> <li>• Miscellaneous: Consensus Standards, State, Municipal, ANSI, ASTM, NFPA, etc.</li> </ul>
<p><b>Are there specific requirements for documenting the program, training, etc...?</b></p>	<p><b>Yes.</b> Requirements for documenting specific items will vary depending on the applicability of the regulations. One aspect of a site-specific plan should identify which employees require training, when training or retraining must occur, and what documentation is necessary.</p>
<p><b>Are there any resources available that can assist me in putting together a Hazardous Waste Management Plan?</b></p>	<p><b>Yes.</b> State Risk Management can assist in developing an agency Hazardous Waste Management Program.</p> <p>Other resources include the Environmental Protection Agency, OSHA, and Arizona Department of Environmental Quality.</p>