



RAMSEY COUNTY

Saint Paul – Ramsey County Public Health

Summer 2016



The HazWaste Quarterly

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

Common paperwork violations - where are the problems?

These are typical paperwork violations found on inspection and some tips to prevent them.

Hazardous waste license is not posted.

Not posting your hazardous waste license is a common violation. Your license is required to be posted in a public place at your business, commonly in the entry way.

TIP: Frame your license and post it where you have other important documents. Your hazardous waste license is valid from May 1st to April 30th every year. As soon as your new license arrives, replace the old one.

Weekly container inspection logs are not available for review.

Containers of hazardous waste are required to be inspected weekly and, with very few exceptions, that inspection must be documented. Look for illegible or incomplete labels, severely rusted, dented or leaking containers and ensure that there is adequate aisle space. Note any problems found and what was done to fix them. Keep these logs on site and available for three years.

Pretreatment unit inspection log for sewerer wastes is not available.

Conduct inspections of pretreatment units with enough frequency to identify issues before they become problems. Keep these logs on site for 3 years from the date of inspection. The log should include the inspector's name, the inspection date and any problems observed and actions taken to correct them.

TIP: By incorporating these inspections into other weekly activities, such as routine maintenance, you will make them a habit. Make documentation easy by using a calendar or a clipboard; make your own waste inspection log or request a copy of our version.

Waste manifests or recycling receipts are not available for inspections.

Fully one third of the paperwork violations deal with disposal or recycling records.

Manifests and recycling receipts must be kept on site and available for inspection for 3 years from the date of shipment.

Note the change

A change to the submittal of hazardous waste manifests has occurred and is discussed on page 2. Briefly, Ramsey County businesses are no longer required to submit manifests to either the Minnesota Pollution Control Agency (MPCA) or the Very Small Quantity Generator (VSQG) manifest program. Currently, there is no federal regulation that requires manifests be submitted to the US Environmental Protection Agency (EPA).

TIP: Organization makes the job easier. Establish a routine and keep up with it.

Contingency plan is not updated (LQG).

Large Quantity Generators (LQG) are required to have an up-to-date contingency plan. This plan is a

written document that describes the available equipment, procedures, lines of authority and the arrangements that have been made with emergency responders.

TIP: Review your contingency plan annually. Or, review and revise your contingency plan whenever you have implemented the plan and it didn't work or had a change in personnel, equipment or facility. While updating a contingency plan can be a daunting task, if you break it down into small pieces, it's easier to accomplish. The MPCA has a fact sheet available that lists the plan requirements and includes several examples.



Changes to hazardous waste manifest submittal requirements

Ramsey County hazardous waste generators of any size

As of April 30, 2016, your business is not required to submit copies of the manifest to either the Minnesota Pollution Control Agency (MPCA) or the Very Small Quantity Generator (VSQG) manifest program. This includes the initial or two signature copy and the final or three signature copy. Currently, there is no federal regulation that requires submittal of the manifest to the US Environmental Protection Agency (EPA).

All other requirements still apply

This is the only change to the manifest requirements. Your business will still need to:

- Ensure the manifest is properly completed.
- Track the status of your waste shipment by ensuring it reached its final destination within 35 days; check with the transporter and facility, if you haven't received the final copy of the manifest within this time frame.
- File an exception report with the MPCA, if you don't receive the final copy of the manifest within 45 days.
- Maintain the manifest copies on site and available for inspection for at least three years from the date of shipment.



Working out the kinks...

We're using a new database, the digital health department – to do inspections, enter annual reports, and generate hazardous waste invoices and licenses. Not only are we learning a new system, we've had some significant issues to work out, which delayed the annual report mailing and the invoice and license renewal process. We are actively working with the database system developer to get these issues corrected and functioning properly. If you are reading this and haven't received your license renewal packet, invoice or your 2016 -2017 hazardous waste generator license, please call your inspector. We appreciate your patience!



Common paperwork violations

Continued from page 1

Telephone posting is absent or not updated (SQG).

The telephone posting is a requirement that is often overlooked and its value is underestimated. In an emergency, having the pertinent information at your fingertips leaves little to chance.

