



RAMSEY COUNTY

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Ramsey County
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IN THIS ISSUE:

Waste Evaluations .. 1
& 2

Earth Day 2

Paint Stewardship
3

Aerosol
Correction..... 3

Your Questions
Answered..... 3

Contact Info 4

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

The HazWaste Quarterly

Evaluation? Hazardous Waste? What's That?

Minnesota's Hazardous Waste Rules require that businesses evaluate their wastes to determine if they are hazardous. Most likely you have heard the phrase "waste evaluation". No matter how familiar you are with the term, it can be confusing. What does it mean to evaluate your waste?

What is a waste?

Typically, a waste is something that you no longer need, want or use. It's contaminated or worn out. It's what you recycle, trash, sewer or otherwise dispose of.

When thinking about your wastes, remember to include ones that are managed by contracted services, like solvent recycling or rag laundering. It's your business that produced this waste by using the products.

Exempt wastes

Wastes are classified as non-hazardous, exempt or hazardous. The first step in an evaluation is to figure out if the waste is exempt from the Hazardous Waste Rules. If it is, your hazardous waste evaluation is complete! Remember, exempt wastes may still be regulated by another program. Among others, the following wastes are exempt:

- normal household refuse;
- non - household refuse (paper, cardboard, plastics);
- samples sent to a testing laboratory;
- recycled scrap metal;
- demolition debris;
- hazardous waste generated in tanks, pipelines or transport vehicles, until it leaves the unit;
- waste discharged to surface waters under a National Pollution Discharge Elimination System (NPDES) permit;
- mining overburden and certain wastes from processing ores;
- fly ash and related wastes from burning fossil fuel;
- waste from emergency spill cleanups approved by the Minnesota Pollution Control Agency (MPCA) commissioner;
- certain wastes containing chromium III.

So, your waste wasn't exempt. What's next? To complete your waste evaluation, you need to be able to answer the following questions.

Is it a listed waste? Does it appear on either the 'F', 'K', 'P', or 'U' list?

Is it a characteristic waste? Is your waste reactive, corrosive, ignitable, toxic, lethal or an oxidizer?

Does it contain more than 50 parts per million (ppm) PCBs?

Listed hazardous waste

Listed wastes are found on specific lists and are adopted from federal regulation by reference in the MN Rules 7045.0135. They are defined by the Rules to be hazardous wastes. Here are some common examples of listed wastes:

'F' listed wastes are from non-specific sources or processes. They are usually solvents or mixtures of solvents. They may be halogenated, like trichloroethylene or methylene chloride or non-halogenated, like toluene, methyl ethyl ketone or xylene. The Safety Data Sheet (SDS) provided with your product is a good place to start when looking for information about the types of solvents that are used as ingredients. Other sources of 'F' listed wastes include distillation bottoms, wastewaters, or spent baths and solutions.

'K' listed wastes are from specific processes such as wood preserving, petroleum refining, metal smelting, or the formulation of inks, pigments, chemicals and pharmaceuticals.

'P' and 'U' listed wastes are discarded, commercial chemical products, off-spec products, containers, and spill residues. 'P' listed wastes are considered acutely hazardous.

To view the complete lists on the MPCA's website, go to <https://www.pca.state.mn.us/waste/hazardous-waste-documents-and-forms>.



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

Gaylord Nelson, a U.S. senator from Wisconsin, 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-8's 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; on that day, 20 million Americans participated in a demonstration calling for a healthy, sustainable environment. A time line of the environmental achievements can be found at the Environmental Protection Agency's (EPA) website at www.epa.gov/history/epa-history-earth-day.



At work: what you can do

Individual efforts can make a difference. Make a commitment.

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 they aren't being used. Learn more about "phantom loads" at <http://standby.lbl.gov>.
- Recycle fluorescent lamps to prevent mercury from entering the environment.
- Buy recycled content office supplies, like copy paper, envelopes or file folders, and recycle them when you're done.
- Set your default to double-sided printing to reduce the amount of paper you use and only print when necessary.
- Host a green meeting by providing reusable plates, utensils, cups or silverware. Consider carpooling, when possible.

What's your environmental footprint?

Calculate it at <http://www.earthday.org/footprint-calculator>.

Evaluation? Hazardous Waste? What's That?

Continued from page 1

Keep in mind - with some limited exceptions - because a listed waste is defined as a hazardous waste anything that comes in contact with it (like a rag), or is derived from it (like a still bottom), or is mixed with it (like used oil) also becomes a hazardous waste.

Characteristic wastes

Next are the characteristic wastes, wastes that have a physical property that makes them hazardous. A complete definition of these can be found on the MPCA's website at <https://www.pca.state.mn.us/sites/default/files/w-hw2-04.pdf>.

