



RAMSEY COUNTY
Saint Paul –
Ramsey County
Public Health

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The HazWaste Quarterly

Waste Evaluation - Using the Tools You Have Available

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

Every business that produces a waste must evaluate it to find out if it is hazardous.

To identify all the wastes you generate, take a walk through your site. Talk with purchasing, production and maintenance staff. They are the front line, with lots of insight and direct knowledge about the wastes you generate. Look at your disposal and recycling areas; check out the dumpsters. Sewered wastes are easy to overlook - don't forget about them.

After you've identified and made a list of the wastes that you generate, start collecting all the relevant information you can.

Safety Data Sheet (SDS)

A good place to start is with the Safety Data Sheet provided with the product by the supplier. A SDS is helpful in pinpointing chemicals that may possibly be of concern to you. The recently standardized format for an SDS now requires specific information to be included.

It's important to remember that SDSs are an OSHA requirement, specific to the product you purchased. When this product becomes a waste, you need to consider what contaminants might have been picked up or what chemical or physical changes took place during its use that would affect the waste you generated. Additionally, SDSs are only required to report their hazardous ingredients in percentages (parts per hundred), while hazardous waste regulations are concerned with parts per million. This can be a significant difference.

While SDSs do not cover all the information that is required by a hazardous waste evaluation, certain sections provide you with an indication of areas you will want to explore further.

Section 3 lists the chemical ingredients that present a hazard, usually by percent. Check this section to see if the product contains any ingre-

redient that would make it a listed waste, such as certain solvents found on the F list. You can find out more about F listed solvents on the Minnesota Pollution Control Agency's (MPCA) website at pca.state.mn.us/publications/w-hw2-00.pdf

Section 9 lists the chemical's characteristics, such as pH or flashpoint. If the flashpoint is 140° F or less or if the pH is ≤ 2 or ≥12.5, you may have an ignitable or corrosive hazardous waste.

Section 11 is where you may find information on the product's LD50, which might be used to determine if you are producing a lethal hazardous waste, a Minnesota-only characteristic.

Section 15 is where you might find out that the waste is regulated under the Resource Conservation and Recovery Act (RCRA), the federal hazardous waste regulations.

Generator knowledge

The knowledge you or your employees have about the process that produces your waste is crucial. You may be able to use this knowledge to evaluate your waste. Think about what products you use and what contaminants (heavy metals, solvents, etc.) might be picked up during production, cleaning or other processes.

Remember, a non-hazardous product can become a hazardous waste because of how the product was used.

Manufacturer certifications or waste information

The company that supplies or manufactures your product may also have valuable information for you, including waste evaluation data.

Before you use this information, get the answers to these questions:

- Was testing done on more than one sample taken from more than one company location after the product had been used as intended? This ensures that the test sample represents a broad spectrum and the "worst case" scenario.





It's Coming...

Electronic communications, it's in our future

The Solid and Hazardous Waste Compliance program is beginning the move to electronic communications. The goal is to better serve businesses by eventually offering online license applications, emailed invoices and the ability to pay license fees electronically. Starting with your next compliance inspection, your inspector will verify or collect email addresses for the various contacts at your business. This includes site, mailing, billing and emergency contacts.

Email account set-up

Free email accounts are available through Gmail, Outlook and Yahoo. If your business or contact people don't have an email account, please open one for your business. We can help you set up an account, if necessary.

Free computer access

Access to a computer is free at all Ramsey County Library locations. In the future, we hope to have computer access available at the Environmental Health Division office.

Questions?

Contact Michael Reed, Solid and Hazardous Waste Program Supervisor, at 651-266-1181 to hear more about the move to electronic communications.



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Waste Evaluation - Using the Tools You Have Available

- Has the supplier requested feedback from the MPCA or Ramsey County about the testing procedure and the waste evaluation results? This ensures that the appropriate test procedure was used.

Manufacturers or suppliers may be able to provide you with a certification that states their product will not generate a hazardous waste. To use this certification as your evaluation, you must use the product according to the manufacturer's instructions. Ask for a copy of the test results for your records.

Laboratory testing

As a final step, you may need to have your waste tested in a laboratory. Here are some things to be aware of:

- If you are working with or considering a waste management company, check with them first. They may want you to test for certain parameters or they may not accept another lab's test results and the test will need to be rerun, at an additional cost to you. By checking beforehand, you should be able to combine all of your testing.

- You might need to run a Toxicity Characteristic Leachate Procedure (TCLP) test. The test mimics landfill conditions to show what might happen if your waste was disposed of there. If this test shows that any of the components exceed certain limits, the waste is considered hazardous for that component. For a complete TCLP list, visit the MPCA's website at pca.state.mn.us/sites/default/files/w-hw2-04.pdf

Remember to keep all evaluation records onsite and to contact your hazardous waste inspector for help, if needed.



BizRecycling.com - Check Out Our New Look!

All new look and feel

Online tools and communications are the cornerstone to connect businesses with recycling resources and education. And, *BizRecycling.com* aims to meet those needs through a totally new web design, featuring educational resources, local stories, a weekly blog, access to online label ordering, an electronic grant application and more! Our redesign goals were simple.

Make it local

The site now features all new photography from businesses that have successfully implemented or enhanced their recycling program, easy to find and navigate local stories and testimonials from businesses. Be sure to look for a business like yours to see what we can do for you. Check out the local stories with east metro business leaders highlighted on rotating banners.

Make it easy

The redesign was based on input and direction from BizRecycling grantees and our recycling experts. All content was re-written and designed based on user input. Infographics are used to impart information in meaningful and easy ways.

Make it compelling

The BizRecycling logo has been paired with modern colors and formatting, for a clean look and feel.

Here's how BizRecycling® can help you



- A local knowledgeable recycling experts will visit your site and custom-design a recycling plan for your facility, at no charge to your business.
- Grants are available up to \$10,000 for containers, labels, equipment and minor facility upgrades. Our recycling experts can assist you in applying.
- Resources, like help with employee training and program implementation.
- Absolutely no obligation for your business to participate.

Want to know more?

Visit *BizRecycling.com* and click on Get Started Now or call Karen Reilly at 651-266-1186.

Questions, Questions (and some answers!)



I have moved into a new position at my company and am now the new regulatory contact person. Communication from your office is addressed to the person who had this position before me. I would like to update our contact information at Ramsey County, so I will be the one receiving any correspondence. Please advise me on how to do this.

Contact the inspector assigned to your business

The back page of this newsletter includes phone numbers and email addresses for each inspector. It also lists the zip codes (territories) each inspector is assigned, as a reference.

Four points of contact for your business

Be prepared to provide information on each of the following:

- Site contact
- Mailing contact
- Billing contact, and
- Emergency contact

For each of these, we need the contact name and job title, address, phone number and email address.

In most cases, this will be the same person

In some businesses, these responsibilities are delegated and shared, while in others, they are not. For example, the billing contact could be located at another site or even another state. Choose what works best for your organization.

Electronic communications

When you contact your inspector to let them know that contact changes have occurred, they will likely ask you to email the contact information. Or, you can email your inspector the updates with a brief explanation. Either method will help assure the contact information reaches us and is updated.

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Environmental Health staff conduct solid and hazardous waste inspections, provide technical assistance, outreach and training to Ramsey County businesses.

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More information?

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

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Inspections areas - 55102, 55105, 55107, 55114, 55116 and pre-demo inspections