A Guide on Hazardous Waste Management

for Florida’s

Auto Repair and Paint and Body Shops
Published by:
Florida Department of Environmental Protection (FDEP)
Bureau of Solid and Hazardous Waste
Hazardous Waste Regulation Section (RCRA)

This document was published to help auto repair and paint and body shops determine whether they are in compliance with certain federal and state environmental requirements. It also includes best management practices (BMPs) that go beyond what is required by regulations. This information is offered only as guidance. Specific requirements may vary with individual processes and/or businesses. Business owners are responsible for obtaining complete information about all applicable regulations. The Florida Department of Environmental Protection is not authorized to relieve any person from any requirement of federal regulations or state, county or local laws.

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Why Should I Care About Hazardous Wastes?
As a business owner, operator or employee, you may be producing materials that can harm people and the environment.

This booklet offers helpful tips on how to:
- Comply with federal and state hazardous waste regulations.
- Avoid penalties by properly managing hazardous wastes.
- Save money on disposal costs by reducing hazardous wastes.

Health and Environment
Hazardous wastes spilled or dumped on the ground or disposed of in dumpsters may seep into the groundwater and contaminate drinking water supplies. Cleanup costs may run into the hundreds of thousands of dollars.

Hazardous wastes may run off into the nearest body of water where they may poison or kill fish and other wildlife.

Hazardous wastes pose a health risk to you, your employees and your community.
Cost Savings
State and county inspectors may visit your business to ensure that hazardous wastes are being managed properly. State penalties may range from $100 to $50,000 per violation per day.

Reducing hazardous wastes can reduce your disposal costs and reduce your liability risk.

Public Image
Your customers will appreciate your efforts to prevent pollution. Your community will recognize your business as a good neighbor.

What Is A Hazardous Waste?
A waste is hazardous if:
• It has any of the characteristics described below; or
• It is listed as a hazardous waste in the Code of Federal Regulations, 40 CFR Part 261.

Characteristic Wastes

Ignitable
Ignitable wastes are easily combustible or flammable. If they have a flashpoint of less than 140°F or an alcohol content of 24% or more, they are hazardous wastes. Examples include some paints, paint solvents, other solvents and degreasers.

Corrosive
Corrosive wastes corrode metals or other materials or burn the skin. These liquids have a pH of less than or equal to 2 or greater than or equal to 12.5. Examples include rust removers, acid or alkaline fluids and battery acid.

Reactive
Reactive wastes are unstable and react rapidly or violently with water or other materials. Examples include bleaches, oxidizers, cyanides and explosives, such as sodium azide (airbag initiators) and compressed gases.
Toxic Wastes are toxic if they contain certain heavy metals, such as chromium, lead, or cadmium, or toxic organic chemicals. Examples include parts cleaners (MEK), chromium-bearing paints, mercury-containing devices, and spray booth filters.

Listed Wastes
A waste is hazardous if it is listed in the Code of Federal Regulations, 40 CFR Part 261. For details on listed wastes and waste code numbers, contact the Florida Department of Environmental Protection or visit www.epa.gov/epawaste/hazard/wastetypes/listed.htm.

Acutely Hazardous Wastes
Small amounts of very dangerous wastes, such as arsenic and cyanide compounds, are regulated in the same way as large amounts of other wastes. A business that generates 2.2 pounds (1 kilogram) or more of these wastes per month is subject to full regulation under the hazardous waste rules.

Identifying Your Hazardous Wastes
It is very important to determine whether a waste is hazardous or non-hazardous. There are several ways to identify hazardous wastes.

- Obtain and read Material Safety Data Sheets (MSDS).
- Talk to product suppliers and manufacturers.
- Read product labels.
- Compare product and process information to hazardous waste characteristics and to wastes listed in federal regulations.
- If product or process information is not available or is inconclusive, have a commercial lab sample and test the waste using the TCLP test.
- A non-hazardous material or product may become a hazardous waste due to contaminants added during use. Lab testing may be necessary.
Listed and Described Below Are Some Common Wastes Generated by Auto Repair/Body Shops.

