Chapter 5
Managing Waste

"☛" - Indicates that a more restrictive state rule or regulation may exist for particular federal regulation. Reference the units' physical location (state) within the CEU Supplement for further guidance.

5.1 Types of Waste

USCG activities generate a wide variety of waste streams ranging from hazardous (such as paint thinner) to the least hazardous (such as waste paper). Generally, USCG's waste streams fall into one of the six categories outlined in Table 5-1.

Table 5-1. Types of Waste

Type of Waste	Definition
Hazardous Waste	Defined as hazardous under RCRA, these waste streams must be managed in accordance with all applicable federal and state HW management regulations.
☛ Universal Waste (Universal waste regulations may not apply in some states. Consult the applicable CEU Supplement for guidance.)	These wastes include batteries, fluorescent lights, thermostats, non-lead batteries and pesticides that are defined as hazardous under RCRA. Although hazardous, they are subject to a reduced set of HW management regulations.
Recyclable/Reusable Materials	As long as they are recycled or reused, these materials are either excluded from HW regulations or subject to a reduced set.
Nonhazardous Waste	These are certain waste streams that are not regulated as hazardous under RCRA, but may pose a potential danger if improperly handled.
General Refuse	These waste streams are not regulated as hazardous under RCRA, nor do they pose an immediate threat. They may be thrown in the dumpster.

Type of Waste	Definition
Process Waste Managed under Contract	These wastes generate in-process (e.g., sludge that accumulates in the oil/water separator). They remain in process until picked up by the contractor.

When Does a Material Become a Waste?

A material becomes a waste upon the intent to discard after the material has outlived its use. This may also apply to unused materials such as paint, which have expired shelf life. However, if these items are turned in for resale or reuse through DRMO, they are considered materials and not wastes.

Hazardous Waste

HW is a solid waste that is not specifically excluded from regulation and meets one of the following criteria:

- Characteristically hazardous (ignitable, corrosive, reactive, or toxic) as measured by standard test methods or can be reasonably determined through generator knowledge
- Specifically ☛ listed in 40 CFR 261, Subpart D or specifically list in the applicable CEU supplements

Common USCG HW streams and associated codes are listed in Table 5-2.

Table 5-2. Common Hazardous Waste Streams

Waste Streams	EPA Waste Code(s)
Absorbent (Containing Hazardous Waste)	Varies
Adhesives	Varies
Aerosol Cans	D003 (reactive)
Alodine	D002 (corrosive) and D007 (toxic for chromium)
Basting Media	D004 (toxic for arsenic) and D008 (toxic for lead)
Dental Amalgam	D009 (toxic for mercury)
Fuel Filters (Gasoline)	D018 (toxic for benzene)
Lead Bullets	D008 (toxic for lead)
MEK Rags	F005
OBA Canisters	D005 (toxic for barium)
Paint & Paint Related Waste (Non-Latex)	D001 (ignitable), D007 (toxic for chromium), and D008 (toxic for lead)
Photo Lab Waste (spent fixer solution, developer, film)	D008 (toxic for lead) and D011 (toxic for silver)

Waste Streams	EPA Waste Code(s)
Soldering Flux	D008 (toxic for lead)
Spent Solvent (including rags)	Varies

Most USCG waste streams have been characterized. The CEU should maintain a Hazardous Waste Profile Sheet (DRMS Form 1930) for all HW generated within the CEU. Unlabeled and unknown waste streams must be tested prior to disposal.

Note	Unknown wastes such, as "mystery drums" must be managed as HW from the discovery date, not the analysis date.

Always contact your CEU when characterizing a new or unknown/unlabeled waste stream to arrange for testing.

Note	Cutters and other tenant units should never leave unidentified or unmarked waste streams at the dockside.

Determining Generator Status

Note	This section explains generator status based on federal criteria. Generator titles and quantity thresholds may vary from state to state. Check the applicable CEU Supplement for state-specific guidance.

The way HW is managed depends on the facility generator status. Under Federal HW management regulations, there are three categories of HW generators:

- ☛Conditionally exempt small quantity generators (CESQG)
- ☛Small quantity generators (SQG)
- ☛Large quantity generators (LQG)

As shown in Table 5-3, generator status depends on the quantity of waste generated per calendar month.

