

RTOC Solid Waste Workgroup

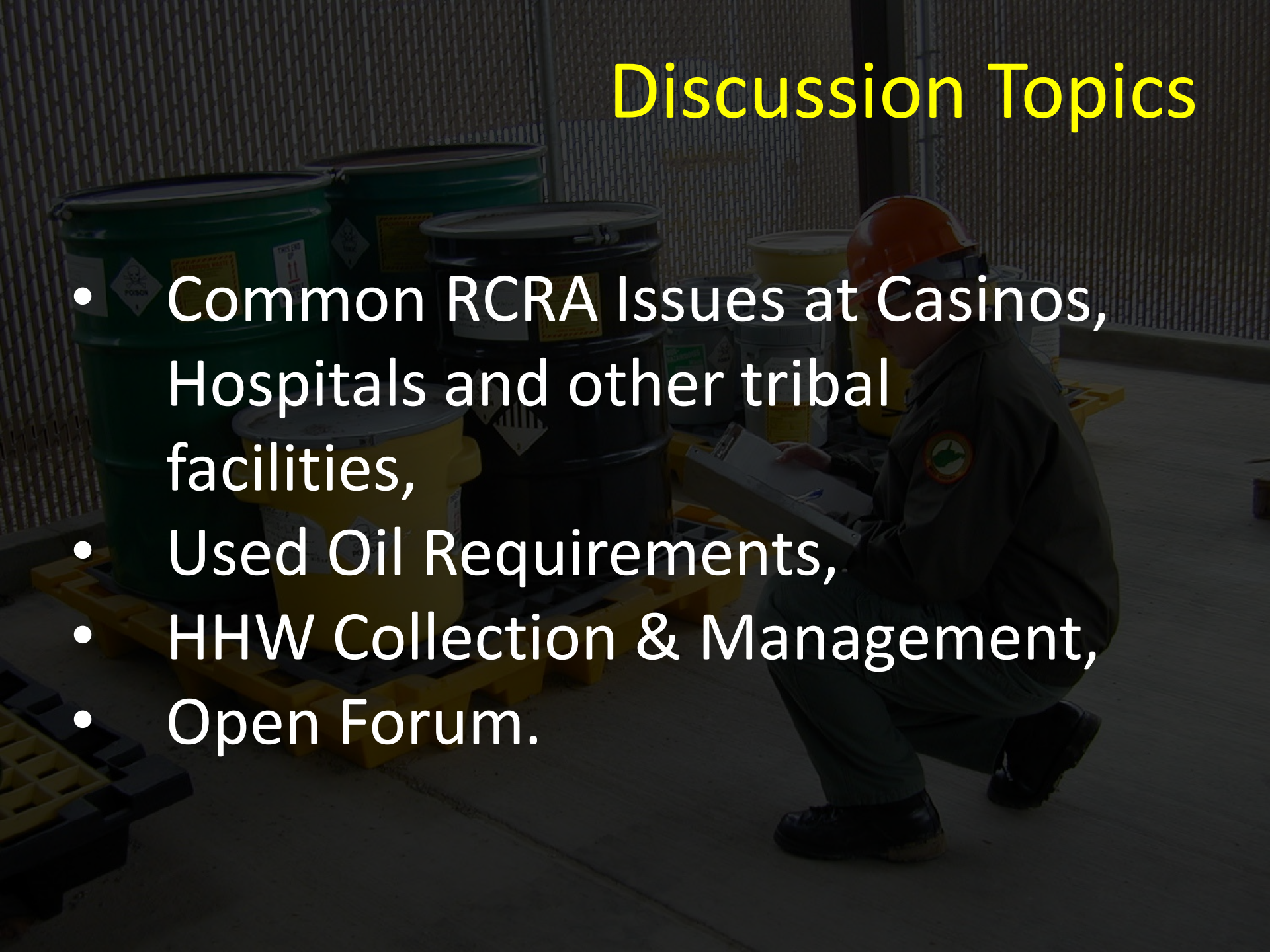
Hazardous Waste Management at Tribal Facilities



5/14/2015 RTOC, San Francisco
Rick Sakow, USEPA R9

Discussion Topics

- Common RCRA Issues at Casinos, Hospitals and other tribal facilities,
- Used Oil Requirements,
- HHW Collection & Management,
- Open Forum.



