



Nonrule Policy Document

Indiana Department of Environmental Management
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Title: Staging Policy for Permitted Hazardous Waste Management Facilities

Identification Number: WASTE-0011-NPD

Date Originally Adopted: June 27, 1997

Dates Revised: None

Other Policies Repealed or Amended: None

Citations Affected: 40 CFR 264 and 270

Brief Description of Subject Matter: The interim period of time between arrival of a shipment of hazardous waste at the facility and the placement of that shipment into permitted units is known as staging, however, permit conditions have limited staging to 72 hours so as to prevent these staging areas from becoming unregulated storage areas. In some cases, this 72 hour time frame has created problems for facilities, e.g. when a hazardous waste is received on a Friday afternoon at a facility that does not operate on weekends.

This nonrule policy document is intended solely as guidance and does not have the effect of law or represent formal Indiana Department of Environmental Management (IDEM) decisions or final actions. This nonrule policy document shall be used in conjunction with applicable laws. It does not replace applicable laws, and if it conflicts with these laws, the laws shall control. A revision to this nonrule policy document may be put into effect by IDEM once the revised nonrule policy document is made available for public inspection and copying. IDEM will submit revisions to the Indiana Register for publication.

Staging Policy for Permitted Hazardous Waste Management Facilities

Background:

Indiana's Hazardous Waste rules establishes management standards and permitting procedures for Hazardous Waste Management Facilities that treat, store or dispose of hazardous waste. These rules are primarily adopted by referencing federal regulations at 40 CFR 264 and 40 CFR 270. Relating to hazardous waste staging, these rules require that facilities inspect and if necessary analyze incoming shipments to ensure that the amounts and identity of the waste are as described on the manifest and, to determine whether the facility is permitted to manage these waste in their hazardous waste management units. The interim period of time between arrival of a shipment of hazardous waste at the facility and the placement of that shipment into permitted units is known as staging. The rules do not establish a time frame for staging, however, permit conditions have limited staging to 72 hours so as to prevent these staging areas from becoming unregulated storage areas. In some cases, this 72 hour time frame has created problems for facilities, e.g. when a hazardous waste is received on a Friday afternoon at a facility that does not operate on weekends.

Policy:

IDEM has determined that stopping the clock on non-operating days e.g. weekends and holidays, will not diminish protection of human health and the environment. The additional time will likely result in a more thorough evaluation of incoming shipments and reduce the possibility of mistakes and other problems caused by facilities attempting to avoid violation of this permit condition. Therefore with this policy the IDEM intends to allow the clock to stop on non operating day which will result in facilities having three operating days to process incoming waste and place it in permitted units. The IDEM defines operating day as any 24 hour period during which at least a partial shift is worked by employees who process, treat, place into storage, or dispose of hazardous waste at the facility. This policy only extends the time for staging, it does not negate any other permit requirements or conditions. As permits are renewed or modified for other reasons current permit language will be modified to reflect this change.

Any questions regarding this policy should be directed to the Hazardous Waste Permit Section of the Office of Land Quality at 317-232-3242. The IDEM toll-free telephone number is 1-800-451-6027.