

Hazardous Waste NH Auto Body Shops

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Objectives

Education
Awareness
Certification
Compliance
Contact at DES (SERVICES)

Reach objectives

- Responsible party - Generator
- What is a waste – hazardous waste
 - Specific to Auto body shops
- Storage – labeling, time, location
- Shipping – when, how, documentation
- Self-Certification requirements

Generator

- Who is the responsible party?
- The person or business that makes the hazardous waste
 - Operator ?
 - Owner ?
- Must have EPA ID number
 - Blank copies of form available.

Notify DES

Hazardous Waste
Activities

Generate – make
Store – accumulate
Ship – approved site

EPA ID number
Site Specific

RCRA C Site Identification Form

The image shows a screenshot of the RCRA C Site Identification Form. The form is titled "RCRA C Site Identification Form" and includes the following fields: EPA ID Number, Site Name, Site Address, and Site Phone Number. The form is partially filled out with text.

Do you have an oil burner?

- MUST notify DES – notification form
- Can only use oil generated by YOUR business
- Can not accept used oil from others (business or individual)
- Can not “give” your oil to another business with an oil burner
 - (Unless same owner)

What is a waste?



Hazardous Waste Determination

The GENERATOR is RESPONSIBLE

Hazardous Waste Determination Procedure

1. Is it a **waste**?
2. Is it **exempt** from the rules?
3. Is it a **listed** waste?
4. Is it a **characteristic** waste?
5. Is it a hazardous waste **mixture**?



Hazardous Waste - What is it?

Waste

Anything that is **SPENT, DISCARDED** or **ABANDONED**

Hazardous

Potential Threat to Human Health or the Environment

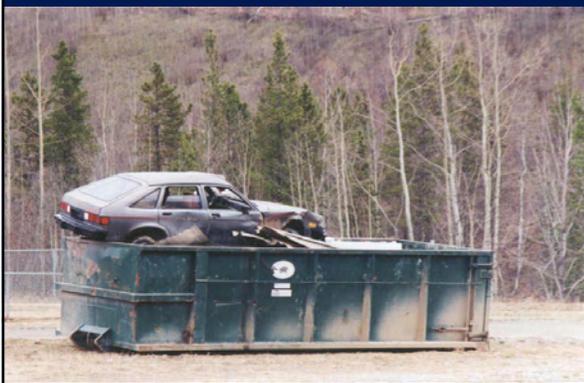
A material must first be a waste before it can be classified a hazardous waste

Spent



A material that has been used and can no longer be used for it's intended purpose without being processed (*filtered, reconstituted, cleaned, etc...*).

Discarded



Abandoned



What wastes do we find in Auto Body Shops

What is in your trash?



What is in your dumpster?



Painting related wastes



Wastes

Paper towels	Paint
Gloves	Fluorescent lamps
Respirators	Sand blast waste
Body suits	Metal scraps
Masking	Evaporation-Rags
Paint stirrers	Waste Solvent
	Grinding dust
Plastic paint cups – empty?	Paint Booth filter
Paint containers -empty?	Paint filters
Aerosol cans – empty?	

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Exemptions

Not Regulated as Hazardous Waste

- Certain specific wastes are not regulated for various reasons



Examples:

- Wastewater discharges regulated by other programs
- Scrap metal**
- Used CFC refrigerants (if refrigerant is reclaimed)
- Empty Containers**

Scrap Metal

Env-Hw 104.38

Bits and pieces of metal parts, bars, turnings, rods, sheets or wire or metal pieces that may be combined together with bolts or soldering, for example radiators, scrap automobiles, or railroad boxcars, which when worn or superfluous (*extra*) can be recycled.

Auto body scrap metal



Empty Container



Empty Container

(RCRA Empty)



- Remove all waste using common practices
 - **Pouring**, pumping, **scraping**, aspirating
 - No more than 1 inch left AFTER
 - Material removed must be managed...
 - IS it a Hazardous Waste?
- Spray cans
 - When pressure inside approaches atmospheric pressure
 - **AND**
 - no product left in can

Pour & scrape out container and put waste in closed container***



Consider HW until proven Not Hazardous - TEST

Empty container?