Common RCRA Issues at Casinos

- No hazardous waste determinations

Flammable paint and solvent wastes are hazardous wastes.



HALOGENATED SOLVENT WASTE CANS



Common RCRA Issues at Casinos

- Unlabeled satellite accumulation area containers



Labels must include the accumulation start date and the words “Hazardous waste” and other words that identify the contents of the container.

CFR § 262.34(a)(2) & (3)

Common RCRA Issues at Casinos

- Training

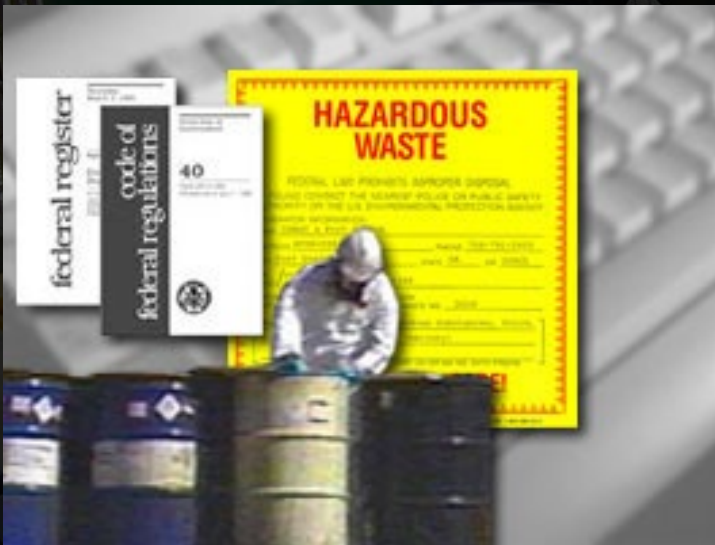
Employees who handle (add / remove) hazardous waste must be trained.

On the job training is fine.

CFR § 262.34(a) & (d)

LQGs must have a written training plan.

CFR § 265.16



Common RCRA Issues at Casinos

- Exceedance of Storage Time

Large Quantity Generators: ≤ 90 days.

CFR § 262.34(a)

Small Quantity Generators: ≤ 270 days.

CFR § 262.34(c)

Conditionally Exempt Generators: 90 days from date 100 kg limit is reached.

CFR § 262.34(b)



Common RCRA Issues at Hospitals

Management of P Wastes.

Hospitals can become LQG of hazardous waste by P-list wastes (acutely hazardous)

Cannot throw hazardous waste down the drain

| Waste Code | Common Name | Use |
|------------|------------------|------------------------|
| P012 | Arsenic Trioxide | Chemotherapy |
| P030 | Cyanide Salts | Laboratory |
| P042 | Epinephrine | Emergency, Surgery |
| P081 | Nitroglycerin | Heart Attack Treatment |
| P075 | Nicotine | Smoking Cessation |
| P105 | Sodium Azide | Chemical Preservative |

Common RCRA Issues at Hospitals

Open Containers:

Fume hoods

Analytical machine solvent drainage
containers



Universal Waste in Hospitals

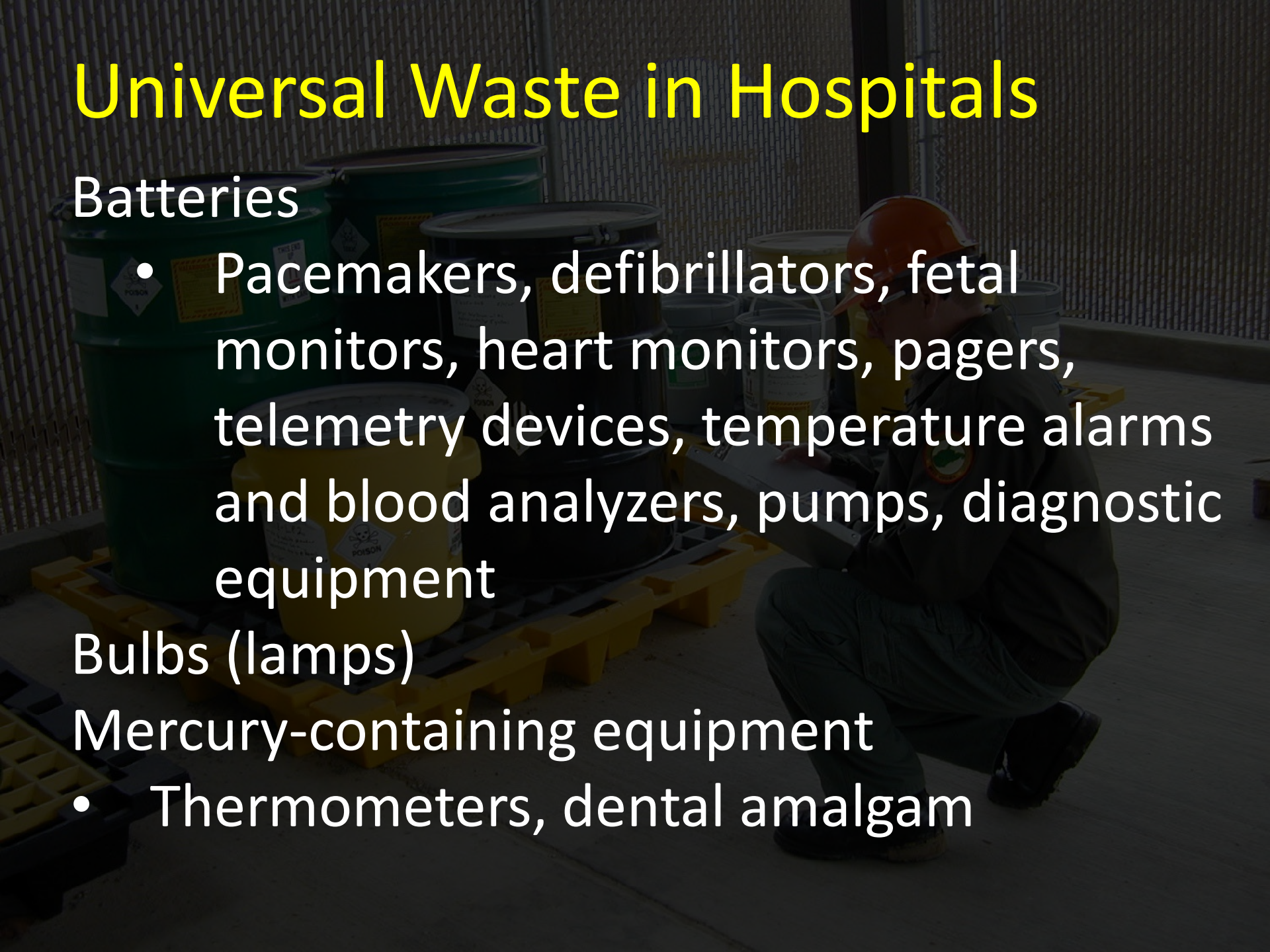
Batteries

- Pacemakers, defibrillators, fetal monitors, heart monitors, pagers, telemetry devices, temperature alarms and blood analyzers, pumps, diagnostic equipment

Bulbs (lamps)

Mercury-containing equipment

- Thermometers, dental amalgam



Used Oil Requirements

- Containers must be marked with the words “Used Oil”
- Keep containers in good condition
- Respond to releases
- Transfer facilities, processors and rerefiners, and burners must also have secondary containment systems

