

US EPA ARCHIVE DOCUMENT

Appendix B

Standard Operating Procedures (SOPs) for:

- Notification of Hazardous Waste Activity;
- Driver Certification Applications;
- CHS Hauler/Vehicle Certification Applications;
- Hauler Certification Secretarial SOP;
- Manifest System;
- Annual/Biennial Hazardous Waste Reports

**HAZARDOUS WASTE PROGRAM
STANDARD OPERATING PROCEDURE**

TASK/FUNCTION: Notification of Regulated Waste Activity Forms (8700-12)

REQUIRED BY: COMAR 26.13.03.03 AND 40 CFR 262.12

RESPONSIBLE DIVISION: Tracking/Hazardous Materials Transportation Division

DESCRIPTION: Any company that intends to generate, transport, or treat, store, recycle and/or dispose of a Controlled Hazardous Substance (CHS) must notify the Secretary and the Administrator of EPA.

FORMAT: Notification booklets containing the Form 8700-12 are supplied by EPA and mailed to requestors by the Hazardous Waste Program. Required information includes company name, location address, mailing address, contact person with phone number, ownership, type of hazardous waste activity, and waste code information.

PURPOSE: To identify all sites involved in the generation, transportation, and treatment, storage, disposal and/or recycling of regulated wastes.

DETAILED PROCEDURES: Applications are date stamped by secretarial staff upon arrival in the mail.

Applications are checked for completeness and accuracy and logged in Notification Logbook and the Notifications file in CWMIS.

Each new application is checked in RCRIS and CWMIS by name and address to see if a previous generator had obtained an ID number for that address.

Each subsequent application is updated in RCRIS and CWMIS to change company name, ownership, mailing address and/or contact person and waste code information.

Detailed Procedures: Continued

With MDE having the responsibility for the Handler ID module in RCRIS, original applications are filed at MDE and copies are sent to EPA for QA purposes.

The suggested timeframe for processing of applications is one week.

After MDE issues the permanent identification number, a copy of the Acknowledgement of Notification of Regulated Waste Activity form to the requestor.

The acknowledgements are matched with the original applications and the permanent numbers and date the number was assigned are logged in the Notification notebook and the CWMIS Notification file.

Notification information is keyed into CWMIS and then held for the random check to be performed on or around the 20th of the month.

A breakdown of how to perform the random check is attached to the front of the Notification Random Check logbook.

The secretarial staff creates a new file and the notification form is filed alphabetically into the Notifiers Files for access by anyone desiring the information.

HAZARDOUS WASTE PROGRAM

STANDARD OPERATING PROCEDURE

TASK/FUNCTION: Driver Certification Applications

REQUIRED BY: COMAR 26.13.04.01 F

RESPONSIBLE ORGANIZATION: Tracking/Hazardous Materials
Transportation Division

DESCRIPTION: Applicants are required to complete an application and affidavit and provide proof of training, a photocopy of their State driver's license and a current copy of their motor vehicle driving record (MVR). The required fee must accompany all applications.

FORMAT: Forms are distributed to transporters as requested to certify their employees.

PURPOSE: Ensure that all drivers have had the required

- a) training in the requirements necessary to transport hazardous waste with emphasis placed on the ability to verify proper DOT shipping names, hazard class and EPA waste codes; the Maryland Hazardous Waste Manifest, other state manifest requirements and the proper disbursement of manifest copies.

- b) training in the required labeling and marking of all containers of 110 gallons or less.

- c) training in placarding according to DOT regulations found in COMAR 11.16.01 and 49 CFR 172 Subpart F.

- d) training in the Federal Motor Carrier Safety Administration regulations including proper maintenance of a driver's daily log.

- e) training in emergency procedures to follow in case of an accident or spill.

- f) training in Maryland's hazardous waste regulations and law.

**DETAILED
PROCEDURES:**

Applications are received and date stamped by secretarial staff and the tracking form notebook is updated with payment information.

Applications are processed in date order as received. The number of applications received is checked with the amount paid. If the number of applications is less than amount of payment, a refund is issued for the amount of the difference.

Driver name is checked with printout:

Renewal: current application is pulled and matched with new application; existing Driver Certification number is stamped on each document.

Completeness check: all information on application, copy of driver's license and copy of their MVR.

IF complete: new expiration date, process date and hauler number are updated on the printout and on the back of each application.

IF incomplete: company is contacted and notified of missing or incomplete information.

New driver:

Completeness check: application, affidavit, proof of training, copy of driver's license, copy of MVR.

IF complete: a DC number is assigned and stamped on each document. New driver is logged in DC number book and printout with DC number, driver name, hauler number, issue date and expiration date.

IF incomplete: company is contacted and notified of missing or incomplete information.

DETAILED

PROCEDURES: A blank driver card is attached to each
(cont.) application and typed by the
secretarial staff. Typed cards,
applications, envelope and cover
letter are proof-read, signed and stamped with
the Director's signature.

