

Rags and wipes often mean two different types of cleaning supplies.

Rags: generally considered to be cloth that can be laundered and reused multiple times.

Wipes: generally considered disposable, or cannot be laundered.

An **example label** for "Dirty Solvent Rags Only" can be found in the Yellow Ink Room.

Centrifuging rags and wipes is currently the only accepted method to remove sufficient solvent to allow handling as a solid waste, assuming the solvent or the rags do not meet the definition of a hazardous waste.

Section B4: How should I properly manage soiled shop rags?

All solvent contaminated **rags and wipes** should be managed as follows upon generation:

- Solvent-contaminated **rags and wipes** should not be dripping with solvent. Liquids in containers of solvent-contaminated rags or wipes may cause the material to be regulated as hazardous waste.
- Store solvent-contaminated rags and wipes in a covered, non-leaking container away from sources of ignition.
- Clearly label the containers, "Dirty Solvent Rags Only."
- Do not put other waste in a container of solvent-contaminated **rags or wipes**.

Solvent-contaminated **rags** that can be reused should be sent to a launderer or dry-cleaning facility.

- You should have a contractual agreement for this service which includes pick-up, cleaning and the delivery of clean rags.
- Rags and wipes unfit for reuse should be sent to a facility that can burn them for energy recovery.

Solvent contaminated **rags or wipes** that are to be thrown away could possibly be hazardous waste.

- You must determine whether **rags and wipes** that are to be disposed of are hazardous or nonhazardous waste and manage them appropriately.
- Solvent contaminated rags and wipes that are laundered, dry-cleaned or burned for energy recovery are not hazardous waste and do not count towards your generator status.

Some printers centrifuge the **rags and wipes**, especially if they have an on-site solvent recovery still.

- A printing facility may accumulate rags for **centrifuging** at a single location within the facility.
- Rags should be stored in a labeled, covered container as stated above.
- Rags or wipes that have been centrifuged should still be laundered, dry-cleaned or burned for energy recovery.
- Any residue or solvent waste generated from the management of these materials, like centrifuging, must be evaluated to determine if it is hazardous waste.

Contact a DNR hazardous waste specialist in your area for help with the requirements. A staff list is located at:

<http://dnr.wi.gov/org/aw/wm/contacts/hazard.htm>.

Section B5: I've calculated the total number of gallons of all hazardous waste that must be included to determine my monthly generation rate. What's the next step?

Your next step is to convert all measurements to pounds. There are two approaches.

One way would be to convert the volume to weight by using the density of the material in pounds/gallon. The MSDSs may have the density and the MSDS always has the specific gravity of the material. Use the following method:

- a) Multiply the specific gravity by 8.34 to give the weight of the waste in pounds per gallon.
- b) Multiply the weight of the waste by the number of gallons of waste generated during the month.
- c) Repeat this process for each type of hazardous waste generated.

The other approach would be to determine the actual density of the material by the following steps:

- a) Weigh an empty one gallon container
- b) Fill the container with one gallon of the waste material
- c) Weigh the filled container
- d) Subtract the weight of the container to determine the weight of one gallon of the waste material
- e) Repeat this process for each type of hazardous waste generated

Once you have converted the measurements, then add the numbers together to determine the total of all hazardous waste generated at your facility in a given month. Use this number to determine your generator status.

Section B6: What is my Hazardous Waste Generator Status?

Facilities that generate hazardous waste are categorized as Very Small, Small, or Large Quantity Generators. A facility's status is based on the total hazardous waste generated each month.

Hazardous Waste Generator Status Thresholds

Thresholds have been established to define the maximum amount of waste that may be generated at each Generator Status level.

Thresholds are:

- **Very Small Quantity Generators (VSQG).** Generating 220 lbs or less per month (less than 27 gallons/month or about one-half of a 55 gallon drum)
- **Small Quantity Generator (SQG).** Generating 220 but less than 2205 lbs. per month (approximately 27-269 gallons/month or about ½ -4 drums)
- **Large Quantity Generator (LQG).** Generating 2,205 lbs. or more a month (approximately 270 gallons/month or about 4-5 drums)

Compare the total hazardous waste generated at your facility with these thresholds to determine your Generator Status.

