

STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WATER MANAGEMENT



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BEST MANAGEMENT PRACTICES FOR NON-DOMESTIC WASTEWATERS ASSOCIATED WITH SECONDARY, TRADE AND TECHNICAL SCHOOL FACILITIES

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INTRODUCTION

Best Management Practices (BMP's) are procedures or methods designed to minimize or eliminate the generation of wastes and wastewaters, spills, leaks, or other harmful releases into the environment. BMP's typically include the <u>design</u> of proper storage, handling, and disposal methods, the <u>process</u> for clean up and containment of spills or leaks, and general <u>procedures</u> to encourage conservation and pollution prevention through improved facility operations.

Subsurface sewage treatment and disposal systems are generally designed to accommodate domestic sewage. Because of the wide variety of wastes which may be generated in conjunction with a secondary school facility, it is very important to provide some type of guidelines for disposal of non-domestic wastes.

Proper disposal of non-domestic wastes is an essential step in protecting our water resources. In the past, secondary schools were not treated as fundamentally different from other school facilities. However, due to the diverse types of wastes which may be generated by the laboratories, shops, and activities associated with secondary schools, these facilities are now recognized as posing a greater threat to our water supplies if they are not properly managed.

Many of the wastes which may be generated by a secondary school can cause the impediment or failure of a subsurface system. Some, such as solvents, disinfectants, and pesticides, may inhibit or kill the essential microorganisms at work in the system, causing the release of partially treated or untreated wastewater. Others, such as oils, grease, and paints, may clog the active soil interface surfaces causing breakout or surfacing of effluent.

BMP's are important to the regulatory community because they help protect the environment through education, management, and increased awareness of environmental concerns.

BMP's are useful to facilities in many ways. They help reduce operation costs by reducing the quantities of materials purchased and wastes disposed of. They reduce the possibilities of accidents and injuries and they reduce environmental liability.

Therefore, although the initial implementation of a BMP may be expensive, the long term savings can be tremendous.

INTENT

This effort is intended to provide guidance in implementing best management practices for the storage, handling, and disposal of chemicals and wastes associated with new and existing high school facilities. This guidance document may be appropriate for high schools, preparatory schools, trade and technical schools, and some community and technical colleges. It includes general best management practices applicable to all existing or new school facilities, followed by separate sections discussing each individual department. These separate sections discuss specific BMP's for the particular materials used and wastes generated by the departments.

Additionally, each of these sections contains suggestions of items which should be included on an inspection checklist. Regular inspections should be conducted at least bi-annually, with findings reported to the school principal, superintendent of schools, or local school board.

Each facility can incorporate the appropriate BMP's into a management plan for training and implementation. The plan should be reviewed by each new staff person upon hiring and by all employees at the beginning of each school year.

Much of the information in this guide comes from "Best Management Practices for the Protection of Groundwater - A Local Official's Guide to Managing Class V UIC Wells" prepared by Oswald Inglese Jr., P.E. The section on managing laboratories is taken for the most part, from Prudent Practices for Disposal of Chemicals From Laboratories, prepared by the National Research Council's Committee on Hazardous Substances in the Laboratory.

GENERAL BEST MANAGEMENT PRACTICES

General Best Management Practices are BMP's which can be applied to any facility or operation. General BMP's should be applied in addition to the specific BMP's for each of the departments covered in the following sections of this guide.

DESIGN

Subsurface Sewage Treatment and Disposal Systems must meet accepted design and performance criteria. They must be used, operated and maintained properly. Facilities should hire a Professional Engineer for design or repair work. Facilities must maintain systems through a licensed waste hauler.

Eliminate floor drain discharges wherever possible. If a floor drain is necessary, discharge to an approved holding tank.

Eliminate dry wells associated with floor drains.

Seal floor surfaces in work areas and chemical storage areas with an impermeable material resistant to acids, caustics, solvents, oils, or any other substance which may be used or generated at the facility.

Storage areas for hazardous materials and waste materials should be permanently roofed, completely contained, and isolated from floor drains. They should have sealed surfaces, and should be accessible only to authorized personnel. Secondary containment is desirable.

Drum and container storage areas should be consolidated into one location for better control of material and waste inventory.

Low-flow fixtures and flow restrictors should be installed to minimize hydraulic loading. Hydraulic loading determines the necessary sizing of the subsurface system. An incorrectly sized system may result in failure of the system.