- Waste solvent degreasers, parts washing fluid, immersion cleaner solvent, mineral spirits (including petroleum naphtha), brake cleaner, and carburetor cleaner - are hazardous wastes even if recycled onsite or at an off-site recycling facility. Many of the products used in repair shops for cleaning and degreasing contain ignitable or toxic solvents. Distilling on-site reduces the amount of hazardous waste generated and the amount of new solvent you must buy. Note: Solvent in a parts washer is considered a useable product up to the date it is serviced. It becomes waste on that day, and the entire amount must be counted for that month.

- Sludges, filters or bottoms from part cleaners; coolant/antifreeze stills or filtration systems; solvent stills; hot dip tanks, and oil/water separators - may be hazardous wastes because they may contain toxic solvents or metals.

- Waste aerosol cans that are not completely empty - aerosols like brake cleaner, carburetor cleaner, other degreasers, and spray paints commonly found at auto repair shops are often hazardous for the chlorinated solvents they contain, or for ignitability. When discarded before they are completely empty, they are hazardous waste.

- Waste paint thinners and lacquer thinners are hazardous waste for ignitability and potentially for toxic solvents.

- Waste oil-based paints are hazardous wastes for ignitability and potentially for toxic solvents and metals.
Other wastes that may be hazardous wastes:
- Mixtures of hazardous waste and used oil.
- Other wastes NOT recycled that are hazardous waste if not recycled.
- Vehicular sandings need to be collected and have a waste determination made on them prior to disposal. Note: this is not a onetime event but must be done on all collected sandings prior to disposal.
- Paint booth filters may be hazardous depending upon the types of paint being sprayed.
- Floor sweepings, paper towels, rags, kitty litter, or other absorbents mixed with any of the above hazardous wastes may be hazardous wastes. However, floor sweepings, paper towels, kitty litter, or other absorbents mixed with non-hazardous waste such as used oil are not hazardous waste.

The use of any of the common substances listed below may produce a hazardous waste.

- Naval Jelly, Strong Acids, Strong Alkalies
- Hydrochloric acid
- Hydrofluoric acid
- Phosphoric acid
- Sodium hydroxide
- Acrylics, Alkyds, Enamels, Epoxies
- Acetone
- Aromatic hydrocarbons
- Epoxy ester resins
- Ketones
- Methyl isobutyl ketone
- Methylene chloride
- Petroleum distillates
- Toluene
- VM&P naphtha
- Enamel Reducers, Paint Thinners, Solvents, White Spirits
- Acetone
- Alcohols
- Methanol
- Methyl ethyl ketone
- Methylene chloride
- Mineral spirits
- Petroleum distillates
- Toluene
- Xylene
These materials are NOT hazardous waste IF RECYCLED:

- Gasoline - is not hazardous waste if used as fuel. If it is not recycled, it is hazardous waste because it is toxic for benzene and it is also ignitable.
- Contaminated shop towels, wipes and rags - are not hazardous if commercially laundered, but are hazardous waste when contaminated by solvents or other hazardous wastes and thrown away.
- Coolant/Antifreeze - is not hazardous waste if recycled, but is likely to be hazardous waste because of toxic metals if not recycled. Recycling is recommended, otherwise laboratory testing is required.
- Used oil (including brake, transmission, power steering fluids and gear oil).
- Filters (including oil, transmission, and fuel filters).
- Lead acid batteries and lead scrap - are not hazardous waste if recycled, but are hazardous waste if not recycled because of toxic lead and cadmium, and because the liquid in a battery is corrosive. Battery dealers readily recycle batteries and other scrap lead such as wheel weights.

Used Fluorescent and HID Light Bulbs and Mercury Switches

Using fluorescent or high intensity discharge (HID) lighting is a smart choice because they use less energy and create less waste heat. However, fluorescent and HID lamps also contain mercury, a toxic metal that can accumulate in living tissue and may cause health problems. Although the amount of mercury in each lamp is small, several million light lamps are discarded by Florida businesses each year, making these lamps a large source of mercury in our garbage. Even though these lamps may contain enough mercury to test “hazardous,” they are in a special category and are not counted towards your hazardous waste generator status if recycled. Before recycling, store them in a closed container safe from the weather and prevent breakage; reusing original packaging is a good option. These lamps can never be thrown in trash destined for incineration. State and local ordinances usually prohibit any number or type of mercury-containing lamps from being disposed in the landfill as well. You can check with your local solid waste department for more information specific to your county.
Several types of automotive switches contain mercury, specifically: trunk and hood light switches, four-wheel drive anti-lock brake systems, and active control or leveling sensors. If the switches were clear, the mercury would be visible as a silvery liquid. However, most automotive mercury switches look like little bullets. Mercury switches always contain more than enough mercury to test "hazardous," but if recycled, are not treated as hazardous waste or counted toward your generator status.

