

Hazardous Waste Generator Workshop In-Depth Topic Discussion 2015



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WORKSHOP OVERVIEW

- ❖ Will discuss hazardous waste (HW) management topics in more detail, including:
 - Review Solvent-Contaminated Wipes Rule in KS
 - Changing Generator Status (routine and one-time events)
 - Notification Forms
 - Used Oil Requirements
 - Used Antifreeze
 - Aerosol Cans
 - E-waste
 - e-Manifesting Update
 - Universal Waste
 - K, U, and P-listings
 - F001-F005 listings
 - Solvent recycling and accounting
 - Navigate the KDHE website
 - Enforcement Case Overview
 - Outreach – Compliance Training Manual
- ❖ Opportunity for questions



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SOLVENT-CONTAMINATED WIPES RULE IN KS

- ❖ Became effective at the federal level January 2014.
- ❖ Kansas Policy BWM 2013-P2, “Solvent-Contaminated Wipes” allows generators to follow this federal rule in Kansas now (signed December 2013).
- ❖ Technical Guidance Document (TGD) HW-1995-G2, “Solvent-Contaminated Wipes” explains the rule and was revised May 2015.



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SOLVENT-CONTAMINATED WIPES RULE IN KS

- ❖ Applies to any wipe contaminated with one or more solvents on the F001 through F005 lists in 40 CFR 261.31 or the corresponding P- or U-listed solvents found in 40 CFR 261.33, or that exhibits the characteristic of ignitability.
- ❖ Applies to wipes being sent for disposal or being laundered (reusable wipes).
- ❖ If a wipe is listed for anything other than solvents, has trichloroethylene (disposable wipes only), or is characteristic for toxicity, corrosivity, or reactivity, it is **NOT** eligible for this rule.



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SOLVENT-CONTAMINATED WIPES RULE IN KS

- ❖ Reusable wipes managed under this rule:
 - Are excluded from the definition of solid waste (do not require a hazardous waste determination);
 - Do not count toward the generator status (counting of wastes).



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SOLVENT-CONTAMINATED WIPES RULE IN KS

- ❖ Disposable wipes managed under this rule:
 - Are excluded from the definition of hazardous waste (do require a hazardous waste determination);
 - Do not count toward the generator status (counting of wastes).



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SOLVENT-CONTAMINATED WIPES RULE IN KS

- ❖ Container management for wipes under this rule:
 - Non-leaking;
 - Closed;
 - Able to contain free liquids;
 - Labeled with the words “Excluded Solvent-Contaminated Wipes”;
 - Marked with the accumulation start date or alternative tracking method;
 - Removed from the site within 180 days.

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SOLVENT-CONTAMINATED WIPES RULE IN KS

- ❖ Recordkeeping
 - Documentation of the name and address of all handlers receiving the wipes, including laundries, dry cleaners, landfills, or combustors.
 - Records (or labeling) to document that wipes are on-site for 180 days or less.

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SOLVENT-CONTAMINATED WIPES RULE IN KS

- ❖ Recordkeeping (continued)
 - Description of how the “no free liquids” condition is satisfied. This must include a description of all technologies, methods, sampling, or knowledge that the generator is using to ensure that wipes sent to handlers contain no free liquids.

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SOLVENT-CONTAMINATED WIPES RULE IN KS

- ❖ Free Liquids
 - If free liquids occur at the generating facility, they should be removed and properly managed, and would count toward the generator’s hazardous waste status.
 - If free liquids occur at a handling facility, they should be removed and properly managed and would count toward the handler’s hazardous waste status.

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SOLVENT-CONTAMINATED WIPES RULE IN KS

- ❖ Important notes about the rule in Kansas:
 - KDHE acknowledges that zipping plastic bags will hold free liquids and can be used adequately to hold wipes.
 - If you are sending disposable wipes to a landfill, make sure that landfill has a synthetic liner. Acceptable Kansas landfills are listed in our TGD.

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SOLVENT-CONTAMINATED WIPES RULE – RECORDKEEPING Example form available with KDHE’s TGD

Solvent-Contaminated Wipes Exclusion Documentation Form

Facility Name: _____

Check the container's reports from the each type of wipe (both are used at the facility):

Disposable Solvent-Contaminated Wipes _____ Reusable Solvent-Contaminated Wipes _____

Number of waste drums generated each month: _____

Facilities have you known that the wipes are not characteristic for toxicity, reactivity, or corrosivity?