Table 5-3. Generator Criteria

Generator Status	Generation Quantity Limits (Hazardous Waste Generated per Calendar Month)
CESQG	☛ No more than 220 lbs HW (about ½ drum) or 2.2 lbs acute HW
SQG	☛ No more than 2,200 lbs (about 5 drums) HW
LQG	☛ No limit

Table 5-4 lists the times and quantity limits associated with each category of generator.

Table 5-4. Accumulation Requirements

Generator Status	Time Limit	Accumulation Quantity Limit
CESQG	☛ No Limit	☛ No more than 2,200 lbs HW (about 5 drums) or 2.2 lbs acute HW
SQG	☛ 180 days	☛ 13,200 lbs (about 30 drums) HW
LQG	☛ 90 days	☛ No limit

Parent commands such as support centers, bases, and groups which have tenant commands moored at, or collocated on the same facility will assume the generator responsibility and will possess the ☛ generator ID number for the overall facility. This does not, however, relieve tenant commands from responsibilities for labeling, packaging, training, and handling waste streams that are eventually turned over to the parent command. Written host-tenant agreements specifying local practices and responsibilities are required. Contact the CEU for additional guidance.

Contact your CEU to verify your need for an ☛ EPA ID number. Depending upon MCL/CEU policy, CEU personnel may prepare the request form for you. The CEU should also retain a record of EPA ID numbers, which will enable units to check if a number already exists for a given facility. Consult the applicable CEU Supplement for additional guidance.

Universal Waste

Universal wastes are a type of HW category subject to special regulations that are less stringent than normal HW management regulations. Common USCG Universal Waste streams are listed in Table 5-5.

Note	Refer to the applicable CEU Supplement and specific state the facility is located regarding the handling and management of universal waste.

Table 5-5. Common Universal Waste Streams

Waste Stream	Description	Waste Category (How to Manage)	Count toward HW Generator Status?
Batteries, Miscellaneous (Lithium, Magnesium, Mercury & Nickel-Cadmium	**Includes** batteries for communication devices such as ATON batteries. **Does not include** alkaline batteries, such as common flashlight batteries, which may be managed as general refuse.[1]	Manage as **Universal Waste**.	No[2]
Light Bulbs	Incandescent	Dispose as **General Refuse**.[1]	No[2]
	Fluorescent and Halogen	Manage as **Universal Waste**.	No[2]

[1] Always check with local solid waste management contractor or the local landfill to see what items can be disposed of at the landfill.
[2] HW that is managed, as UW is not counted toward the unit/facility HW generator status.

Recyclable or Reusable Materials

Recyclable materials is a RCRA term used to identify certain types of HW that are subject to special regulations as long as they are used, reused, or reclaimed. These items may include ☛ lead-acid batteries and ☛used oil.

Contaminated fuel, if reused for its intended purpose (i.e., burned as a fuel) is also excluded from the HW regulations. For example, fuel that is drained from spent fuel filters and poured back into the fuel tank is not a waste. Other materials that are typically nonhazardous by nature that may be recycled include ☛antifreeze. Typical USCG waste streams that may be recycled or reused are listed in Table 5-6

Note	Refer to the applicable CEU Supplement and specific state the facility is located regarding the handling and management of recyclable material.

Table 5-6. Common Recyclable and Reusable Materials

Material	
Lead-Acid Batteries	Used Oil
Contaminated Fuel	Antifreeze

Nonhazardous Waste

Nonhazardous wastes are certain SWs that, although not RCRA hazardous, pose a potential threat if not properly managed. These wastes are listed in Table 5-7.

Note	Refer to the applicable CEU Supplement and specific state the facility is located regarding the handling and management of nonhazardous waste.

Table 5-7. Common Nonhazardous Waste Streams

Waste Stream
Oil Filters, Used (Non-Terne Plated)
Fuel Filters (diesel)
Paint & Paint-Related Waste (Latex)

General Refuse

General refuse wastes pose little or no threat to human health and the environment and may be thrown in the dumpster. In addition to common garbage such as waste paper and food wrappers, these waste streams may also include:

- Emptied and punctured aerosol cans
- Nonhazardous rags
- Used absorbent and floor sweepings (double bag before placing in dumpster)
- Latex paint-related waste (residue only)

Note	If unsure what can be thrown in the dumpster, call the local landfill, waste management service, or the CEU.

