Hazardous Waste Management at Manufacturing Facilities

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General Overview Presentation
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HAZARDOUS WASTE MANAGEMENT

Primary hazardous waste activities at manufacturing facilities:

- Hazardous Waste Generation
- Universal Waste Generation
- Permitted Storage, Treatment, and Disposal
HAZARDOUS WASTE GENERATORS

- Hazardous Waste Generation:
  - Produced during manufacturing operations
  - Stored (accumulated) for a short-period of time (~90-180 days)
  - Transported offsite to a Permitted TSDF

- Common manufacturing hazardous wastes:
  - Spent solvents, by-products, residues, unused chemicals, wastewater, sludges, spill residues

- Three categories of Generators:
  - Very Small Quantity Generator (VSQG): ≤220 lbs/month
  - Small Quantity Generator (SQG): >220 lbs and <2200 lbs/month
  - Large Quantity Generator (LQG): ≥2,200 lbs/month

- All categories must comply with Rules specific to the generator category
UNIVERSAL WASTE HANDLERS

- Universal Waste is a type of hazardous waste that is widely-produced/commonly-generated

- Five Types - Waste Batteries, Lamps (light bulb/tube), Aerosol Cans, Pesticides, and Mercury-Containing Equipment

- Manufacturers could be one of the following:
  - Small Quantity Handler: < 11,000 lb of universal waste
  - Large Quantity Handler: ≥ 11,000 lb of universal waste
  - Universal Waste Destination Facilities* (less common)

- All categories must comply with Rules specific to the handler category

* Destination facilities are facilities that treat, dispose of, or recycle a particular category of universal waste. These facilities may require a TSDF Permit.
HAZARDOUS WASTE PERMITS

- Required for one or more of the following:
  - Onsite Treatment* of Haz Waste
  - Onsite Storage of Haz Waste (typically one year storage timeframe)
  - Onsite Disposal of Haz Waste (e.g. HW Landfills)

- Often referred to as TSDF (Treatment, Storage, and Disposal) Permits or TSDF Facilities

- Permitting process ~1yr for brand new facilities if application is complete and accurate

- Multiple public comment periods

*Limited onsite treatment of waste is allowed at generator sites without a Permit
HAZARDOUS WASTE PERMITS

- Most manufacturing facilities in Georgia are generators and not permitted facilities.

- Most common type of TSDF Permit is for storage.
  - Up to one year of storage versus shorter timeframe allowed under generator rules.

- Currently two active Permits for treatment of hazardous waste.

- Currently no active Permits in Georgia for disposal of hazardous waste.
HAZARDOUS WASTE REGULATIONS

- Vary slightly for each type of facility
- Include but are not limited to:
  - Building construction standards
  - Storage and labeling requirements
  - Routine Inspections
  - Recordkeeping
  - Safety and emergency response procedures
  - Hazardous waste training
  - Waste tracking
  - Reporting
  - Notification and clean-up of releases
- Routinely inspected by EPD to ensure compliance