Through knowledge of the container generating these wipes, have they or anyone on-site at the facility or that the character of waste is or will be not extremely and normally, and not a concern. (See attached safety data sheet(s), if available.)

The wipes were analyzed by a HHSO certified laboratory to ensure that they are not a characteristic hazardous waste. See attached analytical results.

Other: _____

Facilities have you still used the "no free liquid" requirement?

I will manually check each container weekly to ensure that there are no free liquids. If free liquids are present, they will be removed and placed in the hazardous waste container located _____

Other: _____

List the names and address of all handlers receiving the wipes, including landfills, dry cleaners, laundries, or any other facility. Complete this on a separate page if necessary.

Name	Street Address	City	State	Zip Code

Includes the method that will be used to document that these wipes are not over 180 days.

A date is placed on each container.

A manifest is prepared with a chemical facility identified to receive the wipes from each month. A copy of the manifest is maintained at the facility.

Each collection container has a designated number and a bag is kept in which each collection container is emptied into the storage container. Also recorded in the log is the date each storage container is removed from the site.

Other: _____

List the names and title of the persons who completed this form. _____ Date: _____

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CHANGING GENERATOR STATUS (ROUTINE AND ONE-TIME EVENTS)

- ❖ Permanent changes are made using the Notification of Regulated Waste Activity Form 8700-12.

A screenshot of the Notification of Regulated Waste Activity Form 8700-12, showing various fields for facility information, generator status, and event details.

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CHANGING GENERATOR STATUS (ROUTINE AND ONE-TIME EVENTS)

- ❖ One-Time events can also trigger changes to generator status:
 - Clean out of a tank (not routine maintenance)
 - Clean up from spills or releases
 - Lab clean out
 - Process line shut down
- ❖ KDHE does track these to make sure they are truly one-time events.

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CHANGING GENERATOR STATUS (ROUTINE AND ONE-TIME EVENTS)

- ❖ Notify KDHE (Rebecca Wenner specifically). Provide the following:
 - Facility information (name, ID, location)
 - Current Generator Status
 - Status caused by event
 - Describe the event and how it is being resolved
 - Date(s) of the event

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CHANGING GENERATOR STATUS (ROUTINE AND ONE-TIME EVENTS)

- ❖ After shipment of the waste caused by the event, provide KDHE with a legible copy of the Uniform Hazardous Waste Manifest to change back to your routine generator status.
- ❖ Pay appropriate fee or difference in fees to KDHE.

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NOTIFICATION OF REGULATED WASTE ACTIVITY FORM

- ❖ Detailed instructions are available on the KDHE website with the form.
- ❖ Page 1 – Site Information
 - EPA ID
 - Site Name
 - Site Location (street address)
 - NAIC Codes (look up on the internet for your industry - <http://www.naics.com/search/>)

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NOTIFICATION OF REGULATED WASTE ACTIVITY FORM

- ❖ Page 1 – Site Information
 - Site Mailing Address
 - Site Contact Person (Does not have to be local)
 - Legal Owner and Operator of the Site

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NOTIFICATION OF REGULATED WASTE ACTIVITY FORM

- ❖ Page 2 – Regulated Waste Activity
 - Hazardous Waste Activities
Including generator, transporter, TSDF, Importer, mixed waste, and more
 - Universal Waste Activities
Only necessary for Larger Quantity Handlers (very few in Kansas)
 - Used Oil Activities
Only necessary for transporters, processor/refiner, off-spec burner, and fuel marketers.

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NOTIFICATION OF REGULATED WASTE ACTIVITY FORM

- ❖ Page 3 – Description of Hazardous Waste
 - Waste codes (look at your manifests and waste determination documentation).
 - Comments – can be left blank if there is nothing interesting about your notification.
 - Certification – must be a signature of authorized individual.