Nationally, it is estimated that there are 35 million automotive mercury switches currently in vehicles today. The National Vehicle Mercury Switch Recovery Program (NVMSRP) is designed to remove mercury-containing light switches from scrap vehicles before they are flattened, shredded and melted to make new steel. The End of Life Vehicle Solutions Corporation (ELVS) was created by the automotive industry to promote environmental efforts in recyclability, education and outreach, and the proper management of substances of concern. For more information please visit: www.dep.state.fl.us/waste/categories/mercury/pages/MercurySwitchRecoveryFromScrapVehicles.htm. A list of recycling facilities in Florida can be obtained by visiting DEP's Mercury Contacts website at: www.dep.state.fl.us/waste/categories/mercury/pages/contacts.htm.
Waste Tires

When not properly managed, waste tires can provide a breeding ground for rodents and mosquitoes. Stored tires are also a serious fire hazard. Tires can be retreaded or reprocessed into rubber products, rubberized asphalt, or adhesives. They can also be used as fuel in power plants. Up to 80% of tires are now retreaded, recycled, or used as fuel.

Requirements

- Keep your waste tires in one location on your property. Do not scatter them around the site.
- Stack tires neatly.
- Do not store waste tires in grassy areas.
- Maintain a fire lane around the pile.
- Store no more than 1,500 waste tires on your property at any one time.
- If your shop hires someone to transport more than 25 tires per month for recycling or disposal, you must keep receipts or logs of your waste tire disposal or recycling.
- Do not burn, bury, or dump waste tires. IT IS ILLEGAL TO DO SO.
- Only contract with a registered collector to haul off waste tires. The collector that picks up the tires must have a current registration decal displayed on the driver side door of his vehicle.
- You remain responsible for your waste tires. If they are illegally dumped, you can be fined or required to pay for cleanup of the disposal site.
- If you haul your own waste tires in loads of more than 25 tires at a time, you must register with DEP as a waste tire collector.
- Dispose of tires only at a facility authorized by DEP to manage waste tires.
Industrial Wastewater

Industrial wastewater including floor wash waters and water from outdoor car washes can pollute lakes, rivers, and drinking water if not properly managed. All industrial wastewater should be recycled on-site or collected and sent to a sewage treatment plant (also known as a Publicly Owned Treatment Works—POTW) with a Pretreatment Program capable of handling wastewater. You should contact your local POTW to make sure that it can handle your shop’s industrial wastewater. Do not discharge wastewater to a POTW without its permission.

Requirements

Collect floor wash waters and water from outdoor car washes and drain these industrial wastewaters to a POTW sewer that has a DEP-approved Pretreatment Program and agrees to accept your industrial wastewater discharges. An alternative to sending wastewater to a POTW is a 100% wastewater recycling system. The recycling system will generate concentrated contaminated water (called “bleed”) that must be transported by an industrial wastewater hauler to a POTW.

In case of an accidental spill or discharge, notify the local DEP district office or the POTW (if the discharge is to a permitted wastewater treatment facility). Please note that in such cases, a detailed written report describing the problem, remedial measures taken, and steps implemented to prevent the problem from happening again may be required.

Do not drain your shop’s wash waters and rinse waters to a septic tank, stormwater pond, ditch, swale, lake, stream, other surface water, or onto the ground.

If you have an oil/water separator for your wastewater, you must:

- properly maintain it and keep it free of debris;
- recover the oil and recycle it with your shop’s used oil;
- determine whether the sludge from the oil/water separator is hazardous;
- discharge overflow from the oil/water separator to the POTW or 100% recycle system.
Other Solid Wastes
Auto shops generate many types of solid waste, such as used shop towels, empty aerosol cans, and empty containers and drums. Auto shops may also generate liquid wastes that are not hazardous, such as discarded liquid products that cannot be recycled or reused. Since these wastes can pollute the environment if they are not properly disposed of, they are often regulated by FDEP.