Small Quantity Generators (SQG) are required to have a posting near any phone that might be used in an emergency. This posting must have the emergency coordinator's name(s) and phone number(s), the location of emergency equipment and the local fire department's phone number.

TIP: Make up a simple, easy to use form that contains the required information or request a copy of ours. Make sure that the posting is current and in place by looking at it during a routine maintenance activity.

Personnel training is not documented or up to date.

Some form of personnel training is required of all hazardous waste generators. Please note that while this training might be combined with the OSHA Right-To-Know training, it is a separate requirement.



VSQG's have the least number of requirements. Their employees must receive training that adequately ensures that their facilities are maintained and operated to minimize harm to human health and the environment. This training is not required to be documented, but it's always a good idea to keep records.

SQGs have the additional requirement of documenting training of all employees with hazardous waste handling and emergency response duties. This training is a one time requirement.

TIP: While not required for VSQGs and SQGs, yearly refresher classes that cover the basics are an excellent idea. Resources, like Ramsey County training classes or MPCA fact sheets, are readily available.

LQGs have the most requirements for training. Hazardous Waste Rules have extensive, specific language regarding the training program that must be in place. Take a look at the MPCA's fact sheet "Step 9: Personnel Training for Large Quantity Generators" for more information.

TIP: Since yearly refresher training is required, vary the format, content and style to keep the training fresh.

Commercial recycling laws changed - is your business in compliance?

Let BizRecycling® help you

Most businesses in the metro area are now required to recycle at least three types of material, such as paper, glass, metal, or organics.

The Ramsey/Washington Recycling and Energy Board created BizRecycling® to help businesses, like yours, add or expand recycling and organics programs. Here's a bonus - in addition to meeting the legal requirement - adding or expanding recycling service while decreasing garbage service can save your organization hundreds, if not thousands, of dollars a year!



Success stories

Bauer Welding and Metal Fabricators began single-sort and pallet recycling to reduce land filled waste by 43,500 pounds, saving \$1,200 annually.

Honsa-Binder Printing is saving \$720 annually, while diverting about 4,800 pounds of recycling from landfills.

Boston Scientific educated 2,500 employees in seven buildings, becoming one of the first campuses in the world to implement organics recycling at all of their buildings. They increased their campus waste diversion from 61% to 70%.

Want to know more?

Visit LessTrash.com and click on Take Action or call 651.266.1199.

What we offer

- A site visit from one of our local knowledgeable consultants, who will custom-design a recycling plan for your facility, at no charge to your business.
- Grants up to \$10,000 for containers, labels, equipment and minor facility upgrades; our consultants can assist you in applying.
- Resources, like help with employee training and program implementation.
- No obligation to your business.

Questions, Questions (and some answers!)

We use several types of aerosol cans at our shop. We were told the containers have to be empty before we can recycle them. How do we know when they are empty? Also, we heard that waste aerosols are now considered a universal waste in Minnesota. What does this change mean?

The Minnesota Pollution Control Agency (MPCA) answers, "How do we know when an aerosol can is empty?" in their fact sheet, "Waste Aerosols and Compressed Gas Cylinders".

Aerosol cans are considered empty when the following two conditions are met:

1. No liquid is felt or heard when the container is shaken by hand
2. No gas or liquid is released when the spray/discharge valve is activated and the container is rotated in all directions and the valve is not clogged.

Ramsey County recommends replacing a clogged valve with an open, functional one to see if the material inside can be used.



The second question – "What does the change (to a universal waste) mean?" - is also answered in the MPCA's fact sheet. As a universal waste, your aerosol cans will be sent to a recycler/reclaimer that will properly manage the liquids, gas propellant and metal. Protect the spray nozzle or remove it prior to placing the aerosol cans into the accumulation container.

As a universal waste, the aerosol cans do not need a hazardous waste manifest but you should obtain a shipping document from your vendor as proof of proper disposal. Keep in mind that they must be properly managed by the end facility; get a description of final disposal method in writing and keep it for your records. Though this waste is still hazardous, it is now exempted and no longer counts towards your generation size nor will you be charged a license fee for this waste. These changes can result in some financial savings and may make it easier for you to recycle this waste.

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More information?

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

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