Stormwater contact with materials and wastes should be avoided wherever possible. If unavoidable, uncovered storage areas should have a separate stormwater collection system, which discharges to a holding tank.

Identify and eliminate any cross-connections, such as sanitary discharges to storm sewers, stormwater discharges to sanitary sewers, or floor drain discharges to storm or sanitary sewer systems.

Waste collection stations should be provided throughout work areas for the accumulation of spent chemicals, soiled rags, etc. Each station should have labeled containers for each type of waste for disposal.

Existing and future facilities should connect their sanitary facilities to municipal sanitary sewer systems where they are available.

In implementing Best Management Practices it is important to initiate the program and manage it. A responsible, management level person (such as the Vice-Principal) should be appointed to oversee a regularly scheduled inspection and maintenance program. This person would report to the Principal, on a semi-annual basis, who in turn would report to the Superintendent of Schools, Board of Education, or other governing body.

PROCEDURAL

1. Inventory

Conduct monthly monitoring of inventory and waste generation.

Avoid waste and reduce inventory by ordering on an as-needed basis.

Record expiration dates on products in inventory. Eliminate obsolete or excess materials from inventory. Return unused or obsolete products to the vendor.

Ensure material and waste containers are properly labeled.

Mark purchase date and use older materials first.

Maintain product Material Safety Data Sheets (MSDS) to monitor materials inventory and the chemical ingredients of wastes. Make sheets available to staff.

2. Inspection/Maintenance/Operation

Implement a regularly scheduled internal inspection and maintenance program.

Clean spills promptly, using appropriate materials and disposing of them properly. Use recyclable materials where possible.

Store materials in a controlled, enclosed environment (minimal temperature and humidity variations) to prolong shelf life, minimize evaporative releases, and prevent moisture from accumulating.

Keep containers closed to prevent evaporation, oxidation, and spillage.

Place drip pans under containers and storage racks to collect spillage.

Segregate wastes that are generated, such as hazardous from non-hazardous, acids from bases, chlorinated from nonchlorinated solvents, and oils from solvents, in order to minimize

disposal costs and facilitate recycling and reuse.

Recycle cardboard and paper, and reuse or recycle containers and drums whenever possible. Empty drums and containers may be reused, after being properly rinsed, for storing the same or compatible materials. These dilute rinsewaters may be disposed of down the drain.

Wastes accumulated in holding tanks and containers must be disposed of through an appropriately licensed waste transporter in accordance with federal, state, and local regulations. A list of licensed waste haulers is available from the Department of Environmental Protection's Waste Management Bureau.

3. Staff and Student Training

Staff and students should be trained prior to working with equipment or handling materials, and should be periodically refreshed when new regulations or procedures are developed.

Staff and students should be made aware of Material Safety Data Sheets and should understand their information.

Facility plans, plumbing plans, and subsurface sewage treatment and disposal system plans and specifications must be updated to reflect current facility configuration. Copies of associated approvals and permits should be maintained on file.

OSHA requirements, health and environmental emergency procedures, material management plans, inventory records, servicing/repair/inspections logs, and hazardous waste disposal records must be maintained up to date and made available for inspection by regulatory officials.

Posting of signs, communication with staff and students, education and training, and posting of manuals for spill control, health and safety (OSHA), operation and maintenance of facility and equipment, and emergency response are essential. Consider a bulletin board for environmental concerns.

Regular inspection and maintenance schedules should be posted and understood by staff and students.

VOCATIONAL AGRICULTURE PROGRAMS

Potential problems/concerns:

Pesticides

Fertilizers

Paints

Refer also to previous General Best Management Practices.

DESIGN BMP'S

Pesticides, their preparations, and any waste products must not be discharged to subsurface sewage treatment and disposal systems.

Outdoor storage areas should have a permanent roof, impervious surface, and secondary containment for spills or leaks.

Indoor storage areas should be clearly marked and kept separate from work areas.

PROCESS BMP'S

Use pesticides only when needed, not on a regular schedule.

Avoid over-application. Follow directions for use on labels carefully.

Use water-based products wherever possible.

Mixing and preparation should be done in a controlled area with impervious surface.

Lawn and recreational field care should adhere to these practices especially where application of any chemical is concerned.

