

# 25th Annual Hazardous Waste Management Workshop

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## New Generator Rules

# Hazardous Waste Q & A: Beyond the unprecedented 2020 working toward “normal”

## EGLE Panel:

- **Wade O’Boyle** - Grand Rapids District Office, Hazardous Waste and Liquid Industrial By-Products Inspector
- **Jon Vrugink** - Grand Rapids District Office, Hazardous Waste and Liquid Industrial By-Products Inspector
- **Krista Hettich** - Kalamazoo District Office, Hazardous Waste and Liquid Industrial By-Products Inspector
- **Trisha Confer** - Bay City District Office, Statewide Hazardous Waste Coordinator and Hazardous Waste and Liquid Industrial By-Products Inspector

# Today's Goals

Introduce West MI RCRA inspectors

Acknowledge new rules effective August 3, 2020

Acknowledge Covid-19 protocols

Pre-Recorded EGLE webinars are available

Answer Questions

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EGLE / WASTE / ANNOUNCEMENTS

## New Hazardous Waste Rules Effective August 3, 2020

Contact: Ronda Blayer 517-284-6555

Agency: Environment, Great Lakes, and Energy

On July 27, 2020, amendments to the rules promulgated under Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Part 111), were filed with the Michigan Department of State, Office of the Great Seal. The rules become effective on August 3, 2020.

### Summary of Revisions

These revisions address the following subject areas:

- Generator improvements rule (GIR) (*81 Federal Register (FR) 85732, November 28, 2016*)
- Exports/imports (*81 FR 85696, November 28, 2016 and 82 FR 60894, December 26, 2017*)
- E-manifesting (*83 FR 420, January 3, 2018*)
- Definition of solid waste 2018 court vacatur (*83 Federal Register (FR) 24664, May 30, 2018*)
- Designation of aerosol cans as universal waste (*84 FR 67202, December 9, 2019*)
- Elimination of 52 state-only hazardous waste listings

The GIR significantly restructured the generator rules to make it easier to determine the requirements that apply to each type of generator and include provisions for episodic events and large quantity generator consolidation of certain wastes.

### Rule Availability



# Part 111, Rule Reorganization

Topic	New Rule	Old Rule
Applicability	Rule 301	Rule 301
Waste Characterization	Rule 302	Rule 302
Generator Status Calculation	Rule 303	Rule 205(5)
VSQG Accumulation	Rule 304	Rule 205(1), (2), (3)
Satellite Accumulation	Rule 305	Rule 306(2)
SQG Accumulation	Rule 306	Rule 306(4)
LQG	Rule 307	Rule 306(1)
Site ID	Rule 308	Rule 303
Manifest Requirements	Rule 309	Rule 304
Pre-transport Requirements	Rule 310	Rule 305
Recordkeeping for SQG/LQG	Rule 311	Rule 307
Reporting for SQG/LQG	Rule 312	Rule 308
LDR	Rule 313	Rule 311
Transfrontier Shipments	Rule 314	Rule 312
Academic Laboratory	Rule 315	Rule 313
Episodic Generation	Rule 316	NEW
VSQG Collections	Rule 304(e)(v)	Rule 205(4)

# Covid-19 Inspection Protocols

- Un-announced inspections are now announced, with the exception of complaint investigations
- Inspectors request records to be sent by the generator to the inspector via e-mail
- EGLE management is requiring inspectors to send compliance communication within 10 days of the inspection

# Example of Requested LQG Records

- A map of the facility indicating hazardous waste accumulation areas, satellite areas, and any processes that generate hazardous waste
- Waste characterization profiles for the following waste streams: xx, xx, and xx
- Uniform hazardous waste manifests from xx through xx
- Biennial Reports for xx and xx

# Example of Requested LQG Records

- Land disposal restriction forms for the following generated hazardous waste: xx, xx, and xx
- Inspection records for 90-day accumulation area(s) from xx through xx.
- Employee training records, including an employee training plan and the resume of the individual performing the training
- Emergency Contingency Plan

