

HAZARDOUS WASTE MANAGEMENT NEW REQUIREMENT FOR NEVADA LARGE QUANTITY GENERATORS: CONTINGENCY PLAN QUICK REFERENCE GUIDE

When the State of Nevada updated its hazardous waste regulatory program in August 2020, many provisions from the US Environmental Protection Agency's 2016 Hazardous Waste Generator Improvements Rule were adopted. While numerous provisions in that rule provide greater flexibility for hazardous waste generators, there are a few new provisions that are more stringent and require action on the part of generators. When a new or existing large quantity generator (LQG) is either developing or updating its hazardous waste contingency plan, one such new provision is the requirement for the LQG to prepare and submit a Quick Reference Guide that provides key emergency response information (see 40 CFR §262.262(b) and (c)).

The newly required Quick Reference Guide should be a *brief* one or two page summary of an LQG's contingency plan with accompanying facility and street maps. The Quick Reference Guide provides local emergency responders with information they can quickly and easily read to effectively and safely respond to emergencies at a generator's facility. All local emergency responders that may be called upon to provide emergency services at a facility must have a copy. These responders can include but are not limited to: police departments, fire departments, local hospitals, state and local emergency response teams, and the local emergency planning committee.

What does a Quick Reference Guide need to include?

1. The types/names of hazardous wastes at your facility in layman's terms and the associated hazard associated with each (for example: paint wastes = toxic; spent solvents = ignitable; acids = corrosive)
2. The estimated maximum amount of each hazardous waste that may be present at any one time
3. The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff
4. A map of the facility showing where hazardous wastes are generated, accumulated, and treated and routes for accessing these wastes
5. A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers
6. The locations of water supply (for example: fire hydrant(s) and its flow rate)
7. The identification of on-site notification systems (for example: a fire alarm that rings off site, smoke alarms)
8. The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) for the emergency coordinator(s)

It is recommended that facilities use certified mail when sending a contingency plan and its Quick Reference Guide to local emergency responders. Keep certified mail receipts for inspection purposes. It is also recommended that facilities keep on-site a copy of the contingency plan and Quick Reference Guide in an obvious and easily accessed location for emergency responders to read upon entry to the facility. Emergency coordinator names and 24/7 telephone contact information must be posted by the hazardous waste storage and handling areas.

When a Nevada LQG must submit the Quick Reference Guide and when to update a Contingency Plan and its Quick Reference Guide

1. Any new LQG after January 1, 2021 is subject to these provisions and must prepare and submit a contingency plan with a Quick Reference Guide to local emergency responders
2. As of January 1, 2021, when an existing LQG amends its contingency plan, the generator must also prepare and submit a Quick Reference Guide to local emergency responders. An LQG must amend an existing contingency plan when:
 - a. applicable regulations are revised
 - b. a contingency plan fails
 - c. the generator facility makes changes to the facility's design, construction, operation, or maintenance in a way that materially increases the potential for fires, explosions, or releases of hazardous waste constituents, or changes the response necessary in an emergency
 - d. the list of emergency coordinator(s) changes
 - e. the list of emergency equipment changes.

On an ongoing basis, whenever a contingency plan is updated, the Quick Reference Guide must be updated and the updates submitted to local emergency responders

A sample Quick Reference Guide is provided on the following three pages.

Free and Confidential Assistance for Nevada's Businesses and Communities
BEP Toll-Free Assistance (800) 882-3233 | www.unrbep.org

DISCLAIMER: This guidance document is intended as general information and is not provided nor intended to act as a substitute for legal advice or other professional services. BEP advises the regulated community to read all applicable regulations set forth in both US Code of Federal Regulations (Title 40 C.F.R. Parts 260-282) and the Nevada Administrative Code (NAC 444.842-444.976) and to keep informed of all subsequent revisions or amendments to these regulations. This guidance document was developed by BEP with funding support provided by the Nevada Division of Environmental Protection.

ABC Facility Quick Reference Guide (Example)

RCRA Contingency Plan Quick Reference Guide

Facility name: ABC Facility

Location: 1000 Main Street, Las Vegas, NV 89129

EPA ID Number: NVR 000 000 000

Facility Emergency Coordinator: Jane Smith, mobile (24/7) – 702.555.5550

Alternate Emergency Coordinator 1: John Black, mobile (24/7) – 702. 555. 5551

Alternate Emergency Coordinator 2: Jake Jones, mobile (24/7) – 702.555.5552

(Call emergency contacts in order listed)

