

What's So Special About Special Waste?



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What does the term Special waste mean?

- No Real Federal Definition
- Defined in State Regulations
- Defined in Solid Waste Permits and Special Waste Management Plans











Special Waste:

Any non-hazardous waste that is otherwise acceptable but by virtue of its unique properties requires special handling. Can cause dangerous air & water pollution or pose a risk to your health & safety if not managed/disposed of properly.

- ▶ **Must be profiled and disposed of at an approved Subtitle D landfill**



Examples of Unique Properties

- ▶ Presents a Personnel Safety Hazard 
- ▶ Creates Dusty Conditions 
- ▶ Poses a Fire Hazard 
- ▶ Liquids Requiring Solidification 
- ▶ Type of Container - Drums or Totes 
- ▶ Creates Negative Publicity 
- ▶ Generated in large volumes



Examples of Special Waste & Key words to Listen for

- ▶ Asbestos (Friable or Non Friable ACM)
- ▶ Sludge, Filter Cake
- ▶ Contaminated Soil
- ▶ Any type of used filter or Media (ex: oil, paint, etc)
- ▶ Oil Dri from shop or fleet maintenance
- ▶ Lead based paint
- ▶ Railcar debris, Railroad ties, or any waste generated by the railroad
- ▶ Request for a Certificate of Destruction
- ▶ Unused, expired, or off-spec product
- ▶ Most waste streams generated by TVA, Power Plants, or any type of Utilities provider (ex: telephone poles, Capacitor, transformer, Ceramic Insulator



Examples & Keywords Cont'd

- ▶ PCB'S
- ▶ Sandblast (used as an abrasive)
- ▶ All Liquid Waste
- ▶ Paint Chips
- ▶ Auto Fluff aka Shredder Fluff
- ▶ Any debris generated from cleaning a barge or any type of tank
- ▶ Industrial Waste, or any by-product of a Manufacturing process
- ▶ If customer references a UST site (Underground Storage Tank)
- ▶ CERCLA site (Superfund)
- ▶ Clean up of a Spill or Release of Chemicals
- ▶ Resin
- ▶ Fiberglass



- ▶ A lot of time Generators are clueless on what to do.



- ▶ Its our responsibility in the waste industry to inform and educate. Have policies in place, so that when you have someone contact you in a panic you'll know what to do and can instill confidence

- ▶ Having a good relationship & communicating with MDEQ is key. When in doubt ASK!



Special Waste Authorization Program

- ▶ Ensures that facilities are only accepting non-hazardous special waste under the most stringent conditions in order to provide the highest quality of environmental management & limit potential liability



- ▶ Special waste should **NEVER** be accepted for treatment, storage, or disposal until its completed the entire profile approval process with the designated MDEQ permitted Subtitle D landfill



Important Questions to Ask

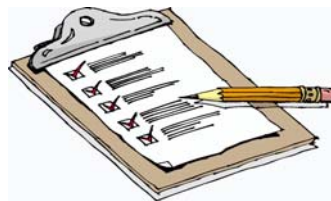
Generators are legally responsible for making hazardous waste determinations on all waste, but you still need to know what questions to ask

- ❑ How was the waste Generated
- ❑ Volume
- ❑ Do they have a SDS or previous waste analysis



Setting up a Profile

- ▶ Generator will need to Complete and Sign Site Specific Applications
- ▶ Depending on the waste stream they will also need to provide Supporting Documentation (SDS, laboratory results, regulatory agency approval letters, written hazardous waste determinations) that Waste is Non-Hazardous



Site Specific Special Waste Profile

Lefferts Landfill
11500 Old State Road, South
Middletown, MD 20640
Tel: 410-441-3400
Fax: 410-441-3700

 FOR OFFICE USE ONLY
OFFICE NUMBER
EMPLOYER/OWNER
ADDRESS

SPECIAL WASTE APPLICATION

Generator obtains a number of this form and profile from an authorized representative of the generator of the waste and/or the transporter of the waste to the facility. The generator or transporter must be licensed under the appropriate RCRA/TSDF permit.

A. PROFILE INFORMATION

New profile Modification to prior approved profile

Other than first or change in the composition or in process generating the waste stream that would alter the characteristics of the waste stream? Yes No Other - Explain project to be approved based on the change in composition or process