PROCEDURAL BMP'S

Maintain accurate records of all pesticide use and application.

Maintain minimum product inventory - purchase only amounts required.

Identify and label mixing and measuring devices according to the use and product used.

Restricted-use products and empty containers that have not been cleaned should be kept in secure storage.

Store pesticides in original containers, tightly closed, and prevent exposure to light.

Segregate storage to prevent cross-contamination.

Triple rinse containers before disposal.

Rinse waters may be re-used for mixing; if they are not, rinse waters must be collected and stored for disposal by a licensed waste hauler.

Avoid use of plastic drums which may deteriorate or crack when in contact with chemicals, or use a removable liner.

Post lists of pesticides in storage areas and maintain a copy with business records.

Notify local board of health and fire department of types, amounts, and location of pesticides.

Provide and post contacts and telephone numbers of local fire department, facility supervisor, pesticide control agency, environmental agency, hospital, board of health, and poison control center.

INSPECTION ITEMS:

Regular inspections for proper storage and handling of raw materials and waste products.

No dumping of wastes and rinse waters down floor drains, storm drains, septic systems, or to the ground surface.

No outdoor rinsing of equipment which may discharge to the ground or stormwater collection system.

Posted signs at all sinks stating that no chemicals or other materials may be disposed of down the drain without prior consent from the appropriate teacher.

ART DEPARTMENT

Potential Problems/Concerns:

Solvents

Paints, Inks, Glues, etc.

Modeling and Pottery Clays, Glazes

Scenery painting- spray paints

Refer also to previous General Best Management Practices.

DESIGN BMP'S

Provide labeled containers for disposal of solvents, empty containers and other materials.

Provide appropriate, secure storage for flammable materials.

PROCESS BMP'S

Replace solvent-based inks with water- or vegetable- based ink systems.

Use water-based paints and inks wherever possible.

Most inks can be recycled, typically by blending different colors together to make black ink.

Detergent or alkaline solutions rather than solvents should be used for general clean-up wherever possible.

Reuse cleaning solvents when possible.

Reuse cleanup solvent in next compatible batch of paint.

Nonchlorinated solvents should be substituted for chlorinated solvents wherever possible.

Eliminate use of lead-based glaze.

PROCEDURAL BMP'S

Waste solvents, inks and ink sludges, etching solutions, and non-water based paints should be collected and stored for disposal.

Pottery or modeling clay should be disposed of in waste baskets, never down the drain.

Use proper spray paint techniques(e.g., use high transfer efficiency; overlap spraying pattern by 50%; maintain a distance of 6-8" from work piece; hold gun perpendicular to surface; trigger the gun at the beginning and end of each stroke).

Use fully enclosed gun cleaning station.

INSPECTION ITEMS:

Proper handling, storage, and disposal of paints and solvents.

Posted signs at all sinks stating that no chemicals or other materials may be disposed of down the drain without prior consent from the appropriate teacher.

AUTOMOTIVE SHOP

Potential problems/concerns:

Petroleum products-oils, grease, gasoline, brake and transmission fluids

Solvents

Paints

Metal-scrap, clippings, shavings, parts

Batteries

Antifreeze

Refer also to previous General Best Management Practices.

DESIGN BMP'S

Seal floors with an impervious material.

Do not clean floor by flushing with water. Use a wet-vacuum or mop and dispose of cleaning wastes properly.

Provide waste collection stations, with labeled containers for each type of waste fluid, or labeled waste sinks which discharge to an approved waste-holding tank.

Any existing floor drains must be sealed or discharge to an approved holding tank for removal by a licensed waste hauler.

PROCESS BMP'S

Use drip pans to minimize leaks and spills onto the floor.

Used engine oil should be stored and recycled through a licensed recycling service.

Spent oil filters may be recycled for their metal content.

Consider the use of propylene glycol-based antifreeze as an alternative to the more toxic ethylene glycol types.

Substitute nonchlorinated solvents for chlorinated compounds in parts cleaning and degreasing whenever possible. Where possible use only hot water for cleaning.

PROCEDURAL BMP'S

Use high-performance, longer lasting oils.

Do not use waste oil as a dust suppresser.

Do not use antifreeze as a de-icing agent.

Antifreeze should be recycled.