Process Waste Managed Under Contract

These wastes are generated through a specific process and remain in process until picked up by the contractor. These waste streams may include the following:

- Oil/water separator sludge

5.2 Selecting and Preparing a Container

Some USCG facilities manage waste in tanks, however, containers are the preferred accumulation method for USCG. Units will accumulate HW in tanks only in unusual

circumstances and then only with the approval from the MLC/CEU. Moreover, only certain types of containers are authorized for accumulating waste. The type of container selected depends on the type of waste.

- Open-head drums are commonly used for non-liquid wastes such as rags and filters.
- Closed-head drums (drums with bung holes) are used for liquids.
- Boxes are sometimes the best containers for certain items like batteries.

Note	Whenever possible, containers in which new HM were shipped should be reused to ship the same materials after they become wastes. Also, all empty drums shall be clearly marked with the word "EMPTY."

Approved containers are listed in Table 5-8.

Table 5-8. Approved Containers for USCG Units

Container Type	National Stock Number (NSN)
55-gallon Closed-head Drum	8110-00-292-9783
30- gallon Closed-head Drum	8110-01-447-2937
85-gallon Disposal Drum, Unlined	8110-01-101-4055
85-gallon Recovery Drum	8110-01-101-4056
55-gallon Removable-head Drum	8110-00-030-7780
305-gallon Removable-head Drum	8110-00-366-6809
Box, Shipping, UA (DOT-rated) 20" x20" x 20"	8115-00-179-0578
Box, Fiber (cardboard); 18" x 12" x 10"	
Box, Fiber (cardboard); 16" x 10" x 8"	
Fluorescent Bulbs Box, Fiber	

Select and prepare the container by completing the following steps:

Step 1. Select the appropriate approved container for the waste stream. Drums must be clean and in good condition and able to withstand handling, transport, and long-term storage without leaking. Containers must not be creased, rusted, or dented and must also have appropriate sealing lids.

Step 2. Remove any previous markings and labels from the container or mask over with paint.

Note	If a container holding waste is not in good condition, USCG personnel must transfer the HW from the defective container to one in good condition or an overpack.

5.3 Labeling the Container

The following DOT labeling procedure applies to all waste categories. However, DOT labels do not have to be affixed during normal accumulation, only prior to transportation.

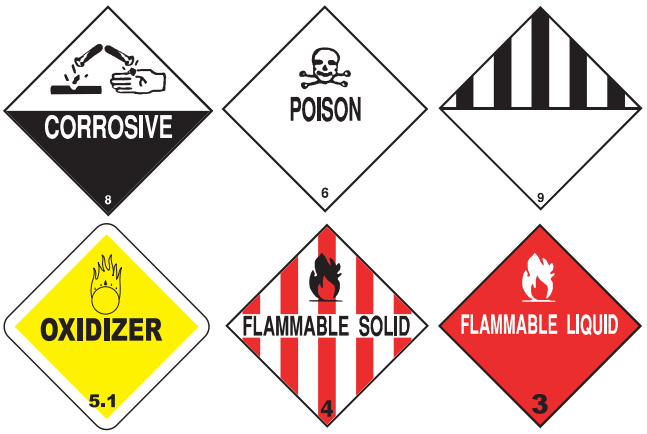
Step 1. Using the hazard class for the waste, check Table 5-9 (49 CFR 172.400) for the proper label to be displayed on the container.

