



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

Managing your Hazardous Waste Containers

Businesses that generate hazardous waste are responsible for properly storing their waste containers. Improper or inadequate storage can lead to a release, requiring a clean up - which can be very expensive and is an inefficient use of time.

The first step - waste reduction!

Think about the wastes your business is currently generating. How much time and money is going into its management? More importantly, how much could be saved if you produced less waste? By reducing waste generated, your company won't have to handle, store or dispose of it and you'll save the costs associated with those activities. (You may be able to reduce the amount of product you purchase, too!) That's why waste reduction is a smart first step.

Choosing your container.

The regulations require all hazardous waste containers to be sturdy and leak proof, with closure devices that will hold the waste if the container is tipped over or dropped. The container that you choose must also be compatible with its contents. With the wide variety of container sizes and types to choose from, here are some things to consider.

- Is the container in good condition? This means no severe rust or dents in the seams that would weaken the containers' integrity and allow it to leak. Weekly container inspections help to guarantee the continued integrity of the container.
- Is the container compatible with the waste? Ask your transporter or disposal facility for their recommendations or use the Department of Transportation (DOT) Hazardous Materials table to help make a determination.
- Does the closure device allow employees to easily add or remove waste? This helps to ensure that the container is kept closed after each use.

Whenever possible, store the waste in the container it will be shipped in. This eliminates the potential for spills during waste transfer.

Keeping your container closed.

Hazardous waste regulations require that storage containers be kept closed, except when you are adding or removing waste. Closure prevents evaporation of the waste – a health and safety issue – and controls spills should the container tip. As important as this is, we all know what a difficult job this can be! In fact, open containers top the list of waste handling violations. Allow employees to help select the type of closure devices that will work best for them. Making it easy, practical, and useful helps eliminate non-compliance.

Marking your container correctly.

All hazardous waste containers must be labeled with the words "Hazardous Waste", a clear description of the contents and, except for satellite accumulation containers, a start date of waste accumulation. This information identifies the contents of the container to people who are unfamiliar with it, such as emergency responders.

Use a stencil or write on the container with a permanent marker or paint. You can always use an accumulation label or pre-transport label to meet the labeling requirement, as well.

For your most common waste streams, create a sample Hazardous Waste label for employees to



use as a template. Don't place labels directly under the bung; this helps the labels remain legible if the waste spills during transfers. Or, protect your labels with a plastic pouch, varnish or clear tape.

Used oil and universal wastes – two special situations.

For used oil and related wastes, the containers are only required to have clear description of the waste. Label them "used oil", "used oil filters" or "used oil sorbents".

Universal wastes should be labeled in one of three ways:

- Universal waste - waste name (i.e. universal waste - batteries);
- Waste "waste name" (i.e. waste batteries); or
- Used "waste name" (i.e. used batteries)

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Take the Mystery Out of What Goes in the Bin

Simplify recycling for everyone at work with downloadable custom-designed signs for your bins. It's simple, easy and free.

Design. Download. Print. Post. Done! Check it out at RethinkRecycling.com/signs/signmaker



Managing your 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, sumps or gradient slopes 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 to allow 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.
- Inspect your container's condition weekly. Document these inspections.
- Don't exceed time or quantity storage limits. These limits can be found in the table to the right.

Discuss different storage options with employees who work in the area. They often have the best ideas and will know what is a workable solution. Make your storage area easy to use by having sufficient aisle space and designated (labeled) areas for storage. This will make waste management easier for your business. Keep emergency response equipment close to your storage area for easy access.

Storing your waste containers outdoors.

For outdoor storage, you must meet all the indoor storage requirements, as well as these additional criteria:

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

Storage and accumulation limits for generators.

The amount of waste your business can accumulate and the length of time you can store it varies with your generator size. The table below lists the requirements for the various generator sizes.

