



**RAMSEY
COUNTY**

Saint Paul –
Ramsey County
Public Health

Spring 2016



The HazWaste Quarterly

Common violations and ways to prevent them

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

Violations cited during a hazardous waste inspection fall into two categories: paperwork and waste management. Here are the seven top waste handling violations - what they are and tips to prevent them.

1. Containers of waste are not closed.

Open containers top the list of waste handling violations. Containers of hazardous waste must be kept closed, except when you are adding or removing waste. Closed containers prevent waste evaporation - a health and safety issue - and control spills should the container tip.

TIP: Allow employees to help select the type of closure devices that will work best for them (i.e. safety funnels, open head drums or regular bungs). Doing so ensures that the closure device is practical and useful for their daily work.

2. Containers or tanks of waste are not labeled with the words "Hazardous Waste".

3. Containers or tanks of waste are not labeled with a clear descriptive name.

4. Fill pipes of underground tanks are not labeled with the words "Hazardous Waste."

5. Fill pipes of underground storage tanks are not labeled with a clear descriptive name.

Labeling violations account for four out of seven commonly cited violations. Hazardous waste containers must be labeled with the words "Hazardous Waste", a clear descriptive name and (with very few exceptions) a start date of waste accumulation. Ensure that labeling clearly identifies the container's contents for employees and emergency responders.

TIP: For your most common waste streams, try creating a sample hazardous waste label for your employees to use as a template.

TIP: Don't place labels directly under the bung; this will reduce the chances of spilling on the label.

TIP: Protect your labels by placing them in a plastic pouch or covering them with clear tape so they remain legible.

6. Containers or tanks of waste are not stored on a curbed, impermeable surface.

All liquid hazardous waste must be stored on a curbed, impermeable surface. Impermeable means floors are sealed or free of cracks, floor drains are covered or collared. Curbing provides secondary containment for your waste should the container leak or spill.

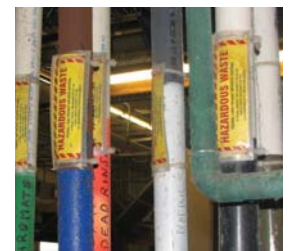
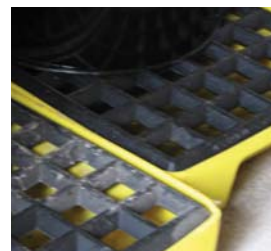
TIP: Discuss different storage options with employees who work in the area. They often have the best ideas and will know what is a workable solution. Asking for employee input creates a sense of ownership in the process and the solution.

TIP: Make your storage area easy to use by having sufficient aisle space and labeled areas for storage. Easy access will make waste management simpler for your employees.

7. Lack of a communication device in the waste storage area.

This requirement is designed to protect worker safety. Accidents happen; spills and leaks occur. Employees working in this area may need to get help quickly.

TIP: Simple solutions do exist. In a small shop, a person's voice is sufficient. Remote storage areas or larger facilities have different needs. The "buddy system", a walkie-talkie, or an air horn are some solutions to this requirement.



2015 - by the numbers

Here's the major activities the Solid and Hazardous Waste Compliance Program performed during 2015.

- Reviewed and issued annual licenses for 1,860 hazardous waste generators, 14 hazardous waste facilities and 8 solid waste facilities.
- Performed 291 reviews of self-audit hazardous waste generators' license applications.
- Conducted 1509 solid and hazardous waste inspections, including the following types:
 - 1,086 routine compliance inspections;
 - 47 follow-up inspections;
 - 35 complaint inspections;
 - 117 site closure inspections;
 - 65 targeting inspections;
 - 155 pre-demolition inspections; and
 - 4 enforcement inspections.
- Issued 17 Letters of Warning (LOW), 14 Notices of Violation (NOV), and took 31 other enforcement actions for non-compliance.
- Provided technical assistance through 2,207 phone consultations and 130 site visits.
- Conducted 25 training sessions, reaching 870 people.

Ramsey County's new website - www.ramseycounty.us - has launched.

Featuring an improved responsive design and navigation for desktop, tablets and mobile devices

An event calendar, robust site search, expanded interactive mapping and streamlined online job application portal are among the new features. All content has been updated to provide a contemporary and accessible online user experience aligned with plain language guidelines.

Need a guided tour?

Watch the 90 second video on the Ramsey County YouTube site at <https://www.youtube.com/watch?v=bZbf93eLzXQ>.

Accessibility and usability

Last fall, a site prototype was tested by a range of people - including the visually impaired - who live or work in Ramsey County. Feedback from these focus groups was incorporated into the final site design. Visitors are encouraged to comment via the website feedback form.

