Chapter 17: Hazardous Waste

Treatment Requirements

1 Purpose

The purpose of these requirements is to ensure on-site treatment of hazardous waste is performed safely and in accordance with the California Tiered Permit Program. They cover planning and operating on-site treatment units. They apply to workers (as hazardous waste treatment operators), line management, the hazardous waste treatment program manager, and Waste Management.

2 Requirements

Hazardous waste treatment is a highly regulated operation, usually performed at a properly permitted treatment, storage, and disposal facility (TSDF). SLAC is not a TSDF. SLAC is, however, allowed under the California Tiered Permit Program to perform limited on-site treatment of specific types of hazardous waste generated on-site. The following is an overview of the administrative and technical requirements for these operations.

2.1 Administrative Requirements

2.1.1 Authorization

Authorization for on-site treatment is coordinated between SLAC departments and regulatory agencies by the hazardous waste treatment program manager, who also works with SLAC departments to determine the feasibility of proposed treatment units as well as process adjustments.

2.1.1.1 Determining the Feasibility of a Proposed Treatment Unit

Any department considering hazardous waste treatment must consult with the hazardous waste treatment program manager in the earliest planning stages to verify that a proposed treatment system will effectively reduce or eliminate the hazardous waste, since treatment may not be the preferred waste minimization option; proper disposal and/or off-site recycling of the hazardous waste may have fewer environmental impacts.

2.1.1.2 Coordinating the Operation and Operational Changes

Management must designate a hazardous waste treatment operator to operate and manage the permitted treatment unit.
Any significant operational changes in any unit or associated equipment must be reported to the hazardous waste treatment program manager as soon as such changes are planned.

2.1.2 Initial and Annual Documentation Requirements

To qualify for and maintain the appropriate level of permit, departments operating hazardous waste treatment systems must collaborate with Environment, Safety, Health, and Quality (ESHQ) program managers to

- Prepare intent to treat documentation, which includes
  1. Treatment unit-specific information
  2. Environmental Protection Agency (EPA) ID number and Board of Equalization (BOE) account number
  3. Treatment processes and process descriptions
  4. Description of waste types to be treated
  5. Financial assurance certification forms
  6. Written certification assessing tank system integrity by an independent, professional engineer
  7. A statement documenting any judgments from agency actions in last three years
- Plan the construction and certification of tanks and secondary containment system(s)
- Prepare an annual waste analysis plan
- Prepare a hazardous waste source reduction plan
- Prepare a written closure plan and update closure costs annually
- Prepare records to demonstrate compliance with applicable sanitary sewer pretreatment standards
- Provide copies of local air quality district permits for operating the unit
- Prepare an operating manual/instructions
- Administer and document an employee training program

2.1.3 Ongoing Documentation Requirements

2.1.3.1 Hazardous Waste Treatment Records

Complete records of the hazardous waste treated must be kept, including

- Date the waste was received and treated
- Quantity of waste treated
- Hazardous waste characteristics, such as hazard type, concentration, state, pH, presence of volatile organic compounds (VOCs)

2.1.3.2 Treatment Unit Operations Log

Each treatment unit must keep an operations log for each day the unit operates. The log must include inspections and must list
2.1.3.3 Waste Accumulation Area Inspection

The waste accumulation area associated with each treatment unit must be inspected weekly and the inspection must be documented and kept on file for three years. For inspection items, see Section 2.2.3, “Inspection Items”.

2.1.3.4 Operating Manual Updates

The operating manual/instructions must be reviewed annually or sooner if an operational adjustment or change is made.

2.2 Technical Requirements

2.2.1 Treatment Unit Operation and Emergency Response

The treatment unit operator must operate treatment units in accordance with the manual or instructions in order to recognize a process upset and implement best management practices. In the event of a spill or emergency, the operator must handle spills in accordance with Chapter 16, “Spills” and any facility-specific emergency plan.

2.2.2 Handling Hazardous Waste

All treatment operations must adhere to the requirements outlined in Hazardous Waste: Management Requirements. In addition, the following requirements apply.

2.2.2.1 Tanks and Container Management

The treatment unit operator must coordinate with Waste Management to ensure that

- All containers are compatible with the hazardous waste generated by the treatment system. To obtain suitable containers, contact Waste Management by submitting a Hazardous Waste Pick-Up and Empty Container Request Form.
- All containers and tanks that accumulate or temporarily store hazardous waste are labeled HAZARDOUS WASTE
- All containers and tanks must remain closed
- All containers for hazardous waste do not exceed the SLAC-designated accumulation time limit, which is generally 45 days

Note: Tanks used for processing waste may exceed the general accumulation time limit for processing purposes.
2.2.2.2 Hazardous Waste Treatment Unit Signs

For each hazardous waste treatment unit identified in the permit, signs must be posted that include the number and name of the unit, the unit operator, and operator telephone number.

2.2.3 Inspection Items

Hazardous waste containers, tanks, and secondary containment must be inspected according to these requirements, in addition to those outlined in Hazardous Waste: Management Requirements:

- Tanks containing hazardous waste and associated secondary containment must be inspected each day the unit is in operation. The inspector must check for leaks and signs of tank or containment damage.
- All hazardous waste containers must be inspected weekly for leaks and container condition.
- Inspection results that require corrective actions that may impact permit requirements must be immediately reported to the hazardous waste treatment program manager.
- Corrective action must be documented and implemented.
- Inspection logs must be completed and kept on file for three years.

2.2.4 Responding to Tank Leaks

If a tank containing hazardous waste leaks

- Notify the hazardous waste treatment program manager immediately.
- Remove the tank from service and replace it unless it can be fully repaired immediately.
- Handle spills in accordance with Chapter 16, “Spills”

3 Forms

The following forms and systems are required by these requirements:

- None

4 Recordkeeping

The following recordkeeping requirements apply for these requirements:

- See Section 2.1, “Administrative Requirements”.

5 References

SLAC Environment, Safety, and Health Manual (SLAC-I-720-0A29Z-001)

- Chapter 17, “Hazardous Waste”
  - Hazardous Waste: Management Requirements (SLAC-I-750-0A08S-001)
Hazardous Waste Pick-Up and Empty Container Request Form (SLAC-I-800-0A08R-001)

- Chapter 16, “Spills”

Other Documents

- Unidocs. Hazardous Waste Tiered Permit Audit Checklist - Permit by Rule (PBR) (UN-089)