



RAMSEY COUNTY

Saint Paul –
Ramsey County
Public Health

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

The HazWaste Quarterly

Emergency Planning and Response

A typical business never intends to have a release of its 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. So make waste reduction a top priority to lessen your requirements!

To understand what requirements your business has, you must know your generator size. Minn. Rule pt. 7045.0206 identifies three size categories of hazardous waste generators.

- Large Quantity Generators (LQG) who's waste volumes are greater than or equal to 1000 kg/month (~ 2200 lbs or 220 gallon);
- Small Quantity Generators (SQG) who's 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), who's 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.

Think about how you are meeting these precautionary requirements. Along with employee training, they can be the key to prevention.

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 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 space in the storage areas to allow for easy access to the containers and the 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 becomes an emergency. Workers should be trained in spill cleanup procedures for routine chemical spills. Be aware of your employee's spill recovery capabilities and their limitations. Typically, smaller companies do not maintain an in-house spill response team. Emergency plans in these companies will

likely involve evacuating workers and calling for outside spill response assistance. LQGs must write a contingency plan, a much more comprehensive document.

If a release of a substance can cause pollution to the land, air or water, you must report the incident immediately to the Minnesota Duty Officer at 651.649.5451. The only exception to this reporting requirement is petroleum spills of 5 gallons or less.

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2014 - By The Numbers

Solid and Hazardous Waste Compliance Program staff performed these activities during 2014:

- Reviewed and issued annual licenses for 1,771 hazardous waste generators, 12 hazardous waste facilities and 7 solid waste facilities.
- Performed 428 reviews of self-audit hazardous waste generators' license applications.
- Performed 1,528 solid and hazardous waste inspections, including the following types:
 - 1,026 compliance inspections;
 - 42 follow-up inspections;
 - 65 complaint inspections;
 - 93 site closure inspections;
 - 71 targeting inspections;
 - 229 pre-demolition inspections;
 - 2 enforcement inspections.
- Issued 7 Letters of Warning (LOW), 2 Notices of Violation (NOV), and took 12 other enforcement actions for non-compliance.
- Provided technical assistance through 2,485 phone consultations and 144 site visits.
- Conducted 20 training sessions, reaching 403 people.

Going Green Today

Ramsey County strives to create a healthy, safe environment for all people to live, work and play. Find out what we are doing to go green inside and out! Sign up for our Going Green Today e-newsletter, which is sent to your inbox every other month. Go to www.co.ramsey.mn.us and click on e-subscribe in the left menu bar. From the subscription page, select Going Green Today under Health & Environment.

Emergency Planning and Response

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The following emergency planning requirements apply to SQGs and LQGs.

SQGs must post emergency information.

Next to every emergency telephone, post the name and phone number of the emergency coordinator, the phone number of the fire department 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 need to notify local authorities about what they will deal with at their business.

Supply the police department, fire department and emergency response teams with the following information:

- A list of the types of hazardous waste stored onsite including their physical properties and associated health hazards.
- A building floor plan that details storage areas, entrances and exits, and personnel working areas.

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 requirements and can help maintain compliance. All employees should be trained on emergency procedures. Even though training isn't required for VSQGs, employees should be familiar enough with waste handling and emergency response procedures to maintain compliance.

For more information, check out the Minnesota Pollution Control Agency's (MPCA) fact sheets at <http://www.pca.state.mn.us/index.php/waste/waste-permits-and-rules/waste-permits-and-forms/hazardous-waste-documents-and-forms.html> - click on the fact sheet for your generator size.

Clear your Clutter with the Minnesota Materials Exchange

Are you a business, non-profit, or institution? If so, the Minnesota Materials Exchange is for YOU!

The Materials Exchange is a website that links organizations that have reusable goods – supplies, equipment, furniture, or raw materials - they no longer need, to others who can use them. This free reuse network helps prevent usable materials from becoming waste and saves users money.

3 Easy Steps

1. Visit www.mnexchange.org
2. Sign in to list or accept items
3. Connect with other users to arrange item exchange

Move it out with Materials Exchange!

- Sell or donate unneeded materials
- Avoid disposal costs
- Free up storage space
- Keep goods out of landfills



Unisys downsized their Roseville facility last year and used the Materials Exchange to donate many items.

They provided a new restaurant in St. Paul with two stage-like carpeted platforms, donated a truckload of chairs to

the Science Museum of Minnesota, and gave over 50 tables to the Forest Lake School District. They had a number of smaller donations, as well. Says Duane Ditterberner of Unisys: "We always use the Exchange as a first option before recycling or disposal."

Find what you need with Materials Exchange!

- Acquire low- or no-cost materials
- Reduce purchasing costs
- Choose to reuse

Gethsemane Lutheran School and Church in Maplewood responded to a posting and was able to upgrade their existing phones to a newer and much better phone system.

"We were able to save a substantial amount by getting phones with more features for our system. We would have never been able to do this upgrade because of the expense it would have taken. We appreciate the opportunity to repurpose equipment that another organization no longer needed," said Duane Schmitz.

The website is operated by the Minnesota Technical Assistance Program (MnTAP) at the University of Minnesota. MnTAP provides tailored pollution prevention and energy efficiency solutions for Minnesota businesses. For more information, contact Anna Arkin, MN Materials Exchange Administrator and MnTAP Solid Waste Specialist, at mnexchange@umn.edu or 612.624.0808.

Questions, Questions (and some answers!)



The Saint Paul Fire Safety inspector is requiring that we replace the 350 gallon plastic tote we use to store our used oil. What do you know about this storage requirement?

Different agencies have different requirements



Because we must defer to the regulating agency for interpretations on their rules, Ramsey County staff spoke to the Saint Paul Department of Safety and Inspections (DSI) Fire Safety staff about your question. In discussing the fire code requirements for used oil storage, the DSI inspector said that any container storing used oil must be rated for that purpose. If your container manufacturer cannot confirm that your

specific container is rated for used oil storage, you may be in violation of the State Fire Code Article 2703.2.1.

Storage requirements change with the volume of the container

A single 55 gallon container of used oil must be labeled and stored on an impermeable surface. If you exceed 55 gallons, DSI will require that you use a double walled container or provide secondary containment that will hold 110% of the largest container of used oil. Your 350 gallon plastic tote container clearly exceeds this volume. So, according to the State Fire Code, you need to show that this container was rated for used oil storage and you must provide secondary containment for 400 gallons (110%).

Need a replacement container?

If you need to find a different way to store your used oil, go to www.co.ramsey.mn.us/ph/hw/index.htm and click on the link to our vendor list. On this list you will find both container and tank providers.



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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?

Phone: 651.266.1199 | Fax: 651.266.1177

www.co.ramsey.mn.us/ph/hw/business_waste_assistance_program.htm

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Comments on the newsletter?

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