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Hazardous Waste Management at Municipal Public Works Garages

Prepared by the
 Waste Engineering and Enforcement Division

Introduction

Recently, forty-seven Municipal Public Works Garages were inspected as part of a Compliance Assistance Initiative in an effort to bring Garages into Compliance with Federal and State Hazardous Waste Regulations. From this Initiative, DEP found common Hazardous Wastes generated at Garages, and common violations that occurred from mismanagement of these wastes.

DEP has compiled a list of Best Management Practices for Municipal Public Works Garages to follow in the future, as improper management and disposal of chemicals and hazardous wastes may have severe consequences. For example, mismanagement of such hazardous wastes can injure Municipal Public Works Garage staff, damage septic and sewage systems, contaminate soils and ground water supplies (which may lead to contaminated drinking water), increase hazardous air emissions or cause fires and explosions.

Is Your Municipal Public Works Garage a Generator of Hazardous Waste?

From this compliance initiative, DEP found that most Garages are generators of hazardous waste. Typically Garages are either Conditionally Exempt Small Quantity Generators (CESQG) or Small Quantity Generators (SQG), although over-accumulation of greater than 1000 kg (2200 pounds) of waste on-site can trigger Large Quantity Generator (LQG) requirements. The differences among the generation categories are *briefly* described below including a table which outlines the different requirements applicable to the generators. More detailed guidance is available through DEP by calling the Hazardous Waste Toll Free Compliance Assistance Help Line at (888) 424-4193.

- 1) **Conditionally Exempt Small Quantity Generator** - Generates less than 100 kg of hazardous waste per calendar month, and never accumulates more than 1000 kg of hazardous waste or 1 kg of acutely hazardous waste on-site at any one time.
- 2) **Small Quantity Generator** - Generates greater than 100 kg but less than 1000 kg of hazardous waste in any one calendar month, and never accumulates more than 1000 kg of hazardous waste or 1 kg of acutely hazardous waste at any time.
- 3) **Large Quantity Generator** - Generates 1000 kg or more of hazardous waste in any one calendar month, or more than 1 kg of acutely hazardous waste. This category is subject to more comprehensive regulation under the Resource Conservation and Recovery Act (RCRA) than CESQG and SQG categories.

This guidance document does not and is not intended to replace or supersede either Regulations of Connecticut State Agencies (RCSA), Sections 22a-449(c)-100 through 110 and 22a-449(c)-11 ("Hazardous Waste Management Regulations") or the Code of Federal Regulations Title 40 ("40 CFR"), Parts 260 through 271. The State of Connecticut Department of Environmental Protection ("DEP") advises the regulated community not to rely solely upon the information presented in this guidance document, but to read all applicable regulations set forth in both the Hazardous Waste Management Regulations and Title 40 CFR, Parts 260 through 271, and to keep informed of all subsequent revisions or amendments to these regulations.

**Requirements for Municipal Public Works Garages that are
Generators of RCRA Hazardous Waste**

	Large Quantity	Small Quantity	Conditionally Exempt
Hazardous Waste Quantity Limits (per calendar month)	1000 kg hazardous waste or 1 kg acute hazardous waste	Greater than 100 kg but less than 1000 kg hazardous waste < 1 kg acute hazardous waste	< 100 kg or < 1 kg acute hazardous waste
Waste Determination Required	Yes	Yes	Yes
EPA ID Number Required	Yes	Yes	No
On-Site Accumulation Quantity Limits	None	<1000 kg < 1 kg acute hazardous waste	<1000 kg 1 kg acute hazardous waste
Maximum Accumulation Time	90 days	180 days	No Limit*
Storage Requirements	Comply with <u>all</u> 40 CFR Part 265 management standards for tanks, containers, and containment buildings and secondary containment	Comply with <u>all</u> 40 CFR Part 265 management standards for tanks, containers, and containment buildings and secondary containment	None*
Off-Site Waste Management	RCRA permitted or interim status HW facility	RCRA permitted or interim status HW facility	RCRA permitted or interim status facility or state approved facility
Contingency Plan	Full plan to minimize hazards from fires, spills, explosion	Posting emergency information by telephones	None*
Permitted Transporter Required	Yes	Yes	Yes
Treatment on Site Without a RCRA Permit or Interim Status	No (With exceptions including treatment in containers and tanks)	No (With exceptions including treatment in containers and tanks)	No (Except for treatment in containers and tanks or on-site recycling)
Manifest Required for Off-site Shipments	Yes	Yes	No
Biennial Report	Yes	Yes (abbreviated form)	No
Recordkeeping	<ul style="list-style-type: none"> • Manifests • Biennial reports • Exception reports • Test results • Waste determinations • Records of past management practices • Documentation if any past decontamination of equipment to eliminate waste codes 	<ul style="list-style-type: none"> • Manifests • Exception reports • Test results • Waste determinations • Records of past management practices • Documentation if any past decontamination of equipment to eliminate waste codes 	Waste Determinations
Personnel Training	Formal classroom training with annual updates - Documented in writing and kept on-site	Employees must be familiar with waste handling and emergency procedures relevant to their position	None*

