WASTE MINIMIZATION PLAN

FOR SMALL QUANTITY HAZARDOUS WASTE GENERATORS AS REQUIRED BY THE MISSISSIPPI MULTIMEDIA POLLUTION PREVENTION ACT



THE MISSISSIPPI DEPARTMENT OF
ENVIRONMENTAL QUALITY
ENVIRONMENTAL PERMITS DIVISION – P2

INTRODUCTION

In response to a growing concern that hazardous waste and nonhazardous waste problems needed far more attention than they previously had received, the Mississippi Legislature passed legislation during the 1990 Regular Session that established a state waste reduction/minimization goal and provided statutory authority for the Mississippi Multimedia Pollution Prevention Act. The legislation established that:

"The state's goal is to reduce or minimize the generation and toxicity, or other characteristics, of waste generated within Mississippi by a minimum of twenty-five percent (25%) by January 1, 1996", and

"'Waste minimization' means the reduction, to the extent feasible, of waste that is generated or subsequently treated, stored or disposed of. It includes any source reduction or recycling activity undertaken by a generator or facility operator that results in either (I) the reduction of total volume or quantity of waste, or (II) the reduction of toxicity or other characteristics of hazardous waste, or both, so long as the reduction is consistent with the goal of minimizing present and future threats to human health and the environment."

Chapter 31 of Title 49 of the Mississippi Code of 1972 (Senate Bill 2568, or Section 49-31-1 et seq., Mississippi Code of 1972, or the Mississippi Multimedia Pollution Prevention Act), requires that both large and small quantity generators of hazardous waste or each facility operator required to file a report under Section 313 of the Emergency Planning and Community Right-to-Know Act, Public Law 99-499 develop a facility waste minimization plan by "no later than January 1, 1992". The law further states "the department shall develop appropriate but less stringent requirements for waste minimization plans to be prepared by small quantity generators." The attached forms constitute the Mississippi Department of Environmental Quality's development of the less stringent planning requirements for small quantity generators.

YOU BEEN IDENTIFIED BYTHE MISSISSIPPI DEPARTMENT OF HAVE ENVIRONMENTAL QUALITY (MDEQ) AS A SMALL QUANTITY GENERATOR OF HAZARDOUS WASTE. Therefore, you are required to complete and maintain the attached forms as your facility's waste minimization plan. Your facility will be visited by a representative of the MDEQ's Multimedia Pollution Prevention Program, who will review your plan and discuss its merits with you. The plan is to be kept on the facility premises and should not be submitted to the MDEQ. This will allow you to maintain complete confidentiality with respect to your facility operations.

A copy of the MDEQ's <u>Waste Minimization Guidance Manual for Large Quantity Hazardous Waste Generators and Sara Section 313 Toxic Release Inventory Filers</u> is available upon request. It contains valuable waste reduction/waste minimization information. Also, MDEQ's Multimedia Pollution Prevention Program, can provide technical assistance and information that is helpful in completing the required Waste Minimization Plan.

ANNUAL UPDATES

Section 49-31-21 (4) of the Mississippi Code of 1972 requires hazardous waste generators to update their waste minimization plans annually to reflect current waste minimization practices and any changes to the original plan. THEREFORE, BEFORE COMPLETING THIS FORM, MAKE COPIES OF PAGES 2, 3, AND 4 TO USE FOR YOUR ANNUAL UPDATE.

PLAN REVIEW

In accordance with Section 49-31-21 (5), a generator or facility operator shall permit the MDEQ or any designee of the MDEQ to review the waste minimization plan.

CERTIFIED REPORT

Section 49-31-21 (6) of the Mississippi Code of 1972 states that "From the waste minimization plan and each annual update of the plan, the generator or facility operator shall submit to the department a certified report of the types and quantities of wastes generated, and the types and quantities of wastes minimized". This can be in the form of a letter signed by the owner and/or manager, dated, and submitted to the Mississippi Department of Environmental Quality, Environmental Permits Division – P2, P O Box 2261, Jackson, MS 39225. These reports are due by July 31 of each year.

WASTE MINIMIZATION PLAN

Answering the following questions will satisfy the waste minimization planning requirements for small quantity generators under Chapter 31 of Title 49 of the Mississippi Code of 1972. (If more space is needed to answer a question, attach additional paper and include the question number with your answer.)

- A. Section 49-31-21(2)(a) - Written Policy
 - 1. List facility owner's name:
 - 2. List facility manager's name:
 - 3. List supervisor names (could be owner or manager) who are responsible for processes that generate, process, store, treat, or dispose of waste. List which process each is responsible for:
 - 4. Attach a facility waste minimization policy showing owner and/or management support of waste minimization. The policy statement does not have to be lengthy but should show support for environmental protection through the practice of waste minimization and recycling (where feasible). It should be signed and dated by the owner and/or management. Example policy statements are attached.

B. Section 49-31-21(2)(b) Scope and Objectives	B.	Section	49-31-	21(2)(b)	Scope	and Objectives
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1. Have you been exposed to or have you explored alternative ways of reducing your waste? What are they?

Have you used any of these?

How do/did you use them?

- 2. Have you purchased any new equipment to help you reduce the generation of or recycle your waste? What type of equipment?
- C. Section 49-31-21(2)(c) - Prior Waste Minimization Efforts
 - 1. List and describe prior waste minimization efforts:
- D. Section 29-31-21(2)(d) - Analysis of Waste Streams and Identification of Opportunities to Eliminate Waste Generation
 - 1. Give a brief description of each process or activity that generates a hazardous waste and list each hazardous waste generated.
 - 2. What are the characteristics of your hazardous waste (toxicity, ignitability, reactivity, corrosivity, etc.)?
 - 3. What opportunities exist to reduce/minimize your nonhazardous waste? (Contact MDEQ's Recycling & Solid Waste Reduction Program at 601/961-5171 or www.deq.state.ms.us for assistance in recycling and non-haz solid waste P2 measures).
 - 4. What types of nonhazardous waste, such as scrap metal, wood, scrap plastic, corrugated containers, waste oil, etc., are you generating?
 - 5. What opportunities exist to reduce/minimize your nonhazardous waste?

