# **Florida Department of Environmental Protection**



### **Hazardous Waste Section**

### Hazardous Waste Determinations











### RCRA

- Resource Conservation and Recovery Act of 1976 (RCRA)
  - Gave EPA the authority to regulate hazardous waste from "cradle to grave"
- Hazardous and Solid Waste Amendments of 1984



# RCRA

- Codified in Title 40 Code of Federal Regulations Parts 239 to 282
  - Available online at: http://www.epa.gov/lawsregs/search/40 cfr.html
- Adopted, in part, by the State of Florida in Chapter 62-730, Florida Administrative Code
  - Available online at: http://www.dep.state.fl.us/waste/quick\_ topics/rules/default.htm





 40 CFR 262.11 states "A person who generates a solid waste...must determine if that waste is a hazardous waste..."



Is anything in this trash can hazardous waste? You cannot tell just by looking.



# What is a Solid Waste ?

- Discarded material
- Abandoned
- Recycled (with some exceptions)
- Inherently waste-like
- Basically anything that you can no longer use for its intended purposed



































# **Exclusions: Not a Solid Waste**

- Domestic Sewage
- Secondary materials reclaimed
- Petroleum refining materials
- NPDES regulated point source discharges





### **Discharges to POTWs and Septic Tanks**

### 62-730.030(4)(a), F.A.C.





### Exclusions: Solid Waste but not Hazardous Waste

- Household wastes
- Agriculture/farming wastes
- Ash from coal or fossil fuel plants
- Mining/exploration wastes
- UST remediations under 40 CFR 280
- Samples







## **Hazardous Wastes**

- Listed
  - Non Specific Sources (F codes)
  - Specific Sources (K codes)
  - Commercial Chemicals (P and U codes)
- Characteristic
  - Ignitability, Corrosivity, Reactivity, Toxicity
  - ( D004 D043 codes)



### **Listed Wastes**

• The F-list (non-specific source wastes). This list identifies wastes from common manufacturing and industrial processes, such as solvents that have been used in cleaning or degreasing operations. Because the processes producing these wastes can occur in different sectors of industry, the F-listed wastes are known as wastes from non-specific sources. Wastes included on the F-list can be found in the regulations at 40 CFR §261.31.



- General Industrial Process Wastes
- Common to many production and service industries
- Spent solvents, electroplating, metal heat treating operations, wood preserving drippage, dioxin wastes, and multi-source leachate
- 39 different "F" codes



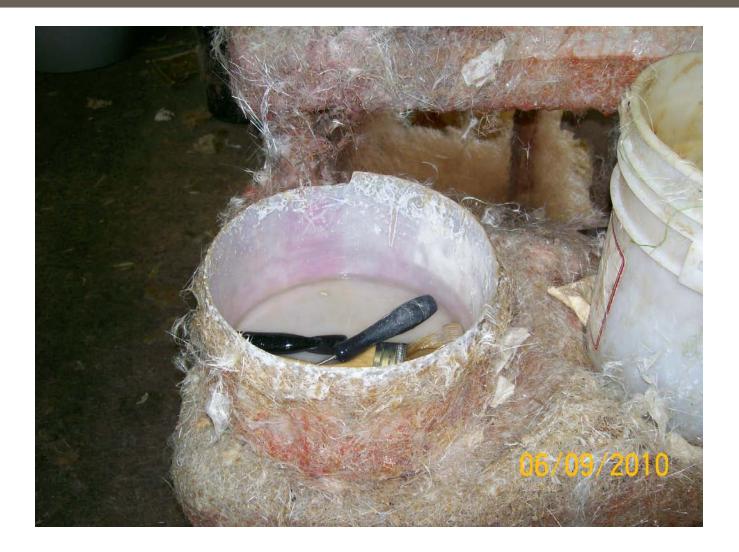
- Tetrachloroethylene
- Trichloroethylene
- Methylene Chloride
- Chlorobenzene
- Acetone
- Xylene
- Methanol
- Cresylic Acid