Table 5-9. DOT Hazard Classes and Label Names

Hazard Class	Label	49 CFR Reference
1.1	EXPLOSIVES 1.1	172.411
1.2	EXPLOSIVES 1.2	172.411
1.3	EXPLOSIVES 1.3	172.411
1.4	EXPLOSIVES 1.4	172.411
1.5	EXPLOSIVES 1.5	172.411
1.6	EXPLOSIVES 1.6	172.411
2.1	FLAMMABLE GAS	172.417
2.2	NONFLAMMABLE GAS	172.415
2.3	POISON GAS	172.416
3(flammable liquid) combustible liquid	FLAMMABLE LIQUID (NONE)	172.419
4.1	FLAMMABLE SOLID	172.420
4.2	SPONTANEOUSLY COMBUSTIBLE	172.422
4.3	DANGER WHEN WET	172.423
5.1	OXIDIZER	172.426
5.2	ORGANIC PEROXIDE	172.427
6.1(inhalation hazard, Zone A or B	POISON INHALATION HAZARDOUS	172.429
6.1(Packing Group I and II, other than Zone A or B inhalation hazardous)	POISON	172.430
6.1(Packing Group III)	KEEP AWAY FROM FOOD	172.431
6.2	INFECTIOUS SUBSTANCE	172.432
7(see 49 CFR 172.403)	RADIOACTIVE WHITE-I	172.436
7	RADIOACTIVE YELLOW-II	172.438
7	RADIOACTIVE YELLOW-III	172.440
7(empty packages, see 49 CFR 173.427)	EMPTY	172.450
8	CORROSIVE	172.442
9	CLASS 9	172.446

Step 2. Obtain the appropriate 4" x 4" DOT label(s) through proper supply channels. See Figure 5-1 for examples.

Figure 5-1. Sample DOT Labels



Step 3. Securely attach the label(s) to the side of the container.

Note	The label must be on the same surface and near the container label. If multiple labels are required for a single package, place the primary and secondary hazard labels next to each other.

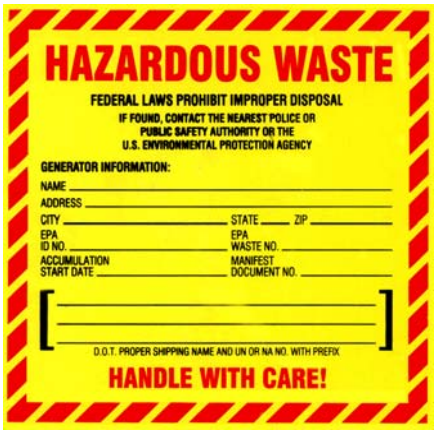
Hazardous Waste

Step 1. All containers must be labeled as soon as any amount of HW is placed in the container. For each container of waste, obtain a HW label (see Figure 5-2) through proper supply channels.

Step 2. Use an indelible black marker to write the required information on the label. For a satellite accumulation point, DO NOT mark the container with an accumulation start date until the container is full or is moved to the HW accumulation area. The proper shipping name must match the manifest.

Step 3. Attach the sticker securely to the side of the container.

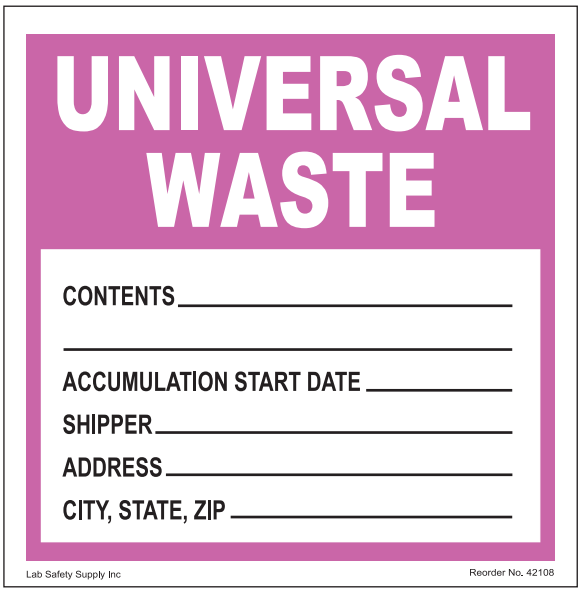
Figure 5-2. Hazardous Waste label



☛ Universal Wastes

Step 1. Obtain a universal waste label (see Figure 5-3) through proper supply channels for each container of waste.

Figure 5-3. Universal Waste Label



Step 2. Using an indelible black marker, write the following information in the space provided on the label: contents, accumulation start date, shipper, and shipper's address.

Step 3. Attach the label securely to the side of the container.

Note	Universal waste must be turned in within ☛ one year from the accumulation start date. However, early and periodic turn-in is encouraged.

Nonhazardous Waste

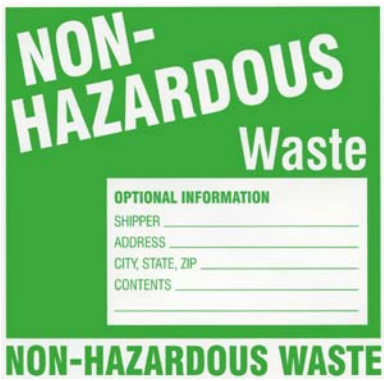
Step 1. For each container, obtain a green nonhazardous waste label (see Figure 5-4) through proper supply channels.

