



Assessment of Hazardous Waste Generators' Compliance with the *Hazardous Waste Regulation*

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Mike Simpson
Harvey Maxwell
Ashley Smith
Mike Younie

Environmental Protection Regional Operations
Lower Mainland Region

EXECUTIVE SUMMARY

The *Environmental Management Act*, July 2004, removed the requirement of permits for facilities storing, treating or recycling hazardous wastes that were previously required in the *Waste Management Act*. The *Hazardous Waste Regulation*, which replaced the *Special Waste Regulation* in July 2004, has a new requirement for an approved operational plan that contains some aspects previously covered in permits - quantity and type of hazardous waste stored, treated, recycled or discharged, plus monitoring, reporting and auditing. These regulatory changes were undertaken to help address some industry concerns about an "uneven playing field" and is part of the ministry's de-permitting initiative.

The uneven playing field issue raised by some in the hazardous waste industry was based on the requirement for permits when a specified quantity is reached, and that the permits imposed additional requirements that the smaller facilities did not have to meet, such as financial security and limits on quantity and type of hazardous waste being managed. It was argued that the smaller companies would operate under the permit quantities and undercut the larger companies, and the smaller companies had a lower level of environmental protection which would lead to a higher potential for environmental problems.

Four plans were required for approval under the former *Special Waste Regulation* for all facilities that required BC Generator (BCG) registration: contingency, spill containment, closure and facility plans and specifications. However, the ministry did not actively verify compliance of smaller facilities with this requirement because priority was given to facilities requiring permits.

A compliance assessment project was developed to assess compliance of facilities in the hazardous waste industry that are operating below the quantities that required permits under the *Special Waste Regulation* and to gather information on the number of additional facilities that will be required to submit operational plans for approval under the *Hazardous Waste Regulation*. Since the smaller facilities do not currently have the four other approved plans, these will also be required.

The project was completed between February and April 2005 and was limited in scope to Transport of Dangerous Goods (TDG) Class 3 (flammable liquids) wastes in order to have a manageable sample size. A generic survey requested information as to the types and quantities of hazardous wastes currently being stored and generated.

As of April 30, 2005, there were 3406 BCG numbers in the Lower Mainland Region. The survey was sent to 733 BCG registrants that listed at least one TDG Class 3 waste under their registration, excluding facilities that hold Special Waste Permits. Out-of-date mailing address and company information resulted in 234 surveys being returned by Canada Post. The ministry received 154 responses (31% response rate) from the 499 surveys that were believed to have been received by registrants.

Results from the project provided information which highlights problems with the BC Generator registration system, the generally poor understanding of regulatory requirements for a large

portion of the hazardous waste industry, and the significant amount of ministry resources needed to achieve a reasonable level of compliance with the *Hazardous Waste Regulation*.

The BC Generator registration system lacks current information for operators in the hazardous waste industry. Many companies (estimated at 32%) contained within the database are out of business or have changed names or addresses. Some companies operate facilities at different locations under one BCG number whereas other companies have a different BCG number for each facility. Approximately 40% of the BCG registrations shown as active on the database have not stored or generated hazardous waste for a number of years and do not intend to store or generate hazardous waste in the future. Some companies that received the survey were unaware that the company had a BCG registration and many companies were unaware of the need to update the ministry of changes to the quantities and types of hazardous wastes being stored and/or generated.

The project did confirm that there is a considerable amount of work needed to achieve an acceptable level of compliance with the *Hazardous Waste Regulation*. Significant efforts must be made in educating and promoting compliance within the industry, in reviewing and approving the required plans, in verifying (inspections) and enforcing (investigations) compliance. Projecting the results of this limited survey to all types of hazardous waste, it is estimated that 2450 sets of plans will be required to be submitted for approval in the Lower Mainland Region.