- Toluene
- Methyl Ethyl Ketone
- Benzene
- Pyridine





## D001/F003 Waste Solvents





### D001/F003/F005 Waste Solvents





### D001/F003/F005 Waste Solvents



### 3. Composition/information on ingredients

Clean way Solvents ABN 19399648361

59 Lincoln Street, Minot NSW 2566 Telephone: (02) 9820 5144 Fax: (02) 9820 5899

Issued: 15th April 2010

Xi: Irritant

#### Material Safety Data Sheet

#### GUNWASH THINNERS

#### 1. Identification of the material and supplier

Product Name: Gunwash Thinners. UN Number: 1263. Dangerous Goods Class: 3 Subsidiary Risk: None Allocated. Hazchem Code: • 3 Y E Packaging Group: II / III

Supplier: Clean way ABN: 59399648361 59 Lincoln Street Minto NSW 2566 Fax No.: 02 9820 5899 Telephone: 02 9820 5144 Emergency contact No 0411 603 683 (all hours)

Uses: Gunwash thinner is a mixture of flammable solvents. It is used in the panel beating, spraypainting, or applied coatings industries. It is recommended for the cleaning of spray painting equipment and other equipment which comes in contact with paint.

#### 2. Hazards Identification

This product is classified as Hazardous according to the criteria of NOHSC Australia. It is also classified as Dangerous Goods (Class 3) by the criteria of the Australian Dangerous Goods Code (ADG Code) for Transport by Road and Rail; Dangerous Goods.

i.e. 'HAZARDOUS SUBSTANCE - DANGEROUS GOODS'

Xn: Harmful

2.1. Risk Phrases. Highly flammable

Solvent	CAS No.	<u>UN No.</u>	Proportion %	<u>Risk Phrases</u>
Toluene	108-88-3	UN 1294	35 – 40	R11, R20
Xylene (isomers)	1330-20-7	UN 1307	20 - 25	R10, R20/21, R38
Acetone	67-64-1	UN 1090	10 - 15	R11, R36, R66, R67
Aliphatic solvents	N/A	N/A	10 - 20	R38, R65, R67



### D001/F003/F005 Waste Solvents – Still Bottoms



The still bottoms are F005 hazardous waste if flash is >140.



### D001/F003/F005 Waste Solvents -Rags



Paint thinner often contains toluene and/or methyl ethyl ketone resulting in F005 hazardous waste rags.





Remember this trash can – are these rags hazardous waste?



100 March 100	
	- <u>1</u>

### MATERIAL SAFETY DATA SHEET

Section 1: Product & Company Identification			
Product Name:	Brakleen® Brake Parts Cleaner (aerosol)		

Product Number (s): 05089, 05089-6, 05089T, 75089, 8508

Manufactured / Supplier Contact Information:		
In United States:	In Canada:	
CRC Industries, Inc.	CRC Canada (	
885 Louis Drive	2-1246 Lorima	
Warminster, PA 18974	Mississauga, C	

www.crcindustries.com 1-215-674-4300(General) (800) 521-3168 (Technical) (800) 272-4620 (Customer Service)

Co r Drive Ontario L5S www.crc-canada.ca 1-905-670-2291

ct Name: Brakleen® Brake Parts Cleaner (aerosol) ct Number (s): 05089,05089-6, 05089T, 75089, 85089, 85089AZ

### on 3: Composition/Information on Ingredients

24-Hr Emergency - CHEMTREC: (800) 424-9300 or (703) 527-388

Section 2: Hazards Identification	COMPONENT	CAS NUMBER	% by Wt.
DANGER: Vapor Harmful. Conte As defined by OSHA's Hazard Communication Sta	Tetrachloroethylene (PERC)	127-18-4	> 95
Appearance & Odor: Colorless liquid, irritatin Potential Health Effects:	Carbon Dioxide	124-38-9	< 5

#### Potential Health Effects

ACUTE EFFECTS:

- EYE: May cause slight temporary eye irritation. Vapo ppm
- SKIN: Short single exposures may cause skin irritation. Prolonged exposure may cause severe skin irritation, even a burn. A single prolonged exposure is not likely to result in the material being absorbed through skin in harmful amounts.
- INHALATION: Dizziness may occur at concentrations of 200 ppm. Progressively higher levels may also cause nasal irritation, nausea, incoordination, and drunkenness. Very high levels or prolonged exposure could lead to unconsciousness and death.
- INGESTION: Single dose oral toxicity is considered to be extremely low. Swallowing large amounts may cause injury if aspirated into the lungs. This may be rapidly absorbed through the lungs and result in injury to other body systems.
- CHRONIC EFFECTS: Repeated contact with skin may cause drying or flaking of skin. Excessive or long term exposure to vapors may increase sensitivity to epinephrine and increase myocardial irritability.
- TARGET ORGANS: Central nervous system. Possibly liver and kidney.
- Medical Conditions Aggravated by Exposure: None known.

See Section 11 for toxicology and carcinogenicity information on product ingredients. Page 1 of 7

Yes, the rags are FOO2 hazardous waste.





W.M. Barr and Company, Inc.

(901)775-0100

### Composition/Information on Ingredients

)	Hazardous Components (Chemical Name)	CAS #	Percentage	OSHA TWA
	1. Methanol	67-56-1	20.0 -25.0 %	200 ppm
	2. Toluene	108-88-3	5.0 -10.0 %	200 ppm
)	3. Acetone	67-64-1	5.0 -20.0 %	1000 ppm
	<ol><li>Acetic acid, Ethyl ester</li></ol>	141-78-6	5.0 -15.0 %	400 ppm
	<ol><li>Hexane, Light aliphatic naptha</li></ol>	64742-89-8	30.0 -50.0 %	
	<ol><li>Methyl ethyl ketone</li></ol>	78-93-3	5.0 -10.0 %	200 ppm
way fro ilot ligi	<ol><li>Ethanol, 2-Butoxy-</li></ol>	111-76-2	1.0 -5.0 %	50 ppm
nic)	Hazardous Components (Chemical Name)	CAS #	OSHA STEL	OSHA CEIL

Product Code: Product Name: Reference #: Manufacturer Information

Company Name:

Phone Number: Emergency Contact: Information Web site address: Preparer Name:

2. Corr

- Hazardous Components (Chemical Name) 1. Methanol
- 2. Toluene
- 3. Acetone
- 4. Acetic acid, Ethyl ester
- 5. Hexane, Light allphatic naptha
- 6. Methyl ethyl ketone
- 7. Ethanol, 2-Butoxy-Hazardous Components (Chemical Name)
- 1. Methanol
- 2. Toluene
- 3. Acetone
- 4. Acetic acid, Ethyl ester 5. Hexane, Light allphatic naptha
- 6. Methyl ethyl ketone
- 7. Ethanol, 2-Butoxy-

#### Emergency Overview

Danger! Extremely flammable. Keep away not smoke. Extinguish all flames and pilot are gone. Beware of static electricity that a

OSHA Regulatory Status: Potential Health Effects (Acute and Chronic

Inhalation Acute Exposure Effects:

Vapor harmful. May cause dizziness; headache; watering of eyes; initation of respiratory tract; weakness; drowsiness; nausea; numbress in fingers, arms and legs; depression of central nervous system; loss of appetite; fatigue; hallocinations; light headedness; visual disturbances; giddiness and intoxication; sleepiness; cough and dyspnes; cold, clammy extremities; diarrhes; vomiting; dilation of pupils; spotted vision. Severe overexposure may cause convulsions; unconscionsmess; come; and death. Intentional misuse of this product by deliberately concentrating and inhaling can be harmful or fatal

Skin Contact Acute Exposure Effects:

May be absorbed through the skin. May cause irritation; numbuess in the fingers and arms; drying of skin; and dematitis. May cause increased severity of symptoms listed under inhalation.

ANSI Z400.1 Format

#### Eye Contact Acute Exposure Effects:

This material is an eye irritant. May cause irritation; burns; conjunctivitis of eyes; and corneal ulcerations of the eye. Vapors may irritate eyes.

