



**RAMSEY
COUNTY**

Saint Paul –
Ramsey County
Public Health

Fall 2016



The HazWaste Quarterly

Attention to Detail Saves Your Business Money!

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Providing useful
information
to businesses
licensed as
hazardous
waste
generators by
Ramsey County
Environmental
Health

Company environmental health & safety managers wear many hats, being a licensed hazardous waste generator is just one of them.

Keeping track of all the licensing details can be tough, but businesses that are currently licensed by Ramsey County for hazardous waste generation are "prompted" by receiving a Hazardous Waste Annual Report/License Renewal packet (annual report) near the end of December. A completed annual report postmarked by January 31st is considered on time. The majority of businesses licensed by Ramsey County submit their annual report on time. But, what happens when they don't?

Missing the deadline – what are the consequences

What happens to the small percentage of businesses that fail to return their annual reports by January 31st? A Notice of Violation (NOV) is sent to these companies. As the NOV explains, the company is in violation of the Ramsey County Hazardous Waste Management Ordinance for failure to submit a license application. The late annual report is now subject to a 10% late report penalty and is due in 10 days. In addition, the absence of the annual report may prompt a hazardous waste inspector to perform a site visit. The majority of the companies that missed the deadline and are issued an NOV, return their annual report within the 10 day deadline. Companies that fail to respond to the NOV can receive a citation, which comes with a \$1000 fine.

Payment of the invoice – the next step

Based upon the information you provide in your annual report, an invoice for your hazardous waste license is sent. Payment is due 30 days from date of invoice. Timely payment is a critical step in the process of issuing your hazardous waste license for the upcoming license year.

Companies that either do not remit the license fee on time or only make a partial payment are sent a follow-up letter and assessed a 25% late payment penalty. Payment of the original invoice amount plus the penalty is due upon receipt of the follow-up letter. There is also a risk that the current hazardous waste license will expire before the new one can be processed and issued.

License expiration – a costly lapse

Any business with an expired license that has ongoing hazardous waste generation, storage, and disposal activities is in direct violation of the Ramsey County Hazardous Waste Management Ordinance, as well as State and Federal environmental rules and regulations.

Companies who are operating without a license are referred to the Ramsey County Attorney's Office for collection of the license fee, including any late payment or penalties. If the

fees are not paid, the business could be issued a citation for operating without a license, a \$1,000 fine.

Independent of the citation, the business is still required to obtain a hazardous waste license. This involves completing a Hazardous Waste Generator License Application packet, paying an application fee and any outstanding late penalties and license fees.

Saving your business time and money can be simple!

Complete and submit your annual report on time. Pay your license fee within 30 days. That way you will avoid not only expensive fines, but additional application fees as well. It's time and money wisely spent.



Simple, Easy, Convenient - Ramsey County's VSQG Collection Program

Our Very Small Quantity Generator (VSQG) collection program is all that - and more!

Started in 2013, the program allows a VSQG to transport their hazardous waste in their company vehicle to the collection program, bypassing the use of a licensed hazardous waste transporter - saving them \$\$.



Who, what, where, when

To date, 189 companies have used the site; ranging from automotive shops, golf courses, medical facilities and distributors to churches, schools, museums, and retail stores. They delivered 80,054 pounds of waste, averaging 423 pounds per company. By weight, the top three wastes delivered in 2015 were latex paint (7,255 #), oil-based paint (5,505#), and ignitable solvents (4,199#). The average cost to the business is \$179.88 - remember, costs are dependent on the type of waste you drop off.

Some caveats

- First, call 763.647.8018 or 651.291.0456 for acceptance criteria, hours of operation, and acceptable wastes.
- Businesses must be located in Ramsey County and licensed as a VSQG.
- Bay West, our contracted vendor, runs the collection program at 5 Empire Drive, St. Paul, MN.



Take Advantage of a Great Opportunity - On-site Hazardous Waste Compliance Training

Ramsey County staff wants to help your business meet its hazardous waste training requirements. Working with your staff, we'll develop a program that's been customized for your site, your wastes, your training needs. And, we'll present the training to your employees at a time and place that's convenient for you! We can cover a range of topics from "What makes my waste hazardous?" to "Manifest shipments of hazardous waste", from "Storing hazardous waste on-site" to "What can I expect from a hazardous waste inspection?" Contact Karen Reilly at 651.266.1186 or karen.reilly@co.ramsey.mn.us to schedule your training today.



