

Small Waste Generator Program

Description:

Propane marketing and transportation companies are not typically generators of large quantities of hazardous waste. However, periodic reviews of their handling of materials other than propane may indicate that a small waste generator program under EPA guidelines is needed to be sure that day-to-day operations do not result in accumulated waste disposal problems and compliance issues.

Regulatory Reference

40 CFR § 261.5 Special requirements for hazardous waste generated by conditionally exempt small quantity generators

Applies to:

The small waste generator program can be applied to any business or facility that does not generate large volumes of regulated wastes or pollutants as defined in the regulation.

General Requirements:

Guidelines for complying with EPA exempt hazardous waste generator requirements can be found in 40 CFR 261.5. It is recommended that propane marketers read and follow these guidelines and take specific steps to implement and document a “Small Waste Generator Program.” The primary objective for such a program is to avoid accumulating hazardous wastes over time, and to keep hazardous waste quantities below the exempted monthly quantities. Suggested program implementation steps should include

- (1) **Step One.** Analyze operations that are potential waste generators; for example,
 - (a) Tank and cylinder painting operations—solvent and paint wastes
 - (b) Fleet maintenance operations—tires, batteries, used oil, used coolant
 - (c) Appliance service operations—mercury from replaced thermostats, NiCad batteries
 - (d) Facility maintenance—mercury from fluorescent light starters, solvents and paint
- (2) **Step Two.** Describe in a written plan how the generation of each of these waste products will be minimized, recycled or properly disposed. The plan should detail how waste products will be contained, labeled, prepared for recycling or proper disposal.
- (3) **Step Three.** Train company managers and employees to ensure that they know the provisions of the written plan, and the procedures for handling all identified wastes according to the plan.
- (4) **Step Four.** Document the training.
- (5) **Step Five.** Schedule and conduct periodic inspections of company facilities to ensure that the plan is being fully implemented and that there are no accumulations of hazardous wastes that exceed program requirements.

Training Requirements:

Although there are no mandated training requirements in the regulation, documented training of affected employees, supervisors, and managers is an important step in any small waste generator program.

Maintenance and Review

Documented periodic facility inspections are important for identifying potential waste disposal needs, and the effectiveness of the overall program. The written program plan and specific changes in disposal needs should be reviewed on a periodic basis to assure that regulated waste accumulation does not exceed the maximum allowances of the regulation.

Additional Information and Resources

Reviewing the provisions of 40 CFR 279, *Standards for the Management of Used Oil* is recommended, since used oil is one of the primary waste products of fleet vehicle operations.

Small waste generator program administrators and affected employees should be familiar with the U.S. DOT requirements for documenting the shipment of hazardous wastes as found in 49 CFR §§ 171.3, 171.8, and 172.205.