
EPA & Reg 347

Generator Responsibility

Generators are responsible for the storage, transfer and disposal of hazardous waste according to all municipal, provincial and federal requirements. There can be severe financial penalties for generators that do not comply with all aspects of these regulations. In addition, generators may be held liable for damage sustained during an emergency involving their hazardous waste (e.g. a spill) or from disposal practices that are later found to be environmentally damaging (known as Superfund in the United States).

Registration

All organizations generating hazardous waste must be registered with the Ontario Ministry of the Environment. This is done via HWIN (the Hazardous Waste Information Network) and is completed for all University of Guelph locations through Environmental Health and Safety. Upon initial registration, generators are provided with a unique registration number, which is then used to track all waste shipments. Each University of Guelph site e.g. Main campus, Kemptville campus, Elora research station etc. has its own generator number. Generators must then register the types of waste (i.e. waste classes) that they generate along with providing information as to the composition of the waste and the process that generates the waste. Currently Main Campus has more than 40 classes of waste registered.

LDR Requirements

In 2007 Ontario adopted Land Disposal Restrictions which prescribe what may be land disposed and/or what treatment is required of the waste prior to land disposal. The LDR regulations require us, as the Generator, to provide significantly more detail about our waste composition and the processes that generate the waste than what was previously required.

Shipments – TDG and Regulation 347 Unite

Removal of hazardous waste is regulated by Transportation of Dangerous Goods as well as Ontario Regulation 347 - Waste Management. All waste removed from the University of Guelph must be accompanied by a completed waste manifest/movement document.

Waste Manifest

The waste manifest is a 6 part document that serves as the TDG shipping document for the waste. Although the manifest may be pre-printed, as the generator, the University of Guelph is responsible for completing Section A of the manifest, which includes:

- Generator information
- name and registration number
- Mailing and Site Location address (as registered)
- Contact number
- Receiver information
- name, address and contact number
- Waste information
- Waste class code (generator must be registered for waste class)
- Shipping name
- UN number

- Packing group
- Amount shipped, number of packages, and physical state
- Date and time shipped
- Scheduled arrival date
- Printed name and signature of generator representative. By signing the manifest the individual is taking responsibility for the consignment of the waste. Generator representatives are to be University of Guelph employees and MUST have a current TDG training certificate. For Main Campus, an EHS representative is to sign the manifest.

Section B is completed by the Carrier. Section C is to be completed by the Receiver.

Distribution of Manifest

The following chart describes the distribution of each of the 6 parts of the waste manifest.

Documentation Retention

Manifests must be retained for a minimum of 2 years and be available for inspection as prescribed by TDG requirements. Manifests for Main Campus and Laboratory Services are retained by EHS. Manifests for the Regional Campuses and Research Stations must be retained at the respective site.

Waste Carriers

In order to meet the requirements of provincial and federal regulations, waste carriers must:

- Be registered with the MOE as a carrier
- Have a certificate of approval for all vehicles to be used during transfer
- Only use drivers trained in TDG
- Transfer only to registered waste management sites.
- Have adequate insurance coverage.

Because of the comprehensive legislation surrounding the management of hazardous waste and the potential liability should there be problems during the waste transfer and disposal process, the University has established specific criteria that must be met by waste contractors before they are able to service the University of Guelph. Only contractors meeting these criteria may be used for hazardous waste removal.

Please contact EHS for approved contractors or more information.

To sum it up...

For Main campus

- hazardous waste removal is coordinated through EHS
- manifests are signed by EHS
- manifests are retained by EHS

For Regional campuses and Research stations

- only approved waste contractors are to be used
- manifests are to be signed by a University employee with current TDG training
- manifests are to be retained onsite for at least two years

Other Related Information

[Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities](#) [1]

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[1] <https://www.uoguelph.ca/hr/system/files/Storage%20Guidelines.pdf>