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Example in Auto Body

1. LOOK at the MSDS
 1. Look at the Hazardous Components
 2. Look at the % of each component
 3. Compare to F-list

Example

- "General Purpose Automotive Lacquer Thinner"
 - Methanol (30%), Toluene (60%), Acetone (40%) =

F- Listing Examples

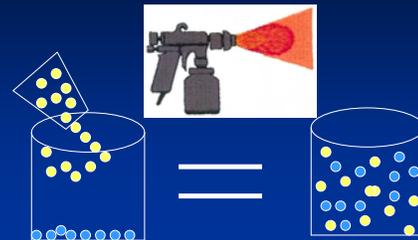
- F001: Tetrachloroethylene, trichloroethylene, methylene chloride, 1, 1, 1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons; all spent solvent mixtures/blends used in degreasing
- F003: Xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone and methanol
- F005: Toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol and 2-nitropropane

Do you use a thinner (solvent) to **clean** your paint gun?

Automated or Manual?

F-listed Hazardous waste
(Proof in the MSDS)

Thinner used to clean



Paint Thinner Recycler

- Use thinner to **clean** paint gun
- Take paint and thinner and mix into distiller
- REUSE the thinner as product
- Manage the PUCK as **HAZARDOUS WASTE**



Manual gun cleaning

- Pour **thinner** into gun....allow the **thinner** to clean the gun....pour the used **thinner/paint** into a container
- Paint settles out
- Are you reusing THIS thinner?
- What do YOU do with this thinner? Paint? Paper towels?

Our observations.... **Thinner/Paint**

~~Allowed to evaporate then container goes into trash~~

~~Immediately goes into trash~~

~~Immediately goes into used paint container for reuse~~

~~Sealed in zip-loc — disposed of in trash~~

What we want to see.... **Thinner/Paint**

1. Immediately goes into used paint container for disposal
2. Immediately put into thinner recycler

Thinner/Waste paint

Likely to be F-listed *

Likely to be Ignitable- < 140° F



Listed Hazardous Waste

F003/F005

Anything the listed WASTE comes in contact with.... becomes a LISTED Hazardous Waste.

Paper towels, gloves, stirrers

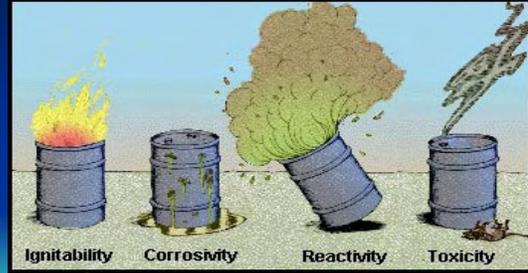
Concentration of thinner does not matter

Hazardous Waste Determination Procedure

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What Is a Characteristic Waste?



D001 D002 D003 D004-43

Env-Hw 400

What is a Characteristic Waste?

Four Characteristics

- 1) Ignitable (flashpoint < 140 degrees F)
- 2) Corrosive ($\text{pH} \leq 2$ or ≥ 12.5)
- 3) Reactive (unstable, can explode)
- 4) Toxic (8 metals, 6 pesticides, 25 organic)



I Can Remember That!!!

Env-Hw 400

Thinner – gun cleaner

- Ignitable - Flash less than 140 °F - D001
 - Read the MSDS
 - Does it say flammable on the container?
 - If it is flammable it is ignitable

Toxic 8 RCRA Metals

• Arsenic	5.0 ppm	Toxic Chemical Leaching Procedure
• Barium	100.0 ppm	
• Cadmium	1.0 ppm	
• Chromium	5.0 ppm	
• Lead	5.0 ppm	
• Mercury	.2 ppm	
• Selenium	1.0 ppm	
• Silver	5.0 ppm	

1,000,000

Material Safety Data Sheets

- To protect human health...not intended for environmental compliance
- List of hazardous ingredients only required to be on MSDS IF
 - Greater than 1% of the PRODUCT
 - 10,000 ppm
 - Greater than .1% of the Product if Carcinogen
 - 1,000 ppm

MSDS

Do not rely on MSDS for your TOXIC metals concentration in your paints

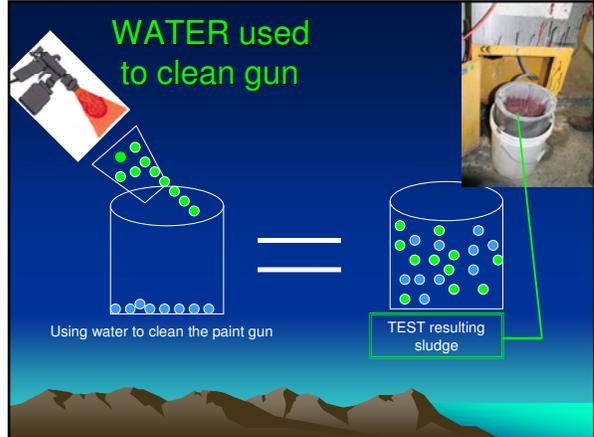
Toxic Chemical Leaching Procedure (TCLP)
Generator Knowledge**

Paints



1. Unused paint – you need to get rid of
2. Waste paint from waterborne process
3. Waste paint from solvent based process
2. Thinner/Paint mixed to clean -

WATER used to clean gun



Thinner based cleaning



NOTE: WATERBORNE Unit adjacent: Make sure NO splashing, cross contamination, rinsing.....

