

CBS Corporate Environmental Health, Safety & Sustainability

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Waste Management

CBS facilities and many short-duration or intermittent locations/sites, including show productions, generate some form of waste requiring disposal or recycling. Depending on the location-specific nature of operations, the types of wastes vary as do their regulatory classification. Broadly speaking, the waste streams typically fall into a few classifications: solid municipal waste (ordinary trash), non-hazardous liquid industrial wastes (e.g. latex paint in most states except CA), hazardous waste, electronic waste and recyclables. A key point to keep in mind is that under U.S. federal law, CBS retains environmental liability for eternity for all of the wastes it generates, even after it leaves our possession. The liability never ends, regardless of waste classification and regardless of contractual provisions with the disposal company.

Hazardous waste has the distinction of having its onsite storage and its offsite transport and disposal strictly regulated. The EPA issues regulations that apply to all states, but the states are free to promulgate regulations that are more stringent. California is a common case in point. The bottom line – you have to check both the federal and state requirements.

To spur your investigation into whether the basic hazardous waste regulations might apply, here are a few fundamental FAQs:

Q. Does my facility (or show production) generate hazardous waste?

- A. If your location is disposing of such items as light bulbs, batteries, solvents (e.g. paint thinner), solvent soaked rags, waste oil in CA, oil based paints, latex paints in CA, aerosol spray cans, pesticides, or liquid fuels, then you are generating hazardous waste, and the regulations apply. Light bulbs and batteries are a special category of hazardous waste, referred to as universal waste, that carry a somewhat relaxed regulatory scheme, but universal wastes are hazardous wastes.

Q. Is electronic equipment hazardous waste?

- A. No, electronic waste is not hazardous waste, but is regulated and must be managed appropriately.

Q. Do I need to file for a Hazardous Waste EPA Identification Number?

- A. If your facility or site (e.g. show production) generates 220 lbs. or more of hazardous waste in any one month, then the facility is regulated by the EPA as a small quantity generator and is required to file for a hazardous waste EPA Identification number. The EPA identification number is address-specific to the actual location where the hazardous waste is generated. Hazardous waste generated at a site has to be shipped from that site.

Q. Should I periodically be tracking the aggregate weight of the hazardous waste generated?

- A. Your facility (or show production) on a weekly basis should be recording the weights of the hazardous waste streams generated as part of a weekly waste inspection.

Q. Can I sign a Hazardous Waste Manifest on Behalf of My Facility or Show Production?

- A. Only CBS employees (full time or contract) that have been trained in accordance with the 49 CFR Hazardous Material Transportation Regulations may sign a hazardous waste manifest (offer a shipment). Fines and penalties are significant for signing a waste manifest without training.

Q. Where can I get a Hazardous Waste EPA ID Number?

- A. To do this, you will need to file EPA Form 8700-12, Notification of Regulated Waste Activity (<https://www.epa.gov/hwgenerators/instructions-and-form-hazardous-waste-generators-transporters-and-treatment-storage-and>)

Q. When might I need to use an EPA ID Number at my facility?

- A. You will need it for completion of the Hazardous Waste Manifest.

Q. Does my facility (or show production) need a new EPA Identification Number if we move to a new or different location?

- A. Yes, if you move to a new or different location and continue to generate hazardous waste at or over the 220 lb. threshold, you will need to file for a new EPA Identification Number for that address. An existing number will not follow you, even if you're moving somewhere in the same neighborhood.

For specific Federal or State hazardous waste regulatory questions such as how to store waste, which companies should I contact for disposal, proper container marking and labels, weekly inspection forms, etc., please contact David Templeman, Director – Environmental, Health, and Safety.