* Best Management Practices, including responsible handling and storage of wastes is recommended.

What Municipal Public Works Garages are Required by Regulation to Do

Listed below in detail are requirements a CESQG must follow. Your Municipal Garage must understand and practice these requirements at all times to remain in compliance with Federal and State regulations.

1) Perform a Hazardous Waste Determination on each waste stream generated by the Garage. Keep these written Hazardous Waste Determinations on-site. (40 CFR 262.11)

A) Common potentially hazardous waste streams found at municipal public works garages include the following:

1) waste / used speedy-dri and other contaminated absorbents

(Note: If the speedy-dri was used only to absorb uncontaminated oil, the speedy-dri may be classified as a Connecticut Regulated Waste (CRW) and may be disposed at a facility that can accept CRW, or as a special waste and may be disposed at a facility that can accept special waste through an Approved Special Waste Plan.)

2) waste gasoline

3) waste oil and waste oil filters

4) waste transmission fluid, brake fluid

5) waste parts washer / degreaser

6) brake cleaner

7) waste paints, oil based vs. latex

(Note: a hazardous waste determination must also be performed on paint dust and paint chips from scraping activities)

8) waste mineral spirits

9) mercury-containing fluorescent lamps

10) aerosol cans with any content or propellant still present

11) waste antifreeze

12) spent batteries (NICAD and Lead Acid)

B) Other wastes that need to be properly managed:

1) vehicle batteries (must be recycled - check with distributor)

2) most latex paints (ensure there is no liquid paint in the can before disposal)

3) spent oil filters (hot drain for 24 hours before disposal)

4) used oil (must be stored in a separate drum labeled "used oil" and go for recycling)

2) Ensure the safe and proper off-site transport and disposal of all hazardous waste generated at the garage.

A) Your garage can contact DEP to obtain a list of licensed hazardous waste transporters in Connecticut.

B) The Transporter and Facility receiving the waste must have EPA ID numbers.

C) If you transport your own waste, you must transport in quantities less than 1000 kg/month and in your own municipality's vehicle to a permitted waste receiving facility with an EPA ID number.

D) NEVER dispose your hazardous waste in a municipal or private solid waste landfill located in the State of Connecticut.

E) Although CESQGs are not required to complete manifests, many transporters may fill out manifests for CESQGs in an effort to keep track of waste shipments. Other forms that may be used for a CESQG include bills of lading.

3) Ensure the Garage is complying with the generator status for on-site storage of hazardous waste at all times.

A) If you are a CESQG or SQG, NEVER accumulate greater than 1000 kg of hazardous waste on-site at any one time.

B) Follow all Best Management Practices identified on Page 4 of this fact sheet.

4) Perform Inspections in areas within the garage that may lead to a release of hazardous waste.

A) Your garage can develop an inspection schedule which includes all Areas of Concern. Areas of Concern include hazardous waste storage areas and areas where hazardous waste is generated.

B) Document and fix any problems noted during the inspection that could cause or lead to a release of hazardous waste to the environment.

5) Plan for Emergencies.