Hazardous waste

Paper Towels???



What about paper towels with F-listed solvent?

Thinner prep-cleaning

Example

Contaminated paper towels Hazardous Waste

Contaminated Wipers for Laundering

Cloth Wipers (Rags) for REUSE Even contaminated with hazardous Waste

ENVIRONMENTAL Fact Sheet

NEW HAMPSHIRE DEPARTMENT OF Environmental Services

28 Hazen Drive, Concord, New Hampshire 03301 • (603) 271-3503 • www.des.nh.gov

WMD-HW-6 2009

Contaminated Cloth Wipers for Laundering

The New Hampshire Department of Environmental Services receives many inquiries concerning the regulatory status of contaminated cloth wipers and the commercial laundering industry in New Hampshire. This fact sheet clarifies DES's position on wipers contaminated with minor amounts of hazardous waste constituents that are to be laundered. The regulatory status of contaminated wipers destined for laundering is one that has been of concern for a long time in New Hampshire, and elsewhere. After DES's thorough review of the issues, the Hazardous Waste Rules (Env-Hw 100-1100), and the positions of other states and regions, DES determined the following management requirements.

Filters

- How often to you change your filter?
- What is ON your filter when removed?
- Prove it!! Test it! Take representative sample

Fluorescent lamps

A Universal waste
DO NOT THROW IN TRASH

- Closed containers
- Labeled : Used lamps for recycle
- One year to recycle*

Summary - Determination

1. Is it a waste... are YOU getting rid of it?
2. Has it been used?
3. Is it in its product state? (1/2 container of paint)
4. Are any of the chemicals on the "F-lists"?
5. Ignitable? Corrosive? Reactive? Toxic?
6. Do you have a hazardous waste? Have you mixed it with ANYTHING else?

Hazardous Waste

WASTE	Hazardous ?	Why?
Waste paint booth filters	Maybe *testing may be necessary to make a determination	Toxic ? Based on glues, binders or flame retardants trapped in filter. Be sure filters are dry before disposing in landfill.
Thinner, thinner-paint waste	Yes	Ignitable, Toxic, Listed
Thinner recycling still bottoms (pucks)	Yes	Toxic, listed
Wipes or Rags	Yes * unless laundered	Toxic, listed
Lead Acid Batteries, Used Antifreeze Florescent lamps	Yes* Unless recycled	Universal Waste

Hazardous Waste

WASTE	Hazardous ?	Why?
Coatings, basecoats and primers (Hardeners, catalysts, retarders) Waterborne???	Yes *fully cured paint filters and disposable cups may not be hazardous – depending upon metal content.	Ignitable, Toxic (Metals) Toxic (Metals)
Sanding dust	Maybe *testing may be necessary to make determination	Toxic (Metals) Often dust generated from primers is hazardous due to metal content
Used containers	Yes *if not (RCRA) empty	Toxic, ignitable, corrosive If meet empty container definition - recycle

How to store hazardous wastes

Container Management
 Label – requirements
 Container – (condition & type) CLOSED requirement
 Where - location
 How long – time
 How much - quantity

The Label

“Hazardous Waste”
 Description of Contents
 Fully Visible



Env-Hw 507.03(a)(1)

HAZARDOUS WASTE

CONTENTS:

Waste paint

Solvent mix

DATE:

WASTE CODE:

Is the container in good condition?



Open/Closed Container Rule

HW Containers Must Be Closed, Except When Adding or Removing Waste

- No Open Funnels
- Bungs tight
- Lids and Covers On and Closed
- Drum Ring Tight



All Hazardous Waste Storage areas

- Impervious surface – concrete or asphalt
- Spill control equipment
- Fire control equipment
- “No Smoking” signs near ignitable wastes
- 2 feet aisle space
- Not near any floor drains/2nd Containment

OUTSIDE -

- ✓ Covered – No rain/snow on tops of containers **AND** secondary containment
- ✓ 50' away from surface waters, 75' from private wells, 50' from storm drains, and outside of the protective radius of any public water supply well
- ✓ Secondary containment capable holding 110% of the volume of the largest capacity hazardous waste container/tank



How much? How long?