B. GENERATOR INFORMATION		C. CUSTOMER/SELLER INFORMATION	
1. Generator Name	2. Name	3. Name	4. Name
5. Address	6. City	7. Address	8. City
9. State	10. Zip	9. State	10. Zip
11. Type of facility (process)	12. Contact Name	11. Contact Name	12. Title
13. Contact Name	14. Phone Number	13. Phone Number	14. Fax Number
15. Email Address	16. Fax Number	15. Title	16. Title
17. Date Profile or P Approval	18. Agent/Consent	17. Is there a second agreement in effect? <input type="checkbox"/> Yes <input type="checkbox"/> No	18. Agent/Consent
19. How many days of approval	19. Other Information	19. Other Information	20. Other Information
D. TRANSPORTER/SHIPPING INFORMATION		E. WASTE STREAM INFORMATION	
1. Name	2. State	3. Material Description or Process or Type of Waste	4. Quantity
5. Street Address	6. City	7. Physical State at 100% <input type="checkbox"/> Gas <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Sludge	8. Unit <input type="checkbox"/> Gallons <input type="checkbox"/> Pounds
9. Phone Number	10. Fax Number	9. Physical State at 20% <input type="checkbox"/> Gas <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Sludge	10. Unit <input type="checkbox"/> Gallons <input type="checkbox"/> Pounds
11. EPA or State Transporter ID #	12. Contact Name	11. Physical State at 50% <input type="checkbox"/> Gas <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Sludge	12. Unit <input type="checkbox"/> Gallons <input type="checkbox"/> Pounds
13. Shipping Method <input type="checkbox"/> Bulk Tank <input type="checkbox"/> Rail Car <input type="checkbox"/> Tank Car <input type="checkbox"/> Other	14. Shipping Method <input type="checkbox"/> Bulk Tank <input type="checkbox"/> Rail Car <input type="checkbox"/> Tank Car <input type="checkbox"/> Other	13. Other Information <input type="checkbox"/> RCRA <input type="checkbox"/> TSDF	14. Other Information <input type="checkbox"/> RCRA <input type="checkbox"/> TSDF
15. Shipping Method <input type="checkbox"/> Bulk Tank <input type="checkbox"/> Rail Car <input type="checkbox"/> Tank Car <input type="checkbox"/> Other	16. Shipping Method <input type="checkbox"/> Bulk Tank <input type="checkbox"/> Rail Car <input type="checkbox"/> Tank Car <input type="checkbox"/> Other	15. Other Information <input type="checkbox"/> RCRA <input type="checkbox"/> TSDF	16. Other Information <input type="checkbox"/> RCRA <input type="checkbox"/> TSDF
17. Shipping Method <input type="checkbox"/> Bulk Tank <input type="checkbox"/> Rail Car <input type="checkbox"/> Tank Car <input type="checkbox"/> Other	18. Shipping Method <input type="checkbox"/> Bulk Tank <input type="checkbox"/> Rail Car <input type="checkbox"/> Tank Car <input type="checkbox"/> Other	17. Other Information <input type="checkbox"/> RCRA <input type="checkbox"/> TSDF	18. Other Information <input type="checkbox"/> RCRA <input type="checkbox"/> TSDF

F. NONHAZARDOUS DETERMINATION

1. Material is not listed in RCRA Table 1 Yes No Not Applicable Yes No Not Applicable Yes No Not Applicable Yes No Not Applicable

2. Material is not listed in RCRA Table 2 Yes No Not Applicable Yes No Not Applicable Yes No Not Applicable

3. Material is not listed in RCRA Table 3 Yes No Not Applicable Yes No Not Applicable Yes No Not Applicable

4. Material is not listed in RCRA Table 4 Yes No Not Applicable Yes No Not Applicable Yes No Not Applicable

G. GENERATOR CERTIFICATION STATEMENT

I hereby certify that all information contained herein is true and correct. I am authorized to provide this information and to sign this application. I understand that all information provided on this application is subject to review and verification by the State and Federal agencies. I understand that if any information is found to be false or misleading, I may be subject to penalties under RCRA and other applicable laws. I understand that if any information is found to be false or misleading, I may be subject to penalties under RCRA and other applicable laws. I understand that if any information is found to be false or misleading, I may be subject to penalties under RCRA and other applicable laws.

Signature: _____ Date: _____

Signature: _____ Date: _____

Review Process

- ▶ The information provided is reviewed to ensure waste is acceptable per RCRA, State Regulations, Solid Waste Permit, Special Waste Management Plan
- ▶ If there is reason for concern the generator should be contacted for additional information or clarification
- ▶ Project is assigned a Waste Authorization Code/Profile #. That Code or Profile # is how the landfill identifies the waste

- ▶ Approval Letter is generated providing the Waste Authorization Code/Profile# and any special instructions
- ▶ Approval package should be sent to Landfill, Sales, and Generator (if requested)
- ▶ Waste Authorization Codes/Profile# must appear on manifests or accompany the waste via a Special Waste Permit



Keep Copies of Special Waste Approval Letters and Supporting Documentation



Manifests and Agreements

- Prior to shipping, all special wastes should have a special waste agreement or contract in place.
- All special waste loads must be accompanied by a manifest .



Load Checking and Waste Screening

- ▶ Random Inspections
- ▶ Documenting Inspections
- ▶ Training Personnel in Recognizing Prohibited and Special Wastes
- ▶ Notification to State/EPA if regulated waste is discovered



Working Together

- ▶ Regardless of your position or Title if you know what it is and what to do, you become a valued asset & a necessary component to keep our State and Environment a safe Great place to live for Generations to come.



YOU CANNOT
ESCAPE
THE
RESPONSIBILITY
OF TOMORROW
BY EVADING
IT TODAY.
-ABRAHAM LINCOLN

