



The United States Environmental Protection Agency (EPA) establishes and enforces hazardous waste regulations in Iowa, Hawaii, Alaska, Puerto Rico, the US Virgin Islands and all other US territories. To implement an effective waste management program, the facility must determine if its wastes are hazardous or non-hazardous.

Wastes are defined as hazardous by specific EPA listing or by demonstrating one or more of the following characteristics:

Ignitability - A waste is considered an ignitable hazardous waste if it has a flash point less than 140 degrees Fahrenheit. Examples of ignitable hazardous waste include liquids such as mineral spirits or naphtha. Material Safety Data Sheets (MSDS) may be used as a reference in obtaining flash point information on a waste. Ignitable hazardous wastes have the EPA hazardous waste number D001.

Corrosivity - A waste is considered hazardous because of its ability to corrode if it has a pH less than or equal to 2 or greater than or equal to 12.5. MSDS may be reviewed to obtain information regarding a waste's ability to corrode. Corrosive hazardous wastes have the EPA hazardous waste number D002.

Reactivity - A waste is considered hazardous because of its ability to react with another substance or if the waste is unstable under normal conditions. This includes wastes that react violently with water; explode or generate toxic gases, vapors or fumes when mixed with water or air; or are capable of detonation or exploding. Information regarding the reactivity or stability ranking of a waste may be obtained from MSDS. Reactive wastes have the EPA hazardous waste number D003.

Toxicity - A waste is considered hazardous because of toxicity if it contains one or more of specific contaminants at concentration levels equal to or greater than the corresponding regulatory thresholds. Toxicity is determined by a specific laboratory analytical procedure identified as Toxicity Characteristic Leaching Procedure (TCLP). A waste that exhibits the characteristic of toxicity has an EPA hazardous waste number that corresponds to the specific TCLP contaminant(s) that cause it to be hazardous.

A representative sample of potentially hazardous automotive wastes should be tested for the following TCLP parameters to make an accurate hazardous/non-hazardous waste determination:

<u>TCLP Parameter</u>	<u>Regulatory Level*</u>	<u>EPA Number</u>
<i>Metals:</i>		
Arsenic	5.0 mg/L	D004
Barium.....	100.0 mg/L	D005
Cadmium.....	1.0 mg/L	D006
Chromium.....	5.0 mg/L	D007
Lead	5.0 mg/L	D008
Mercury	0.2 mg/L	D009
Selenium	1.0 mg/L	D010
Silver	5.0 mg/L	D011
<i>VOCs:</i>		
Benzene	0.5 mg/L	D018
Carbon tetrachloride	0.5 mg/L	D019
Chlorobenzene	100.0 mg/L	D021
Chloroform	6.0 mg/L	D022
1,2-Dichloroethylene	0.5 mg/L	D028
1,1-Dichloroethylene	0.7 mg/L	D029
Methyl ethyl ketone (MEK)	200.0 mg/L	D035
Tetrachloroethylene.....	0.7 mg/L	D039
Trichloroethylene.....	0.5 mg/L	D040
Vinyl chloride.....	0.2 mg/L	D043

* Samples exceeding these levels are hazardous.

If the TCLP test results (of the representative sample) show concentrations less than the regulatory level for each parameter, then the potentially hazardous automotive waste is non-hazardous.

If TCLP results indicate the waste meets or exceeds one or more of the TCLP regulatory levels, the waste must be managed as hazardous waste. This would include storage in sealed, labeled containers and disposal by an EPA-permitted hazardous waste management company. Hazardous wastes must also be included in the facility's monthly hazardous waste inventory.

To ensure proper and least costly testing at the analytical laboratory, include this list with the sample when requesting TCLP analysis for the purpose of a regulatory determination of hazardous/non-hazardous waste.

If testing waste antifreeze, specifically request that the GRAPHITE FURNACE TEST be utilized to make the determination for the eight heavy metals. This testing methodology will avoid a false positive for arsenic and selenium due to an additive in antifreeze.