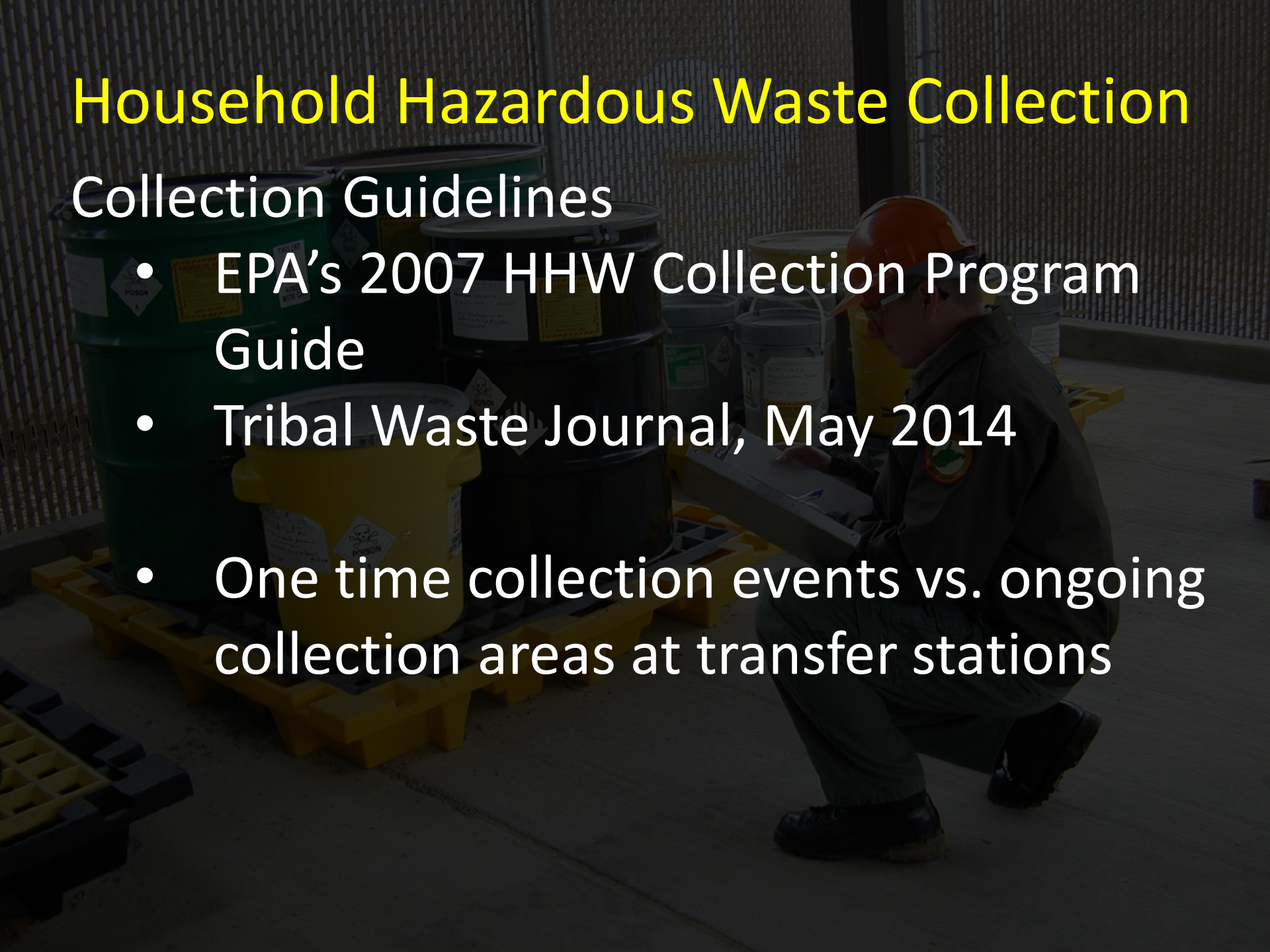


| | |
|--|-------|
| USED OIL | |
| GENERATOR INFORMATION | |
| COMPANY | _____ |
| ADDRESS | _____ |
| CITY/STATE/ZIP | _____ |
| SOURCE | _____ |
| CONTACT | _____ |
| USED OIL | |
| <small>LABELMASTER® (800) 621-5808 www.labelmaster.com</small> | |

Household Hazardous Waste Collection

Collection Guidelines

- EPA's 2007 HHW Collection Program Guide
- Tribal Waste Journal, May 2014
- One time collection events vs. ongoing collection areas at transfer stations





Open Forum / Specific Questions