Lead-acid batteries should be recycled. Inspect batteries for cracks and leaks and store in an acid-resistant container, which will hold released material.

Waste oil tanks should be used to collect and store petroleum-based fluids drained from vehicles, including oil, transmission fluid, and brake fluid; they should not be used for collecting cleaning solvents or antifreeze. Tanks should be pumped out by a waste hauler licensed in accordance with federal, state, and local regulations.

Scrap metal parts, or other parts which were in contact with lubricant, must be stored in enclosed containers indoors or in areas secured from stormwater accumulation.

Use recyclable cleaning rags or absorbent pads to clean up spills. Have rags cleaned by an appropriate industrial laundry service. When necessary, dispose of rags and pads in a separate container and have them removed by a licensed waste hauler.

Clean hands with waterless cleaners and paper towels, dispose of these wastes properly with solid wastes, then wash hands.

INSPECTION ITEMS:

Proper storage of new and waste paint, solvents and motor vehicle fluids.

No dumping of wastes down drains, septic systems, storm drains, and outside of facility on the ground.

No outside storage of vehicles and scrap materials

Contracts with waste haulers.

Posted signs at all sinks stating that no chemicals or other materials may be disposed of down the drain.

CUSTODIAL/MAINTENANCE DEPARTMENT

Potential Problems/Concerns:

Custodial Activities:

Cleaning Agents Deodorizers Polishes Paints Solvents

Maintenance Activities/ Lawn and Recreational Field Care

Fertilizers
Pesticides
Brake and Transmission fluids
Oil
Antifreeze

Fuels

Refer also to previous General Best Management Practices.

DESIGN BMP'S

Material Safety Data Sheets(MSDS) for all products should be posted and understood by staff. MSDS's should be reviewed by staff at least once a year.

All cleaning products, paints, and solvents should be stored in a secure area, accessible only to authorized personnel.

Provide appropriate storage containers for disposal of excess products as well as waste materials.

Use dry pesticide or irrigation injection for grounds maintenance.

Recycle pesticide rinse water.

Avoid the use of underground fuel storage tanks.

PROCEDURAL BMP'S

No concentrated cleaners, deodorizers, polishes, etc. should ever be poured down the drain.

Any unused or unwanted products such as concentrated cleaners, deodorizers, and polishes, should be left in their original containers and disposed of. They can be given to another school or town department for their use. Check with the local(town) Household Hazardous Waste Collection for any ultimate disposal.

Solvents must be placed in an appropriate container for disposal by a licensed hazardous waste hauler.

INSPECTION ITEMS:

Proper storage and handling of concentrated cleaners, deodorizers, polishes, paints, oils, and solvents.

Disposal of concentrated disinfectants, deodorizers and polishes as well as paints and solvents in appropriate containers.

Posted signs at all sinks stating that no chemicals or other materials may be disposed of down the drain without prior consent from the appropriate authority.

PHOTOGRAPHY LAB

Potential Problems/Concerns:

Film Developer Solutions

Stop Bath Solution

Fixer Solution

Rinsates

Refer also to previous General Best Management Practices.

DESIGN BMP'S

Discharge to septic system only if effluent meets Maximum Contaminant Levels for silver and chromium, of 0.05 mg/l. Solutions should not contain chromium, and fixers must be treated for silver recovery. A regular testing program for contaminant levels must be initiated if discharge is intended.

Discharges should be metered slowly over a 24-hour period to prevent impairment of treatment system performance.

Solutions containing sodium or potassium dichromate should not be discharged to septic systems because of toxicity to microorganisms.

PROCESS BMP'S

Practice water conservation.

Use squeegees to wipe excess liquid from film and paper to reduce dragout and carry-over during transfer between process baths.

Fixer baths can be extended by adding ammonium thiosulfate to increase capacity of allowable silver buildup, using an acid stop bath prior to the fixing bath, and adding acetic acid to the fixing bath to maintain low pH.

Reuse tray-method solutions until test strips indicate they are chemically exhausted.

Recycle waste film and paper to recover silver.

Photographic wastes should be treated to remove silver.

PROCEDURAL BMP'S

Contract a commercial service for the collection and disposal of spent photographic processing solutions.

INSPECTION ITEMS:

No improper storage and handling, leaks, spills, or dumping of spent, excess, or obsolete solutions and rinse waters down drains to septic systems or storm drains, or outside of facility on the ground.