The results of this assessment produced the following recommendations:

- Lower Mainland Region staff should develop a hazardous waste strategic plan for the next five years. The plan would define priority activities to promote, verify and enforce compliance with the *Hazardous Waste Regulation* (HWR);
- Develop a communication plan to discuss the findings of this report with key stakeholders such as industry, information management system managers, staff in other regions and executive;
- Include a letter, outlining the recent legislative changes, to new BCG registrants as well as those updating their information.

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1 BACKGROUND

Amendments to the *Special Waste Regulation* (SWR) were required as a result of recent changes in the federal *Transportation of Dangerous Goods Regulation* (TDGR) and the enactment of the new *Environmental Management Act* (EMA). EMA replaced the *Waste Management Act* and the old *Environmental Management Act*. The *Special Waste Regulation* was re-named the *Hazardous Waste Regulation* (HWR). Previously, under the *Waste Management Act*, storage, treatment and recycling of special waste were subject to both the provisions of the regulation (i.e. the *Special Waste Regulation*) and site-specific permits. With some exceptions, the *Environmental Management Act* eliminates the permitting provision for these activities, changes the term “special waste” to “hazardous waste” and introduces new provisions in the regulation to empower a director to require posting of financial security for hazardous waste storage facilities.

Under the SWR, generators of certain amounts of hazardous waste required a separate generator (BCG) number for each facility. For example, waste classes 3.1, 3.2 and 3.3 (Flammable liquids) required a BCG number for quantities of waste in excess of 100L, 500L and 1000L, respectively. Under the WMA, a permit was required for those same wastes in quantities in excess of 1000L, 5000L and 10,000L, respectively.

As per Section 43 of the HWR, BCG numbers are required for companies who generate, within a 30 day period, or store, treat, recycle or dispose of, a quantity of hazardous waste in excess of registration quantities (Schedule 6). Also, one BCG number is required for each site as per Schedule 5. Following the changes in the TDGR, the *Hazardous Waste Regulation* amendment has eliminated the divisions within Class 3, and changed the minimum amount of class 3 waste that requires a BCG number to 500 L. The EMA and the HWR have also removed the requirement for permits for quantities over the specified threshold limits. However, the HWR, in addition to the new provision for operational plans, maintains the requirement for preparation and submission of facility works, spill protection, contingency, and closure plans as was required under the *Special Waste Regulation*. The Director is tasked with approving all five (5) of these plans. The new operational plans should generally meet the intent of the previously issued permits. The companies that held a permit issued under the *Waste Management Act* are well aware of the requirement for the plans as their permits will not be cancelled until the necessary plan approvals have been made and letters approving the plans have been issued. However, companies that previously held BCG numbers for wastes stored in quantities below those required for permits have not been made aware of the requirement for operational plans. Some companies are also likely not aware of the HWR requirement for other plans.

It has come to the ministry's attention that some companies with a BCG number are accepting wastes without having the approved plans in place. Companies that continue to hold a permit while their plans are being developed and approved are unauthorized to accept any non-permitted wastes until their permit is cancelled and they have all necessary plans in place. These companies are claiming that the non-permitted BCG number companies have an unfair advantage as they are accepting a wider range of wastes without any approved plans in place.

The ministry's Compliance and Enforcement Policy and Procedure identifies new initiatives, such as the HWR, as a priority for compliance promotion and verification activities. In addition, the policy also states that it is especially important that the ministry has a presence in commercial

sectors so that businesses that do not comply with regulatory requirements do not gain an unfair economic advantage. As a result of the changes to the HWR and in response to the allegations made by several companies, the Ministry's Lower Mainland Regional office has committed to undertaking a project to promote improved compliance with the HWR.

2 OBJECTIVES

The objectives of this compliance assessment were to:

- contact the companies that hold BCG numbers for TDG Class 3 hazardous wastes (flammable liquids) but did not hold permits under the *Waste Management Act*, advise them of changes to TDG Class 3 limits, and remind them of their regulatory obligations and new requirement under the HWR for an operational plan;
- determine, by reviewing the survey responses and BCG number database, the number of generators that still require registration under the HWR in order to assess the current compliance situation;
- through survey questionnaire, determine the extent to which companies that hold a BCG number may not be in compliance with the HWR's requirements for operational, facility works, spill protection, contingency, and closure plans;
- make recommendations for future work that will improve industry's compliance with the HWR;
- develop a standardized letter highlighting HWR requirements to include when issuing new BCG numbers; and
- discuss the findings with other regions to ensure a consistent approach across the province.