### CTION 2 - COMPOSITION INFORMATION DNANGREDIENTS

MATERIAL SAFETY DATA SHEET	% by Weight	CAS Number	Ingredient <sup>woort</sup> woo	Contai
WATERIAL GAPETT DATA SHEET	<u>, , , , , , , , , , , , , , , , , , , </u>			
02 00	ŧ5.	74-90-G	Fropanc	
SECTION 1			ACGIUTLV	2500 PPM
PRODUCT NUMBER 4010			OSHA FEI	ICDO IPPM
PRODUCT NAME NAPA® Mad's® Brake Parts Cleaner	<b>f</b> 5	106-97-0	Batane	
MANUFACTURER'S NAME Manufactured by.			ACGIN TLV	BRO PEM
The Sherwin-Williams Co. Diversified Brands			OSHA PEL	BOO PPM
Clevoland, CH 44116	16	67-66-5	Methanol	2 M V 1 1 20
Distributed by: Balkamp Heedquartara	10	01-00-1		SDO E DM ARK-1
P. O. Box 421268 Indianapolis, 'N 46242			ACGIR TLV	200 PPM (Skin)
Tel-phone Numbers and Websites Regulatory information   (210) 566-2502			ACCIE TI V	250 EPM (Skin) STEL
Netical Energeney (216) 698 2917 Transportation Energeney (E01) 424-3300			OSHA PEL	200 PPM (Sidn)
To Chambai Onergany ONLY (spl), thak, fire, exposure, or accident)			OSHA PEL	250 FFM (Skin) STEL
SECTION 2 - COMPOSITION/INFORMATION ON INGREDIENTS	55	67-64-1	Acaione	······································
% by Weight         GAS Number         Ingrediant         Openet         Openet	7 2		ACCIE ILV	SHO FEM
ACCILITLY 2500 PPM OSHA FEI 1000 PPM 15 106-97-8 Bytane	-		ACGIENTLY	/50 P2M ST⊟.
ACGINTLV BRUPPM OSHAPEL BRUPPM	_		C3HA PEL	1000 PFM
16 67.66-5 Methanol ACGII-TLV 200 P24 (Skin) ACGII-TLV 250 P14 (Skin)	-			
으로 HA PEL 200 PPM (SMn) 이용 HA PEL 250 PFM (SMn) STEL				
55 67-54-7 Academia 2007 2007 2007 2007 2007 2007 2007 200	CTION 3 — HAZ	AROS IDENTIF		
SECTION 3 - HAZAROS IDENTIFICATION		There is	ac are not hasar	daue waeta
ROUTES DE EXPOSURE INTA-ATION d'accure sure miel	HIMRE Codes.	These rags are not hazardous waste. But remember – liquid waste is a		
EYE or SKIN contain will the product, veper or spray triat. Centains a cohois and acelates which can be absorbed through the skip.	Flammability 4			
EFFECYS OF OVERAEXPOGUAE EYTES: Instation. SKIK: Pre baged or repeated excasare may sause Infation.	·	but remember – nyulu waste is a		
INHALATION: Inflation of the aspectrospitatory system.		different story.		A R
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page 1 of 4











Generators are responsible for making a complete hazardous waste determination, that does not mean you cannot ask for help.



# F002 Waste Paint Chips





# F002 Waste Paint Chips



### Are these paint chips hazardous waste?



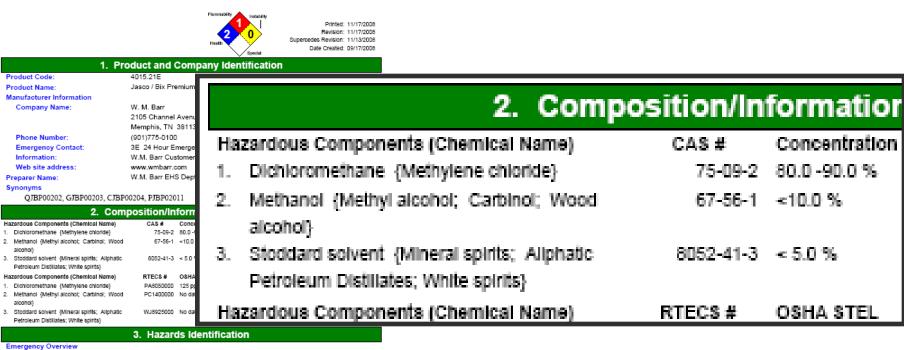


## **F002 Waste Paint Chips**

### MATERIAL SAFETY DATA SHEET

Page: 1

Jasco / Bix Premium Paint & Epoxy Remover



Danger! Poison!