This is a more accurate way to measure the materials weights, given potential inaccuracies in MSDS and other resources.

NOTE: About one-half of a 55 gallon drum of liquid waste weighs 220 lbs.

	<p>Question HW.3: What is your generator status?</p>	<p><input type="checkbox"/> VSQG <input type="checkbox"/> SQG <input type="checkbox"/> LQG</p>
---	---	--

EPA form 8700-12 can be found at:
<http://www.epa.gov/epaoswer/hazwaste/data/form8700/forms.htm>

EPA ID Number is a 12-character number assigned by EPA to each generator, transporter, and treatment, storage, or disposal facility upon request. Facilities which are not generators but anticipate possible generation activity must also apply for and receive an EPA ID number. See the Yellow Ink Room section for procedures to obtain an EPA ID number.

DOT guidance on marking and labeling: <http://www.fmcsa.dot.gov/documents/03-mark-lab.pdf>

Am I required to notify DNR of my Hazardous Waste Generator Status?

Yes, **unless** you are a VSQG. Every SQG, LQG, **transporter and person** which generates, treats, stores, or disposes of hazardous waste must inform DNR of its hazardous waste activity by filing EPA form 8700-12, Notification of Hazardous Waste Activity. After receiving the notification form, **DNR** assigns an identification number to the site. This is called your EPA ID number. A VSQG only needs the EPA ID number if manifesting waste.

Section C: Hazardous Waste Management Requirements

Some hazardous waste requirements apply to all facilities that generate hazardous waste and there are some requirements that apply solely based on the facility's Hazardous Waste Generator Status.

C1. What requirements apply to all hazardous waste generators?

All generators must meet the following requirements:

- perform a hazardous waste determination on all waste streams
- **label** all containers "Hazardous Waste"
- use containers that are compatible with the waste and in good condition (not leaking, rusting or dented)
- keep incompatible waste in separate containers
- ensure delivery/shipment to an approved treatment, storage, and disposal facility
- keep all hazardous waste drums/containers closed except when adding or removing waste

	<p>Question HW.4: Do you keep all drums/containers with hazardous waste closed unless adding or removing waste?</p>	<p><input type="checkbox"/> Yes.</p> <p><input type="checkbox"/> No. Correct immediately.</p>
---	--	---

How should I label my containers?

Labels should include, at a minimum:

- when in a satellite storage area, the label can have either the type of waste (i.e. Hazardous Waste) or the specific name of the waste (i.e. spent solvents, dirty rags)
- in the final storage/accumulation area the label must say "Hazardous Waste" and have a date (see section D for information on dating containers)
- prior to shipment you must ID the hazard (ignitable, toxic, corrosive, or reactive) for US DOT shipping requirements

One example:

Hazardous Waste
Name of Waste _____
Hazard _____

A full size example hazardous waste container label can be found in the Yellow Ink Room.

	Question HW.5: Are your containers labeled properly?	<input type="checkbox"/> Yes. <input type="checkbox"/> No. Correct immediately.
---	--	--

C2. What requirements apply based on generator status?

The following requirements apply based on your Generator Status.

VSQG's must:

- meet basic requirements for **"All"** generators above
- ensure that on-site accumulated hazardous waste does not exceed 2,205 pounds total
- obtain an EPA ID number **ONLY** if you manifest your hazardous waste (refer to Section E for information on manifests)

Many hazardous waste haulers **and treatment storage and disposal facilities** will not accept materials that are not manifested. VSQG's may self-transport to **household and very small quantity generator collection facilities**. A list is available at: <http://www.uwex.edu/erc/VSQG.html> and look for the **List of Communities Collecting HW from VSQG**.

