



The HazWaste Quarterly

SUMMER 2011

IN THIS ISSUE:

Managing your Hazardous Waste Containers 1 & 2

2010 - By the Numbers 2

Rethink Recycling 3

Your Questions Answered 3

Contact Info ... 4

Providing useful information to businesses licensed by the Ramsey County Environmental Health Section to generate hazardous waste.

Managing Your Hazardous Waste Containers

Businesses that generate hazardous waste are responsible for properly storing their waste containers. Improper or inadequate storage can lead to a release; which requires a clean up, can be very expensive, and is an inefficient use of time.

The first step - waste reduction!

Think about the wastes your business is currently generating. How much time and money is going into its management? More importantly, how much could be saved if you produced less waste? By reducing waste generated, your company won't have to handle it, store or dispose of it and you'll save the costs associated with those activities. (You may be able to reduce the amount of product you purchase, too!) That's why waste reduction is a smart first step.

Choosing your container.

The regulations require all hazardous waste containers to be sturdy and leak proof, with closure devices that will hold the waste if the container is tipped over or dropped. The container that you choose must also be compatible with its contents. With the wide variety of container sizes and types to choose from, here are some things to consider.

- Is the container in good condition? This means no severe rust or dents in the seams that would weaken the containers' integrity and allow it to leak. Weekly container inspections help to guarantee the continued integrity of the container.
- Is the container compatible with the waste? Ask your transporter or disposal facility for their recommendations or use the Department of Transportation (DOT) Hazardous Materials table to help make a determination.
- Does the closure device allow employees to easily add or remove waste? This helps to ensure that the container is kept closed after each use.

Whenever possible, store the waste in the container it will be shipped in. This eliminates the potential for spills during waste transfer.

Keeping your container closed.

Hazardous waste regulations require that storage containers be kept closed, except when you are adding or removing waste. Closure prevents

evaporation of the waste – a health and safety issue – and controls spills should the container tip. As important as this is, we all know what a difficult job this can be! In fact, open containers top the list of waste handling violations. Allow employees to help select the type of closure devices that will work best for them. Making it easy, practical and useful helps eliminate non-compliance.

Marking your container correctly.

All hazardous waste containers must be labeled with the words "Hazardous Waste", a clear description of the contents and, except



for satellite accumulation containers, a start date of waste accumulation. This information identifies the contents of the container to people who are unfamiliar with it, such as emergency responders.

Use a stencil or write on the container with a permanent marker or paint. You can always use an accumulation label or pre-transport label to meet the labeling requirement, as well.

For your most common waste streams, create a sample Hazardous Waste label for employees to use as a template. Don't place labels directly under the bung; this helps the labels remain legible, if the waste spills during transfers. Or, protect your labels with a plastic pouch, varnish or clear tape.

Used oil and universal wastes - two special situations.

For used oil and related wastes, the containers are only required to have clear description of the waste. Label them - "used oil", "used oil filters" or "used oil sorbents".

Universal wastes should be labeled in one of three ways:

- Universal waste - waste name (i.e. universal waste - batteries);
- Waste "waste name" (i.e. waste batteries); or
- Used "waste name" (i.e. used batteries)

2010 - By The Numbers!

Here's the major activities the Solid and Hazardous Waste Compliance Program performed during 2010.

- Reviewed and issued annual licenses for 1,931 hazardous waste generators, 14 hazardous waste facilities and 9 solid waste facilities.
- Performed 1,675 solid and hazardous waste inspections, including the following types:
 - 1,107 compliance inspections;
 - 43 follow-up inspections;
 - 70 complaint inspections;
 - 127 site closure inspections;
 - 125 targeting inspections;
 - 179 pre-demolition inspections; and
 - 12 enforcement inspections.
- Performed 420 reviews of self-audit hazardous waste generators' license applications.
- Issued 16 Letters of Warning (LOW), 19 Notices of Violation (NOV), 7 Court Citations and took 20 other enforcement actions for non-compliance.
- Provided technical assistance through 3,098 phone consultations and 257 site visits.
- Conducted 32 training sessions, reaching 754 people.