- Small Quantity Generators

Small Quantity Generator

- Make or produce in one calendar month
- LESS than 220 pounds (all sources)
- What does typical container hold
 - 5 gal. bucket ($5 \times 8.34 = 41.7$ lbs)
 - 30 gal. bucket ($30 \times 8.34 = 250.2$ lbs)
 - 55 gal. drum ($55 \times 8.34 = 457.7$ lbs)

Small Quantity Storage Options

- Basic SQG Storage Requirements
- Extended Quantity/Storage Time Provision

Storage Time for SQGs

▪ **Unlimited TIME**–

As long as you do not accumulate more than 220 pounds of non-acute hazardous waste and manage your waste according to the rules



- or 2.2 pounds of acutely (P) hazardous waste

Env-HW 507.02 & 508.03

Once you have on site 220 pounds of hazardous waste.....

- **You automatically must comply with the SQG Extended Storage Provisions**
 - By following additional regulations as a SQG you may accumulate up to 2200 pounds for an unlimited period of time
- Avoid this by shipping off your hazardous waste **BEFORE** accumulating 220 pounds

If you use Extended Storage....

- - STORE 220 LBS or more Hazardous Waste
- Inspect containers (weekly) - written
- Emergency coordinator designated & available
- Communication or Alarm System
- Emergency phone postings**
- Employee training-familiar with waste emergency procedures



AND.....

Env-Hw 508.03

MORE Extended Storage regs

- Arrangements with local authorities
- When 2,200 lbs is reached, containers must be dated **and shipped** within 90 days

Emergency Posting

- At Nearest Telephone (w/i 100 feet) -
 - Emergency Coordinator(s) office AND home phone numbers
 - DES, M-F, 8am-4pm, 603-271-3899
 - State Police, 24 hrs, 603-271-3636
 - Local Fire, Police, Hospital Numbers
 - Location of fire extinguishers, spill control material, and alarms



Shipping Hazardous Waste

Recordkeeping Requirements

Are Manifests Kept
For 3 Years?

Do You Send One To
DES At Time Of
Shipment?

Env-Hw 510 & 512

YOUR SIGNED STATEMENT

- 15. **GENERATOR'S CERTIFICATION:**
- I hereby declare that the contents of this consignment
 - are fully and accurately described
 - proper shipping name
 - are classified & packaged
 - marked and labeled/placarded
 - and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Also the Manifest says....

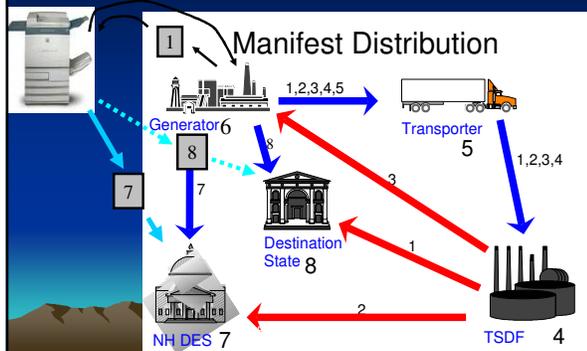
- I certify that the waste minimization statement identified in 40 CFR 262.27(b) is true. (for small quantity generators)
- b) "I am a small quantity generator. I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."

Manifest copies should be mailed within **5** days of shipment to:



NH Dept of Env Svcs
WMD-RIMS
PO Box 3900
Concord, NH 03302-3900

Manifest Distribution



Shipping Hazardous Waste

- Manifest
 - Distribution
- Use Registered Transporter - verify
- Self-transport options
- DOT training (Federal requirement)

SQG Self-Transport Options

Please take a copy of the fact sheet
If you are interested in this option there are special regulations
Read the fact sheet. Follow the rules.
Call for assistance.



SQG Self-Certification Program

- Blank Forms in your packet

The Program: Self-Certification

- The SQG Inspects the Facility (every 3 yrs)
- The SQG Identifies Any Problems and Corrects
- The SQG Completes the Form/Declaration and Sends it in With Payment
- DES Provides Assistance and Training
- DES Does Spot Checks



Env-Hw 514

Declaration Due Date by County

County	Certifications Due
Rockingham Strafford	January 1, 2010
Cheshire Hillsborough	January 1, 2011
Belknap Carroll Coos Grafton Merrimack Sullivan	January 1, 2012

Contacts

- Hazardous Waste Hot Line
 - 1-866-HAZ-WAST
 - 1-866-429-9278
- Hazardous Waste Management Bureau
 - 603-271-2967
- Hazardous Waste Certification Programs
 - HWCC – Tim Prospert – 271-7837
 - SQG- Christie Peshka – 271-6425