E.	Section 49-31-21(2)(e) -	Waste Management (Costs
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- How much did it cost you to:(A) dispose of your hazardous waste last year?
 - (B) treat your hazardous waste last year?
 - (C) recycle your hazardous waste last year?
- 2. List any savings you realized from recycling.
- F. Section 49-31-21(2)(f) - Employee Awareness and Training Programs
 - 1. Have you conducted any waste minimization training for your workers? Describe the training.
 - 2. Did your workers respond favorably to the training? If you answered no, what appeared to be the problem?
- G. Section 49-31-21(g) - Establishment of Performance Goals
 - 1. Describe any waste minimization goals you have established for your facility.

POLICY STATEMENT EXAMPLES

<u>Issue a Waste Reduction Policy Statement</u>

All employees need to be made aware of the need for waste reduction and the contribution that each individual can make. This can best be accomplished by issuing a policy statement on waste reduction. The policy should be issued by senior management and discussed with all employees to ensure commitment. Some of the major points that could be covered in the policy statement are listed below:

- (Your Company)'s policy is to reduce all hazardous and nonhazardous waste to the minimum levels economically and technically practical and to be in full compliance with all Federal and State waste regulations;
- As both a responsible citizen and (Company Name) employee, each individual is responsible for reducing waste during working hours, for complying fully with all waste reduction program goals established by the company, and for not violating any Federal or State waste regulations.
- Employees are urged to come forth with suggestions for further reducing waste in their own work area and in any other areas about which they may have ideas.
- Mr./Ms. _____ has been given overall company responsibility for establishing the training programs and operating procedures required to implement this policy.

Another sample:

(Your Company) advocates a clean and safe environment. Its policy is to minimize the generation of hazardous and nonhazardous solid wastes and, insofar as possible, to eliminate air and water pollutants. It seeks the help of all employees in the achievement of these objectives. Further, (Company Name) wants its employees to be fully aware of all hazardous and potentially dangerous chemicals or equipment used in the work place and to use them in a completely safe manner. Finally, it is (Company Name)'s desire to operate in full compliance with all applicable Federal and State environmental regulations.

Another sample:

(Your Company) is committed to excellence and leadership in protecting the environment. In keeping with this policy, our objective is to reduce waste and emissions. We strive to minimize adverse impact on the air, water, and land through excellence in waste reduction. By successfully reducing waste at its source, we can achieve cost savings, increase operational efficiencies, improve the quality of our products and services, and maintain a safe and healthy workplace for our employees. Secondarily, (your company) promotes environmentally sound recycling, reuse, and reclamation of all waste streams.

(Your company's) environmental guidelines include the following:

- *Environmental protection is everyone's responsibility. It is valued and displays commitment to (your company).
- *Reducing and eliminating the generation of waste and emissions at the source is a prime consideration in research, process design, and plant operations. (Your company) is committed to identifying and implementing waste reduction opportunities through encouragement and involvement of all employees.
- *Technologies and methods which substitute nonhazardous materials and utilize other source reduction approaches will be given top priority in addressing all environmental issues.
- *(Your company) seeks to demonstrate its corporate citizenship by adhering to all environmental regulations. We promote cooperation and coordination between industry, government, and the public toward the shared goal of reducing waste at its source and recycling in an environmentally sound manner.

Another Sample:

At (Your Company), protecting the environment is a high priority. We are pledged to eliminate or reduce, wherever possible: 1) our use of toxic substances; 2) our release of toxic pollutants; and 3) our generation of hazardous and other wastes. When wastes or releases cannot be avoided, we are committed to recycling, treatment, and disposal in ways that minimize any undesirable impacts on the air, water, and land.

Policy Statements

- I. (*Company Name*) and all its employees are committed to a sound environmental program directed to bring hazardous and all waste to the lowest level, using the best available technology.
- II. (*Company name*) is committed to protecting the environment. We will pledge to practice waste reduction with an emphasis on pollution prevention. This policy should curb all waste generation, thus enhancing profitability.
- III. (Company name) is committed to excellence in environmental protection. Our policy is to constantly seek opportunities in source reduction, thereby achieving advantages in cost minimization, operational efficiencies, and quality. This reaffirms our goals to provide a safe and healthy environment for the growth of our employees and neighbors in the community.
- IV. (*Company name*) and its employees are committed to preserving our environment through an innovative waste reduction program. Utilizing the latest waste reduction techniques, employee involvement, and top management support, we pledge to reduce generation of hazardous and other wastes to the maximum possible extent.
- V. As a steward of the public, (*Company name*) advocates maintaining a clean and safe environment through minimizing the generation of hazardous and industrial waste.
- VI. (Company name) is committed to excellence and leadership in protecting the environment. It seeks the help of all employees in the achievement of these objectives. We strive to minimize adverse impact on the air, water, and land through excellence in waste reduction. Finally, it is (Company name)'s desire to operate in full compliance with all applicable federal and state environmental regulations.
- VII. It shall be the policy of this company to bring about effective waste reduction by use of available technology in a manner that will enhance job security, regulation compliance, and provide continual effort in this direction.
- VIII. The policy of this company is to eliminate, reduce, recycle, substitute to user friendly products in order to provide for a safe and sound environment. Our policy is to protect the environment via employee participation and waste reduction.