3 SCOPE

This assessment project included all companies that hold a BCG number within the Lower Mainland Region, with at least one Class 3 waste (Flammable Liquids) listed on their current or initial Generator registration, as recorded in the ministry's Special Waste Information System (SWIS) database as of January 28, 2005. This criterion yielded 757 BCG numbers belonging to 722 different companies. Seventeen companies that held special waste permits under the *Waste Management Act* were removed from the sample set because they were already in contact with the ministry.

The assessment was designed to gather information and engage industry in discussions which would result in improved compliance. Enforcement was beyond the scope of the project; however, if it became apparent that a significant risk to the environment existed, the ministry's Compliance and Enforcement Policy and Procedure would guide the ministry's response.

4 METHODOLOGY

The initial stage of this project was the acquisition of data from the BC Generator database that was required to distribute the necessary information. Once mailing addresses and waste information was acquired, a generic letter (Appendix I) and survey (Appendix II) were drafted to include in the initial mail out package. Companies listing at least one flammable liquid under their BC Generator Number were chosen to serve as the study group. It was hoped that this distinction would create a manageable study set that would still be large enough to be representative of all BC Generator number holders. Generator surveys were sent to the corporate addresses of these companies. All returned information in the form of completed surveys, phone calls, faxes and e-mails were recorded in a Microsoft Excel worksheet for analysis.

4.1 Data Acquisition

A Microsoft Excel database of basic information for BCG number holders was compiled from the Special Waste Information System (SWIS). SWIS includes the information submitted by each company on their Initial Generator Registration (form 1-A) as well as any information received via Generator Registration Updates (form 1-B). Included in this data were both company corporate addresses as well as the addresses of sites generating and/or storing wastes. Where more than one corporate address was found, or where obvious corporate names or addresses were out of date, internet searches were used to identify correct mailing addresses.

4.2 Development of a Letter

In order to properly inform the BCG number holders of the ministry's intentions, a generic letter (Appendix 1) was drafted. This letter served two main purposes. The first was to inform recipients of recent changes to legislation involving hazardous wastes, specifically the 2004 enactment of the *Environmental Management Act* and the 2004 amendment of the *Special Waste Regulation* to the *Hazardous Waste Regulation*. Recipients were also reminded of unchanged requirements of the regulations such as keeping the ministry apprised of changes to their original registrations. The second purpose was to ask for assistance in updating our records via the accompanying Generator Survey (Appendix 2) and to brief BCG number holders on procedures for its proper completion.

4.3 Development of a BCG Number Survey

A survey (Appendix 2) was developed in order to collect relevant information from BCG number holders. The survey included basic questions regarding the use and applicability of the company's existing BCG number. Recipients were also asked to supply information regarding the storage capacity, generation quantity and current on-site storage status of hazardous waste. The survey was also made available on a website in the event people needed access to an electronic copy.

4.4 Mail Out

On February 28, 2005, letters were sent to all companies that listed at least one Class 3 (flammable liquids) hazardous waste on their BCG Number registration. Responses were requested by March 11, 2005. To avoid postal returns due to closed facilities, the letters and surveys were sent to corporate addresses. Seventeen companies were exempted based on currently holding permits under the *Special Waste Regulation*. Letters and surveys were sent to 705 companies in the Lower Mainland Region representing a total of 733 BCG numbers.

4.5 Data Management

Information received from the completed surveys was entered into a Microsoft Excel spreadsheet. The design of this spreadsheet facilitated future queries of on-site materials listed by individual companies. Results were entered as they appeared on the completed surveys, only technical errors (e.g. incorrect TDG class listed for a certain hazardous waste) were corrected.