- A) Designate an "Emergency Coordinator" at your Garage.
- B) Post Emergency Information.
- C) Respond to all Emergencies.
- D) Equip the Garage with Appropriate Safety and Emergency Equipment.
- E) Maintain aisle space.
- F) Safely Handle Ignitable and Reactive Wastes.
- G) Post "No Smoking" signs.
- H) Know all Emergency Response Contacts.
- I) Safely Maintain and Operate your Garage to minimize hazards.

6) Ensure that all personnel are Trained.

- A) Inform employees of
 - 1) hazards associated with wastes.
 - 2) what to do in an emergency.
 - 3) locations and proper use of fire control and spill control equipment.
 - 4) safe hazardous waste handling procedures.
 - 5) Hazardous Waste Management Regulations applicable to your Garage.

Common Problems found at Municipal Public Works Garages

Municipal Public Works Garages face many of the same challenges when working to comply with regulations. Some common mistakes found at garages include:

- 1) No Hazardous Waste Determinations were made on wastes being stored in the garage. Analytical hazardous wastes determinations or hazardous waste determinations through knowledge of process must be conducted and documented on-site. When a hazardous waste determination is conducted through knowledge of process rather than analytical data, written documentation should still be kept to confirm the results. Due to failure to conduct these determinations, many Connecticut Regulated Wastes and Hazardous Wastes were being disposed as a municipal waste. Improper disposal of wastes due to lack of hazardous waste determination is illegal.
- 2) Lack of labeling and marking drums containing hazardous wastes.
- 3) Improper management and lack of inspection logs for spent batteries kept in storage before being brought for recycling.
- 4) Lack of adequate documentation of off-site disposal of hazardous wastes.
- 5) Best Management Practices within the garages, such as secondary containment and an impervious base for hazardous wastes.

Best Management Practices for Managing Hazardous Wastes in Containers

- 1) Ensure your containers are in good condition.
- 2) Ensure the container is compatible with the waste being stored in it.
- 3) Keep the container closed.
- 4) Handle the container carefully in order to avoid ruptures and leaks.
- 5) Separate containers with incompatible wastes and materials.
- 6) Store the container in a contained area - including a berm and an impermeable base to prevent leakage in case of a spill or release.
- 7) Label the container with the words "Hazardous Waste" and the contents of the container.
 - By doing this, the garage can:
 - a) Keep track of quantity and types of hazardous waste in storage. (AVOID OVER-ACCUMULATION)
 - b) Keep wastes segregated.
 - c) Alert emergency crews to types of chemicals during an emergency.
- 8) Inspect the container on a routine basis, weekly if practicable, to ensure that all Best Management Practices are being followed.

Other Issues and where to get Helpful Information

1) Floor Drains, Vehicle Washing and Other Waste Water Discharges - Unless floor drains are hooked up to Oil / Water Separators, they should not be used. All other waste water discharges need to be permitted by DEP. Contact the Bureau of Water Management at (860) 424-3018 for further information. In addition, if your garage has questions regarding the proper management of sand and salt storage sheds, contact the Bureau of Water Management to ensure proper management of any run off.

2) Storm Water Management Plans - Public Works Garages are required to apply for a General Permit for Storm Water Discharge and prepare a Storm Water Plan, which includes annual sampling. Contact the Storm Water Program at (860) 424-3018 for further information.

3) Air Emissions - Ensure that your garage has all required air permits when conducting spray painting operations in a spray paint booth, or any other process that may generate air emissions. Contact the Bureau of Air Management at (860) 424-3027 if you have any questions regarding your air emissions.

4) Underground Storage Tanks - Your garage may use underground storage tanks to store petroleum products. If you have tanks which store product on the property, it must be registered with the State of Connecticut. Contact the Underground Storage Tank Division at (860) 424-3374 if you have any questions regarding your underground storage tanks containing product.

5) Spills - In addition to calling 911, contacting your Emergency Response Contractor and the National Response Center at (800) 424-8802 once a spill has occurred, your garage needs to report any significant spills immediately to the DEP Oil and Chemical Spills Response Division at (860) 424-3338.

If you have any questions regarding the management or disposal of hazardous wastes at schools, call DEP's Waste Engineering and Enforcement Division toll free Compliance Assistance phone number (1-888-424-4193).

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