Harmful if swallowed, inhaled, or absorbed through the skin. May be fatal or cause blindness if swallowed

Eye, skin, and respiratory tract irritant.

**OSHA Regulatory Status** 

This material is classified as hazardous under OSHA regulations.

#### Potential Health Effects (Acute and Chronic)

INHALATION ACUTE EXPOSURE EFFECTS:

Vapor harmful.

Mist or vapor can irritate the throat, lungs, and upper respiratory tract. May cause central nervous system depression with symptoms including nausea, headache, dizziness, fatigue, drowsiness, or unconsciousness.

Severe overexposure may cause irregular or rapid heartbeat, convulsions, unconsciousness, and death. Intentional misuse of this product by deliberately concentrating and inhaling the vapors can be harmful or fatal. May cause carboxyhemoglobinemia, thereby impairing the blood's ability to transport oxygen. Elevated carboxyhemoglobin levels can be additive to the increase caused by smoking and other carbon monoxide sources.

### Yes, the paint chips are F002 hazardous waste.



## **F-Listed Waste Example**



Separator water and still bottoms (sludge) from the recovery of tetrachloroethylene at dry cleaners are F002 hazardous waste.





## F-Listed Waste Example

 F006 - Wastewater treatment sludges from electroplating operations





### **F-Listed Waste Example**



Spent cyanide plating bath solutions from electroplating operations result in a F007 hazardous waste.



### **F-Listed Waste Example**



Spent cyanide plating bath solutions from electroplating operations result in a F007 hazardous waste.



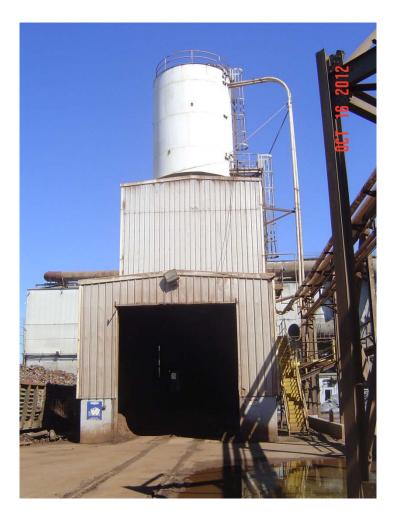
#### **Listed Wastes**

**The K-list** (source-specific wastes). This list includes certain wastes from specific industries, such as petroleum refining or pesticide manufacturing. Certain sludges and wastewaters from treatment and production processes in these industries are examples of source-specific wastes. Wastes included on the K-list can be found in the regulations at 40 CFR §261.32.



#### Specific Source "K" codes

- Process wastes
- Specific wastes from specific industries
- Examples Distillation bottoms, wastewater treatment sludges, heavy ends and condensate from specific processes





#### The P-list and the U-list

(discarded commercial chemical products).

These lists include specific commercial chemical products in an unused form. Some pesticides and some pharmaceutical products become hazardous waste when discarded. Wastes included on the P- and U-lists can be found in the regulations at 40 CFR §261.33



#### Commercial Chemicals "P" & "U" codes

- Unused, off specification, or technical grade products
- Sole active ingredient
  - Toxic (U Codes)
  - Acutely Toxic (P Codes)
- Spill residues
- Does not include mixtures with more than one active ingredient



#### **Commercial Chemicals**







#### **Commercial Chemicals**





#### **Commercial Chemicals**





### "U" Waste on the Ground





#### "P" Waste



"P" waste can be generated as a result of a laboratory clean-out or at hospitals/pharmacies.







#### **Listed Wastes**

# Use 40 CFR 261 Appendix VII to see the hazardous constituent for which listed.

Examples:

- F006 Cadmium, hex chromium, nickel, and cyanide
- K061 Hex chromium, lead, and cadmium



#### **Listed Wastes**

#### Mixture Rule:

Mixtures of solid waste and one or more hazardous wastes listed in Subpart D of 40 CFR 261 and has not been excluded [40 CFR 261.3(a)(2)(iv)].

