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What do I Need to Inspect?

- Written Inspection Schedule
 - *Monitoring equipment*
 - *Safety equipment*
 - *Emergency equipment*
 - *Security devices*
 - *Operating & structural equipment*
 - *Containers, storage areas, & containment systems*
 - *Tanks & ancillary equipment*
 - *Loading & unloading areas*



How Often do I Need to Inspect?

- Inspection Schedule
 - *Weekly: container, container storage area, & containment systems*
 - *Monthly: safety & emergency equipment*
 - *When used: loading & unloading areas*
 - *Daily: tanks*



How do I Document Inspections?

- Inspection Items

- *Conditions*
- *Labels*
- *Dates*
- *Containment*
- *Etc.*

- Inspection Log

- *Date & time of inspection*
- *Full name of inspector*
- *Notation of observations*
- *Date & nature of repairs*
- *Keep on file for 3 years from date of inspection*
- *Follow up and record corrective actions*



Blank Weekly Inspection Form

Example

Instructions: Please use ink. Results of weekly inspections of hazardous waste containers and container storage areas must be recorded in this log. If any deficiencies are found, a description of the deficiencies must be recorded in the "Observation" column. Prompt and immediate action must be taken to correct any deficiencies observed. The date and nature of all corrective actions must be recorded in the "Corrective Actions Column". Once this log is completed, it should be maintained in a binder and must be kept on file for at least three years from the date of inspection. These inspection logs must be made available for inspection by State DEP inspectors.

Date of Inspection: _____ Time of Inspection: _____ a.m./p.m.

Full Name of Inspector: _____

Item/Condition to be checked	Yes	No	Observation/Deficiency	Corrective Actions and Date
Are all containers closed?				
Are all containers in GOOD condition (NOT leaking, rusted, bulging or otherwise in poor condition)?				
Are all containers marked?				
Does the marking include the words "Hazardous Waste" and other words to describe the waste?				
Are all markings legible and visible for inspection?				
Are all containers marked with accumulation start dates?				
Are dates less than 180 days?				
Is the amount of waste on site less than 1,000 kg (2,200 lbs)?				
Is there adequate aisle spacing?				
Are the containers stored on an impermeable base that is bermed?				
Are the base and berm free of gaps, cracks, and damage?				
Is the base free of spills, leaks, or other accumulation?				
Are incompatible materials separated by a wall or a berm?				

Note: If the "NO" column is checked, corrective action must be taken and the "Observation" and "Corrective Action" columns must be completed.

Additional Comments:

Universal Waste

- Wastes include:
 - Batteries
 - Mercury-containing thermostats
 - Mercury-containing equipment
 - Lamps
 - Used electronics
 - Certain pesticides
- Generator Status



Universal Waste

- How do I store my universal waste?
 - *Container rules:*
 - *Closed*
 - *Structurally sound*
 - *Compatible with contents*
 - *Capable of preventing leakage, spillage, or damage*
 - *Date of initial storage provided*
 - *One year to remove from site*



Universal Waste

- Universal Waste labeling
 - Accumulation start date
 - One of the following

“Universal Waste _____”

“Waste _____”

“Used _____”

Example Label

UNIVERSAL WASTE	
CONTENTS	Universal Waste Batteries
ACCUMULATION START DATE	Jan. 1, 2009
SHIPPER	Battery Recycling, Inc.
ADDRESS	1 Battery Road
CITY, STATE, ZIP	Hartford, CT 06106

Universal Waste

- Off-Site Shipments
 - *Licensed Universal Waste Disposal Facility*
 - *Applicable DOT Regulations for the following:*
 - Lead acid batteries*
 - Nickel cadmium batteries*
 - Mercury-containing thermostats*
 - Mercury-containing equipment*



Universal Waste

- Training Requirements
 - *Proper handling procedures*
 - *Emergency procedures*
- Spill/Release Procedures



What is Used Oil?

- Oil that is no longer fit for its original use
- Examples include:
 - *Gear, chain, and ball bearing lubricants*
 - *Hydraulic & compressor oils*
 - *Metalworking fluids & oils*
 - *Heat transfer oils*
 - *Crankcase oil & motor vehicle oils*
 - *Dielectric fluid*



Used Oil

- Do not mix with hazardous waste
- Test waste for characteristic waste codes
- Common contaminants include:
 - Halogenated Solvents
 - TCLP Metals
 - PCBs
 - Flammable Solvents



How Do I Manage Used Oil?

