DEPARTMENT OF ENERGY & ENVIRONMENT
GOVERNMENT OF THE DISTRICT OF COLUMBIA

Updated!

RCRA C Hazardous Waste Environmental Compliance and Technical Assistance session for Auto Service Professionals

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- This information was prepared specifically for auto and small engine repair professionals and may not be appropriate for other facilities.

- This information is highly condensed and does not include all regulatory requirements. It CANNOT be used as training material.

- This information includes best practices which may exceed the regulatory requirements.

- DOEE cannot attest to the accuracy of information provided at the links I the presentation. Providing these links does not constitute an endorsement by DOEE or any of its employees.

What can get you in trouble?

- Failing to get an EPA ID #
  - (also called an EPA Handler ID # or an EPA Generator ID#).
- Failing to identify hazardous wastes (HW).
- Failing to properly manage hazardous wastes (HW), universal waste (UW), or used oil.
- Failing to properly dispose of hazardous wastes (HW), universal waste (UW), or used oil.
- Failing to keep paperwork to show you did everything right.

Penalties!

- No EPA ID # is a $2,000 fine.
- Not properly managing regulated wastes has fines ranging from $500 to $2,000 per infraction.
- Not submitting the annual renewal fee is a $500 fine.
- Not submitting the annual self-certification of compliance is a $500 fine.
- Clean up expenses caused by not properly managing or disposing of regulated wastes cost many thousands of dollars.

- Failure to properly manage regulated wastes puts you, your staff, your family, and the environment at risk.

How to stay out of trouble:

1 - Get an EPA ID #.

- All generators of hazardous waste, universal waste, or used oil in the District must have an EPA ID #.
  - An EPA ID # looks like this: DCR 000 500 109.
- To get an EPA ID # fill out EPA Form 8700-12 and submit it, with the registration fee, to the DOEE Hazardous Waste Branch.

2 - Identify all the items in your facility that will be hazardous waste if you can't use them.

3 - Properly manage and dispose of hazardous waste, universal waste, and used oil.

4 - Train your staff to follow the rules.

5 - Keep your paperwork to prove you did everything right!

Commonly found wastes at auto shops which are regulated under the RCRA C hazardous waste (HW) regulations

- Used oil
- Some parts washer solutions (HW) (ignitable)
- Some paints and paint thinners (HW) (ignitable)
- Lead wheel weights (HW) (toxic)
- Some concentrated cleaning products (HW) (corrosive)
- Battery acid (HW) (corrosive)
- Most aerosol products (HW) (ignitable)
- Spoiled gasoline (HW) (ignitable)
- Car or forklift batteries (UW)
- Fluorescent lamps (UW)
- Mercury tilt switches (UW)

It might be a hazardous waste if…

- If it says ‘danger’ on it
- If it says ‘flammable’ on it
- If it says ‘toxic’ on it
- If it says ‘poison’ on it
- If it says ‘warning’ on it
- If it has a picture of a skull and cross bones on it
- If it has a picture of a fire on it
- If it is an acid
- If it is a base
- If it is a solvent

These items should be evaluated to see if they must be managed as hazardous waste.

Note: This list is not exhaustive, it is intended to initiate the evaluation process.

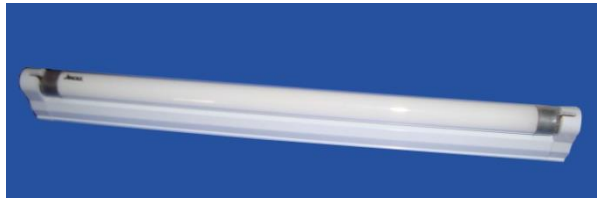
The regulation defines RCRA C regulated hazardous wastes as:

- Listed wastes
- Characteristic wastes
  - Ignitable (flash point below 140ºF or 60ºC)
  - Corrosive (pH $\leq$2 or pH $\geq$12.5)
  - Reactive
  - Toxic
- Anything the Administrator or the Director says is hazardous waste
- Anything <u>you</u> say is hazardous waste

Other RCRA C regulated wastes

Universal waste is a subcategory of hazardous waste.