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USED OIL REQUIREMENTS

- ❖ Used oil (UO) is not a hazardous waste as long as it is recycled. Therefore it does not count towards your HW generator classification.
- ❖ Containers and above-ground tanks of UO must be marked with the words "Used Oil" and maintained in good condition.
- ❖ Must use a transporter registered with KDHE unless you are transporting 55-gallons or less of your own used oil to an aggregation point or collection center.

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USED OIL REQUIREMENTS

- Can burn any of the following in an on-site space heater:
 - UO generated on-site or by sister facility (as long as no more than 55 gallons is self-transported)
 - UO from do-it-yourselfers
 - On-spec UO from any source
- Space heater must meet the following:
 - Maximum capacity of 0.5 million Btu/hour;
 - Combustion gases vented to the ambient air;

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USED OIL REQUIREMENTS

- ❖ Burning in a space heater (Continued):
 - On-specification UO can be accepted from off-site, but must have been tested to show that it meets these criteria before burning in a space heater:

USED OIL FUEL SPECIFICATIONS
Constituent/Property Allowable Level

Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Flash point	100 minimum
Total Halogen	4,000 ppm maximum
(If > 1,000 ppm halogens, then only on-spec if rebuttable presumption is met)	

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USED ANTIFREEZE

- ❖ Recycling, either on-site or off-site is the preferred method for handling.
- ❖ Disposal is a last resort, and a waste determination is required prior to disposal.
 - If hazardous waste, then it must be managed accordingly.
 - If non-hazardous then it can be solidified and disposed at a landfill or if written permission is obtained by the local wastewater authority, it can be disposed through the sanitary sewer (never a septic system).

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AEROSOL CANS

- KDHE considers empty aerosol cans to be non-hazardous (as long as they did not contain acutely hazardous waste).
- If the contents of an aerosol can cannot be used (the can breaks, nozzle clogs, etc.), attempts can be made to repair the can and put it back into service.
- If the can cannot be repaired, or if no attempt will be made to repair the can, a hazardous waste determination must be made on the contents (generally done by reviewing the Material Safety Data Sheet (MSDS)).
- If the contents are HW, the following slides apply.

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AEROSOL CANS

- The satellite accumulation area must be at or near the point of generation of the aerosol cans.
 - Must be where cans are generated originally if no attempts will be made to fix the cans and put them back into service.
 - Can be the maintenance area or other central location if attempts will be made to fix the cans in that area/location and put the cans back into service.

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AEROSOL CAN PUNCTURING

- If done in a closed and self-contained unit (such as a drum top unit), KDHE considers this an exempt form of hazardous waste treatment.
- KDHE considers the waste drained from the aerosol cans to be a newly generated waste, and therefore the drum accumulating this liquid waste can be a satellite accumulation container.
- The emptied cans can be recycled or disposed (unless they contained P-listed waste).

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AEROSOL CANS



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ELECTRONIC WASTE

- ❖ There is no landfill ban in Kansas for electronic waste.
- ❖ KDHE has not adopted federal e-waste rules.
- ❖ KDHE has used grants to encourage the building of an e-waste recycling infrastructure in Kansas.

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E-MANIFESTING UPDATE

- ❖ Hazardous Waste Electronic Manifest Establishment Act signed 10/5/2012.
- ❖ Congress initially failed to fund the e-manifesting system. That pushed back the implementation schedule.

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E-MANIFESTING UPDATE

- ❖ EPA has started the Fee Rule work group and expects to have the proposed fee methodology and related policy proposals published in late 2015 (no new information).
- ❖ EPA hopes to have the Final Fee Rule schedule (amounts) published in late 2017 or early 2018.

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E-MANIFESTING UPDATE

- ❖ Production of the e-manifest system is planned for late spring 2018.
- ❖ At this time, it is planned that at least one paper manifest will accompany the waste with the transporter and paper manifests will be used if the system goes down.

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E-MANIFESTING UPDATE

- ❖ Generators will be able to view their own information at any time.
- ❖ The public will be able to access information on all shipments after 90 days have passed from the receipt of the shipments at designated facilities.

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UNIVERSAL WASTE

- Universal waste (UW) is a subset of hazardous waste.
- Kansas follows EPA rules for UW.
- Lamps (fluorescent bulbs) cannot be deliberately crushed if they are going to be managed as UW.