Celebrate Earth Day...every day!

Since 1970, Americans have celebrated April 22 as Earth Day, a day to reflect on the accomplishments made to protect the environment and renew our commitment to the continuation of that progress.

How it began

U.S. Senator Gaylord Nelson proposed the first Earth Day with the objective of organizing a national demonstration of concern for the environment so large that it would shake up the political establishment and force this issue onto the national agenda. Remember, at that time, most cars were V-8s using leaded gas, regulations on air, water or waste were nonexistent and the term "environmentalist" was virtually unheard of. Earth Day 1970 changed all of that; 20 million Americans participated in a demonstration calling for a healthy, sustainable environment. Visit the Environmental Protection Agency's (EPA) website at www.epa.gov/earthday/history.htm to see a time line of environmental achievements.



At work: what you can do

Individual efforts can make a difference. Make a commitment to try at least one of these earth-friendly ideas this year:

- Reduce energy use by turning off your computer, monitor, printer, copy machine or lights when not in use. Learn more about "phantom loads" at www.standby.lbl.gov.
- Set your default to double-sided printing to reduce paper usage and only print when necessary.
- Buy recycled content office supplies, like copy paper, envelopes or file folders. Reuse or recycle them when you're done.
- Recycle fluorescent lamps to prevent mercury from entering the environment.
- Host a green meeting with reusable plates, utensils, and cups. Encourage carpooling, when possible.

What's your environmental footprint?

Calculate it at www.earthday.org/footprint-calculator.

Free energy assessments for small businesses and institutions

Are your facility's furnace, door seals, recycling program, and lighting working at their best? If you answered 'I don't know', consider contacting the Minnesota Retiree Environmental Technical Assistance Program (RETAP).

RETAP provides free energy, water, and waste reduction assessments to small businesses and institutions throughout Minnesota, using an experienced team of retired professionals to:

- Analyze your utility bills,
- Visit your facility or interview someone knowledgeable about the building systems, and



- Create a customized report with prioritized recommendations and estimated financial and environmental savings.

Recommendations may include behavior changes, maintenance improvements, or retrofits. While you are under no obligation to implement recommendations, a high percentage of surveyed clients implement many of them. Average savings from RETAP recommendations implemented last year was over \$4,000 per client.

Since RETAP's start in 2001, over 350 businesses and institutions – including retail stores, churches, small manufacturers, and public buildings – have benefited from RETAP's free assessments. To find out more or to request an assessment, visit www.pca.state.mn.us/retap or contact Mike Vennewitz, RETAP Coordinator, at 612.781.1307 or mvennewitz@yahoo.com.

CORRECTION

The sunset date for puncturing non-RCRA empty aerosol cans has been extended from July 1, 2016 to January 1, 2017. For more information on this issue, you can view the Minnesota Pollution Control Agency's (MPCA) fact sheet at www.pca.state.mn.us/sites/default/files/w-hw4-00.pdf.

Questions, questions (and some answers!)

Our small manufacturing business is closing the doors after nearly thirty years of doing business. We plan to sell what we can and clean up and discard the rest. What do we need to do to assure that we satisfy county hazardous waste regulations?



Ramsey County Hazardous Waste Management Ordinance, Section 5.01: Termination Of Licensed Operation, deals with your question.

Any person who, for any reason, terminates or ceases operations at a site must remove all hazardous waste and materials contaminated with hazardous waste prior to termination of operations. Termination of operations may include the sale of an operation to a new entity, a business which dissolves or otherwise ceases to operate, or the relinquishing of a lease or rental rights to a property. ... Materials remaining on the site of a terminated operation shall be considered waste materials.

Simply put, you must remove all hazardous waste (including used oil and related wastes) and all hazardous products before you leave the site. Hazardous wastes must go to a site that is permitted or licensed to receive them. You cannot take your hazardous waste with you to your new site. Keep all manifests, shipping receipts and bills of lading to verify shipment.

Prior to closing, limit the number of products being purchased; use up what you can. For products left over, we can help you connect your unwanted, unused products to a business that can use them.

If products are included as part of the property sale, get a written agreement from the purchaser that describes exactly what they will take. If you are a property purchaser, insist on an agreement that describes acceptable site conditions prior to taking possession of the property.

Before leaving, call our office for a closure inspection, which documents site condition at the time of your departure. Call as early in the process as possible. The more time you allow, the more likely you are to find a home for the remaining products.

During the closure inspection, many companies will photograph or video tape the site. This documentation can prove valuable in case questions come up later about the property's condition. Follow the steps outlined above, to ensure your company minimizes its costs and risks and satisfies county regulations.

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



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