- Spent fluorescent lamps (intact only, broken or crushed lamps are usually hazardous waste)
- Some batteries
- Some pesticides
- Mercury thermostats
- Mercury tilt switches



Used oil is also regulated

How to figure out if the item is a hazardous waste

1 - Decide if it is a waste. Remember, the regulations only apply to waste, not to products you are currently using.

2 - Determine if the waste meets or exceeds one of the criteria in the regulation (see slides 8 & 9).

- Review a current safety data sheet (SDS) for the product, the flash point and pH will be listed. Also, many SDSs now state if the item will be regulated when it becomes a waste.
- Ask the vendor for the flashpoint, pH, and ingredients.
- Submit a sample for testing

3 - Any waste which meets or exceeds one of the criteria, is a hazardous waste.

How to manage your
- hazardous waste items

- Identify it
- Label it
- Date it
- Close it
- Inspect it
- Dispose of it (correctly)
- Train staff

How to manage your - hazardous waste items (continued)

- Identify it
  - Make a determination on all waste to identify all which require management under the regulation. See slide 10 for instructions.
- Label it
  - With the contents if it is not waste
  - "Hazardous Waste" if it is hazardous waste
  - Universal waste allows several variants (see slides 13 and 14)
- Date it - with the accumulation start date
- Close it – keep it in a closed container
- Inspect it – conduct weekly inspections, and keep a log
- Dispose of it (correctly). Arrange for appropriate disposal using a licensed contractor on a schedule. You will get a manifest. Keep the manifest for your records.
  - Using small bottles helps
- Train staff

- As of October 23, 2015, secondary containment is no longer required for liquid hazardous waste except at TSDFs.

How to manage your - universal waste lamps

- Contain it – put spent lamps in a drum, box, or carton
- Label it - “Universal Waste - Lamps” or “Waste Lamps” or “Used Lamps.”
    - You can’t call them tubes or bulbs, only lamps.
- Date it - with the accumulation start date
- Close it – keep it in a closed container
- Dispose of it (correctly). - You may store universal waste at your site for up to 1 year.
    - Arrange for appropriate disposal by a licensed contractor <u>on a schedule</u>
- Train staff

- Incandescent lamps and LED lights are not universal waste

- Remember that broken or crushed lamps are never universal waste; they are usually hazardous waste.

How to manage your - universal waste batteries

- Label it - "Universal Waste Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)."
- Date it - with the accumulation start date
- Dispose of it (correctly). - You may store universal waste at your site for up to 1 year.
  - Arrange for appropriate disposal by a licensed contractor <u>on a schedule</u>
- Train staff

- Alkaline batteries are not universal waste

How to manage your - used oil

- Label it - “Used Oil”
- Close it – Keep the container closed
- Contain it – Use secondary containment
- Train staff

- You <u>cannot</u> burn used oil in the District

- Cooking oil is not regulated by DOEE. It <u>is</u> regulated by DOH.

Other regulatory bodies

- DOEE
  - Water Quality Division
  - Lead Program
  - Air Quality Program
- OSHA
- WASA / DC Water
- Fire Marshall
- DOT
- others

Reminders:

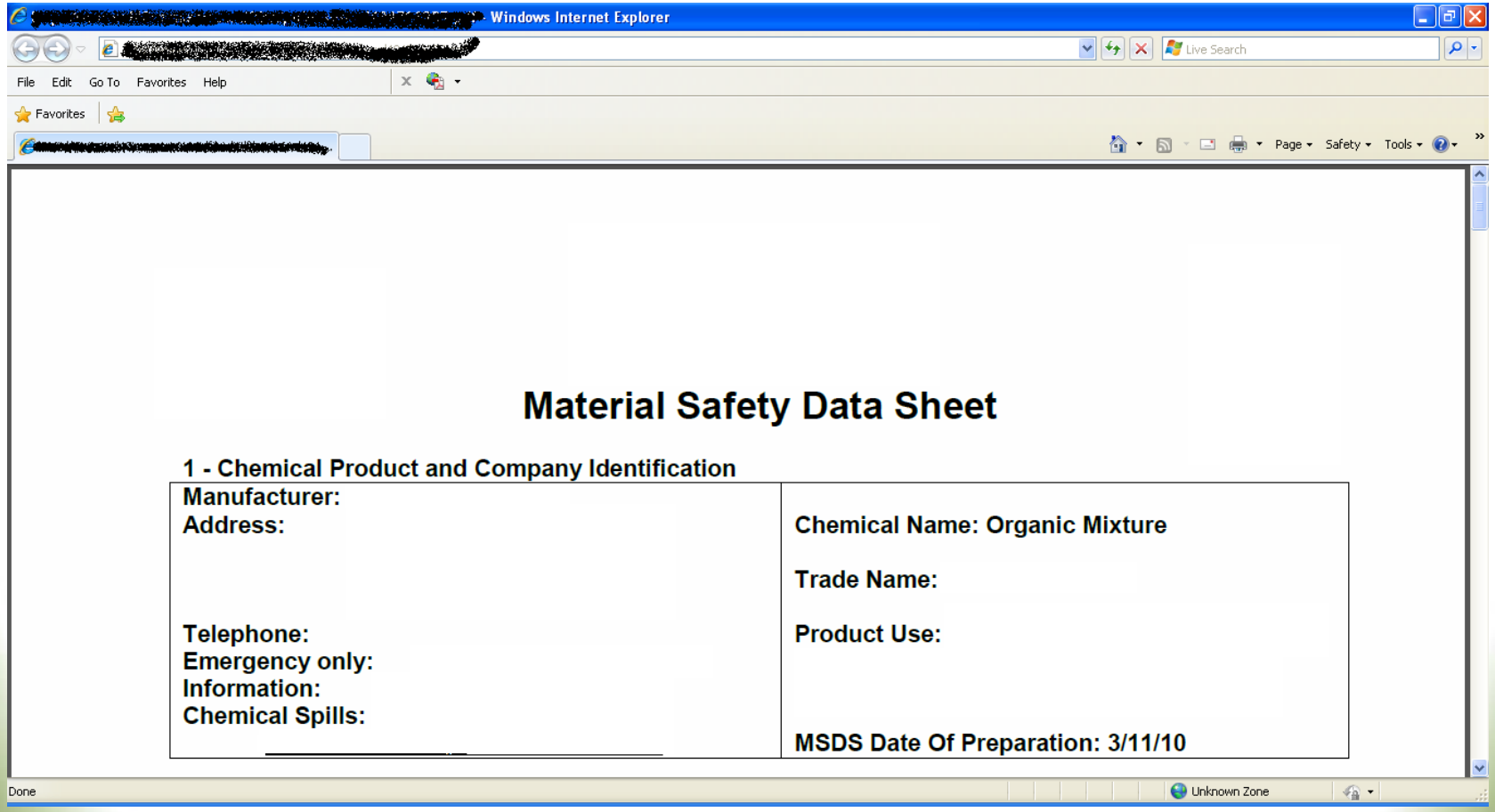
- Each site must maintain current information on file with the DOEE Hazardous Waste Branch
  - Remember to send in a revised 8700-12 when the contact person changes, the mailing address changes, the waste streams change, or the generator status changes.
  - It's free to update the information!
- The annual fee is due <u>every</u> March 1st.
- The annual self-certification of compliance is due <u>every</u> March 1st.

As of October 23, 2015, the annual fee for conditionally exempt small quantity generators (CESQGs) will be $250 unless the generator has less than 8 employees. For CESQGs with less than 8 employees, the fee is $100.

Examples

Where is the info on an SDS?

This is what the front page of a (material) safety data sheet (MSDS or SDS) looks like:



Material Safety Data Sheet

1 - Chemical Product and Company Identification

Manufacturer: **Address:**	**Chemical Name: Organic Mixture** **Trade Name:**
Telephone: **Emergency only:** **Information:** **Chemical Spills:**	**Product Use:** **MSDS Date Of Preparation: 3/11/10**

Where is the info on an SDS?

pH and flashpoint area ALWAYS called out.

