

Oklahoma Department of Transportation

Hazardous Waste Reporting for Bridge Painting Activities
Construction Control Directive No. **20060717**

November 26, 2007

Scope: To identify the requirements of the United States Environmental Protection Agency and the Oklahoma Department of Environmental Quality for managing hazardous waste related to bridge painting activities.

Roles and Responsibilities

The United States Environmental Protection Agency (EPA) and the Oklahoma Department of Environmental Quality (ODEQ) have been assigned the responsibility of managing hazardous wastes in the State of Oklahoma. As part of this task, the EPA and ODEQ collect and maintain information regarding the generation, management, and final disposition of hazardous wastes which are regulated by the Resource Conservation and Recovery Act (RCRA).

The majority of ODOT projects which are subject to these regulations are bridge painting jobs that include the removal of lead based paint. These projects can generate large amounts of hazardous waste and must be reported to the EPA and the ODEQ.

Definitions

Large Quantity Generators (LQG) - Generates more than 2,200 pounds of hazardous waste per month.

Small Quantity Generators (SQG) - Generates between 220 pounds and 2,200 pounds of hazardous waste per month.

Conditionally Exempt Small Quantity Generators (CESQG) - Generates no more than 220 pounds of hazardous waste per month.

EPA Identification Number - All persons who generate, transport, recycle, treat, store, or dispose of hazardous waste are required to notify ODEQ of their hazardous waste activities. Unless their hazardous waste has been exempted, these persons must obtain an EPA Identification Number by submitting RCRA Subtitle C Site Identification Form to ODEQ. This form may be obtained at

<http://www.deq.state.ok.us/lpdnew/forms/indexhazforms.html>.

The contractor will be responsible for obtaining the EPA Identification Number.

Disposal Plan - Hazardous Waste Disposal Plans are required for all LQG's in Oklahoma, regardless of if they dispose of the waste in-state or export it to another state or country. In some cases, SQG's, CESQG's, or even non-generators are required to possess disposal plans in the event a spill or cleanup of historical waste (with a volume exceeding 2,200 pounds) would place them under LQG status for a brief period (one-time generators). This form may be obtained at

<http://www.deq.state.ok.us/lpdnew/forms/indexhazforms.html>.

The contractor will be responsible for obtaining the Disposal Plan.

Manifest Form - Hazardous Waste Manifest Forms are used to track hazardous waste from a generator's site to the site of its disposition. Handlers of waste will obtain new forms from any source that has registered with EPA to print and distribute the form. Oklahoma does not have its own version of the Uniform Hazardous Waste Manifest. The procedure for acquisition of hazardous waste manifests may be found in [40 CFR 262.21](#). Shipments to Oklahoma from a state that has a uniform hazardous waste manifest should use the manifest of the state in which the waste is generated. Shipments from Oklahoma to states that have their own version of the Uniform Hazardous Waste Manifest should use the manifest of the state to which the waste is shipped. If neither state has its own version of the manifest, the generator may use a generic uniform hazardous waste manifest or any valid Uniform Hazardous Waste Manifest. Refer to <http://www.deq.state.ok.us/lpdnew/hw/manifest.htm>.

The contractor will be responsible for obtaining the Manifest, and must submit a copy to the Resident Engineer. The Resident will place this copy in the project file with a copy to Construction Division at the time of receipt, and two copies as part of the Final Estimate Packet.

Certificate of Disposal/Destruction - The disposal facility will issue a

certificate of disposal (typically when landfilled), or a certificate of destruction (typically when incinerated) to the generator of the waste. A certificate of destruction is the only way a generator is free of that waste, otherwise, if it is simply stored or disposed of, he will always be liable for whatever dangers the waste may impose, even if he is not directly responsible for that danger.

The contractor will be responsible for obtaining the appropriate Certificate, and must submit a copy to the Resident Engineer. The Resident will place this copy in the project file with a copy to Construction Division. Receipt of this Certificate will not be a prerequisite for project finalization due to the possibility of there being an extended period of time before the waste is finally disposed of or destroyed.

