



National Park Service Commercial Services Program Hazardous Waste Management



What is Hazardous Waste?

Hazardous waste is any solid, liquid, or gaseous material that is no longer suitable to be used for its intended purpose or is being discarded and is contaminated with hazardous substances.

Implementing Authority:

In 1976, the Resource Conservation and Recovery Act and in 1984, the Hazardous and Solid Waste Amendments were passed by Congress to regulate the management of solid and hazardous waste from “cradle to grave.”

Waste Generator Responsibilities:

Determinations – All waste generators must accurately determine if their waste streams contain hazardous waste. The generator must then accurately determine the applicable waste codes.

Generator Category – All waste generators must determine how much hazardous waste is generated by the facility on a monthly basis. Monthly generation rates determine the generator’s classification category.

EPA ID Number – SQGs and LQGs must obtain an EPA generator ID number upon determining that the facility generates hazardous waste.

Generator Classifications:

The quantity of hazardous waste generated in a calendar month determines a generator’s classification category.

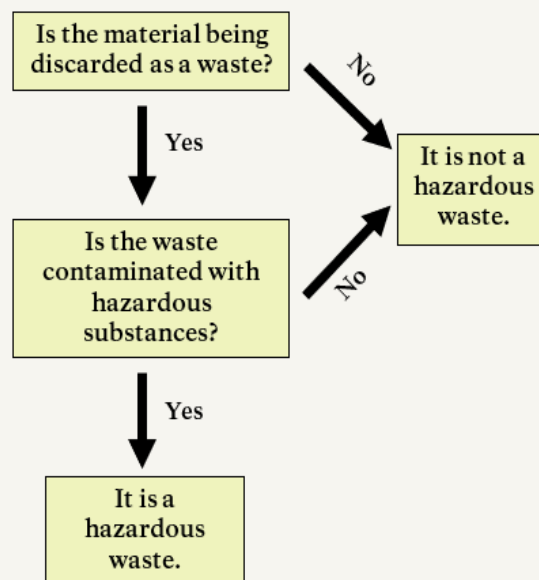
- Very Small Quantity Generator (VSQG)
 - ≤ 220 lbs. per month
- Small Quantity Generators (SQG)
 - > 220 lbs. but ≤ 2,200 lbs. per month
- Large Quantity Generators (LQG)
 - > 2,200 lbs. per month

Personnel Requirements:

Training – Employees managing hazardous waste must receive training on proper management techniques.

Emergency Coordinator – SQGs and LQGs must maintain a designated employee either onsite or on call with the responsibility for coordinating all emergency response measures and procedures.

Determining a Hazardous Waste



Storage Requirements:

- Containers must be kept in good condition.
- Containers must be compatible with the waste stored in them.
- Containers must be kept closed.
- Containers of ignitable waste must not be stored near wasted oxidizers.
- Containers must be properly labeled.
- Periodic inspections of storage areas must be conducted.
- Limitations on total accumulated hazardous waste and accumulation time frames.

Documentation and Records Requirements:

- Hazardous waste determinations for each waste stream
- Hazardous waste shipping manifests
- Hazardous waste storage area inspection records
- Training for hazardous waste handlers
- Applicable emergency plans
- If self-transporting hazardous waste, a transporter's license may be needed
- SQGs must re-notify EPA of generator status every 4 years

Waste Codes:

Hazardous waste is categorized and treated according to waste codes.

D – Waste displaying one or more hazardous characteristics (ignitability, corrosivity, toxicity, and reactivity).

F – Hazardous waste from non-specific sources (solvents, degreasers, dioxin containing waste, and wood preserving wastes).

U – Pure or commercial grade toxic hazardous wastes that are unused.

P – Pure or commercial grade acutely hazardous wastes that are unused and possess extremely hazardous properties that are lethal in small quantities (rarely found in concession operations).

K – Wastes from specific industry sources (rarely found in concession operations).

Solvent Contaminated Wipes:

Solvent contaminated wipes are excluded from the definitions of solid waste and hazardous waste provided specific operating requirements are met.

Employees must:

- Store and transport wipes in non-leaking, closed containers labeled “Excluded Solvent-Contaminated Wipes”
- Take measures to ensure the wipes do not contain free liquids
- Accumulate wipes for no more than 180 days prior to being sent for cleaning
- When wipes are laundered, maintain documentation containing:
 - The name and address of the laundry or dry cleaner
 - Documentation the 180-day accumulation limit is being met
 - A description of the process the concession employees use to ensure the solvent-contaminated wipes contain no free liquids at the point of being laundered or transported off-site
- Demonstrate that the solvent-contaminated wipes are sent to a laundry or dry cleaner with a municipal or state wastewater discharge permit

States must adopt this rule for it to be in effect. Please check with your state to see if it has been adopted in your area.

Please note, this fact sheet does not cover all requirements and situations related to hazardous waste. In addition to checking federal regulations, be sure to check your state and local regulations. For any operational questions or emergency situations, please contact your park concession specialist. For more information pertaining to compliance with hazardous waste requirements, please email cs_envaudits@nps.gov or contact the applicable regulatory authority.