



*(prepared by George S. Gamble, 2G Environmental, LLC)*

## **Environmental Health and Safety (EHS) Policy**

### **Hazardous Waste**

---

**Regulatory Reference:** 40 CFR 261, Identification and Listing of Hazardous Waste; State specific hazardous waste rules.

**Purpose:** The purpose of this Hazardous Waste Program is to establish a framework for each Fixed Base Operation (FBO) to become and remain compliant with the Federal Environmental Protection Agency (EPA) rules as well as state specific rules for hazardous waste.

This procedure will help FBOs to recognize what is considered a hazardous waste and how to properly handle and dispose of hazardous waste. The EPA defines three different levels of waste generators:

- Large quantity generators (more than 2,200 pounds per month).
- Small quantity generators (between 220 pounds and 2,200 pounds per month).
- Conditionally exempt small quantity generators (less than 220 pounds per month).

#### **General Requirements:**

The federal EPA has set forth rules for proper handling, storage, and disposal of hazardous waste under 40 CFR 261. Hazardous waste is defined as listed wastes (typically a specific waste item or waste from a specific process stream) or characteristic wastes (flammable, reactive, corrosive, or toxic). Examples of hazardous wastes that may be generated at an FBO operation include oil based paint wastes, acids, Alodine wastes, solvents (that aren't recycled), batteries (that aren't recycled), and fluorescent lamps (that aren't recycled).

There are several guidelines that facilities should follow to avoid the requirements in the hazardous waste rules as shown below.

- Properly recycle all spent solvents.
- Properly recycle all used batteries.
- Properly recycle all used fluorescent lamps.
- Properly recycle all used oil.
- Dispose of all sumped AVGAS and jet fuel as a product to be burned for its BTU content. (Typically the used oil contractor will handle used AVGAS and used jet fuel as well as used oil.)
- Minimize hazardous wastes to remain under the limit of 220 pounds per month for the conditionally exempt small generator status.

If a General Manager is not sure if a waste is hazardous, he or she should contact the EHS/Safety office for assistance. If a facility exceeds the limit of 220 pounds of hazardous waste in any given month, he or she should contact the EHS/Safety office for assistance as the facility must obtain an EPA Identification Number and follow strict handling and shipping requirements.

Employees must not transport hazardous waste and must use only an approved transporter.

Storage of hazardous waste must include proper labeling (including the EPA Waste Code and date waste was generated), proper containers, and proper secondary containment. The facility should have access to spill response equipment if needed for a spill.

If a leak or spill of hazardous waste occurs, the leak must be immediately controlled (stop flow from valve or container if possible) and contained with available spill response equipment. Any clean-up activities must be conducted using an outside contractor trained and certified to handle hazardous waste.

### **Responsibilities:**

#### 1. Employees:

Employees must be aware of the requirements for identifying and handling hazardous waste, and proper response to a spill.

Employees must properly store hazardous waste and label containers properly (including the EPA Waste Code and date waste was generated).

Employees must wear proper personal protective equipment when handling hazardous waste. Each type of waste typically requires a different set of protective equipment, so if there are any questions, please call the EHS/Safety office. Equipment should include safety glasses, chemical resistant gloves, and possibly protective clothing.

Employees must not dispose of hazardous waste in any drains or dumpsters – no exceptions.

#### 2. Managers/Supervisors:

Managers/Supervisors should ensure that employees are performing their work activities in a proper manner including handling, storage, recycling, and spill response.

Managers/Supervisors should ensure that employees respond appropriately to spills. Managers/Supervisors should make notifications to Federal, State, and Local environmental regulatory agencies if required.

Managers/Supervisors should ensure that hazardous waste is properly labeled (including EPA Waste Code and date waste was generated).

Managers/Supervisors should ensure that employees were proper protective equipment while handling hazardous waste.

Managers/Supervisors should ensure employees never dispose of hazardous waste in any drains or dumpsters.

### 3. EHS/Safety:

The Environmental Health and Safety (EHS)/Safety Department will monitor compliance with all environmental regulations including the hazardous waste regulations.

The EHS/Safety Department will assist in any environmental questions that may arise such as proper identification of waste items, proper storage, proper protective equipment, and response to spills.

The EHS/Safety Department must be notified of any reportable spill event and will properly document in the company tracking system.

#### **Training:**

If facilities remain under the limit for conditionally exempt small quantity generators (generate less than 220 pounds of waste in a month and store less than 2,200 pounds at any time) then no specific training requirements are required. If a facility exceeds these limits, they should contact the EHS/Safety office for training assistance.

#### **Recordkeeping:**

No shipping records or manifests are required if facilities remain under the limit for conditionally exempt small quantity generators (generate less than 220 pounds of waste in a month and store less than 2,200 pounds at any time).