Self-Audit Reports to be Mailed in October

The self-audit program: a successful change in regulatory procedure

The self-audit program is an alternative regulatory program for some relatively low-risk hazardous waste generators. By filling out the self-audit report, dentists, chiropractors and photo finishers are guided through the proper management of their hazardous wastes and reminded of the procedures to be followed that will ensure compliance. While the program is a success for most of the county's self-audit generators, a major problem occurs for companies who do NOT complete or return their reports by the deadline.

Complete and return your report by the November 15th deadline

Failing to do so violates the Ramsey County Hazardous Waste Management Ordinance. Non-compliance with this reporting requirement may result in a referral to the County Attorney's office for possible legal action.



Additionally, your company could be removed from the self-audit program and reinstated into the hazardous waste regulatory program, resulting in more frequent inspections and more regulatory scrutiny.

So, if you miss the deadline, what could this mean for your business?

In addition to legal action, you will:

- Be required to complete an annual report form;
- Pay an increased fee based on the volume of hazardous waste generated (not a flat fee); and
- Be subject to routine compliance inspections.

Avoid hassles!

Complete and return your report by the deadline. Call Laura Piotrowski at 651.266.1185 with any questions.

RAM/SWANA Second Annual Hazardous Waste Pre-Conference Session

The Recycling Association of MN (RAM) and the MN Chapter of the Solid Waste Association of North America (SWANA) are hosting the 2nd Annual Hazardous Waste pre conference session on Wednesday, October 5, 2016 at the DoubleTree Hotel in Bloomington. You do not need to be a member to register. A variety of industry experts on hazardous materials and hazardous waste will present on:

- Chemical incompatibility
- Emergency spill response
- Reducing long term liability through hazardous waste facility audits
- Identifying non hazardous parts washer solvent alternatives
- Identifying and removing hazardous building materials prior to demolition
- The evolving green dry cleaning industry
- MN law enforcement's partnership with 3M to dispose of controlled substances and pharmaceuticals
- Business technical assistance resources, and
- MN Pollution Control Agency's regulatory updates



Additional conference and registration information can be found at:

<http://recycleminnesota.org/news-events/ram-swana-annual-conference-show/>. Click on "Hazardous Waste Pre Conference Agenda".

Questions, Questions (and some answers!)

During our last environmental training, staff asked for a clear understanding and a straight forward procedure for handling spills of chemicals. Currently, we do not have an up-to-date spill plan but would like to put one together ASAP. We weren't sure which direction to turn for resources. Can you help us out?



Many resources are available to help you better understand spill prevention and response. Our office stresses spill prevention first. Practicing spill prevention can often end up minimizing the severity of spill, keeping your work environment safer.

We cannot write a plan for you but we can provide resources to support your efforts. Ramsey County offers on-site hazardous waste compliance training free-of-charge to licensed hazardous waste generators; this training could include requirements for preventing and handling spills.

Another possibility is to contract with a consultant to write your spill response plans and policies. Choosing to research the topic on your own prior to selecting a consultant may help you build a better understanding of the requirements as you proceed. Who knows, you might decide to write your own spill prevention and response plan.

The Minnesota Pollution Control Agency (MPCA) has fact sheets available that provide information on writing a spill prevention and response plan; the web locations are listed below. The fact sheets are based on your generator size; for assistance in determining your size, go to www.pca.state.mn.us/sites/default/files/w-hw1-02.pdf

- Very Small Quantity Generators (VSQG): www.pca.state.mn.us/sites/default/files/w-hw1-08a.pdf
- Small Quantity Generators (SQG): www.pca.state.mn.us/sites/default/files/w-hw1-08b.pdf
- Large Quantity Generators (LQG): www.pca.state.mn.us/sites/default/files/w-hw1-08c.pdf

Good luck in putting together your plan. Please contact your county inspector if you need further assistance.

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

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More information?

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www.ramseycounty.us/business/recycling-waste/hazardous-waste



Comments on the newsletter?

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