# Example of Requested LQG Records

- Contingency Plan Quick Reference Guide
- Waste analysis plan, if applicable
- Daily tank inspection records, if applicable
- Tank assessment(s), if applicable
- Tank closure documentation, if applicable
- Discharge permit issued by the local POTW, if applicable



EGLE / WASTE / ANNOUNCEMENTS

## Hazardous Waste and Liquid Industrial By-Products Regulations Webinar Series

Contact: Christine Grossman 517-284-6860

Agency: Environment, Great Lakes, and Energy



Every business generates waste and it's important to know what kind of waste it is to understand the management standards that apply to protect human health and the environment. For hazardous waste, you also need to know how much is generated monthly to understand the management standards that apply. Properly managing waste materials prevents releases, prevents costly clean-ups and ultimately saves money and peace of mind knowing you and your employees are protected.

In the recorded webinar series below, EGLE inspection staff share details about inspection observations, what's good and bad, and why it is important to meet the regulations. When viewing this series, you will learn about the various types of waste and the state and federal regulations that govern how the waste must be managed. The series provides an overview of how commonly generated wastes must be accumulated, transported and disposed. It also provides a close look at the specific requirements that apply to managing hazardous waste and liquid industrial by-products and highlights the [rule changes that became effective on August 3, 2020](#), which adopted the federal [Generator Improvement Rules](#) and designation of aerosol cans as a universal waste.

### [EGLE Hazardous Waste Generator Trainer – Self Certification Form](#)

Use this form to document the data the Michigan Department of Environment, Great Lakes and Energy requires for hazardous waste generators. You are encouraged to sign each condition that applies to your site specific...

# EGLE Recorded Waste Webinars

- **Waste 101** (recorded 3/25/20, 65 min)
- **Waste Characterization and Generator Status** (recorded 4/2/20, 88 min)
- **Accumulation, Labeling, and Shipping** (recorded 4/16/20, 73 min)
- **Inspections and Recordkeeping** (recorded 5/5/20, 69 min)

# EGLE Recorded Waste Webinars

- Generator Improvement Rules and Universal Waste Aerosol Cans (recorded 5/27/20, 70 min)
- Universal Waste (recorded 6/03/20, 70 min)
- What Small Businesses Need to Know about Hazardous Waste (recorded 6/17/20, 68 min)
- Implementing a Household Hazardous Waste and Universal Waste Collection (recorded 6/30/20, 61 min)



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- Michigan
- March

(e-8 min.)

- Liquid
- Report

- Used

- Was
- Avail

EGLE

training



## Hazardous Waste and Liquid Industrial By-Products Waste Webinar Series

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD) proudly presents the Hazardous Waste and Liquid Industrial By-Products Webinar Series. The series was first recorded in 2016 and 2017 and was refreshed in 2020 to provide new, valuable information to help Michigan facilities achieve and maintain compliance with the waste regulations overseen by MMD. Sites handling hazardous waste and liquid industrial by-products are encouraged to view all of the webinars that apply to their site-specific waste activities and complete the self-certification form documenting the training was completed. The webinars are introductory in nature, free, and feature firsthand experiences from MMD inspection staff. The series:

- Provides details on Michigan's implementation of the newly adopted federal Generator Improvement Rules;
- Covers Michigan's adoption of aerosol cans as a universal waste, and
- Introduces attendees to additional rule changes expected in light of recent federal rulemaking.

Access the webinars listed below and more at [Michigan.gov/EGLEWaste](https://Michigan.gov/EGLEWaste) by selecting "Hazardous Waste and Liquid Industrial By-Products Regulations Webinar Series" under the "Announcements" tab.

### WASTE 101 (MARCH 25, 2020)

In this webinar, attendees learn the basics about the various types of waste, what regulations apply, to whom, and who implements the enforcement program. Attendees will come away with a big picture perspective of how the waste regulations work and what common wastes fall into the various regulations out there, including those that overlap. The webinar covers hazardous waste, liquid industrial by-products, solid waste, PCB waste, medical waste, radiological waste, and recycling.