Communications between company representatives (via fax, mail and phone) were also noted in the spreadsheet for future reference. A field was added for ministry staff to comment on the need for a BCG number for each company based on the received information regarding waste quantities.

5 RESULTS AND DISCUSSION

5.1 Data Management and Access

Several issues were noted during the development of this survey and from the completed surveys. Issues regarding data management were particularly significant. Firstly, access to corporate information necessary for a survey of this nature is not readily available to all ministry staff. Only the SWIS administrator is able to export the necessary information in a useable format. This reliance delayed the mailing of the surveys and strained the resources in Victoria.

Secondly, the information is difficult to manipulate and often can not be supplied in a format that lends itself to a survey (e.g. mail merges). For example, the corporate names were all one word and all letters were capitalized.

Thirdly, the survey clearly showed that current corporate information is not always available. Over 32% (234 of 733) of mailed surveys were returned due to outdated addresses and dissolved companies. Also, former facility addresses are kept in the database even after companies inform the ministry of their closures. This inclusion can cause confusion in surveys of this nature as no distinction is made between closed and active facilities.

5.2 Initial Response

Approximately 120 phone calls were received with questions regarding the survey. A further 50 letters and emails were received. The majority of the questions from survey recipients highlighted a lack of awareness regarding BCG numbers and the maintenance required once a BCG number has been issued (see last bullet below). Other common questions and or comments included:

- What materials or locations are listed on our original BCG application?
- If our company is not currently storing or generating above registration quantities, do I want to keep my BCG number?
- Our company name has changed or our company has been bought out by another company, how do we update our records?
- If the waste generated and/or stored on-site is less than registration quantities, is it necessary to list them on the survey form?
- We need clarification on the requirements of the *Hazardous Waste Regulation*.
- Our facility does not operate an electric generator of any sort.

The majority of companies that did respond to the survey were willing to respond to the requests of ministry staff. Companies that hesitated were predominantly larger companies that were fully aware of the new requirements of the *Hazardous Waste Regulation*. The most reluctance was shown by companies operating multiple sites under their BCG number when asked to fill out one survey for each facility. One company representative stated plainly "Why have these permits? We don't want to do them and we know you don't have the resources to monitor them."

5.3 Survey Completion and Returns

Of the 733 surveys initially mailed out, only 154 (21%) surveys were completed and returned to the ministry. Approximately 2% of the returned surveys were incomplete. In total, 234 surveys were returned by Canada Post. Seventy-eight of these were returned due to companies being amalgamated, dissolved or cancelled, according to subsequent BC Online registry searches. The remaining 156 surveys were returned due to outdated mailing addresses. When the number of returned surveys are removed and companies that have contacted the ministry stating that they would be submitting a survey are included, the overall response rate improves to 38%.

A second mailing of the survey and letter to an updated address list of companies not reached during the first mail out was mailed approximately one month after the initial mailing. The results of the second mailing were not received in time to be included in this report.

Approximately 60% (92 of 154) of the completed surveys returned to the ministry listed waste quantities that require a BCG number. A further 15 companies (10%) commented that they still require their generator number despite storing and/or generating less than registration quantities. 73% (112 companies) of respondents reported currently storing hazardous waste although this includes facilities storing wastes in quantities below those requiring registration under the HWR.

Of the companies no longer storing hazardous waste, approximately 47% had stored hazardous waste in the past 2 years. Nearly 38% of respondents had not stored waste on site in the past 2 or more years with a further 16% responding that either waste was never stored on site or it was unknown how long it had been since hazardous waste had been stored.

The survey results show that the majority of respondents (60%) are storing and/or generating hazardous wastes above registration quantities and would be required to submit plans for their facilities as per Sections 4, 10, 11 and 14 of the *Hazardous Waste Regulation*. Assuming a similar portion of non-respondents are also continuing to store/generate hazardous waste, this translates into 300 companies that would be required to submit plans for facilities storing flammable liquids alone.

