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Screening for Hazardous and PCB Wastes at Solid Waste Management Facilities

The purpose of this document is to provide guidance for facility operators regarding waste screening plan development and training of personnel to recognize and properly handle regulated hazardous wastes or banned wastes that may be delivered to a solid waste management facility. In accordance with Title 132 – Integrated Solid Waste Management Regulations, Chapter 3 and Chapter 6 an applicant for a solid waste management facility permit shall implement a program for detecting and preventing the acceptance or disposal of regulated hazardous wastes and Toxic Substances Control Act (TSCA) regulated polychlorinated biphenyl (PCB) wastes. At a minimum, this includes random load inspections, records of any inspections, training of facility personnel to recognize regulated hazardous wastes and PCB wastes, and notification to appropriate agencies if a regulated hazardous or PCB waste is discovered at the facility. Any regulated hazardous or PCB waste identified must be removed and handled in accordance with applicable requirements in Title 128 – Nebraska Hazardous Waste Regulations.

Part A. The Screening Plan

At a minimum, a waste screening plan should address the following criteria. These criteria are based on the Solid Waste Disposal Facility Criteria – Technical Manual published by EPA in November 1992 (EPA 530-R-93-017).

1. Knowledge of the Commercial and Industrial Base of the Service Area

- A. What types of industry and commercial businesses are present and what kind of regulated waste streams are commonly associated with these industries?
- B. Does the facility receive only household waste or only processed, screened waste?

2. Initial Screening of the Waste

- A. Do operators and haulers visually observe the loading and unloading of vehicles?
- B. If a suspicious waste is found, are proper procedures followed to further characterize the material? The procedures should include at a minimum the following:
 - 1. Use of appropriate protective equipment;
 - 2. Segregation of suspicious waste;
 - 3. Field testing where appropriate (pH, PCB's, free liquids, reactive wastes and organic vapors);

4. Questioning the driver concerning the origin of the waste;
5. Contacting and returning the waste to the source if possible; and
6. Contacting NDEE and/or EPA.

3. Training Program for Facility Personnel

- A. Are facility personnel adequately trained by qualified personnel to identify banned or suspicious waste?
- B. Are personnel able to do the following:
 1. Identify containers, labels, placards, or markings typical of hazardous or PCB waste;
 2. Determine if a material exhibits hazardous characteristics or if it is a listed hazardous waste in Title 128;
 3. Detect suspicious materials such as liquids, powders or dust, sludges or materials with bright or unusual colors; and
 4. Distinguish between wastes which are regulated and wastes which are conditionally exempt/household hazardous waste?
- C. Do personnel know hazardous waste handling and storage requirements?
- D. Do personnel know the necessary record keeping requirements?
- E. Are hazardous material safety training and worker health monitoring requirements addressed?

4. Random Load Checks

- A. At a minimum, does the facility conduct a detailed inspection of at least 1% of the loads, or a least one load per week if less than 100 loads per week are processed at the facility as a minimum level of effort?
- B. Is the load chosen for detailed screening based on a random selection procedure and are suspicious loads inspected?
- C. Are the random load inspections conducted in an area that is a separate and exclusive space; on an impervious pad; and protected from the elements?
- D. Are procedures and equipment for conducting the detailed random load inspection and screening inspections identified? This should include:
 1. Availability of protective clothing;
 2. Equipment and tools (Rakes, front end loader, shovels, etc.);
 3. Methods of storage, transport and disposal of restricted waste are identified are identified (Both for known and unknown generators);
 4. Procedures for moving waste if no prohibited waste is found; and,
 5. Decontamination procedures for the inspector are identified if regulated hazardous waste is found.
- E. Are procedures for handling other banned materials identified in the screening process outlined? (Waste oil, asbestos, liquids, yard waste, medical waste, special wastes, etc.)

5. Record Keeping on Random Load Inspections

- A. Does the facility keep records of the detailed random inspections? The following should be included:
 1. Date and time of inspection;
 2. Type of vehicle

3. Name of hauling firm and driver;
4. Vehicle license plate number;
5. Source of waste if known;
6. Inspector's observations;
7. Any field tests conducted and associated readings or records of samples taken for laboratory testing;
8. Pictures; and
9. Description of subsequent actions taken.

6. Notifications to Relevant Authorities

- A. Are personnel familiar with procedures to notify authorities if regulated hazardous waste or TSCA regulated PCB waste is found?
- B. Are phone numbers available for NDEE's Waste Management Section (for regulated hazardous waste identified, 402-471-4210) and EPA (for TSCA regulated PCB waste identified, 1-800-223-0425)?
- C. Do personnel know what forms need to be filled out to notify authorities of wastes identified?

Part B. Training

The facility personnel should successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures compliance with the procedures for excluding the receipt of regulated hazardous waste or TSCA regulated PCB wastes. The program should, at a minimum, address all of the criteria set forth in the Screening Plan. The program should be directed by a qualified person trained in the procedures for detecting and preventing the acceptance or disposal of regulated hazardous waste and TSCA regulated PCB wastes. The program may need to consist of one or more training courses (such as SWANA, OSHA or others) in addition to on-the-job training or individual studies in order to ensure that all program criteria are met. Because the level of training required will differ from facility to facility based on previous experience and training of employees, the Department cannot prescribe a specific training course or program for all facilities.

Part C. Record Keeping

Records that are generated from random load inspections as described in Part A, Section 5 must be maintained at the facility or at another location that is approved by the Department. Records must be made available to Department inspectors during facility inspections. At a minimum, the following types of waste screening records should be maintained:

- A copy of the hazardous waste screening plan approved by the Department;
- Records of each detailed random load inspection.
- Records of personnel training may consist of certificates of participation, licenses, or memos regarding in-house training. Records of initial and ongoing training must be maintained on each individual who currently has waste screening duties; and
- Necessary documentation or forms, which result from the notification of authorities when regulated hazardous waste or TSCA regulated PCB waste is detected at the facility.

RESOURCES:

- NDEE Home Page <http://dee.ne.gov/>

Contacts:

- NDEE Waste Management Section (402) 471-4210
- NDEE Toll Free Number (877) 253-2603
- NDEE Hazardous Waste Compliance Assistant (402) 471-8308
- Email questions to: NDEE.moreinfo@nebraska.gov

NDEE Publications:

- [Title 128 – Nebraska Hazardous Waste Regulations](#)
- [Title 132 – Integrated Solid Waste Management Regulations](#)
Titles are available on the NDEE Home Page under “Laws/Regs & EQC”, “Rules & Regulations”

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