

The HazWaste Quarterly

Spring 2019



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Mark your calendars!

Your current hazardous waste generators license will expire on April 30. Contact your inspector with any questions.



Managing Your Hazardous Waste Containers

Hazardous waste generators are responsible for properly storing their waste containers. Improper storage can lead to a release, requiring a clean up - an expensive and inefficient use of resources.

The first step - waste reduction!

Think about what wastes you generate and how much time and money goes into its management. Reducing your waste means your company won't have to handle, store or dispose of it. Saving the costs associated with those activities makes waste reduction a smart first step.

Choosing your container.

Your hazardous waste containers must be sturdy and leak proof, with closure devices that will hold the waste if it is tipped over or dropped. Some things to consider:

- Is the container in good condition? This means no severe rust or dents that would weaken the containers' integrity.
- Is the container compatible with the waste? Ask your transporter or facility for a recommendation or use the Department of Transportation (DOT) Hazardous Materials table to make a selection.
- Does the closure device allow employees to easily add or remove waste? This helps ensure that the container is kept closed after use.

If possible, store the waste in the shipping container. This reduces the potential for spills during waste transfer.

Keeping your container closed.

You must keep your waste accumulation containers closed, unless you are adding or removing waste. Closure prevents waste evaporation – a health and safety issue – and controls spills should the container tip. This is an important but difficult job. In fact, open containers top the list of waste handling violations. Having employees help select the closure devices makes them easy, practical, and useful.

Marking your container correctly.

Your hazardous waste containers must have the words "Hazardous Waste", a clear description of the contents and, with few exceptions, a waste accumulation start date. You can use an accumulation or pre-transport label to

meet these requirements. Or, write this information on the container with paint or a permanent marker.

Used oil and universal wastes – a special labeling situation.

Used oil and related wastes are only required to have a clear description of the waste, such as used oil, used oil filters or used oil sorbents.

Universal wastes should be labeled as:

- Universal waste - type of waste, such as 'universal waste batteries';
- Waste - type of waste, such as 'waste thermometers'; or
- Used - type of waste, such as 'used lamps'.



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Websites Worth Watching

Ramsey County

Provides hazardous waste compliance information, waste management assistance and training opportunities.

BizRecycling

Offers solid waste recycling assistance, consultants, grants and the business recycling guide.

Minnesota Pollution Control Agency (MPCA)

Provides information on air, water and waste regulations that may impact your business.

Minnesota Technical Assistance Program (MnTAP)

Offers waste reduction, pollution prevention and technical assistance to Minnesota businesses.

Minnesota Materials Exchange

Connects businesses that have reusable materials to those who can use them.



Questions, Questions (and some answers!)

My hazardous waste inspector is requiring me to evaluate my waste, but I already have a waste profile. What's the difference? Does it matter?

Hazardous waste evaluations

Hazardous waste regulations require, that within 60 days of first generating a waste, you determine if it is hazardous. You can do this by using your knowledge of the products used and the waste generating process or through laboratory testing.

Soft vs. hard evaluations

Looking at a product's Safety Data Sheet (SDS), with its information about the chemical's make-up, can provide you with information on what might make this waste hazardous. This is a soft evaluation.

Sending your waste to a laboratory for testing its physical and chemical properties provides an exact measure of the waste's hazardous characteristics. This is a hard evaluation.

Waste profiles

A waste profile is an additional requirement for wastes that are shipped off site. It contains details specific to the waste, such as chemical composition, physical state, odor, and DOT shipping description. This information helps determine which facility can handle the waste and how it needs to be treated.

Company responsibility

Many companies find it helpful to hire a consultant or contractor to help evaluate or profile their wastes. Keep in mind though, that whoever you decide to hire, the evaluation and profile information remains your company's responsibility. The information must be correct or it can cause safety, environmental and regulatory problems.

Hazardous Waste Containers

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Storing your waste containers indoors.

Indoor storage consists of a permanent building with a roof and at least three walls that are attached to an impermeable floor. An impermeable floor does not react with the waste and has no cracks, drains, or sumps that would allow the waste to escape.

Follow these basic management requirements for indoor storage.

- Close and mark your container.
- Place containers, with the labels facing out for easy identification, in your storage area. Maintain adequate aisle space.
- Store all liquid hazardous waste on an impermeable surface.
- Separate any wastes that would be incompatible if mixed. Do this by using a dike, berm, or secondary containment.
- Do weekly inspections to document your container's condition.
- Don't exceed time or quantity storage limits.

Discuss different storage options with employees who work in the area to find a workable solution. Waste management is easier if you have sufficient aisle space, a designated storage area and emergency response equipment close by.

Storing your waste containers outdoors.

You must meet all the indoor storage requirements and these additional criteria:

1. Protect your storage area from unauthorized access, moisture, and inadvertent damage.
2. Liquid wastes must be stored on an curbed, impermeable surface with that will contain a release.
3. Ignitable wastes must be shaded to prevent heat buildup. Tarping may hold in the heat, causing expansion of the waste and a possible release.

Storage and accumulation limits for generators.

Your generator size determines the amount of waste your business can accumulate and the length of time you can store it. Here are the requirements.

Generator size per month	Accumulation limit	Storage time limit
Very Small Quantity Generator (VSQG) 220 lbs. or less	2200 lbs.	Indefinitely, until reaches 2200 lbs., then 180 days.
Small Quantity Generator (SQG) Between 220 lbs. and 2200 lbs.	6600 lbs.	180 days from the accumulation start date.
Large Quantity Generator (LQG) 2200 lbs. or more	No limit	90 days from the accumulation start date.

Welcome!



Please join us in welcoming Erin Wetzstein to the Solid and Hazardous Waste Compliance program.

Erin interned at the Metropolitan Council after graduation performing water sampling, flow measurements, data entry & analysis, and lake and wastewater treatment plant groundwater monitoring. Prior to that, she interned with the Minnesota Pollution Control Agency in the biological monitoring unit and served as a research assistant in college. She has a BS in conservation biology and sustainability with a minor in chemistry. Erin can be reached at 651-266-1184 or erin.wetzstein@ramseycounty.us.

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Inspectors | Assigned Areas

Aaron Chavez

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Inspection areas: 55101, 55103, 55104, 55106,
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Inspection areas 55109 and 55117 are currently
unassigned, call 651-266-1199 for assistance.

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