Cover letter and cards are xeroxed and copies
placed in the driver files.

Information on processed applications is
added/updated into the Driver Certification
file in CWMIS.

Applications are held for the random check
around the 20th of the month. The random
check is documented in the Driver Random Check
logbook.

Once the random check is completed, the
secretarial staff file the applications in
numeric order in each file which is arranged
by the hauler where the driver is employed.

A count of the number of applications
processed per month is reported on the monthly
status report to the Deputy Director.

HAZARDOUS WASTE PROGRAM

STANDARD OPERATING PROCEDURE

TASK/FUNCTION: CHS Hauler/Vehicle Certification Applications

REQUIRED BY: COMAR 26.13.04.01 C

RESPONSIBLE ORGANIZATION: Tracking/Hazardous Materials Transportation Division

DESCRIPTION: Applicants are required to complete a haulers application, an application for each vehicle, provide a copy of an inspection certificate for each vehicle, proof of liability insurance (a certificate of insurance AND a copy of their MCS90). Payment of \$50.00 per vehicle must accompany the applications.

FORMAT: Forms are distributed to transporters as requested to certify their vehicles.

PURPOSE: To ensure the cradle-to-grave tracking of hazardous waste generated in the State and/or delivered to a treatment, storage, disposal or recycling facility within the State.

DETAILED PROCEDURES: Applications are received and date stamped by secretarial staff. The tracking form notebook is updated with payment information.

A letter is sent to the regulatory agency where the applicant is physically located notifying them of the company's intention to become a Maryland-certified hauler and requesting them to respond within 10 days if there is reason why MDE should not issue a permit to the applicant.

Applications are processed in date order as received. The number of applications received is checked with the amount paid. If the number of applications is less than amount of payment, a refund is issued for the amount of the difference. If the number of applications is greater than amount of payment, the company is contacted to determine which applications they want processed.

DETAILED

PROCEDURES:

COMPLETENESS CHECK: check to see if all required forms were received and that all information is complete.

- * If complete: application package is forwarded to secretarial staff where a vehicle sticker number is assigned to each application and the hauler certificate, vehicle listing, cover letter, envelope, and floater letter (if applicable) are typed. The vehicle sticker log book is maintained by the secretarial staff when numbers are issued to applications. Once typed, the entire application package is proof-read. If there are no typographical errors, the package is signed off on by staff members and the Program Administrator. The final sign off is in the form of the Director's signature on the certificate.
- * If incomplete: company is contacted concerning the missing or incomplete information and the application package is not considered complete until the required information is furnished by the company.

Signed certificate, vehicle listing, and cover letter are copied and original mailed to the transporter along with the appropriate vehicle stickers, emergency response guidebook, State holiday listing, and any other information which is pertinent. The copy is retained in the transporter file.

The transporter (hauler) files are located and maintained in the Hazardous Waste Program.

The secretarial staff keep track of the number of haulers and vehicles certified each month for the monthly status report to the Deputy Director.

DETAILED

PROCEDURES: Hauler and vehicle information is keyed into

CWMIS whenever time permits. Random checks are performed around the 20th of each month to ensure that the vehicle information has been keyed.

EST 2/93 Revised 3/93
Revised 8/96

cc: Butch Dye 8/96
Steve Markowski 8/96
Ray Goodwin 8/96
Rosemary Peay 9/97
Connie Angelos 9/97

HAULER CERTIFICATION. SECRETARIAL.SOP

- 1 Type 10-day letter to state regulatory agency for out-of-state companies and mail
OR
Memo to HWED for Maryland-based companies and refer to Rick Johnson.
Keep copy for file.
- 2 Prepare label and place on folder.
- 3 Place MCS-90 inside right side & staple in place.
Certificate of Insurance
Letter of Credit
Bond
- 4 Prepare Hauler's cover letter.
- 5 Assign sticker numbers to vehicle applications.
- 6 Type Hauler's Certificate
Vehicle Listing
Floater Letter & Floater Forms, if applicable
Certified Mail Card (green)
Address label
- 7 Place Address Label and numbered certified mail sticker on outside of envelope
- 8 Place appropriate stickers
Holiday List
Emergency Response Brochures (one for each vehicle)
in envelope and hold until file comes back from sign-offs.
- 9 Paper clip Sign-off
Cover Letter
Certificate
Vehicle Listing
Floater Letter and Floater Forms, if applicable
Tracking Sheet
Applications
to front of folder and give to Rose or Floyd.
- 10 After Butch signs, he returns to Rose or Floyd for Collins signature.
- 11 Photocopy Cover Letter
Certificate
Vehicle Listing (make 2 copies)
Floater Letter & Floater Forms, if applicable
and place originals in prepared envelope.

Mail !!!!