ODEQ Quarterly Calendar Year Report - The ODEQ requires the filing of a Quarterly Report for each EPA identification number issued to LQG's and one-time LQG's only. This report need only be generated in the calendar quarter when waste is actually being managed. This means that the waste was shipped for disposal or treated on site for ODOT's purposes, and not just generated and awaiting shipment. This form may be obtained at <http://www.deq.state.ok.us/LPDnew/forms/v2quarterlyreport.pdf>.

The Resident Engineer will complete the most current version of the ODEQ Quarterly Report for each EPA ID number issued to that project, and submit it directly to the ODEQ with a copy to the project file and a copy to Construction Division at that time. Two copies must be submitted as part of the Final Estimate Packet.

EPA Biennial Report, including Form GM - The EPA requires the filing of a Biennial Report, including Form GM, for each EPA identification number issued to LQG's and one-time LQG's only. This form may be obtained at <http://www.epa.gov/epaoswer/hazwaste/data/biennialreport/>.

The Resident Engineer will complete the most current version of the EPA Biennial Report, including Form GM, for each EPA ID number issued to that project, and submit it to the project file with a copy to Construction Division

at that time. Two copies must be submitted as part of the Final Estimate Packet.

ODOT Construction Division will be responsible for submitting these reports to the ODEQ when applicable. Biennial Reports are due by March 1st of every even numbered year and contain the information of waste generated and disposed of from the prior odd numbered year. A letter will be sent from ODEQ several months prior to the due date of the Biennial Reports.

Letter to Close - In addition to the Quarterly Report, the Resident Engineer will submit a letter to ODEQ for each EPA ID number issued to LQG's and one-time LQG's only, indicating that the work at that particular site is complete. Example language - "This memo is to inform you of the Oklahoma Department of Transportation's request to cancel the above referenced disposal plan. The Department has concluded the work activities at this site. Enclosed is the final quarterly report for this site. Thank you for your assistance in this matter."

The Resident Engineer will submit a copy of this letter to the project file with a copy to Construction Division at the time of issuance. Two copies must be submitted as part of the Final Estimate Packet.

Summary

There are three different classifications of hazardous waste generators determined by the amount of waste handled per month, and each classification has varying requirements to comply with applicable regulations. The three classifications, their requirements, and the party responsible for each are as follows:

Large Quantity Generators (LQG) - Generates more than 2,200 pounds of hazardous waste per month.

- 1) Contractor - RCRA Subtitle C Site Identification Form (submit to

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- ODEQ)
- 2) Contractor - Hazardous Waste Disposal Plan (submit to ODEQ)
 - 3) Contractor - Hazardous Waste Manifest Form (submit copy to Resident)
 - 4) Contractor - Hazardous Waste Certificate of Disposal/Destruction (submit to Resident)
 - 5) Residency - ODEQ Quarterly Calendar Year Report (submit to ODEQ)
 - 6) Residency - EPA Biennial Report, including Form GM (submit to Construction Division)
 - 7) Residency - Letter to close (submit to ODEQ)

Small Quantity Generators (SQG) - Generates between 220 pounds and 2,200 pounds of hazardous waste per month.

- 1) Contractor - RCRA Subtitle C Site Identification Form (submit to ODEQ)
- 3) Contractor - Hazardous Waste Manifest Form (submit copy to Resident)
- 4) Contractor - Hazardous Waste Certificate of Disposal/Destruction (submit to Resident)

Conditionally Exempt Small Quantity Generators (CESQG) - Generates no more than 220 pounds of hazardous waste per month.