Posted signs at all sinks stating that no chemicals or other materials may be disposed of down the drain without prior consent from the appropriate teacher.

SCIENCE LABORATORIES

BIOLOGY LABORATORY

Potential Problems/Concerns:

Animal carcasses and tissues Microorganism cultures Formaldehyde or other preservatives Disinfectants Sharps- razor blades, needles, etc

Refer also to previous General Best Management Practices

DESIGN BMP's

Include procedures for disposal of any wastes generated or unused products, when planning an experiment.

Viable organisms in biological materials must be killed before they leave the laboratory.

Separate, marked containers should be provided for broken glassware and equipment, disinfectants and preservatives, and animal carcasses and tissues. Check with the local Household Hazardous Waste Removal for disposal of these containers.

PROCESS BMP's

Concentrated disinfectants and preservatives must not be discharged down the drain, they should be collected and disposed of by a licensed hauler. Spills should be removed from surfaces with paper toweling and disposed of as solid waste, rather than being rinsed into drains.

Avoid or limit the use of disinfectant products containing phenols, ethylene oxide, formaldehyde, or sodium hypochlorite.

Rinsewaters from hand cleaning and instrument cleaning can be discharged to the drain.

Spent reagents and solvents used in slide preparations should be collected and disposed of by a licensed hauler.

Evaluate the use of disposable vs. reusable products, considering pollution prevention opportunities as well as cost factors.

PROCEDURAL BMP's

Mercury from broken equipment should be recovered and reused. Provide and use mercury spill kits to increase mercury reuse.

Carcasses and body parts can be collected and stored in plastic bags and frozen for collection by a licensed cremating service.

INSPECTION ITEMS:

Proper storage and disposal of animal carcasses or tissues, sharps, unused or obsolete chemicals or other wastes generated.

Properly labeled collection and storage containers marked with the appropriate hazard.

Posted signs at all sinks stating that no chemicals or other materials should be disposed of down the drain without prior consent from the appropriate teacher.

CHEMISTRY LABORATORY

Potential Problems/Concerns:

Reagents Solutions Chemicals Compounds

Refer also to previous General Best Management Practices.

DESIGN BMP'S

Include disposal procedures for excess reagents, products and by-products generated by the experiment, when planning an experiment.

Control accumulation of excess reagents, especially those that are prone to deteriorate over time. Order only amounts that are necessary.

Share surplus chemicals.

Computerize inventory - keep a running inventory of unused chemicals for use by other departments.

Consider the possibilities for exchange of unneeded chemicals and for recovery of used solvents, to reduce costs of purchasing new chemicals and of disposal.

Reduce the scale on which experiments are carried out; consider "Microchemistry."

Increase instrumental analyses over wet chemistry.

Substitute less toxic chemicals(e.g., sodium hypochlorite for sodium dichromate, alcohols instead of benzenes, cyclohexane for carbon tetrachloride, stearic acid for acetamide).

Use specialty detergents(instead of chromic or sulfuric acid) to clean glassware.

Maintain reagent labeling properly. If a label has deteriorated, but the reagent or container has not deteriorated, and the identity is certain, the container should be re-labelled. If the identity is uncertain or the reagent or container has deteriorated the chemical should be discarded according to accepted laboratory procedure, which can be found in <u>Prudent Practices for Disposal of Chemicals From Laboratories</u>, referenced previously.

Require that all reaction mixtures stored in laboratory glassware be labeled with the chemical composition, the date they were formed, the name of the person responsible, and a notebook reference.

PROCEDURAL BMP'S

All spent reagents generated by the various laboratory experiments must be stored in appropriate storage containers.

Separate storage containers must be used for each laboratory experiment due to incompatibility of certain chemicals.

Storage containers should be clearly and permanently marked with the experiment number of which all waste chemicals will be deposited. As the experiments are repeated the same containers can be used until they become full.

Full storage containers should be removed to a waste storage area until they can be disposed of by a licensed waste hauler.

Wash or rinse waters from any experiments involving the use of volatile organic compounds or heavy metals must be stored in appropriate containers for disposal by a licensed waste hauler.

Wash or rinse waters from the cleaning of laboratory equipment or glassware from experiments using aqueous solutions of concentrations of 1 molar or less, or from hand washing may be disposed of down the drain.

