

# The HazWaste Quarterly

Fall 2018



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## Attention Self-Audit Generators (aka dentists and chiropractors)!

You will no longer be receiving your self-audit report in October. Watch for the report in January; it's due date is January 31. This change improves efficiencies in processing the report, to ensure your license is issued before the May 1 expiration date.

## Emergency Planning and Response

**Most businesses never intend to have a release of their hazardous waste or materials, but accidents happen.**

Planning and being prepared are two of the best forms of prevention and help decrease your chances of a release. Emergency response requirements are based on your hazardous waste generator size. The larger your generator size, the more involved the requirements.

- Large Quantity Generators (LQG) - waste volumes are greater than or equal to 1000 kg/month (~ 2200 lbs. or 220 gallon).
- Small Quantity Generators (SQG) - waste volumes are between 100 and 1000 kg/month (220 lbs. to 2200 lbs. or 22 gallons to 220 gallons).
- Very Small Quantity Generator (VSQG) - waste volumes are less than or equal to 100 kg/month (~ 220 lbs. or 22 gallons).

The following requirements apply to *all* hazardous waste generators.

### **Set up procedures that minimize the possibility of accidents or releases.**

Store your hazardous waste containers to prevent accidental damage. Keep your containers closed, unless adding or removing waste. Ensure that there is adequate aisle space in the storage area to conduct weekly container inspections. Plug or seal floor drains to contain releases.

### **Have the following emergency equipment readily available.**

- An internal communication system capable of alerting personnel. If

work is done in a "closed door" storage area, immediate access to a communication device is required.

- A telephone to contact emergency responders.
- Spill response equipment.
- Decontamination equipment.
- Fire control equipment.
- Water supply of adequate volume and pressure to meet fire protection needs.



### **Maintain and test your emergency equipment to ensure proper operation.**

Keep fire protection equipment operational at

all times. Inspect alarms and sprinkler systems annually. Maintain basic spill recovery equipment and check on it periodically to ensure its availability.

### **Provide enough aisle space in your storage area to allow for easy access to the containers and evacuation of personnel.**

Doors leading outside should not be locked in a way that requires keys or special knowledge to open them. During an emergency, employees may need to leave quickly.

### **Plan for emergencies.**

When planning for a chemical spill response, determine what type of spill can be handled routinely and what type would require an emergency response.

**Article continued on page 2**

## Emergency Planning

Continued from page 1

Train your workers in spill cleanup procedures for routine chemical spills, being aware of their spill recovery capabilities and limitations. Typically, smaller companies do not maintain an in-house spill response team. In these companies, emergency plans will likely involve evacuating workers and calling for outside assistance.

The following requirements apply to SQGs and LQGs.

### **SQGs must post emergency information.**

Next to every emergency telephone, post the emergency coordinator's name and phone number, the fire department's phone number and the location of your emergency response equipment. While this is only required for SQGs, we recommend that all businesses use a phone posting.

### **SQGs and LQGs must appoint an emergency coordinator.**

The emergency coordinator needs to be on site or on call and is responsible for responding to an emergency. Have an alternate or back up for this position.

### **SQGs and LQGs have training requirements that must be documented.**

Train your employees so they are familiar with the hazardous waste and emergency response requirements to help ensure compliance. Even though training isn't required for VSQGs, employees should be familiar enough with waste handling and emergency response procedures to maintain compliance.

### **More information.**

Check out the Minnesota Pollution Control Agency's (MPCA) fact sheets.

## RAM/SWANA Fall Conference



### **Hazardous waste pre-conference**

As part of the annual RAM/SWANA Solid Waste & Recycling Fall conference, the 4th annual hazardous waste pre-conference workshop will be held on Monday, October 15, 2018 at the Minneapolis Marriott Northwest. Join colleagues who are responsible for hazardous waste compliance; visit with hazardous waste vendors, local and state regulatory staff.