- Used Oil Management (Tanks & Drums)
 - *Marked with “Used Oil”*
 - *Good condition*
 - *Sealed unless adding or removing oil*
 - *Located indoors or under roof with containment*
 - *Suitable impervious surface*

USED OIL

GENERATOR INFORMATION

COMPANY _____

ADDRESS _____

CITY/STATE/ZIP _____

SOURCE _____

CONTACT _____

USED OIL



Used Oil

- How do I ship my used oil?
 - *CT DEEP Licensed Transporter*
 - *CT DEEP Licensed Used Oil Facility*
- Onsite combustion in a space heater
 - *Oil must be generated onsite*
 - *Heater < 0.5 million Btu/hr capacity*
 - *Exhaust is vented outside*
 - *Oil heating value is >5,000 Btu/lb*

Closure Documentation

- Characterize the waste
- Properly dispose of waste
- Properly dispose or decontaminate any equipment or structures
- Identify constituents of concern list, based on wastes managed
- Assess if releases occurred, consider migration pathways
 - *Concrete sampling*
 - *Wipe sampling*
 - *Soil sampling*
- Records/Documentation
 - *Maintain closure records onsite*
 - *File DEEP/EPA forms to change or renew generator status*

Recycling

- What should my company be doing?
 - *Solid Waste Audit (What's in the trash?)*
 - *Ensure contract in place for recyclables collection*
- See Business Recycling Assistance page linked from DEEP's Recycling Homepage:

www.ct.gov/dep/recycle



Recycling



What should my company be doing? (continued)

- Use reusable or reduced transport packaging
- Identify materials currently being disposed that have recycling markets
 - *Ex. Paper beverage cartons, used textiles, other types of plastics, other types of paper, yard waste, clean wood, electronic devices, etc.*
- Consider changing processes to reduce waste
- Purchase environmentally-preferable products
 - *Ex. Products with recycled content, recyclable, durable and reusable rather than disposable*

Universal Waste Student Workbook Activity # 12

Directions: Complete the Universal Waste Marking below with the required information for Fluorescent Lamps stored at your facility. The containers were filled today by one of your employee's who was asked to replace all of your burnt out bulbs.

UNIVERSAL WASTE
CONTENTS _____
ACCUMULATION START DATE _____
SHIPPER _____
ADDRESS _____
CITY, STATE, ZIP _____
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Used Oil Student Workbook Activity # 13

Directions: Review the two descriptions below and determine whether or not the contents of the containers are considered Used Oil. For each of the containers that do not qualify as Used Oil, describe why and identify potential corrective actions in the space provided.

1. A 55-gallon drum was generated through vehicle maintenance activities. This drum is filled with equal concentrations of gasoline, engine coolant (water and ethylene glycol mixture), and used motor oil. Do the contents of this container meet the definition of Used Oil?

- Yes
- No

If you selected no, describe why not and identify potential corrective actions in the space provided below:

2. A 5-gallon pail of lubricating oil was generated by a company when they switched out an oil filter from a machine which uses petroleum based oil as a lubricant. This oil has a flashpoint of 430°F; contains no metals, halogens, or Polychlorinated Halogens (PCBs); and has a neutral pH. Do the contents of this container meet the definition of Used Oil?

- Yes
- No

If you selected no, describe why not and identify potential corrective actions in the space provided below:

Recycling Student Workbook Activity # 15

Directions: Review the list of recyclable materials provided below. Place an "X" in the space provided for the items that you currently recycle. Place a "?" in the space provided for the items that you currently do not recycle. Provide comment in the discuss section describing potential management options for implementing recycling programs for the items in the list which were assigned a "?".

– Glass & Metal Food & Beverage Containers

– Corrugated Cardboard

– Newspaper

– White Office Paper

– Scrap Metal

– Nickel Cadmium Rechargeable Batteries

– Used Oil

– Lead Acid Batteries

– Leaves

– Type 1 & 2 Plastic Containers

– Magazines

– Drink Boxes & Juice Containers

– Discarded Mail

– Used Electronics

Discussion:

Questions?