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9 – Physical and Chemical Properties

Appearance:	Light amber liquid	Flammable Limits: (Solvent Portion)	LEL: 0.6% UEL: 8%
Odor:	Mild petroleum odor	Vapor Pressure:	95-115 PSI @ 70°F
Odor Threshold:	Not established	Vapor Density:	Greater than 1 (air=1)
pH:	Not Applicable	Relative Density:	0.8 – 0.82 @ 60°F
Melting/Freezing Point	Not established	Solubilities:	Insoluble in water
Boiling Point/Range:	361 - 369°F (183 - 187°C)	Partition Coefficient; n-octanol/water:	Not established
Flash Point:	122°F (49°C) Tag Closed Cup (concentrate)	Autoignition Temperature:	Not established
Evaporation Rate:	Not established	Decomposition	Not established

3	HAZARDS IDENTIFICATION	
3.1	Fire and Explosion	
	Flash point:	Tag open cup 44° Celsius (minimum)
	Flammable/explosion limits:	(Low) 0.6% (High) 8.0% (Solvent portion)
	Extinguishing media:	CO^2, dry chemical, foam

Where is the info on an SDS?

Check the 'disposal considerations' for useful information.

13 - Disposal Considerations

If this product becomes a waste, it would be expected to meet the criteria of a RCRA ignitable hazardous waste (D001). However, it is the responsibility of the generator to determine at the time of disposal the proper classification and method of disposal. Do not puncture or incinerate containers, even empty. Dispose in accordance with federal, state, and local regulations.

What NOT to do

Universal waste lamps must be
- in boxes
- which are closed
- are labeled
- and are dated

What NOT to do

Labels must be meaningful!

Hazardous waste must bear the words "Hazardous Waste" and the date it was determined to be a waste.

Secondary containment for - above ground storage tanks

Secondary containment for - large containers

These are suitable for use outdoors. There are different styles available.

Secondary containment for - large containers (continued)

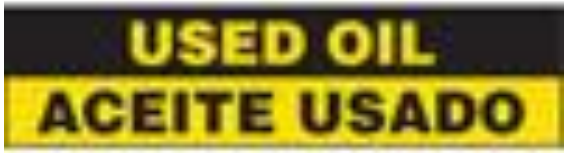
These are <u>not</u> suitable for use outdoors.
A variety of configurations are available, pick one that works in your space.

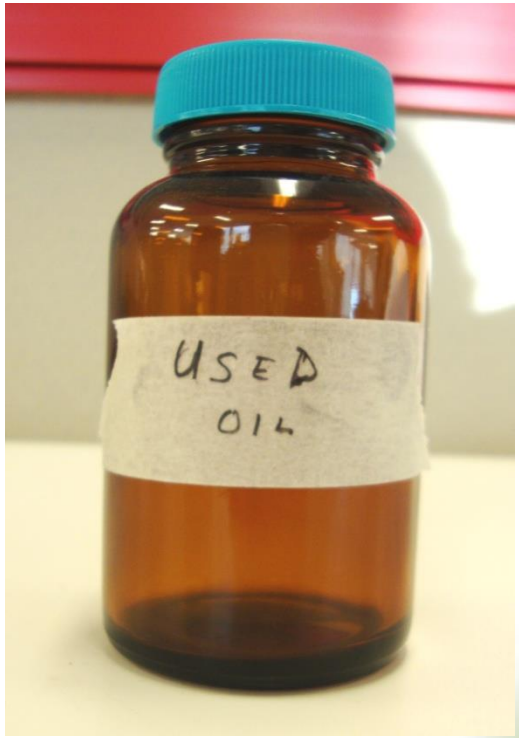
Secondary containment for - small containers

Secondary containment does not have to be fancy or pretty, it just needs to work!
You may have something appropriate onsite already.