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UNIVERSAL WASTE



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UNIVERSAL WASTE

- UW in Kansas includes:
 - Batteries
 - Certain pesticides
 - Mercury-containing equipment
 - Lamps (including fluorescent bulbs)

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UNIVERSAL WASTE

- UW batteries, mercury-containing equipment, and lamps, must be labeled:
 - “Universal Waste - _____”; or
 - “Waste _____”; or
 - “Used _____”.

Fill in the blank with: Batteries, mercury-containing equipment (or mercury thermostats), or lamps.

- UW pesticides must be labeled either:
 - “Universal Waste – Pesticides”; or
 - “Waste Pesticides”.

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UNIVERSAL WASTE

- Must document the accumulation time of the UW by:
 - Dating each container or the group of containers (such as on a pallet); or
 - Date the accumulation area; or
 - Maintain a written inventory or log

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UNIVERSAL WASTE

- UW can be shipped under a bill of lading or other shipping papers. A Uniform Hazardous Waste Manifest is not required.
- Employees who handle or have responsibility for managing UW must be given information describing the proper handling and emergency procedures appropriate to the type(s) of UW handled.

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K, U, AND P-LISTINGS

- ❖ K-List (40 CFR 261.32) – Hazardous Waste from Specific Sources
 - Wood Preservation
 - Inorganic Pigment (oven residue and/or Wastewater treatment sludges)
 - Wastes from production of Organic Chemicals, Inorganic Chemicals, Explosives
 - Petroleum Refining Wastes
 - Iron and Steel and other metals production wastes
 - Veterinary Pharmaceutical wastes
 - Ink formulation waste
 - Coking Waste

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K, U, AND P-LISTINGS

- ❖ U-List and P-List (40 CFR 261.33) – Discarded commercial chemical products, off-specification species, container residues, and spill residues thereof.
 - P-List – Acutely toxic
 - Regulated at 2.2 lbs (generated or accumulated on-site) in Kansas
 - U-List – Not as toxic

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K, U, AND P-LISTINGS

- ❖ U-List and P-List (40 CFR 261.33) –
 - Both lists – The chemical of concern must be the sole active ingredient.
 - Example – An off-specification mixture of 85% Toluene and 15% water would carry the U220 waste code upon disposal.
 - Example – An off-specification mixture of 50% Toluene and 35% Xylene and 15% water would not be a listed hazardous waste (It would probably be characteristic for Ignitability (D001)). The U-listings would not apply because neither xylene nor toluene are the sole active ingredient. The F-listings would not apply because the waste was not “spent”.

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F001-F005 LISTINGS

- ❖ F001 - (T) - The following spent halogenated solvents used in degreasing: Tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons; all spent solvent mixtures/blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures
- ❖ F002 - (T) - The following spent halogenated solvents: Tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, trichlorofluoromethane, and 1,1,2-trichloroethane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those listed in F001, F004, or F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures
- ❖ F003 - (I)* - The following spent non-halogenated solvents: Xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; all spent solvent mixtures/blends containing, before use, only the above spent non-halogenated solvents; and all spent solvent mixtures/blends containing, before use, one or more of the above non-halogenated solvents, and, a total of ten percent or more (by volume) of one or more of those solvents listed in F001, F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures
- ❖ F004 - (T) - The following spent non-halogenated solvents: Cresols and cresylic acid, and nitrobenzene; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures
- ❖ F005 - (I,T) - The following spent non-halogenated solvents: Toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, and 2-nitropropane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, or F004; and still bottoms from the recovery of these spent solvents and spent solvent mixtures

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F001 LISTING

F001 - (T) - The following spent halogenated solvents used in degreasing: Tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons; all spent solvent mixtures/blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures

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F001 LISTING

- ❖ Only for large-scale degreasing operations.
- ❖ Example – 95% Trichloroethylene (TCE) used in a 1,000 gallon vapor degreasing unit would carry the F001 waste code.
- ❖ Example – 95% Trichloroethylene (TCE) used in a 5-gallon parts washer would not carry the F001 waste code (but would carry the F002 waste code).