The estimate of 300 companies requiring plans may be low due to the number of facilities that are listed under each BCG number. On average, companies storing class 3 wastes have 1.1 sites listed under each of their BCG numbers. Further, many of the companies that responded by telephone after the initial mail out were unaware of the requirement to obtain a new BCG number for each facility in operation and were actively using their one BCG number for facilities not listed. Five of the completed surveys each listed 2 or more facilities not cited on the company's one BCG number. It is likely, then, that for each active BCG number there are at least 1.2 facilities that would require submission of the necessary plans.

As of April 30, 2005, there were 3406 BCG numbers in the Lower Mainland Region. A conservative estimate suggests that 60% of these companies still store and or generate hazardous waste above registration quantities and for every BCG number a company operates 1.2 facilities. Therefore, over 2450 operational plans, plus the other required plans under Sections 4, 10, 11 and 14 of the HWR, will be required for submission and approval by ministry staff under the *Hazardous Waste Regulation*. The workload is currently being reduced by basing ministry approvals for requiring Sections 10, 11 and 14 plans on certification statements prepared by qualified professionals. Nevertheless, since there are other elements to delivering a successful hazardous waste program, there is a need for the Lower Mainland Region to develop a strategic plan that identifies the priorities for the hazardous waste program over the next few years.

5.4 Discrepancies Between Completed Surveys and SWIS Database

A detailed analysis of the differences between wastes reported on the survey and those listed in the SWIS database is beyond the scope of this report. Based on the quality of completed surveys and the limited knowledge of those who responded, such a comparison would be a significant undertaking. However, some preliminary findings can be reported. Of the approximately 120 phone calls received regarding the survey, nearly 20% of companies were actively using their BCG number despite drastic changes to facility locations, waste materials or waste quantities from their initial generator registration (form 1-A). These companies were subsequently encouraged to fill out registration update forms. Further, 20 of the 154 (13%) completed surveys were from companies that had changed their legal names without updating the ministry.

5.5 Need for Education

A large portion (~75%) of the calls received regarding the survey was from BCG holders completely unaware that they were in possession of any such number. It seems likely that a similar number of non-respondents are also unaware and may be the reason for the non-response. Of those that were aware, only a small number were familiar with recent changes to hazardous waste legislation. The region's hazardous waste strategic plan will need to include a comprehensive compliance promotion program with individual companies to ensure that the new regulations are understood. The strategic plan will also need an effective compliance verification component to ensure that obligations are met.

Many respondents did not know that one BCG number cannot be applied to all facilities owned and operated by a company. In fact the ministry has informed companies in the past that one BCG number can be used for multiple facilities. The ministry needs to review this portion of the regulation and ensure that the regulatory requirements are being applied consistently throughout the province. Many respondents were also not aware of the requirement to update the ministry of changes to facility location and company name as well as the types and quantities of materials stored and/or generated.

6 RECOMMENDATIONS

This survey has noted many significant deficiencies in the way hazardous waste information and data are being managed. Industry has a significant lack of understanding of their regulatory requirements. Similarly, there have been limited efforts on behalf of government to inform industry of their obligations. The ministry has outdated information management systems and

has actively engaged in limited compliance promotion, verification and enforcement activities. The following recommendations are made.

6.1 Future Mail outs

In order to properly assess the levels of industry knowledge and compliance, further mailings may be warranted in order for all companies in the sample set (Class 3's) to be contacted. Although time consuming, a round of BC Online Searches prior to mail outs may reduce workloads in the future by preventing further postal returns. Surveys sent via registered mail may also reduce workloads in the future. Alternatively, the companies that chose not to respond or did not receive a copy could be prioritized for compliance verification activities within the region's hazardous waste strategic plan.

During the course of the first survey, many questions were received regarding minor confusions in the wording and meaning of some areas of the survey. In particular, approximately 10 different companies thought the survey pertained to on-site electric generators. This feedback has proven valuable in reworking the survey to prevent confusion in the future. An updated version of the survey is included (Appendix 3).

