



RAMSEY COUNTY

Saint Paul –
Ramsey County
Public Health

Winter 2015



The HazWaste Quarterly

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

Winter is here - once again!

Time to think about getting the family together, picking out those special gifts, and filling out your Ramsey County Hazardous Waste Annual Report/License Renewal Application (annual report).



Your annual report will be mailed in late December and must be completed and postmarked by January 31, 2016. If postmarked after this date, you will receive a late report penalty, equal to 10% of your total license fee.

Before submitting your report, carefully review it to ensure it's complete. If you have any questions, call your inspector; their name and phone number are at the bottom of the annual report. Make a copy for your records. This will be useful if we call you with questions.

Your annual report undergoes two reviews.

The initial review checks for the following items:

- Has the form been signed?
- Have numerical values been entered in Column C – Waste Generated in 2015?
- Has the (green) Certificate of Compliance form been submitted?

If any of these are missing, the report is immediately returned along with a letter noting the problem. Your report is not logged as "received" and the January 31, 2016 due date still applies. If the resubmitted, completed form is not postmarked by the due date, the late report penalty will be assessed. After passing the initial review, the report is logged in as received and is given to your hazardous waste inspector for the final review.

What does your inspector look for?

The first item reviewed is the business information at the top of the form. Have you changed owners or locations? If so, a new generator license application must be filled out. If not, the inspector's review will continue.

Here are some common problems and ways to avoid them. If your inspector finds any of these, they will call or visit you to correct them.

Not providing numerical values for Column C – Waste Generated. The number provided must be the actual amount of waste that was generated in 2015, which may differ from the volume shipped. Don't leave it blank or write "same as last year". Report accurately and have logs, receipts, or other records to back it up.

Not circling "gal" or "lbs". Choose the unit of measure by circling either gallons (gal) or pounds (lbs). Some common conversions are included on our instruction sheet.

Not providing any information in Column D – Transporter Name and HW ID# or Column E – Facility Name/Address and HW ID#. Supply this information for all hazardous waste transporters or facilities you used. Wastes shipped on a bill of lading or waste tracking invoice are generally exempt from this requirement.

Providing HW ID#s that do not match the Transporter or Facility. Ensure that the HW ID#s are correct. This information can be found on your hazardous waste manifest or by contacting the companies used.

Not providing any information in Column F – Management or Disposal Method. Indicate what method was used for each waste; the instruction sheet has a list.

Not providing numerical values in Column G – Waste On Site. Provide the actual amount of waste remaining on-site at the end of 2015. This information will be useful to you next year when completing your annual report.

Not completing the (green) Certificate of Compliance Form. This form is required to be completed and submitted annually.

Remember, to be considered "on time", the signed, completed annual report must be postmarked no later than January 31, 2016. Call your inspector with any questions!

Do you generate waste aerosols or have an aerosol puncturing device?

Revised requirements

Most businesses have this type of waste and will need to understand the revised Minnesota requirements for waste aerosol containers. Beginning July 2016, you will only be allowed to puncture RCRA-empty aerosol cans; RCRA-empty means the aerosol contains no hazardous waste contents or propellants.

Why the change?

For many years, the Minnesota Pollution Control Agency (MPCA) allowed generators to puncture waste aerosol cans, even though it was prohibited under Hazardous Waste Rules. More stringent air quality goals and updated options for aerosol waste disposal drove the MPCA to stop this practice. Going forward, to make it easier for businesses to dispose of waste aerosols that aren't RCRA-empty, the MPCA will allow these wastes to be managed as universal wastes. The MPCA is currently updating the fact sheet to outline these changes and it should be available soon.

Questions?

Please contact your Ramsey County inspector, their phone numbers and emails are on the back page



Have you heard? Applying for, modifying and inactivating HW ID#s is now available on-line.

You can now submit the Notification of Regulated Waste Activity by completing the e-service notification on the Minnesota Pollution Control Agency's (MPCA) website at <https://rsp.pca.state.mn.us>. Don't have access to the internet? Contact the MPCA at 651.296.6300 to request a paper copy. Paper copies may experience longer processing times.