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F002 LISTING

- ❖ F002 - (T) - The following spent halogenated solvents:
 - Tetrachloroethylene
 - methylene chloride
 - Trichloroethylene
 - 1,1,1-trichloroethane
 - Chlorobenzene
 - 1,1,2-trichloro-1,2,2-trifluoroethane
 - ortho-dichlorobenzene
 - Trichlorofluoromethane
 - 1,1,2-trichloroethane
- all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those listed in F001, F004, or F005;
- still bottoms from the recovery of these spent solvents and spent solvent mixtures

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F002 LISTING EXAMPLES

- ❖ Spent 95% TCE in a 5-gallon parts washer would be an F002 listed hazardous waste.
- ❖ Spent 85% Tetrachloroethylene (PCE) used for cleaning would be an F002 listed hazardous waste.
- ❖ A spent mixture of 15% PCE and 85% water would be an F002 listed hazardous waste.
- ❖ A spent mixture of 5% PCE and 95% water would not be hazardous unless the flashpoint was less than 140°Fahrenheit.

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F003 LISTING

- ❖ F003 - (I) - The following spent non-halogenated solvents:
 - Xylene
 - Acetone
 - Ethyl acetate
 - Ethyl benzene
 - Ethyl ether
 - Methyl isobutyl ketone
 - N-butyl alcohol
 - Cyclohexanone
 - methanol
- all spent solvent mixtures/blends containing, before use, only the above spent non-halogenated solvents;
- All spent solvent mixture/blends containing, before use, one or more of the above non-halogenated solvents, and, a total of ten percent or more (by volume) of one or more of those solvent listed in F001, F002, F004, and F005;
- still bottoms from the recovery of these spent solvents and spent solvent mixtures

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F003 LISTING EXAMPLES

- ❖ A spent 95% xylene blend used for cleaning would carry the F003 listing.
- ❖ A spent mixture of xylene and ethyl benzene used for cleaning would also carry the F003 listing because both are on the F003 list.
- ❖ A spent mixture of 75% xylene (F003) and 15% Toluene (F005) would carry both the F003 and F005 listings because it has more than 10% toluene.

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F004 LISTING

- ❖ F004 - (T) - The following spent non-halogenated solvents:
 - Cresols and cresylic acid
 - nitrobenzene
- all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, and F005
- still bottoms from the recovery of these spent solvents and spent solvent mixtures

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F005 LISTING

- ❖ F005 - (I, T) - The following spent non-halogenated solvents:
 - Toluene
 - Methyl ethyl ketone (MEK)
 - Carbon disulfide
 - Isobutanol
 - Pyridine
 - Benzene
 - 2-ethoxyethanol
 - 2-nitropropane
- All spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, or F004;
- still bottoms from the recover of these spent solvents and spent solvent mixtures;

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F005 LISTING EXAMPLES

- ❖ Spent MEK that was used to strip paint and to clean painting equipment carries the F005 listing.
 - ❖ A spent mixture of 85% MEK and 25% Toluene would carry the F005 listing.
 - ❖ A spent mixture of 85% Isopropyl Alcohol (not listed), 7% MEK (F005), and 8% chlorobenzene (F002) would carry the F002 and F005 listings.
 - This is because it contains 10% or more of the F001, F002, F004 and/or F005 solvent constituents so the F-code for each constituent (F002 and F005) apply.
- Note:** If any of the above mixtures has a flashpoint below 140° F, it will also carry the D001 waste code.

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OTHER F-LISTING EXAMPLES

- ❖ Spent mixture of 92% isopropyl alcohol and 6% MEK and 2% toluene and a flashpoint of 125° F would only carry the D001 waste code.
- ❖ Still bottoms from the recycling of F003, F005 spent solvent would carry the F003 and F005 waste codes.

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OTHER F-LISTING EXAMPLES

- ❖ Still bottoms from the recycling of spent solvent that is only characteristic for Ignitability (D001), would only be hazardous waste if the still bottoms had a flashpoint below 140° F.
- ❖ Still bottoms from the recycling of spent solvent that is only characteristic for F003 would be a hazardous waste and would carry the F003 waste code.