Requirements
- Do not store solid waste in any area that is likely to flood.
- Do not store solid waste outdoors within: 200 feet of a wetland; 500 feet of any private drinking water well; or 1,000 feet of any community drinking water well.
- Do not store solid wastes on the public right-of-way of a highway, road, or alley.
- Do not mix used oil in with your solid waste.
- Dispose of solid waste only at solid waste management facilities permitted by the FDEP or in dumpsters or roll-offs that are routinely picked up by commercial waste haulers.
- Do not bury or burn solid waste.
- Do not dump any liquid wastes on the ground, or in a ditch, swale, storm water sewer, septic tank, lake, stream, or other surface water.
- Do not throw dirty wipes, paper towels or rags into the dumpster if they have come into contact with hazardous solvents or hazardous waste.

Sources of Hazardous Wastes in Paint and Body Shops

Painting and Paint Removal
Waste paint-contaminated materials, such as paint booth filters, masking paper and overspray paper, may be hazardous because of heavy metal pigments in paints. Hazardous wastes can be minimized with equipment that has greater transfer efficiency. Reducing wastes saves money and makes cleanup easier. Waste paints, paint strippers and thinners may be ignitable and may contain hazardous materials such as toluene, xylene, acetone, methyl ethyl ketone, petroleum distillates, methylene chloride or
methyl isobutyl ketone. Paint chips from sanding and spent grit blast media may be hazardous because of heavy metal pigments in paints.

Federal Regulations - National Emission Standards for Hazardous Air Pollutants (NESHAP)

Brief Summary

40 CFR Part 63 Subpart HHHHHH

The US Environmental Protection Agency (EPA) has new requirements to reduce air pollution of metals such as chrome, lead, cadmium, manganese and nickel compounds, and also to reduce methylene chloride fumes, from autobody refinishing work. These compounds pose health risks to anyone who breathes the air when these fumes are present. Many paints used in autobody refinishing work contain these compounds. The new regulations require autobody shops and refinishing businesses to do several things to prevent these metals from getting into the air during spray painting. This is a short summary of things an existing shop must do before January 2011. New autobody shops must do all these before beginning to paint. Although EPA has no requirements for hobbyists or private citizens, two things should be noted:

1. The following are also good practices to improve the air for anyone exposed to autobody paint overspray.
2. The new regulations strictly define what qualifies one as a hobbyist or private citizen when it comes to autobody painting

- All spray painting must be done in a spray booth.
- Full cars must be painted in a spray booth with four walls, a roof and a ventilation system. (Filters in the booth have to remove at least 98% of the particulates. Your filter provider can give you the right filters and necessary paperwork.)
- Parts of cars must be painted in a booth with at least three walls or flaps, a roof and a ventilation system that pulls air into the spray booth.
- Spot repairs must be done in an enclosure which prevents any mist from getting out of the enclosure.
- Painters must use spray guns and techniques which reduce overspray (such as High Volume Low Pressure (HVLP).
- All painters must receive training. Owners must keep records of the training of each painter.
For information on techniques and information your painters need to know and workshops available see the Collision Repair Campaign website with upcoming trainings www.epa.gov/collisionrepair/.

Paint spray gun cleaning cannot create any mist of cleaning solvent to the air. You may spray solvent through the gun for cleaning purposes using an enclosed gun cleaner or you may clean the gun manually.

All shops must also send a notification to EPA with some general information by January 2010:

- Location of facility.
- Description of spray painting equipment.
- Confirmation that shop has necessary equipment and training.

An example of this notification is found here: www.epa.gov/ttn/ATW/area/paint_strip_example.doc

Exemptions to the rule are facility maintenance activities, which include the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, and to pavements and curbs.

You can send this notice that you are an owner or operator, to your local EPA office. Florida is listed in the web link for your EPA office. For the complete Federal Rule, please view the following link: www.epa.gov/collisionrepair/20080701_CFR_HHHHHH.pdf

For more details and assistance for Florida businesses, please talk to your Regional EPA air toxics office at the following numbers/address:

www.epa.gov/region4
Region IV Contact for Florida
Lee Page (404) 562-9131
page.lee@epa.gov
(800) 241-1754
Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960
State of Florida Regulations
The State of Florida Department of Environmental Protection (DEP) has separate state air regulations for surface coating operations. Auto shops and other businesses that paint-strip and surface coat must comply with both state and federal regulations. Florida has exemption guidelines for surface coaters as well as an air general permit registration program.

