



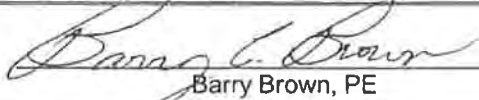
STATE OF TENNESSEE  
DEPARTMENT OF TRANSPORTATION  
ENVIRONMENTAL COMPLIANCE OFFICE  
SUITE 900 - JAMES K. POLK BUILDING  
505 DEADERICK STREET  
NASHVILLE, TENNESSEE 37243-0334

**TDOT STANDARD OPERATING PROCEDURE - ENVIRONMENTAL**

NO.  
007

Subject: **RECORD-KEEPING AND REPORTING FOR SPECIAL AND HAZARDOUS WASTE**

Reviewed and approved by:

  
Barry Brown, PE

05-02-17

Date

Facilities and MS4/TSCS Program Manager, TDOT Environmental Compliance Office



5.5.17

Date

Toks Omishakin  
Environmental Bureau Chief, TDOT Environmental Planning Bureau

Status: Revised and re-approved with minor changes.

Version 5 – Replaces  
Version 4 dated April 2016

## 1.0 PURPOSE AND SCOPE

This Standard Operating Procedure (SOP) defines record-keeping requirements for special and hazardous waste management at TDOT facilities. The manager of each TDOT facility that generates special and/or hazardous wastes must designate one or more persons to perform the record-keeping and reporting duties set forth in this SOP, and shall so advise the Environmental Compliance Office. The following record-keeping is required:

1. A Weekly Accumulation Area Inspection Record will be completed on a weekly basis for all waste Accumulation Areas (AAs) at Region and District facilities. See the AA SOP for details on inspection requirements. These inspection records will be maintained at each facility for at least three years after the date of inspection.
2. A Monthly Satellite Accumulation Areas Inspection Record will be completed on a monthly basis for all Satellite Accumulation Areas (SAA) at Region, District, and County facilities. These inspection records will be maintained at each facility for at least three years after the date of inspection.

3. A written Waste Characterization Profile for each special and hazardous waste that is generated will be maintained by TDOT for a period of at least three years. All waste profile cover sheets are available on the TDOT Environmental Compliance web site, which is maintained by the Environmental Compliance Office. The complete waste characterization profile includes the waste profile cover sheet, the waste determination memorandum, and any laboratory analytical data or product Safety Data Sheets used to support the hazardous waste determination. These completed waste characterization profiles are maintained by the Environmental Compliance Office.
4. Copies of the Uniform Hazardous Waste Manifest and Land Disposal Restriction Notification/Certification forms prepared for each shipment of hazardous wastes will be maintained at each facility for a period of at least three years after the date of shipment.
5. A copy of each Waste Manifest **signed by the receiving facility** and returned to the facility, will be maintained at the facility for a period of at least three years after the date of shipment.
6. The Environmental Compliance Office will be responsible for tracking offsite shipments of special and hazardous wastes and for ensuring that the TDOT generating facilities receive completed hazardous waste manifests (signed by the receiving waste management facility) within the applicable time periods (45 days for Large Quantity Generators and 60 days for Small Quantity Generators) as specified by regulations. The Environmental Compliance Office will also be responsible for the filing of Exception Reports to the Tennessee Department of Environment and Conservation (TDEC) if these time limits are not met, and for providing copies of such reports to the appropriate TDOT-generating facility.
7. The Environmental Compliance Office will be responsible for preparing and submitting to TDEC all required Annual Reports of hazardous waste activities, and for providing copies of such reports to the appropriate TDOT facilities. A copy of each such report will be maintained at each facility for at least three years after the date the report is submitted to TDEC.
8. Each month TDOT District and Region facilities will complete a Waste Accumulation Area Inventory Form and submit it to their Regional Environmental Technical Group by the 5<sup>th</sup> of the following month. Unless inventory forms are specifically requested for Satellite Accumulation Areas (SAAs), this requirement applies only to Accumulation Areas (AAs). A copy of each month's completed Waste Accumulation Area Inventory Form will be maintained at the facility for at least three years after the date on the report.
9. Each TDOT District and Region facility will complete an End-of-Year Waste Inventory Form and submit it to their Regional Environmental Technical Group by the 5<sup>th</sup> of January. The amount of hazardous and special wastes present in all AAs and SAAs at the facility will be totaled and recorded on the inventory. A copy of each End-of-Year Waste Inventory form will be maintained at the facility for at least three years after the date on the report.
10. Each TDOT District and Region facility that receives universal waste, special waste, or recyclable materials (e.g., aerosol cans) from a TDOT County, District, or Region garage should complete a Material Transfer Form. These forms will be maintained in the appropriate color coordinated notebook at the originating and receiving facility for at least three years after the last date on the form.