6.2 Non-Respondents and Future Surveys

To avoid setting a precedent of indifference, ministry staff should contact a portion of those companies that received a survey and inquire as to why the completed survey was not returned. A site visit by staff and/or the BC Conservation Officer Service may be arranged at the convenience of the company. Alternatively, some degree of follow-up could be made by staff phoning the companies. Problems with outdated contact information may be partially avoided by completing B.C. Online Searches to find active contact numbers. This process may also reduce the workload associated with this step by eliminating companies that no longer exist.

Communications between ministry staff and non-respondents will further quantify the number of BCG holders that continue to store and/or generate hazardous waste above registration quantities and will require plan approval by the Director. Future surveys that include all BC Generator numbers will yield more accurate results. However, it is not unreasonable to assume that the sample set of 733 BCG numbers (of 3406 in total) is representative of all BCG number holders.

6.3 Data Management

One of the hurdles in the initial stages of this project was accessing the necessary company profiles. This issue may be partially resolved by conferring with SWIS administrators earlier in the study. Copies of project charters could serve to quickly inform such staff of the goals of these types of projects. This may accelerate the speed at which ministry staff receive necessary information and also increase the applicability and usefulness of the information by having database managers aware of the intended final product.

Out of date company information seriously impeded the ability to proceed with this project. Unfortunately there is no simple way to ensure that BCG numbers are cancelled once a company is dissolved, amalgamated, etc. Alternatively, a system where each new BCG number comes with an expiration (e.g. 1 year) would remove outdated information by ensuring only regularly updated numbers remain active. Information gained during the process of this study, with

regards to which companies no longer exist, should be entered into SWIS to prevent future confusions. Updates to the SWIS database should also include the distinction between active and former facility locations. Such updates should be made in a manner that will be transferable to other exported forms (e.g. excel files).

It is recognized that the Ministry's information systems are undergoing considerable change at the present time. The SWIS is not scheduled for updating for at least 2 years. Nevertheless, it is imperative that the findings from this report are considered when the SWIS replacement is being designed.

6.4 Education and Compliance Promotion

Based on the feedback received during the course of this assessment, many of the companies that would continue to operate under their existing BCG number would do so because of a simple lack of understanding of the new requirements of the *Hazardous Waste Regulation*. Also, many companies are unaware of the need to update the ministry as to changes to the waste types and quantities being stored and/or generated. Many are unsure of what is currently listed under their generator number; a web-based database, available to the public, could inform companies of what they are currently authorized for. A variety of approaches are needed to continue to educate and promote compliance with these companies. An information package summarizing the regulation changes sent to all BCG number holders, together with posting guidance documents on the internet, would be an effective start. However, personnel would be required to draft and send this package as well as to answer the hundreds of phone calls that would be expected. This survey demonstrated that comprehensive and personal follow-up is required; web based information, letters etc. are not sufficient to educate when the level of understanding is so low.

Further efforts would be needed to ensure compliance for those companies refusing to submit plans and/or continuing to operate under existing BCG numbers. The ministry must be aware of unfair economic conditions between companies that may result. The region's hazardous waste strategic plan will prioritize where ministry resources are best allocated to promote and improve compliance and prevent unfair economic advantages.

6.5 Ensuring Compliance

This assessment highlights the potentially large workload associated with the approval of submitted plans for all companies currently storing and/or generating hazardous wastes above registration quantities. As mentioned above, a significant amount of effort must also be invested in promoting compliance within the hazardous waste industry. Verifying and enforcing compliance will also require significant resources. It is recommended that the Lower Mainland Region develop a hazardous waste strategic plan to identify the priority activities and the resources required to deliver those activities.

The plan needs to identify priority compliance promotion, verification and enforcement activities. The plan also needs to identify which hazardous waste facilities need to be engaged first. The choices are varied and could be hazardous waste management facilities (previously permitted and non-permitted ones), they could be facilities for which the ministry has received complaints, they could be facilities that did not respond to the BCG number survey etc.