Current Florida Air regulations provide for a Surface Coating Operation exemption from permitting within a single facility, provided:

- The surface coating operation shall use only coatings containing 5.0 percent or less VOC, by volume, or the total quantity of coatings containing greater than 5.0 percent VOC, by volume, used at the facility shall not exceed 6.0 gallons per day, averaged monthly, where the quantity of coatings used includes all solvents and thinners used in the process or for cleanup; and
- Such operations are not subject to any unit-specific applicable requirement.

Air General Permit for Surface Coating Operations:
The Surface Coating Air General Permit Workbook explains the state of Florida regulations for those that go beyond the exemption limits above and qualify for the air general permit for surface coating operations. An electronic copy of the workbook can be downloaded for printing at the DEP Small Business Environmental Assistance Program (SBEAP) website: www.dep.state.fl.us/air/publications/sbeaplib.htm scroll down to Surface Coating. If your auto shop also uses a solvent for degreasing tools or does decorative chromium plating for parts, you may not be eligible for the air general permit.

Please call the Small Business Environmental Assistance Program @ 1-800-722-7457 or the Air General Permits Section @ 850-488-0114 for more information.
How Should I Manage Hazardous Wastes?

First, determine how much hazardous waste you generate each month. A gallon of most liquids weighs 7 pounds. The rules you must follow depend on how much you generate, how much you store, and how long you store it.

Less than 220 pounds (100 kilograms or about half a drum): you are a “Conditionally Exempt Small Quantity Generator.” (CESQG)

220 - 2,200 pounds (100 - 1,000 kilograms or about half a drum to 5 drums): you are a “Small Quantity Generator.” (SQG)

More than 2,200 pounds (1000 kilograms or more than about 5 drums): you are a “Large Quantity Generator.” (LQG)

The following practices may be required for your business depending on your generator size. Generator sizes are indicated for each practice that is required by law. They are good business practices even if not required. Additional information is available from DEP. Visit our publications page for SQG guidance materials.

Containers

- Maintain containers in good condition. Prevent leaks, ruptures and accumulation of rainwater on tops of drums. [CESQG, SQG, LQG]
- If a container leaks, transfer waste to a new container. [CESQG, SQG, LQG]
- Keep containers closed and use self-closing funnels when adding waste. Do not allow wastes to evaporate. [CESQG, SQG, LQG]
- Wastes must be compatible with the container. For example, use HDPE plastic containers for corrosive wastes. [SQG, LQG]
- Never place incompatible wastes, such as wastes that react with each other (acids and bases), in the same container. Elementary neutralization is OK. [SQG, LQG]
- Disposable containers with hazardous material residues (other than paint cans with a thin dry coating of paint) must be disposed of as hazardous wastes.
- Reuse thinner as wash thinner. Be sure to keep paint waste separate from wash thinner.
Storage
- Maintain adequate aisle space between container rows to allow inspection for leaks and damage. [SQG, LQG]
- Store ignitable and reactive wastes at least 50 feet from property boundaries. [LQG]
- Keep wastes segregated so that they may be easily recycled. Do not mix waste types.
- Storage time limit is 180 days for SQGs and 90 days for LQGs.
- CESQGs may not store more than 1000 kilograms, and SQGs may not store more than 6000 kilograms.

Labels
You must use the following words on DOT transportation labels for hazardous wastes [SQG, LQG]:

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
If found, please contact the nearest police or public safety authority or the U.S. EPA
(Your business’s name and address and manifest document number)

- Label every container with the type of waste and whether it is hazardous or non-hazardous. [SQG, LQG]
- Include federal waste code numbers.
- Include the accumulation start date (the date when waste was first placed in the drum). [SQG, LQG]
- Include your business’s name and address.