Generator size	Accumulation limit	Storage time limit
Very Small Quantity Generator (VSQG) Generates 220 lbs. or less per month (less than 1/2 drum)	2200 lbs. If a generator exceeds this limit, waste must be managed according to Small Quantity Generator guidelines.	Less than 2200 lbs. of waste may be stored indefinitely. Once 2200 lbs. is reached, ship waste off-site within 180 days. (There is an extension, if the facility is located over 200 miles away.)
Small Quantity Generator (SQG) Generates between 220 lbs. and 2200 lbs. per month (about 1/2 to 4 drums)	6600 lbs. If a generator exceeds this limit, waste must be managed according to Large Quantity Generator guidelines.	Ship waste off-site within 180 days of the waste first being placed in the container. (There is an extension, if the facility is located over 200 miles away.)
Large Quantity Generator (LQG) Generates 2200 lbs. or more per month (more than 4 drums)	No limit	Ship waste off-site with 90 days of the waste first being placed in the container. (If the deadline isn't met, the generator must apply for a hazardous waste storage facility permit.)

Visit the Minnesota Pollution Control Agency (MPCA) web site at www.pca.state.mn.us for fact sheets about container management.

Are Minnesota's Waters Swimmable, Fishable, Fixable?

Did you know half of lakes and streams in southern Minnesota are too polluted for safe swimming or fishing? Industrial stormwater facilities can affect state waters by contributing contaminated runoff or preventing it. The Industrial Stormwater Program prefers the latter! We work with facilities to prevent contaminated runoff and protect our precious resources. This may require an industrial stormwater permit, but not always.

Have hazardous waste? Need an industrial stormwater permit? Have a 2015 permit?

Most hazardous waste facilities need an industrial stormwater permit. Facilities in 29 industrial sectors are required to have the five-year general permit.



Permittees who previously had coverage were required to re-apply by October 2014. To date, only 78% of Ramsey County industrial stormwater permittees have applied for the 2015 permit. Many more facilities may need permit coverage and don't have one or don't realize they need one. Apply now to minimize potential penalties and enforcement actions.

2015 sampling requirements - what's changed

- No sampling between April 5-June 30th. All permittees start collecting stormwater samples quarterly on July 1.
- Minimum of 4 samples over 4 separate quarters are required before averaging results and comparing to permit values
- Sampling forms for submitting results will be available around July 1.
- Sampling training available through the University of Minnesota. For more information or to register for a workshop, visit: www.erosion.umn.edu.

No exposure exclusion

Those facilities that can certify for the No Exposure exclusion do not have sampling requirements nor do they have to pay annual fees. Learn how you may qualify at www.pca.state.mn.us/xggx14d7. To determine whether you need permit coverage, or to apply for the 2015 permit, visit: www.pca.state.mn.us/8393q9y

Not sure if you need permit coverage and want to talk to technical staff? Send an email to iswprogram.pca@state.mn.us or call the Stormwater Hotline at 651.757.2119.

To learn more about the state's problem waters and solutions, visit: www.pca.state.mn.us/wwqwaxr.

Questions, Questions (and some answers!)

Our paint supplier told us we could dry out our unused paints by spreading them on cardboard. We weren't sure if this is legal or not. Can you advise us on what is legal and what is not? We don't want to get into trouble, so we could use your help before we do this.

You are right to be cautious

Your supplier's advice was misleading. While you can dry out your water-based or latex paints (we don't recommend it), you cannot do this with your oil-based paints. We are glad you checked into this before acting on this advice.

As a generator of hazardous waste, your waste management options are restricted

Oil-based paints often contain solvents that are hazardous for ignitability, having a flash point of 140° F or less. A safety data sheet (SDS) usually will provide enough detail for you to determine if your paint is an ignitable hazardous waste.

For your health and safety, as well as legal requirements, you must accumulate the hazardous waste paint in closed containers, labeled with the words "Hazardous Waste", a descriptive name and the date you start accumulating this waste in the container.



New options may exist

Since November, 2014, PaintCare has operated paint collection sites, typically at retail paint stores, in Minnesota as part of a product stewardship program that provides for end-of-life recycling and reuse of paints. Any business generating latex or water-based paints can use the drop-off sites. Businesses that are Very Small Quantity Generator (VSQG) can also use the sites for recycling of their hazardous waste paints. Certain restrictions apply.

For more details on this program, how it works and what's accepted, go to the Minnesota Pollution Control Agency's web site at <http://www.pca.state.mn.us/index.php/view-document.html?gid=21195>

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

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