### HAZARDOUS WASTE AND LIQUID INDUSTRIAL BY-PRODUCTS CHARACTERIZATION AND GENERATOR STATUS (APRIL 2, 2020)

In this webinar, attendees will learn the basic steps for determining if a waste is a hazardous waste, liquid industrial by-product, or non-hazardous solid waste, and how to calculate your site's hazardous waste generator status. These concepts are vital to understanding how to properly manage and dispose of waste. It's vital because the hazardous waste regulations require each business at each site to evaluate the character and composition of their waste and determine the total weight of all hazardous waste generated each month. Until this information is known, you don't know the legal disposal options for the waste.

# EGLE Revised Guidance Reflecting Rule Changes

- Universal Waste Guidance Updated 3/2021
- Contingency Plan and Emergency Procedures for Fully Regulated Generators Updated 3/2021
- Hazardous Secondary Material Updated 3/2021
- Generator Tracking Log for Manifests/Shipping Documents Updated 3/2021
- SQG Hazardous Waste Emergency Posting Form for Updated 1/2021
- Summary of Hazardous Waste Generator Category & Accumulation Requirements Updated 8/2020

# EGLE Revised Guidance Reflecting Rule Changes

- Michigan Guide to Environmental, Health, and Safety Regulations Updated 9/2020
- Small Quantity Generator Requirements Updated 10/2020
- Very Small Quantity Generator Requirements Updated 10/2020
- Shipping Document Example Updated 6/2020
- Used Oil Common Violations Checklist, Emergency Posting and Labels Updated 12/2020
- Waste Characterization Updated 3/2020

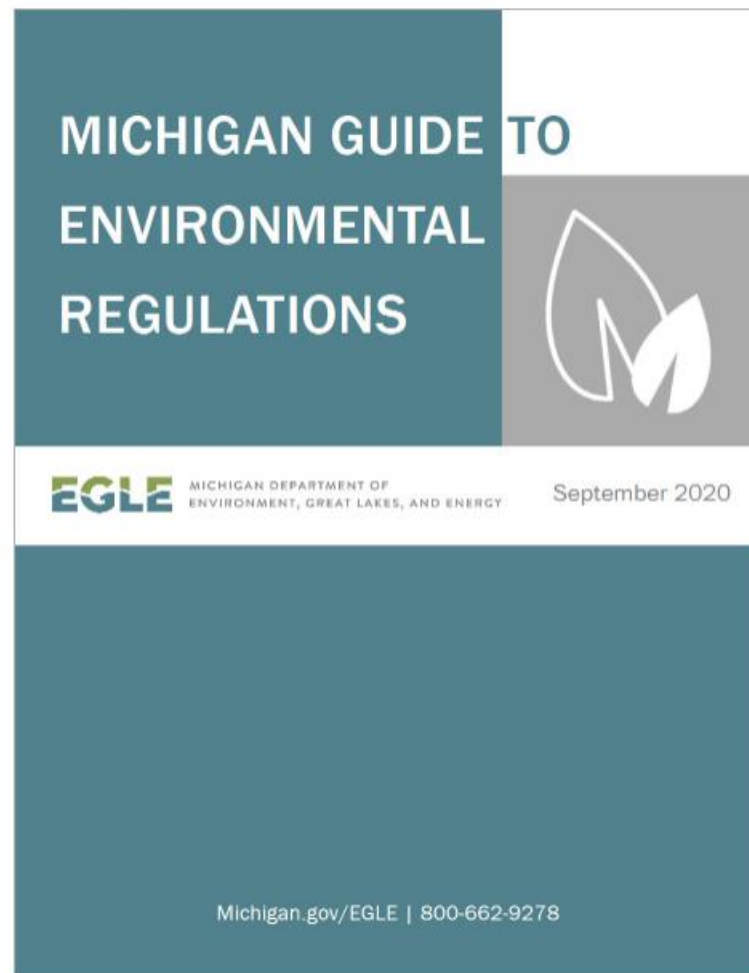
# EGLE Guidebook

Available at:

[Michigan.gov/EHSGuide](https://Michigan.gov/EHSGuide)

Provides links to all of these helpful resources and more

Covers most EGLE programs: air, waste, water, remediation, etc.



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**Questions?**