12. Give file to Debbie or Sharon to add to Certified Haulers' List.

MANIFEST SYSTEM

RECEIPT:

When the manifests arrive in the mail, they are forwarded to a staff person to sort by copy and type and assigned batch numbers. There is a system in place to assign each copy of the manifest a unique control number. Copy 1 of the manifest is assigned a number when it is read by the scanner. Copies 2, 6, and 7 and all out-of-state manifests are assigned unique "locator numbers" using a Bates numbering machine. There are log books as evidence that this practice has been in use since the original audit finding and is performed on a **daily basis**. Batch control sheets and log book forms have been revised to encompass several requests: total number of documents in batch when originally batched, number in batch after logging in system, number of rejected documents, and locator number/manifest number of rejected documents. In most cases the problem is that it is either copy 6 or 7 and the print is so light that it is not readable. Staff will attempt to locate copy 1 or 2 to retrieve the missing information and document that the rejected document was logged into the system.

PROCESSING:

Numerous efforts have been made since the original audit to process the backlog of manifests. Over 1000 staff hours were devoted to matching copies and batching documents in preparation for an outside contractor. It took from May 1990 to October 1992 to get an approved contract (documentation available). There is currently one remaining box of 1990 documents to be keyed (they will be picked up by the contractor on 7/19/93). The total cost for processing this one year of manifests is approximately \$22,000.00. The manifest documents for the 1992 calendar year have been divided into two groups and the machine-scannable documents have been processed-- documents read, edited and written to text files for subsequent download into CWMIS. Non-scannable copies and out-of-state documents are logged-in to the IBM system to account for copies received. These log-in files were sent to a vendor to be converted to a tape file which arrived back to MDE on 7/14/93. Staff will use this data for two purposes: 1) to identify missing copies of manifests from each generator for the entire 1992 reporting year; and 2) to identify all generators that shipped hazardous waste and therefore, should have prepared and submitted a 1992 hazardous waste report.

The current status of 1993 scannable documents is: the backlog of documents from April through July has been scanned "automatic" to log them in with a locator number. One staff member will process the daily incoming documents "interactive" (making the corrections as they are being scanned) and if there is time, go back to editing the "automatic" scanned batches. Meanwhile, another staff member will be editing "automatic" scanned batches using the additional terminal that was installed to eliminate the backlog.

The 1992 manifest copies are now filed by year in numeric order in the file cabinets where they are easily retrievable. The 1993 copies are filed in the same fashion and are located on the shelves in the computer room.

REVIEW OF MANIFEST FORMS (PAGE 21)

The staff position that reviewed and filed manifests was lost when it became vacant-- approval was given to fill the position, then denied . Review of filed manifests is performed on a random basis around the 20th of each month. Review forms have been prepared to check for completeness of forms, correct number of copies received, valid certifications/permits for hauler, vehicle, driver and facility. Waste information will be verified on all copies. Documents containing discrepancies and/or omissions will be forwarded for enforcement action.

During both the 1992 and 1993 legislative session, manifest fee bills were introduced but defeated. These bills would have generated enough funds to properly fund and manage the manifest system !!

**Hazardous Waste Program
Standard Operating Procedures
Annual/Biennial Hazardous Waste Reports**

1. Labels are run for all generators with status codes of 1,2,3 and 8 (LQG, SQG, CESQG AND Periodic or Occassional Generators) and sorted by zip code.
2. Reports are packaged with cover letter, list of State waste codes and info showing who must file.
3. Reports were mailed out by zip code on four dates: November 20, November 27, December 4 and December 11. Documentation was kept as to which zip codes were mailed on which dates.

Print-outs (both alphabetical by company and numerical by EPA ID) are retained for reference as to who was sent reports.

4. Documenting Receipt:

All reports are date stamped and logged into a CWMIS database with EPA ID, report year and date received at MDE.

Postcards are logged into same CWMIS database with "PC95" as report year.

Packages returned as undeliverable are logged into CWMIS with "UN95" as report year.

5. Technical Review:

Form IC is reviewed for completeness and accuracy. Status code is checked after Form GM is reviewed. Company name, ownership, contact person and telephone number is verified in the CWMIS directory and a Notification of Regulated Waste Activity Form is mailed if necessary for applicant to update file.

Form GM is reviewed for waste description, waste code, SIC, form code, unit of measure, on-site treatment code, TSD ID, TSD's system type. If on-site treatment codes are indicated on GM, then it is verified that the generator completed a Form PS.

Form OI is reviewed to ensure that all transporters and TSDs are identified and that all EPA IDs are correct.

Any questions as to whether or not IC and GM are accurate are verified by querying the current year's manifest database in

CWMIS.

6. Accurate and complete reports are sent to data entry staff for input into BRS database.
 7. Submitters are contacted for all Hazardous Waste Reports that did not pass the IC, GM, PS and/or OI review (either by telephone or by letter).
- ** Staff members complete as much incorrect or missing information (e.g. system type) that can be done without contacting submitters. At a later date, copies of corrected forms will be forwarded to submitters to attach to their copy of the report.

Revised for 1995 Hazardous Waste Reports