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OTHER F-LISTING EXAMPLES

- ❖ MEK is used to thin paint prior to painting a piece of metal. Then MEK is used to clean the paint gun lines and tips. Waste paint is poured into a 55-gallon drum outside the paint booth and the spent solvent from cleaning the lines and tips is poured into a 5-gallon bucket outside the same paint booth.
 - The waste paint (55-gallon drum) is a characteristic hazardous waste (flash is <140°F)
 - The spent solvent (5-gallon bucket) is a listed hazardous waste with waste codes D001 and F005.

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OTHER F-LISTING EXAMPLES

- ❖ Same example, but the spent solvent is poured into the 55-gallon drum instead of being managed separately:
 - The waste paint and spent solvent carries waste codes D001 and F005.
- ❖ Paint filters from the process above would not be a listed hazardous waste (and are probably not characteristic hazardous waste) as long as the paint guns are not sprayed into the filters deliberately during the cleaning process (considered unlawful disposal of the spent solvent).

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SOLVENT DISTILLATION (ON-SITE)

- Waste accumulated prior to distillation:
 - Counts towards generator status
 - Is subject to all container management requirements
- Waste placed directly in a distillation unit without prior accumulation:
 - Does not count towards generator status
 - Is not subject to container management requirements

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SOLVENT RECYCLERS

- Examples:



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SOLVENT DISTILLATION

- Counting waste solvent being distilled on-site
 - Starts over each calendar month
 - Count all solvent the first time it is recycled each month
 - Count still bottoms only if the solvent was not counted.

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SOLVENT DISTILLATION

Example (assume solvent is 7 lbs/gallon and F005)

May 1 – recycle 10 gallons of waste solvent

- Recover 8 gallons of recycled solvent
- Generate 1 pound of still bottoms (F005)
- A total of 70 lbs of HW counts towards generator status
- 2 gallons of new solvent are added to the distilled solvent so that a total of 10 gallons of solvent can be used in the process.

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SOLVENT DISTILLATION

Example (continued)

May 15 – recycle 10 gallons of waste solvent

- Recover 8 gallons of recycled solvent
- Generate 1 pound of still bottoms (F005)
- 2 gallons of solvent were not counted on 5/1/12, so they count now, for a total of 14 pounds of HW.
- Since 20% of the solvent was counted (2÷10), you subtract that amount from the still bottoms (1-0.2). So 0.8 lbs counts toward the generator status.
- Still bottoms (0.8 lbs) + solvent (14 lbs) = 14.8 lbs of HW that counts toward the generator status.

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SOLVENT DISTILLATION

Example (continued)

- May 1 – 70 lbs of HW counted
- May 15 – 14.8 lbs of HW counted
- $70 + 14.8 = 84.8$
- If no more solvent is recycled this month, then a total of 84.8 lbs of hazardous waste counts toward the monthly HW generation rate.

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SOLVENT DISTILLATION BOTTOMS

- Are also called hockey pucks, pancakes, still bottoms, cake, etc.
- Are HW if:
 - They exhibit any characteristic
 - The solvent being recycled met the F-listing definition for F001-F005.

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Finding things on KDHE's website

- KDHE homepage: <http://kdheks.gov/>



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Finding things on KDHE's website

- BWM homepage: <http://www.kdheks.gov/waste/index.html>



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Finding things on KDHE's website

Compliance, Assistance, & Enforcement

- Accredited Environmental Laboratories
- Closed City Dump Cleanup Program
- City/County Illegal Dump Cleanup Program
- File a Complaint
- Compliance Assistance Visits Program
- Solid & Hazardous Waste Compliance Documents

- First bullet is a link to the KDHE certified lab database.
- Last bullet links to several useful documents (see next slide)

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OUTREACH – COMPLIANCE TRAINING MANUAL

- ❖ Step 3 – Based on the information from Steps 1 and 2, determine the generator status.
- ❖ Step 4 – Discussion of regulatory requirements for each classification.
- ❖ Step 5 – Review facility operations to ensure compliance with requirements identified in Step 4.
- ❖ Step 6 – Provide training using the completed manual.

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OUTREACH – WASTE DETERMINATION APP

- ❖ Got a smart phone, tablet, or other device that can use a mobile application (App)?

KDHE will soon have a free App available for you to use to assist with your waste determinations. The App will hopefully be available for download free from both Apple and Google Play.

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CONTACT INFO

- BWM web site:
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Questions



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