

## WASTE MINIMIZATION PROGRAM

When a generator signs a hazardous waste manifest, it is certifying that the appropriate waste minimization statement in the Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation No. 23, Section 262.27 is true.

APC&EC Regulation No. 23, Section 262.27(a) applies to Large Quantity Generators and states “I am a large quantity generator. I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.”

APC&EC Regulation No. 23 Section 262.27(b) applies to Small Quantity Generators and states “I am a small quantity generator. I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.”

The Waste Minimization Program requirements apply to both manufacturing plants, as well as remediation only sites. Waste Minimization includes source reduction and environmentally sound recycling. Whereas the regulations do not require generators to have a written description of their waste minimization program, it is recommended that a facility document its program and have that documentation signed by the corporate officer responsible for ensuring compliance. In Arkansas, Permitted sites (both commercial and non-commercial) have Permit conditions that require the facility to submit a written plan annually describing their previous years waste minimization efforts. The Waste Minimization Program should cover, at a minimum, the following six elements:

1. Top Management Support
  - Make waste minimization part of organization policy
  - Set explicit goals
  - Commit to implementing recommendations
  - Designate a waste minimization coordinator
  - Publicize success stories
  - Recognize individual and collective accomplishments
  - Train employees on waste generating impacts of work practices
2. Characterization of Waste Generation and Waste Management Costs
  - Maintain a waste accounting system to track types and rates and amounts of wastes generated
  - Determine the true costs of waste management and cleanup. This should include costs for (a) regulatory oversight; (b) paperwork and reporting; (c) loss of production potential and materials; (d) waste treatment, storage, and disposal; (e) employee exposure; and (f) insurance for potential future liability
3. Periodic Waste Minimization Assessments
  - Identify opportunities at all points in a process where materials can be prevented from becoming waste. Analyze waste minimization opportunities based on the true costs associated with waste minimization and cleanup
4. Cost Allocation
  - Allocate costs to the activities that generate the waste rather than simply to overhead
5. Technology Transfer
  - Encourage sharing of best practices
  - Seek or exchange technical information on waste minimization from (a) other parts of the organization; (b) other companies/facilities; (c) trade associations/affiliates; (d) professional consultants; and (e) university or government technical assistance programs
6. Program Implementation and Evaluation
  - Implement recommendations identified by the assessment program
  - Periodically review program effectiveness
  - Identify areas for improvement highlighted by these reviews

EPA maintains a Waste Minimization website which provides technical and program information and resources (<http://www.epa.gov/wastemin/>)

References:

- *Guidance to Hazardous Waste Generators on the Elements of a Waste Minimization Program* (EPA; May 28, 1993; 58 FR 31114)
- *Waste Minimization Questions and Answers* (EPA/530/F-93/036)  
[<http://nepis.epa.gov/EPA/html/Pubs/pubtitleOSWER.htm>; report number 530F93036]