Note	If unsure whether a waste falls into this category, contact the applicable CEU EPS.

Step 2. Use an indelible black marker to write the required information on the label.

Step 3. Attach the label securely to the side of the container.

Figure 5-4. Nonhazardous Waste Label



5.4 Adding Waste to the Container

These procedures are general instructions that apply to any waste. Some wastes may require special handling. Consult the applicable CEU supplement for specific guidance.

Step 1. For drums, remove the lid or bungs from the container.

Step 2. Add the waste to the container marked for that particular waste stream. DO NOT mix different waste streams in the same container.

Note	Wear proper PPE during waste handling. Use a funnel to pour liquids into a drum. Do not place liquids in open-head drums without permission from the CEU. Place a sign stating "IN USE" on drums currently being filled.

Step 3. When adding waste to an empty container for the first time, use an indelible black pen to write the accumulation start date on the label. For a SAP, DO NOT mark the container with an accumulation start date until the container is full or is moved to the HW accumulation area.

Step 4. Replace the lid or bungs on the container. Never leave the lid off the container.

Step 5 Record the quantity of waste added to the container inventory log (if required).

Step 5. When the level of the waste is near the top of the container, STOP adding waste. Maintain weight and headspace in the container as noted below.

Size of Container	Amount of Headspace
55 gal.	4 inches
30 gal.	3 inches
15 gal.	2 inches
less than 15 gal.	1 inch

5.5 Shipboard Waste

The U.S. EPA takes the position that HW generated in raw material transport vessels (including watercraft) is exempt from HW regulations until the waste is removed from the vessel. Therefore, when the HW is removed from the ship onto a host shore facility, both the ship and the shore facility would be co-generators. However, EPA allows either to assume the duties of generator.

The USCG takes the position that ships are satellites of their host shore facility. Any wastes generated while at sea should be properly managed onboard IAW this manual until it can be turned over the shore facility. See Table 5-10 for typical wastes generated aboard ship. When the waste is turned over, the shore facility shall assume the role of generator, not the ship. As such, the shore facility will use its ☛ EPA ID number as appropriate for any required paperwork. The host/tenant agreement shall establish the responsibilities of the tenant vessel with regard to HW management.

Note	See exceptions below with respect to independently moored vessels and shipyard contractors.

Table 5-10. Typical Wastes Generated Aboard Ship

Waste Streams	Waste Classification	EPA Waste Code(s)
ATON Batteries	☛ Universal Waste	D002
Bilge Slop	Nonhazardous Waste	NA
Contaminated Fuel	Recyclable Material	NA
Dichromate Rust Inhibitor	Hazardous Waste	D007
Paint Waste	Hazardous Waste	Varies
Spent OBA Canisters	Hazardous Waste	D005
Spent Solvent	Hazardous Waste	Varies
Used Oil	☛ Recyclable Material	NA

Independently Moored Vessels

In cases where the shore facility is a CESQG (or state equivalent) and does not have an EPA ID number AND the vessel is an SQG (or state equivalent) or above, the vessel will function as an independently moored vessel. Independently moored vessels must follow all applicable sections of this manual. Independently moored vessels will also assume the responsibilities of the generator and therefore, must obtain an ☛EPA ID number. If the vessel only occasionally generates enough HW that exceeds the ☛ CESQG (or state equivalent) status, it may obtain a temporary ☛ generator ID number from the appropriate state.

Note	Some states do not have the CESQG provision or may not issue temporary ID numbers. Consult the applicable CEU Supplement for guidance or call the CEU EPS.

Shipyard Disposal

In general, when a vessel is undergoing repair at a commercial shipyard, the repair contractor shall specifically state that disposal of all HW generated as a result of the contract will be performed by the contractor. As such, the contractor will assume the responsibilities of the generator. The contractor shall also manage any bilge water, slop tanks, and other waste that may be removed, even though not directly associated with the repair.

Note	Always check with the applicable CEU to make sure the contract stipulates these conditions.

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