Monthly for _____ (month/year)
HAZARDOUS WASTE INVENTORY

Waste	Identification	Quantity (lbs/month)	Disposal/Storage Location
Used Oil	Exempt if recycled		
Lead-Acid Batteries	Exempt if recycled		
Fluorescent Bulbs	Exempt if recycled		
Mercury Switches	Exempt if recycled		
Refrigerant	Exempt if recycled		
Antifreeze	Hazardous Waste Determination Required		
Oily Waste	Hazardous Waste Determination Required		
Sump sludge	Hazardous Waste Determination Required		
Solvent Waste	Hazardous Waste	_____ lbs/month	_____ stored on-site
Waste Fuels	Hazardous Waste	_____ lbs/month	_____ stored on-site
Solvent/Paint Waste	Hazardous waste	_____ lbs/month	_____ stored on-site
Total Hazardous Waste Generated this month		_____ lbs/month	_____ lbs stored on-site

*Federal law prohibits improper disposal of hazardous waste.
All waste containers must be labeled.*

I certify that the information listed above is, to the best of my knowledge, accurate and complete.

(signature / date)

If the facility cites the CESQG waste generator status or is a non-generator based on the facility's monthly hazardous waste inventory. An EPA identification number is NOT required.

Three hazardous waste generator categories have been established by the EPA. These include: (1) Conditionally Exempt Small Quantity Generator (CESQG); (2) Small Quantity Generator (SQG); and (3) Large Quantity Generator (LQG). The appropriate generator category for a facility is determined from monthly hazardous waste generation rates and the total weight of hazardous waste stored at the facility at any one time. The following provides a brief description of each generator category and its corresponding regulations.

CESQG Category - The Conditionally Exempt Small Quantity Generator category is the least restrictive regulatory category. Facilities that generate less than 220 pounds (approximately 25 gallons or 100 kilograms [kg]) of hazardous waste per calendar month and never accumulate more than 2,200 pounds (approximately 250 gallons or 1,000 kg) of hazardous waste at any given time fall within the CESQG category. Although current regulations do not require CESQGs to obtain an EPA identification number, many hazardous waste transporters are requesting that companies have a number regardless of their generator category.

SQG Category - The Small Quantity Generator category pertains to facilities that generate more than 220 pounds but less than 2,200 pounds of hazardous waste per calendar month on either a regular or intermittent basis. Also, an SQG may not accumulate more than 13,200 pounds (approximately 1,500 gallons or 6,000 kg) of hazardous waste on site at any given time. An SQG cannot store hazardous waste for more than 180 days (or 270 days if the waste must be transported further than 200 miles). A waste is considered "stored" from the day the first drop of hazardous waste enters the container.

An SQG is required to obtain an EPA identification number used in preparation of a hazardous waste manifest. A hazardous waste manifest is necessary to track the movement of hazardous waste from the point of origin to the point of the ultimate treatment, storage or disposal (TSD). Only EPA-permitted transporters and TSD facilities are allowed to remove hazardous waste from a facility.

LQG Category - The Large Quantity Generator category is the most stringent regulatory level. Facilities generating hazardous waste in excess of 2,200 pounds per calendar month on either a regular or intermittent basis are considered LQGs.

Facility personnel should record the weight of all hazardous waste generated each month. This is known as the monthly hazardous waste inventory and is required to be maintained at every facility generating hazardous waste. At the end of the month, a monthly total should be determined. This information should then be used to determine the appropriate set of regulations (i.e., CESQG or SQG) for the salvage yard.

Record keeping is an important part of maintaining regulatory compliance. Each salvage yard should maintain all environmental/waste management records in a centralized file at the facility. These records should be readily available in the event regulatory personnel inspect the facility. Documents such as laboratory reports, hazardous waste manifests, and a hazardous waste inventory log should be included among these records. Hazardous waste manifests should be maintained for a minimum of three years to document compliance.