The plan should also search for ways to streamline the approval processes for required plans. Increased reliance on professionals is one possibility. Streamlining measures could be forwarded to staff working on the HWR amendments if they are found to be successful.

It is recommended that Lower Mainland Region staff prepare a communications plan that highlights the findings of this report. The plan should be shared with staff in other areas of the province and should be provided to managers and executive for consideration in future resource allocations and data management system upgrades.

Appendix 1
BC Generator Number Letter



June 27, 2006

File: 57500-20/LMR21-03/BCG
Update

Dear BCG Number Registrant:

Re: Update to Lower Mainland Region's BCG Number Database – Permit #

The purpose of this letter is to advise you of the recent changes to legislation and regulations related to the management of hazardous waste in British Columbia and to ask for your assistance in updating our records.

The *Environmental Management Act* was enacted July 8, 2004 replacing the Waste Management Act, and the Special Waste Regulation was amended to the Hazardous Waste Regulation (HWR) on July 7, 2004. The regulation can be accessed through the following website:

http://www.qp.gov.bc.ca/statreg/reg/E/EnvMgmt/EnvMgmt63_88/63_88.htm

In addition, consequential amendments were required as a result of changes in the federal Transportation of Dangerous Goods Regulation. For example, the HWR amendment has eliminated the divisions within Class 3, and changed the minimum amount of class 3 waste that requires a BCG number to 500 L.

At this time, the ministry is asking for your assistance in updating its records regarding BC Generator number holders. Please complete the attached Generator Survey form for each BCG number assigned to your company and return it to the undersigned by March 31, 2006. Companies that do not return the completed survey may be contacted to arrange for a convenient time for ministry staff to visit the facility to collect the information. A digital version of the survey is available at:

ftp://ftpsry.env.gov.bc.ca/pub/outgoing/EP/Compliance_Assessments/BCG_Update

The digital version can be downloaded, completed and emailed back to the undersigned at mike.simpson@gems3.gov.bc.ca.

Please list all types of hazardous wastes that are stored at your facility on the Generator Survey form and complete a separate form for each facility. Where there is a material change to the information previously

submitted in a generator registration report, you are also required to complete and submit a Generator Registration Update form (Form 1B), available at:

<http://www.env.gov.bc.ca/epd/epdpa/sw/generators/pdfs/gen1b.pdf>

Should you have any questions, please contact the undersigned at 604-930-7106. Thank you for your assistance.

Sincerely,

Mike Simpson
Environmental Protection

Appendix 2
BC Generator Number Survey

Generator Survey

Generator Name: _____

Facility Location: _____

BC Generator Number: BCG _____

Please complete the following information for the facility authorized by the above Generator Number

Hazardous Waste Name	TDG Class	Maximum Storage Capacity (L or kg)	Maximum Quantity Generated in 30- day Period (L or Kg)	Quantity Currently in Storage (L or Kg)

Is the current authorization still applicable for your facility? Yes No

Please answer the following questions if no hazardous waste is currently in storage:

a) Is the generator number still required? Yes No

b) When was the latest date hazardous waste was stored at the facility?

Survey completed by: _____
(please print name)

Signature: _____

Phone number: _____

Date: _____

Appendix 3
Updated BC Generator Number Survey

Hazardous Waste Generator Survey

Company Name: _____

Facility Location: _____

BC Generator Number: BCG _____

Please complete the following information for the facility authorized by the above Generator Number. If no hazardous waste is currently being stored or generated, proceed to question #2 below.

Hazardous Waste Name	TDG* Class	Maximum Storage Capacity (L or kg)	Quantity Currently in Storage (L or Kg)	Maximum Quantity Generated in 30- day Period (L or Kg)

*Transport of Dangerous Goods

1. Is the current authorization still applicable for your facility? Yes No Not Sure
(i.e. is the above different than what is stated on your BCG number registration)

2. Is the generator number still required? Yes No

3. When was the latest date hazardous waste was stored at the facility?
(If currently storing waste, enter 'present')

Survey completed by: _____ Signature: _____
(please print name)

Phone number: _____ Date: _____