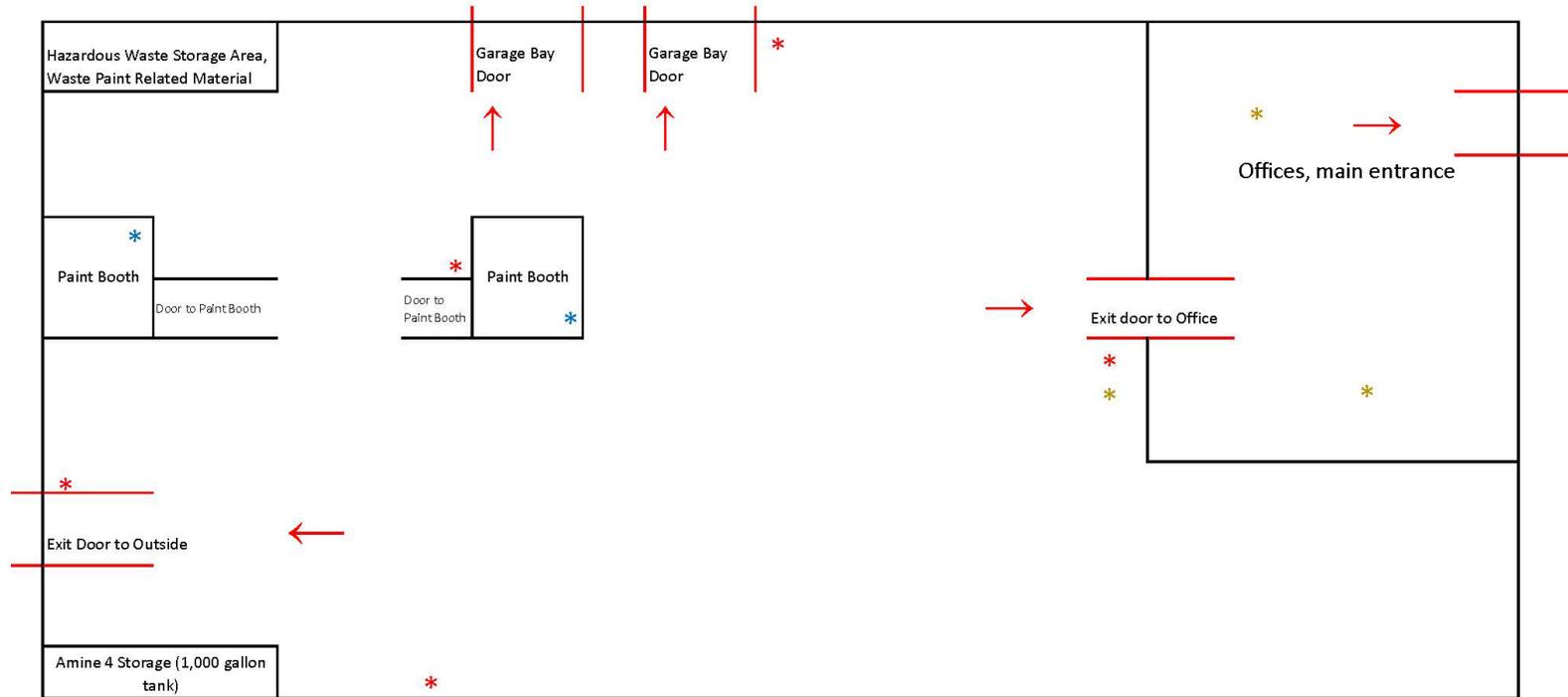
Name of Waste/ Common Name	Waste Codes/ Associated Hazards	Location Where Accumulated	Maximum Amounts Present	Response Notes	Special Notes for Hospital/Treatment Personnel
Paint related wastes (liquid)	D001 (ignitable , flash point <140F) F003, F005 (toxicity , benzene, methyl ethyl ketone, toluene)	NW corner of warehouse, central hazardous waste storage area	Five, 55 gallon drums (2,065 lbs)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Paint related wastes (liquid)	D001 (ignitable , flash point <140F) F003, F005 (toxicity , benzene, methyl ethyl ketone, toluene)	Two Satellite Accumulation Areas (SAA) as noted with blue asterisks on the attached facility map	One, 55 gallon drum at each SAA (440 lbs total)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Off-specification 2, 4-D, a herbicide brand name: Amine 4 (liquid)	D016 (toxicity) Flashpoint is 190F	SW corner of warehouse near new product storage of Amine 4	Off-spec -- 1 tank, 1,000 gallons New product - 1 tank (same tank as off-spec), 1,000 gallons	Use PPE to prevent contact with skin and eyes. Immediately prevent spills from entering drains and waterways. Prevent sources of ignition and open flames	Contact Chemtrac for emergency medical treatment information at 800.424.9300. If in eyes, wash eyes for several minutes.

* This Quick Reference Guide was updated and submitted to local emergency responders on 01/01/2021



ABC Facility Quick Reference Guide (Example)

Facility Map



- * Satellite Accumulation Area for Paint Related Waste Material (D001, F003, F005)
- * Fire Alarms (ring on-site only, there are no fire alarms that notify off-site personnel)
- * Telephone for off-site notification of emergency

→ Indicates evacuation route out of the building.

Note 1: Hazardous waste (paint related waste) is generated and accumulated inside each of the two paint booths, and is accumulated in the hazardous waste storage area. Amine 4 can be a hazardous waste if it is off-specification and it is generated and accumulated in the SW corner at the Amine 4 tank.

Note 2: Smoke detectors are located throughout the office and main warehouse on the ceiling, in a grid about every 25 feet. Smoke detectors are connected to an automatic sprinkler system.

ABC Facility Quick Reference Guide (Example)

Street Map