Used oil labels
- examples

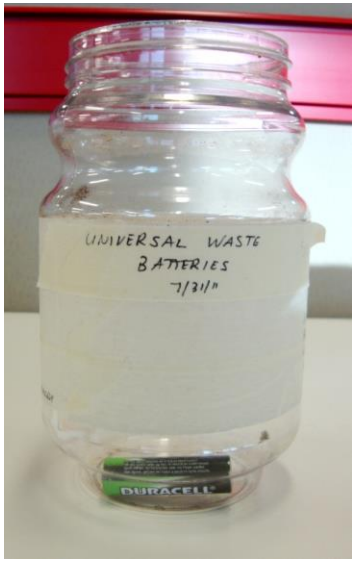
Handmade labels are ok. Be sure to put the bottle of used oil in secondary containment.



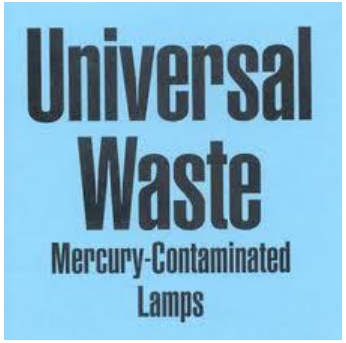


Universal waste battery labels
- examples

Handmade labels are ok.
It may be easier to put small batteries in a container and label and date the container than to label each individual battery.



Universal waste lamp labels
- examples

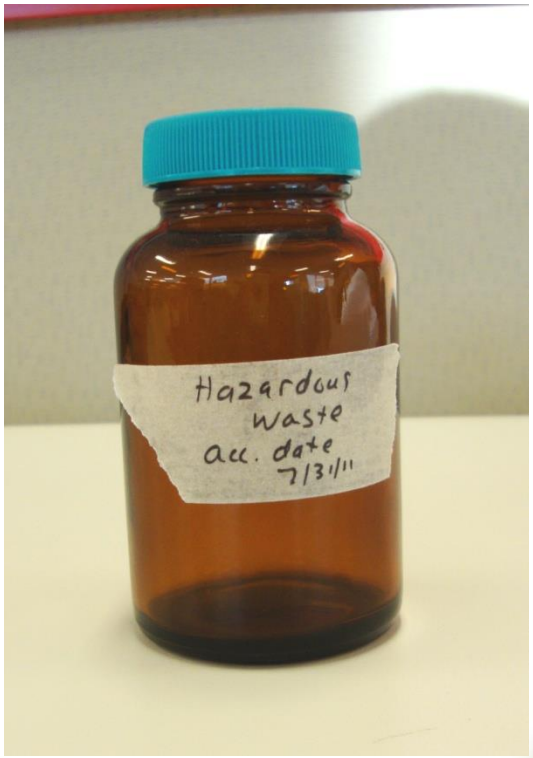


Both labels above need to have a date added to them.

Hand written labels are ok. Make sure the date is included (in this photo the date is very faint)

Hazardous waste labels
- examples

Hand written labels are ok.



Containers of used oil must be closed.

A self-closing funnel may be used with above ground storage tanks or 55-gallon drums of <u>used oil only.</u>

This funnel is not self-closing

Resources

Questions can be answered by contacting DOEE Hazardous Waste Program at: (202) 671-3308

District Regulations and Law may be viewed online at: http://doee.dc.gov/node/14732

EPA Form 8700-12 can be found here: http://doee.dc.gov/sites/default/files/dc/sites/ddoe/page_content/attachments/8700-12%2C%20just%20the%20form%2C%202015_0.pdf

Guide: How to Determine if Solvents That Can No Longer Be Used in the Workplace Are Hazardous Waste https://www.epa.gov/hwgenerators/guide-how-determine-if-solvents-can-no-longer-be-used-workplace-are-hazardous-waste

Department of Energy and the Environment website: www.doee.dc.gov

EPA Regulations may be viewed online at: https://www.epa.gov/rcra/resource-conservation-and-recovery-act-rcra-regulations#haz

EPA assistance document for managing hazardous waste for vehicle maintenance providers: https://www.epa.gov/sites/production/files/2015-01/documents/vehicle.pdf