Ignitable wastes are liquids that have a flashpoint of 140 degrees Fahrenheit or less or are solids that are capable of causing a fire under standard pressure and temperatures. Mineral spirits or paint thinners are good examples.

Oxidizing wastes contribute oxygen to a fire. They may be chemicals whose names begin with 'per', have 'ate' in it, or end with 'oxide'.

Corrosive wastes have a pH of ≤ 2 (strong acids) or ≥ 12.5 (strong bases). A common example is the sulfuric acid in a lead acid battery.

Reactive wastes react violently with air or water, release toxic vapors like sulfide or cyanide bearing wastes or are shock sensitive.

Lethal wastes, a Minnesota-only characteristic, have been found

through testing to cause death when ingested, inhaled or absorbed above specific levels. Unevaluated pharmaceuticals is an example.

Toxic wastes are shown to be hazardous by a laboratory test, known as the Toxicity Characteristic Leaching Procedure (TCLP). Under slightly acidic conditions, the waste releases metals, pesticides, or volatile organic compounds above certain limits.

Unlike listed wastes, items that either come into contact with, are derived from or are mixed with a characteristic wastes, must continue to exhibit the hazardous characteristic to be a considered a hazardous waste.

PCB wastes

The final category of waste contains PCBs above 50 parts per million. Examples include capacitors in older appliances, oil from older utility transformers and many old fluorescent lamp ballasts. Unless the ballasts are labeled as NOT containing PCBs, you need to test them or manage them as a hazardous waste.

We'll cover the resources you have on hand to evaluate your wastes in the next HazWaste Quarterly. Till then, keep in mind - non-hazardous doesn't necessarily mean **non-regulated**.

Got Paint? Who Doesn't?!?

Let's face it, most businesses have leftover paint - stored in basements, closets, shelves, any out of the way place.

In fact, the U.S. Environmental Protection Agency (EPA) estimates that about 10 % of all paint purchased in the US - both commercial and residential - goes unused, around 64 million gallons annually!



***What is architectural paint?**

Architectural paint includes items like interior and exterior latex, acrylic, water and oil-based paints, deck and flooring coatings, primers, sealers, undercoatings, stains, shellacs, and waterproofing and sealers for concrete, masonry or wood. It does not include automotive paints, aerosols, roof patch or tar, thinners, strippers or solvents.

How can your business participate?

PaintCare sites accept all brands of latex and oil-based paint. Containers must be five gallons or smaller, complete with lids and the original labels. All sites accept up to five gallons per visit, some accept more. Any business is eligible to use PaintCare to dispose of their latex or water-based paint.

To be eligible to dispose of oil-based or other hazardous waste paint, your business must:

- Be a Very Small Quantity Generator (VSQG), who generates ≤ 220 pounds of total hazardous waste per month.
- Have a Hazardous Waste Identification Number (HW or EPA ID) before you take your paint waste to a collection site.
- Keep disposal records for this waste. If you aren't given a receipt, record the date and volume of any hazardous waste paint you disposed of.

For a complete list of acceptable items, to find a collection site or learn more about the program, go to www.paintcare.org.



Aerosol Correction

The sunset date for puncturing non-RCRA empty aerosol cans has been extended to January 1, 2018. For more information on this issue, read 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!)

I just completed and returned our company's hazardous waste relicensing forms. I recently took over this position and this was my first time filling out these forms. To be honest, I found it very difficult. The preparation was the biggest challenge. In my former coworker's office, I had to track down the scattered recycling information and I felt lucky when I found it in various stacks. This is not something I want to repeat. Can you suggest a better way? How are other businesses preparing for relicensing?



Organizing your paperwork along the way

Your question speaks to an important, and often overlooked, part of the hazardous waste world - paperwork. Everybody who has the task of relicensing can save a lot of time and stress by creating a dedicated folder to hold your waste receipts and paperwork. It sounds simple but following through is the challenge.



Create a file for 2017 hazardous waste receipts

You will need to know all the wastes produced by your company. Make a list of them, starting with the ones on the annual report you just completed. Don't assume that your predecessor knew or reported all of your waste streams. Speak to coworkers in the areas where wastes

are produced to help identify any additional wastes. Look for "suspect" containers, labeled and unlabeled, and add them to your list, if needed. Note how much is already accumulated next to each waste name. This will be useful information for next year's relicensing.

Keeping track throughout the year

Now that you're satisfied that you have a good handle on the wastes produced at your company, keep track. Monitor volumes, at first weekly, then monthly, until you have a good sense of how much is produced. Figure out who at your company ships these wastes and let them know you need a copy of the shipping documents for your file. Relicensing next time should be much easier because you have broken up the task during the year. If you have questions, please contact your inspector for assistance.