### **Session highlights**

This year's agenda includes topics on:

- Evaluation of pharmaceutical wastes.
- Hazardous waste treatment technologies for metal treaters and platers.
- Precious metals recovery technologies.
- Safety risk management.
- Regulatory compliance and safety: a refinery perspective.
- Hazardous waste compliance resources & guidance.
- Tour of Hennepin County recycling & transfer station.

For more details including registration information, visit [recycleminnesota.org](http://recycleminnesota.org).

## We're going electronic!

### **An e-newsletter in 2019**

For quite some time now, we've been collecting email addresses from businesses with the intent of doing most of our communications electronically. As part of this effort, the HazWaste Quarterly will be moving to an e-newsletter in 2019. We are hoping that this streamlined format will fit easily into your busy work day and continue to be a resource that you read and trust.

### **For some, this won't be a change**

If you are already receiving the Quarterly through an email notification, you won't need to do anything. If you are still receiving a printed copy and have an email address, contact us to update our records.

### **No email address?**

To continue receiving the HazWaste Quarterly, you will need to set up an email address for your business. If you're not sure how to do that, ask us. We'd be glad to help!

## Electronic Manifesting Tracking System

### Launched June 2018

The Environmental Protection Agency (EPA) established a national system for tracking hazardous waste shipments electronically. Known as e-Manifest, it modernizes the nation's cradle-to-grave hazardous waste tracking process while saving valuable time, money and resources for industry and states. Launched on June 30, 2018, generators, transporters, and receiving facilities now have the option of using e-manifests. For the first time, there will be a single hub for one-stop reporting of manifest data to EPA and the states.



### E-manifest user fees

Facilities receiving manifested waste must submit all manifests, paper or electronic, to the EPA's e-Manifest system. Receiving facilities pay a fee based on how the manifest is submitted. These fees pay for the costs for developing and operating the national e-Manifest system.

### User fees from June 30, 2018, through September 30, 2019

- Mailed paper manifest: \$15.00.
- Scanned image: \$10.00.
- Data + image: \$6.50.
- Electronic: \$5.00.

### E-manifest user registration now open

Instructions on how to register for different permissions to view, create, and/or sign manifests electronically can be found at [epa.gov](http://epa.gov). For more information, call (toll-free) 833-501-6826 or contact the helpdesk.

Information sourced from [epa.gov](http://epa.gov).

### Benefits of the e-manifest

- Cost savings.
- Accurate, timely information on waste shipments.
- Rapid notification of discrepancies or other problems with a particular shipment.
- A single hub for one-stop reporting of manifest data.
- Potential for integration with Resource Conservation and Recovery Act (RCRA) biennial reporting and other federal and state information systems.

## Questions, Questions (and some answers!)

### Our business is inspected by Ramsey County every couple of years. We understand that these inspections are unannounced but what can we do to prepare and help make the inspection go smoothly?

When your inspector arrives for a routine inspection, they will check for compliance with the county ordinance and the state hazardous waste regulations. In general, the inspector looks at how your organization approaches compliance with these regulations and, if appropriate, will offer ways to improve what you are currently doing. For most businesses, improvement means small changes and adjustments.

### Here are some items to focus on to ensure compliance

- Be sure your hazardous waste containers are closed before you or others walk away from them.
- Make sure that your containers remain in good condition - free of dents, breeches, rust and spillage.
- Provide a readable label with the words "hazardous waste" and clear, identifiable description of the waste.

- Clean up spills as they occur.
- Keep your records, such as shipping documents and training files, organized and available. Let others know the location of the records, just in case you are unavailable.

Checking on these items regularly will help your business be in compliance and ready for your next hazardous waste inspection.

### Your inspector is a resource for your business

They can provide you with information on ways to reduce waste generation, manage your waste efficiently and correctly and provide you with fact sheets and rule citations. Feel free to contact them with any questions that you might have.



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Inspection areas 55109 and 55117 are currently  
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