Managing Your Hazardous Waste Containers

continued from page 1

Storing your waste containers indoors.

Indoor storage consists of a permanent building with a roof and at least three walls that are attached to an impermeable floor. An impermeable floor does not react with the waste and has no cracks, drains, sumps or gradient slopes that would allow the waste to escape.

Follow these basic management requirements for indoor storage.

- Close and mark your container.
- Place containers, with the labels facing out to allow for easy identification, in your storage area. Maintain adequate aisle space.
- Store all liquid hazardous waste on an impermeable surface.
- Separate any wastes that would be incompatible if mixed. Do this by using a dike, berm or secondary containment.
- Inspect your container's condition weekly. Document these inspections.
- Don't exceed time or quantity storage limits. These limits can be found in the table to the right.

Discuss different storage options with employees who work in the area. They often have the best ideas and will know what is a workable solution. Make your storage area easy to use by having sufficient aisle space and designated (labeled) areas for storage. This will make waste management easier for your business. Keep emergency response equipment close to your storage area for easy access.

Storing your waste containers outdoors.

For outdoor storage, you must meet all the indoor storage requirements as well as these additional criteria:

1. Protect your storage area from unauthorized access, moisture, and inadvertent damage.
2. Liquid hazardous wastes must be stored on an impermeable surface with curbing that is sufficient to contain a release.
3. Ignitable wastes require shading to prevent heat buildup. Tarping the waste may actually hold the heat, causing expansion of the waste and a possible release.

Storage and accumulation limits for generators.

The amount of waste your business can accumulate and the length of time you can store it varies with your generator size. The table below lists the requirements for the various generator sizes.

Generator size	Accumulation limit	Storage time limit
Very Small Quantity Generator (VSQG) Generates 100 kg or less per month (less than 1/2 drum)	1000 kg If a generator exceeds this limit, waste must be managed according to Small Quantity Generator guidelines.	Less than 1000 kg of waste may be stored indefinitely. Once 1000 kg is reached, ship waste off-site within 180 days. (There is an extension if the facility is located over 200 miles away.)
Small Quantity Generator (SQG) Generates between 100 kg and 1000 kg per month (about 1/2 to 4 drums)	3000 kg If a generator exceeds this limit, waste must be managed according to Large Quantity Generator guidelines.	Ship waste off-site within 180 days of the waste first being placed in the container. (There is an extension if the facility is located over 200 miles away.)
Large Quantity Generator (LQG) Generates 1000 kg or more per month (more than 4 drums)	No limit	Ship waste off-site within 90 days of the waste first being placed in the container. (If the deadline isn't met, the generator must apply for a hazardous waste storage facility permit.)

Visit the Minnesota Pollution Control Agency (MPCA) web site at www.pca.state.mn.us for fact sheets about container management.

P2 Tip - Information & Insight: Rethink Recycling Offers Improved Waste Management Guide

Guide offers enhanced search and list functions to help businesses go green!

With so many recycling and disposal options for Twin Cities businesses, you can waste valuable time and resources trying to find the right answers — until now. Rethink Recycling updated the metro-wide “Resourceful Waste Management Guide” on its Web site, www.RethinkRecycling.com/business, to provide complete, in-depth guidance for businesses.

Re-tooled with new search and list functions, the online guide will allow your business to identify recycling or disposal options for all of your wastes in just a matter of minutes. The guide also features case studies, an A to Z Material Management Directory, an 11-step guide to help businesses reduce and recycle their wastes, a list of materials banned from the garbage, and much more.

“In addition to improving their bottom line, many businesses in the Twin Cities are also looking at their environmental performance,” said Angie Timmons, communications manager for the Solid Waste Management Coordinating Board. “We’re excited to share this guide and help businesses save valuable time and resources, while properly disposing of waste and recyclables.”

Make a list of items to recycle or dispose of – from old electronics, to paper, to food waste – and the Resourceful Waste Management Guide will develop a list of companies based on location or the ability to handle all of your recycling or disposal needs.