- 3) Contractor - Hazardous Waste Manifest Form (submit copy to Resident)
- 4) Contractor - Hazardous Waste Certificate of Disposal/Destruction (submit to Resident)

Construction Division Requirements

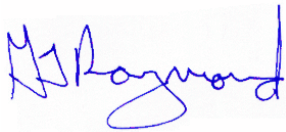
When required, as indicated in the Summary section above, the Manifest,

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Certificate of Disposal/Destruction, ODEQ Quarterly Report, EPA Biennial Report (including Form GM), and the Letter to Close will be placed in the project file with a copy to Construction Division when they are received/created. Two copies of each of these items, except for the Certificate of Disposal/Destruction, will be furnished to Construction Division as part of the Final Estimate Packet, and will be considered a requirement for the finalization of the project. All items furnished to Construction Division must contain the ODOT project number and job piece for identification purposes.

ODOT Construction Division will be responsible for submitting the EPA Biennial Report (including Form GM) to the ODEQ at the appropriate time.

Note: These requirements pertain to those applicable projects whether administered by consultants or ODOT personnel.



George Raymond, P.E.
Construction Engineer



Oklahoma Department of Transportation

Hazardous Waste Reporting
Construction Control Directive No. **060717**

July 17, 2006

Scope: To identify the requirements of the United States Environmental Protection Agency and the Oklahoma Department of Environmental Quality for managing hazardous waste.

Roles and Responsibilities

The United States Environmental Protection Agency (EPA) and the Oklahoma Department of Environmental Quality (ODEQ) have been assigned the responsibility of managing hazardous wastes in the State of Oklahoma. As part of this task, the EPA and ODEQ collect and maintain information regarding the generation, management, and final disposition of hazardous wastes which are regulated by the Resource Conservation and Recovery Act (RCRA).

The majority of ODOT projects which are subject to these regulations are bridge painting jobs that include the removal of lead based paint. These projects can generate large amounts of hazardous waste and must be reported to the EPA and the ODEQ.

EPA Requirements

The EPA requires the filing of a Biennial Report, including Form GM, for each EPA identification number issued. The latest version of these forms and their instructions may be found on the EPA website.

<http://www.epa.gov/epaoswer/hazwaste/data/biennialreport/>

The Resident Engineer will complete the most current version of the EPA Biennial Report, including Form GM, for each EPA ID number issued to that project, and submit it to the project file with a copy to Construction Division. ODOT Construction Division will be responsible for submitting these reports to the EPA.

ODEQ Requirements

The ODEQ requires the filing of a Quarterly Calendar Year Report for each EPA identification number issued. The latest version of this form and its



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Instructions may be found on the ODEQ website.

<http://www.deq.state.ok.us/LPDnew/forms/v2quarterlyreport.pdf>

The Resident Engineer will complete the most current version of the ODEQ Quarterly Report for each EPA ID number issued to that project, and submit it directly to the ODEQ with a copy to the project file and a copy to Construction Division.

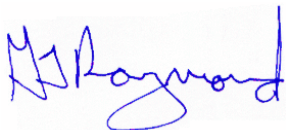
A Quarterly Report need only be generated in the calendar quarter when waste is actually being managed. This means that the waste was shipped for disposal or treated on site for ODOT's purposes, and not just generated and awaiting shipment.

In addition to the Quarterly Report, the Resident Engineer will submit a letter to ODEQ for each EPA ID number issued indicating that the work at that particular site is complete. Example language - "This memo is to inform you of the Oklahoma Department of Transportation's request to cancel the above referenced disposal plan. The Department has concluded the work activities at this site. Enclosed is the final quarterly report for this site. Thank you for your assistance in this matter."

Construction Division Requirements

The EPA Biennial Report, the ODEQ Quarterly Report and the Cancellation Letters will be included in the project file with copies to Construction Division. In addition, two copies will be furnished to Construction Division as part of the Final Estimate Packet, and will be considered a requirement for the finalization of the project.

Note: These requirements pertain to those applicable projects whether administered by consultants or ODOT personnel.



George Raymond, P.E.
Construction Engineer