Other wash or rinse waters should be collected and stored for disposal by a licensed waste hauler.

The majority of aqueous solutions and solid wastes can be properly stored in plastic bottles. All organic solution wastes should be stored in glass bottles.

Consolidation of wastes from different experiments is acceptable only when it is certain that only compatible chemicals are involved.

Use of hazardous reagents should be avoided whenever possible.

Any rags, glassware or other materials contaminated with chemicals should be disposed of in appropriate containers and stored for disposal by a licensed waste hauler.

INSPECTION ITEMS:

Proper storage and handling of chemicals and wastes generated by experiments.

No spills, leaks or dumping of excess or obsolete reagents, solutions, products or by-products of experiments down drains to septic system or storm drains, or to the ground.

Posted signs at all sinks stating that no chemicals or any other materials may be disposed of down the drain without prior consent from the appropriate teacher.

SWIMMING POOLS

Potential Problems/Concerns:

Cleaning Wastewaters: wastewaters and any other liquids generated by the acid cleaning of swimming pool sidewalls

Draining Wastewaters: wastewaters generated by draining of water from swimming pools, do not include cleaning wastewaters

Backwash Wastewaters: wastewaters generated by backwashing a swimming pool filtering system

Chlorine

Refer also to previous General Best Management Practices.

DESIGN BMP's

Chlorine and acids, cleaners, disinfectants, or other chemicals should be stored in a secure area, covered, with an impervious floor. Access should be restricted to authorized personnel only.

Purchase materials on an as-needed basis.

PROCEDURAL BMP's

Swimming Pool Cleaning wastewaters may discharge to an approved subsurface leaching system subject to the conditions listed below AT THIS TIME, but this is currently under departmental review.

Swimming Pool Backwash and Draining wastewaters may discharge to an approved subsurface leaching system subject to the conditions below.

Non-residential swimming pools may discharge wastewaters to an approved subsurface leaching system if it is dedicated for this purpose only, subject to the conditions listed below. No connections are allowed into subsurface sewage disposal systems(septic systems) and associated leaching fields.

Discharge Conditions:

- 1) The pH of the discharge shall be between 6.5 and 8.0.
- 2) Total Residual Chlorine shall be non-detectable as determined by a water test kit(less than 1 mg/l).

No water treatment chemicals may be added to the pool for at least a week before draining it.

Add chlorine only as needed, not on a regular schedule.

Clean filter traps often.

Local approvals may be required for discharge of swimming pool wastewaters.

All swimming pool wastewaters may also be collected and hauled by a hauler licensed for that purpose, to a wastewater treatment facility licensed for that purpose.

INSPECTION ITEMS:

Proper storage and handling of chlorine, acid cleaners, disinfectants and any other chemicals used.

Regular maintenance - cleaning filter traps, pool bottom and sidewalls and water testing.

No chlorine or concentrated disinfectants are being disposed of down the drain.

WOOD AND METAL SHOP

Potential Problems/Concerns:

Paints and finishes

Oils

Solvents

Cuttings, shavings, and other scrap metal

Refer also to previous General Best Management Practices.

DESIGN BMP'S

Use paints and other finishes which have lower volatility, lower metal concentrations, and higher solids content whenever possible. Consider water-based paints.

Substitute water-soluble cutting fluids for more hazardous oils.

PROCEDURAL BMP'S

Recycle lubricant oil and cutting oils.

Use only water for cooling and lubrication during grinding and polishing.

Eliminate the use of organic solvents in tumbling solutions.

Use water rather than oils for quenching. Recycle water and oils used for quenching.

Dumpsters and drums containing oil-coated scrap metal should be stored in an enclosed area or covered to prevent stormwater accumulation.

Spills should be cleaned with recyclable rags or absorbent pads which should be re-used when possible followed by storage and disposal with similar solid wastes.

Wash and wipe hands with waterless cleaner and paper towels, dispose of these with solid wastes, then wash hands.

INSPECTIONS ITEMS:

Proper storage and handling of paints, solvents, and oils.

No leaks, spills or dumping of any paints, stains, solvents, oils or other wastes to floor drains, storm sewer, septic system or the ground outside the facility.

Posted signs at all sinks stating that no chemicals or other wastes may be disposed of down the drain without prior consent from the appropriate teacher.