Transport and Disposal
- Make sure your transporter and disposal facility have EPA identification numbers. [SQG, LQG]
- Use manifests for all hazardous wastes shipped offsite. [SQG, LQG]
- Comply with Department of Transportation rules. [SQG, LQG]
Inspections and Recordkeeping
- Inspect containers at least once a week and keep a written log of container inspections. [SQG, LQG] See 62-730.160(6) for further details.
- Keep training and inspection records for 3 years. [LQG]
- Keep manifests and shipping receipts for 3 years. [CESQG, SQG, LQG]
- Keep records of waste determination results for 3 years.
- Keep land disposal restriction forms for 3 years from the date the waste was last shipped. [SQG, LQG]

Training
Train all employees to identify, reduce and properly handle wastes. [SQG, LQG]
Train new employees before they handle hazardous wastes. [SQG, LQG]
Train all employees on emergency response procedures. [SQG, LQG]

How to Reduce Hazardous Wastes
Reducing hazardous wastes in your shop makes good business sense. Benefits include:
- Saving money on waste management costs.
- Reducing concerns about penalties and liability.
- Creating a safer, healthier workplace.
- Promoting positive public relations with clients, customers and your community.
How Do I Begin?
- Make a commitment to reducing wastes in every area of your business.
- Evaluate your shop’s wastes and identify areas where changes can be made.
- Encourage the participation of all employees through education, training and incentives.

Solvents
- Use a multi-purpose solvent to reduce the types of hazardous waste that need to be managed.
- Find less hazardous substitutes for solvents, such as citrus-based, water-based or detergent-based cleaners.
- Reduce solvent waste by replacing solvent only when necessary.
- Use spigots and pumps to transfer thinners from storage drums to smaller containers.
- Contract with recycling services for thinners and other solvents.
- Use self-closing funnels to add waste to containers.
- Use a two-stage cleaning process (dirty solvent followed by clean rinse) to reduce solvent usage.

Training
Train employees to use solvents and chemicals correctly and efficiently, using minimal amounts required to get the job done.

Painting
- Replace paints containing heavy metal pigments, such as chromium and lead, with less toxic or non-toxic paints.
- Check MSDSs or analyze paint and solvent wastes for toxic materials.
- Use spraying equipment and application methods that result in maximum transfer efficiency.
- Replace low-volume high pressure spray guns with high-volume low pressure spray guns.
- Replace conventional primers with water-based primers.
- Replace lacquers and enamels with low-VOC coatings.
Shop Practices

- Minimize inventory and use a “first-in, first-out” system to prevent the need for disposal of old unused materials.
- Store raw materials and wastes in closed containers in a covered area protected from rain and sunlight.
- Use drip trays under solvent storage drums.
- Prevent leaks and spills. Keep floors clean.
- Use the least hazardous type of floor cleaner available.
- For dirty rags, use an approved laundry service that discharges its water to a publicly owned sewer system.
- Do not discharge wastes to the ground surface, floor drains, septic tank, storm water pond, ditch, swale, lake, stream, or other surface water.
Who Needs To Know If My Business Generates Hazardous Wastes?

Notify DEP
If your business is a small or large quantity generator, notify DEP to obtain an EPA identification number. Local environmental agencies should also be notified. The form can be found at: www.dep.state.fl.us/waste/categories/hwRegulation/pages/NotificationRegulatedWaste.htm.

Notify Local Authorities
Police and fire departments and local hospitals who would respond to an emergency need to know that there are hazardous wastes. [SQG, LQG]

Designate an Emergency Coordinator (LQG)
- Guidance on contingency plans is available from DEP. Large quantity generators must have a written plan that includes:
  - Emergency response arrangements with police, fire, hospitals and emergency response contractors.
  - Emergency coordinators’ addresses and phone numbers.
  - On-site emergency equipment descriptions and locations.
  - Evacuation plan and routes, including a site diagram.

Post Emergency Information (SQG)
Post the following information near telephones where hazardous waste is accumulated:
- Fire department phone number.
- Emergency coordinator’s name and phone number.
- Locations of fire alarms and extinguishers.
- Locations of spill control materials.
**CHECKLIST**
This checklist will help you to prevent the most common hazardous waste violations. For more detailed information on hazardous waste management requirements, contact DEP or visit our website: www.dep.state.fl.us/waste/default.htm