About Rethink Recycling:

The Solid Waste Management Coordinating Board (SWMCB) launched its first education outreach campaign in 2003 to help citizens living in the six-county Twin Cities metro area (the counties of Anoka, Carver, Dakota, Hennepin, Ramsey and Washington) understand the urgent need to make environmentally responsible purchasing and disposal decisions in their daily lives. By giving citizens the information needed to make these decisions, we can reverse the ever-growing waste stream and protect the environmental health of the six-county Twin Cities metro area. The SWMCB was formed in 1990 to increase the efficiency and environmental effectiveness of the region's solid waste management system. The SWMCB is proud to sponsor its current campaign, Rethink Recycling. For more information, visit www.RethinkRecycling.com.

Questions, Questions (and some answers!)



Our paint and adhesive supplier told us we could dry out our unused paints and adhesives by spreading them on cardboard. We weren't sure if this is legal or not. Can you advise us on what is legal and what is not? We don't want to get into trouble, so we could use your help before we do this.

You are right in being cautious with the directive your supplier gave you. Unfortunately, we encounter this problem too often and we are glad you checked into this before acting on the bad advice.

As a generator of hazardous waste, you are restricted in your options to manage your waste. Paints and adhesives often contain solvents that are hazardous for ignitability, having a flash point of 140° F or less, and, at times, ingredients that are neurotoxins or carcinogens. A material safety data sheet (MSDS) usually will provide enough detail for you to determine these characteristics.

For your health and safety, as well as legal requirements, you must accumulate the waste paint and adhesives in closed containers, labeled with the words “Hazardous Waste”, a descriptive name and the date you began accumulating this waste in the container. When shipped off-site, these types of wastes are typically managed by the hazardous waste facility by either recycling the solvents and paints or burning them for energy recovery.

For more information, you can go to the Minnesota Pollution Control Agency's web site at <http://www.pca.state.mn.us/index.php> and read a fact sheet on handling paints or contact our office for assistance in learning about the hazards associated with your waste and what your options are for managing this waste.



Saint Paul – Ramsey County Public Health
 Environmental Health Section
 2785 White Bear Ave., Suite 350
 Maplewood, MN 55109-1186

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Environmental Health staff conduct solid and hazardous waste inspections, provide technical assistance, outreach and training to Ramsey County businesses.

Larry Carlson, Program Supervisor
 651.266.1180 | larry.carlson@co.ramsey.mn.us

Karen Reilly, Solid & Hazardous Waste Business Assistance and Training
 651.266.1186 | karen.reilly@co.ramsey.mn.us

Paul Gelbmann, Hazardous Waste Facilities
 651.266.1183 | paul.gelbmann@co.ramsey.mn.us

Paul Gelbmann / Greg LaMere, Solid Waste Transfer Stations
 651.266.1183 | paul.gelbmann@co.ramsey.mn.us
 651.266.1184 | greg.lamere@co.ramsey.mn.us

Joe Wozniak, Solid Waste Haulers
 651.266.1187 | joe.wozniak@co.ramsey.mn.us

More Information?

Phone: 651.266.1199 | Fax: 651.266.1177
www.co.ramsey.mn.us/ph

Comments on the newsletter?

Karen Reilly | 651.266.1186
karen.reilly@co.ramsey.mn.us

HAZARDOUS WASTE INSPECTION STAFF & AREAS COVERED

Aaron Chavez
 651.266.1182 | aaron.chavez@co.ramsey.mn.us
 55101, 55103, 55104, 55106, 55130, 55155 and Ramsey County hospitals

Paul Gelbmann
 651.266.1183 | paul.gelbmann@co.ramsey.mn.us
 55107, 55114, 55116, 55119, 55126, 55144 and Ramsey County auto salvage / scrap yards

Greg LaMere
 651.266.1184 | greg.lamere@co.ramsey.mn.us
 55109, 55117, 55127 and pre-demo inspections

Laura Piotrowski
 651.266.1185 | laura.piotrowski@co.ramsey.mn.us
 55112, 55113, 55421, 55449 and the Self-Audit program

Michael Reed
 651.266.1181 | michael.reed@co.ramsey.mn.us
 55102, 55105, 55108, 55110, 55414, 55432 and pre-demo inspections