#### Derived From Rule:

Unless and until it meets the criteria of 261.3(d), a hazardous waste will remain a hazardous waste [40 261.3(c)].



# **Characteristic Wastes**

- Characteristic
  - Ignitability
  - Corrosivity
  - Reactive
  - Toxicity (TCLP Analysis)
- May be knowledge-based or analysis may be required



#### Ignitability D001

• Liquids, Flash Point < 140° F

– <24% alcohol / water solutions excluded</p>

- Ignitable compressed gases per DOT rules
- Oxidizers per DOT rules
- Non liquids which can cause fire through friction, absorption of moisture or spontaneous combustion. When ignited, burn so vigorously and persistently that it creates a hazard.



#### **D001 Waste Paint**



#### And the MSDS says:

FLASH POINT(Deg F): 1 METHOD USED: TOC FLAMMABLE LIMITS IN AIR BY % VOLUME- LOWER: .9 UPPER: 36





#### **D001 Waste Paint**





#### Waste Paint ?





# Waste Vs Empty Container





# Waste Vs Empty Container



RCRA defines 'empty' at 40 CFR 261.7(b)(1) and creates a two part test to determine whether a container or liner is empty.



#### Aerosol Cans





#### **Aerosol Cans**



RCRA regulations require that, unless relieved of pressure, aerosol cans must be packed in a drum and manifested for hazardous waste disposal (40 CFR Part 261).



#### Corrosivity D002

- Aqueous,  $pH \le 2$  or  $\ge 12.5$
- Liquid, corrodes SAE 1020 steel at 1/4 in./year at 55° C by NACE Method TM-01-69







### Corrosivity D002





### Corrosivity D002







#### Reactivity D003

- Normally unstable violent changes
- Water reactive
- Forms explosive mixtures with water
- When mixed with water, generates toxic gasses
- Cyanide or sulfide wastes
- Forbidden, Class A or Class B DOT Explosives



# Managing Reactive Waste





#### Toxicity Characteristic D004-D043

- TCLP test
- Zero headspace extraction
   Use correct sampling technique
- Particle reduction, filtration
- 40 Toxic constituents
  - 8 heavy metals
  - Pesticides
  - Other organics





# Toxicity Characteristic D004-D043

- **TCLP Test**—(Toxicity Characteristic Leaching Procedure)
  - arsenic; barium; benzene; cadmium; carbon tetrachloride; chlordane; chlorobenzene; chloroform; chromium; o-cresol; m-cresol; p-cresol; cresol; 2,4-D; 1,4-dichlorobenzene; 1,2-dichloroethane; 1,1dichloroethylene; 2,4-dinitrotoluene; endrin; heptachlor; hexachlorobenzene; hexachlorobutadiene; hexachloroethane; lead; lindane; mercury; methoxychlor; methyl ethyl ketone; nitrobenzene; pentachlorophenol; pyridine; selenium; silver; tetrachloroethylene; toxaphene; trichloroethylene; 2,4,5-trichlorophenol; 2,4,6-trichlorophenol; 2,4,5-TP (Silvex); vinyl chloride

# • Examples: paints containing heavy metals, sand blast grit, thermometers



#### Toxicity Characteristic D004-D043



Paint booth filters can become hazardous waste if the paints being used contain heavy metals.



#### Toxicity Characteristic D004-D043



Remember this trash can – are the metal turnings hazardous waste?

These are





#### **Spent Sandblast Grit**



#### 4.77 mg/L or ppm Barium

#### TCLP Motals by 6000/7800 Series Methods

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#### **Pesticide Waste**





### Parts Washer



- May or may not result in a hazardous waste
- What type of solvent is used?
- What is washed?
- Are any other solvents used in conjunction with the parts washer?



### Water-Based Parts Cleaners





Usually produces an oily sludge that will require proper disposal.



#### Commercial Chemical Products May Become Characteristic Hazardous Wastes







Unlabeled, unknown containers will lead to expensive analytical costs.





#### Improper Unknown Waste Management







#### Proper Waste Management for Unknown Wastes





# What is in the Drum?





### What is in the Bucket?