- Identify types and quantities of hazardous wastes.
- Determine how much hazardous waste is generated.
- Notify Florida DEP and obtain an EPA identification number from DEP.
- Use proper containers to collect and store wastes.
- Label all containers as hazardous or non-hazardous wastes.
- Include accumulation start dates on labels.
- Keep containers of hazardous waste closed.
- Maintain aisle space between containers for inspection.
- Inspect containers weekly for rust, leaks or damage.
- Train employees to properly handle hazardous wastes.
- Designate an emergency coordinator.
- Notify police, hospitals and fire department.
- Post emergency information near each phone.
- Develop a contingency plan for emergencies.
- Use manifests for all waste transported for disposal.
- Keep all records for at least 3 years.
Tips from Inspectors

Drums
- You cannot have any mystery drums. All drums should be labeled as to their contents. “Rain water” does not identify the contents.
- Evaporation of hazardous waste is a serious violation. Do not allow the hazardous wastes to evaporate. You must keep the drum closed when you are not in the process of putting waste into the drum. You also should keep the top of the drum clean.
- You should not store old drums outside. If you have to store drums out of doors store them lying on their sides with bungs screwed in or ring tops latched closed with the bungs parallel to the ground. If they get storm water inside them, you will have to sample the storm water and determine whether or not the water in the drum is hazardous. Insist that the person who sold you the drum and its contents takes the drum back when you are done with it.
- Inspectors may inspect dumpsters and walk the entire property line of a business. They look everywhere for orphan drums and distressed/dead vegetation.

Oil
- You cannot utilize used motor oil for weed control. Used oil containers must not leak and must be in good condition. Used oil containers must be labeled as “used oil”. If located outside or near a doorway, used oil containers must be in secondary containment. You must retain your used oil and used oil filter disposal records for three years.
Spills
- You must clean up your spills at the time of the spill. This includes used oil releases as well as hazardous waste releases.
- Try to store old automotive batteries on a floor that is under a roof. Try not to stack batteries. If they fall over, they will leak acid and create a spill problem.

Transportation
- The only generators who are allowed to transport their own hazardous waste are conditionally exempt small quantity generators. All other generators must use a hazardous waste hauler who is registered with the DEP or US EPA.

Waste
- The most common violation is the non-determination of whether something is a hazardous waste.
- Abandoned products are a waste and may be regulated as a hazardous waste.
- If you throw away containers, make sure the container is completely empty before you place it in a waste receptacle. If you are throwing away paint containers, be sure to drain all the paint out of the container. Aerosols should be either emptied through complete use or emptied through the aid of a drum-top aerosol can puncturer. The drained liquids should be collected for proper disposal, and the empty cans should be recycled as scrap metal.
Water

- Hazardous waste cannot be discharged to a city sewer system without written permission. The city sewer system must be a Publicly Owned Treatment Works (POTW). It cannot be a privately owned package plant.
- If you use rags, you should send the rags to a commercial laundry service that is served by a publicly owned sewage treatment plant. If you use paper towels, you must make a determination as to whether the used paper towels are a hazardous waste.
- Know where your drains go. All drains that lead from a hazardous materials area to a storm water area, septic tanks or to the ground should be sealed shut.
Where Can I Get More Information?

Florida Department of Environmental Protection
Hazardous Waste Compliance Assistance Program
Tallahassee: 850.245.8707
Available publications include:
Summary of Hazardous Waste Regulations
Requirements for Conditionally Exempt Small Quantity Generators
Handbook for Small Quantity Generators of Hazardous Waste
See our website for details:
www.dep.state.fl.us/waste/categories/hazardous/pages/publications.htm

Hinkley Center for Solid and Hazardous Waste Management
4635 NW 53rd Avenue Suite 205
Gainesville, FL 32606
352.392.6264

Florida Small Business Assistance Program
The Small Business Assistance Program helps businesses with environmental concerns and problems related to compliance with air regulations. Assistance is confidential and staff experts have business experience.
Phone: 800.722.7457
www.dep.state.fl.us/Air/programs/sbeap.htm

U.S. Environmental Protection Agency
The EPA has published a series of industry-specific guidelines and handbooks on preventing pollution and complying with hazardous waste regulations.
www.epa.gov/epawaste/index.htm

Trade Associations
Many trade associations have published guides to help you find solutions to your hazardous waste management problems.
For additional information contact:
Florida Department of Environmental Protection
Hazardous Waste Compliance Assistance Program
2600 Blair Stone Road, MS #4560
Tallahassee, FL 32399-2400
Phone: (850) 245-8707
Fax: (850) 245-8810