Digital Health department

Times are changing and so are we

If Ramsey County has inspected your business in the last couple of months you may have noticed something different. As of July, we transitioned to using a laptop computer and a digital inspection report. In the past, you would have received a carbon copy report with hand written orders or comments after an inspection. Going forward, you will continue to receive a report, but instead of the difficult to read carbon copy, we will email you a copy of the digital inspection report. The content and format of our inspections will remain the same - the only thing changing is the look of the inspection report form.



The reason for the change

You may be wondering why we are changing our process after decades of doing it the same way. One reason is the significant cost savings associated with reducing our consumption of paper. It also fits the county's initiative to reduce the amount of paper we use in the course of conducting our work. And, it will significantly standardize both the look and the content of an inspection report. Our goal is to have your inspection report look the same regardless of the inspector.

Tell us what you think

Hopefully this is another step toward streamlining and solidifying our working relationship with Ramsey County businesses. Feel free to contact your inspector with questions you may have regarding the process.

Rags, paints, inks and solvents... What do these all have in common?

Generated by many industries, some may be hazardous and some may not. Are yours?

Take this opportunity, as you fill out your annual report, to really review your wastes. Has anything in your operation changed – processes or products – since you were first licensed that would have an effect on the waste you produce? Review the waste codes associated with your wastes to ensure that they accurately reflect the hazard.

Relics from the past

Over the years, formulations for various products have changed. Paints and inks are a good example of this. Many of these products used heavy metals, like lead or cadmium, for pigments. They were a toxic hazardous waste; the waste codes for the heavy metals run from D004 to D011. The industry has evolved over time, eliminating a lot of the heavy metal use. It may be worth investigating; you may no longer be generating a hazardous waste.



Solvents used on rags are another situation worth examining. It was common practice, in the past, to use “F listed” solvents – chemicals like toluene or benzene.

When discarded, the rag became an “F listed” hazardous waste. Has your solvent use changed? Check into it, your rags may not be “listed” anymore, maybe not even hazardous!

Re-evaluate

Even if these specific examples don't apply to your situation, it's a good idea to review your wastes. This simple practice could end up saving you money: in disposal costs, license fees and personnel expenditures. Feel free to give us a call for assistance in re-evaluating your wastes.

Questions, questions (and some answers!)

Our business generates a solvent waste that we accumulate in a 55 gallon drum, shipping a couple of these drums each year. When we fill out the Hazardous Waste License Renewal Application and Annual Report form, our inspector asked us to report the amount generated, not the amount shipped. What's the difference?



The Annual Report and License Renewal (annual report) form helps county staff understand how much hazardous waste is produced each year. It also tells us who is shipping and managing the wastes and how they are being managed. Keeping track of your waste stream volumes and management throughout the year makes completing your annual report much easier.

Create a list of the wastes your company generates for your reference, re-checking it periodically to make sure all wastes, even the new ones, are accounted for. Note on your list which wastes are fully regulated hazardous wastes, which are exempted hazardous waste and which are simply industrial wastes.

The amount of hazardous waste your company produces and ships in a year might be the same but often they are not. You may have started the year with waste remaining onsite from last year's generation or ended the year not having shipped all the waste you produce.

For example, on January 1, you had 30 gallons of solvent waste left onsite from last year's generation. Throughout the year, you generate another 80 gallons and you made two shipments of 50 gallons (equaling 100 gallons), leaving you with 10 gallons on site.

The following formula and table will help you figure out the "amount generated" each year: $[amount\ of\ the\ waste\ shipped\ during\ the\ year] + [amount\ of\ the\ waste\ stored\ at\ the\ end\ of\ the\ year] - [amount\ of\ waste\ on\ site\ at\ the\ beginning\ of\ the\ year] = [amount\ generated]$.

$$100\ gals + 10\ gals - 30\ gals = 80\ gals\ generated.$$

Another example are companies who use solvent in a parts washing device. This waste is picked up for shipment right from the parts washer and the waste solvent is not stored on site. So, in this example, the amount generated is equal to the amount shipped.

Waste Name	Amount shipped/calendar year	Amount stored/end of year	Amount onsite/1st of year (subtract this volume)	Amount generated (report this amount)
Solvent	100	10	30	80
Parts washer	32	0	0	32

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TWIN CITIES MN
PERMIT NO. 7407



Printed on
100% recycled paper

*Environmental Health staff conduct solid and hazardous waste inspections,
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More information?

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www.co.ramsey.mn.us/ph/hw/business_waste_assistance_program.htm



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