SQG's must:

- meet the **basic requirements for "All" generators above**
- obtain an EPA ID number
- write the proper date of accumulation on all hazardous waste containers – refer to Section D for **how to determine the date of accumulation**
- inspect all containers once a week – it is no longer a requirement that you keep records of the inspections, but having records would reflect best management practices
- **use US DOT approved containers and follow US DOT requirements when shipping waste off-site**
- complete annual reporting (go to the hazardous waste reporting web page at: <http://dnr.wi.gov/org/aw/wm/hazard/reporting/>)
- utilize a licensed hazardous waste transporter for disposal
- observe land disposal requirements (see EPA's web site: <http://www.epa.gov/epaoswer/hazwaste/ldr/index.htm>)

NOTE: Provide sufficient aisle space to inspect containers - preferably three feet or more. If space is limited, stack drums on pallets. However, flammable wastes may NOT be stacked at any time for fire safety reasons.

Example Checklists provided in the Yellow Ink Room explain emergency preparedness and prevention procedures.

- **establish emergency procedures and preparedness and prevention procedures** (see Yellow Ink Room)
- provide training to all employees appropriate to job responsibilities
- **meet the storage and accumulation requirements in Section D**

How do I know if I have US DOT approved containers?

Containers meeting US DOT shipping requirements have greater than 5 gallon capacity only and are stamped or printed with the UN symbol and an 18-22 character alphanumeric code. For more information on US DOT approved containers for hazardous waste shipments, you have two options:

- read the federal regulation in 49CFR part 178, or
- contact the Hazardous Materials Information Center by calling 1-800-HMR-4922 (1-800-467-4922) Monday through Friday from 9:00 am to 5:00 pm (EST)

LQG's must:

- follow the requirements for SQG's, but with a few modifications:
 - develop a Emergency Contingency Plan (see Yellow Ink Room)
 - maintain training records (see fact sheet WA-099 in the Yellow Ink Room)
 - **meet the storage and accumulation requirements in Section D**

	<p>Question HW.6: Are you handling your HW appropriately based on the generator requirements?</p>	<p><input type="checkbox"/> Yes.</p> <p><input type="checkbox"/> No. Submit a RTCP.</p>
--	--	---

Section D: Accumulating and Storing Waste

Am I allowed to store waste before I must ship it offsite for treatment, storage, and/or disposal?

Requirements for accumulating hazardous waste are based upon the facility's generator status. If a facility is a:

VSQG: up to 2,205 lbs (approximately 3-5 drums) may be accumulated on site at any one time. **No time limit** requirement exists for VSQ generators.

SQG: up to 13,230 lbs (approximately 24-30 drums) may be accumulated on site at any one time. A SQG must closely monitor the retention time of the stored waste. Waste **must be shipped 180 days** from the label date indicating the start of accumulation on the drum or tank. If shipping over 200 miles, waste may be accumulated for 270 days.

LQG: though there is **no quantity limit for LQGs**, printers in this category must **ship waste 90 days** from the label date on the drum or tank indicating the start of accumulation.

An example sign for a Hazardous Waste Storage area can be found in the Yellow Ink Room.

Can I store small quantities of waste near presses or other equipment?

Yes. Satellite accumulation allows you to accumulate small amounts (not more than 55 gallons per satellite site) of hazardous waste at or near the point the waste is generated and where the waste is under the control of the operator in that part of the plant.

The main reasons for satellite accumulation are:

- so you can conveniently accumulate waste in the area it is generated
- so you can accumulate waste over a longer period of time without having to ship within the accumulation period (90 or 180 days) and avoid shipping a partial drum of waste

There may not be more than 55 gallons **of each type** of hazardous waste accumulating in any one satellite accumulation area. There may be containers for each of the various wastes generated in the same area, **but the total quantity of waste in the satellite accumulation area cannot exceed 55 gallons.**

While in a satellite accumulation area, the containers must be:

- **marked with the words “Hazardous Waste” or other words that identify the contents (i.e., spent press wash solvent)**
- **compatible with the waste**
- **closed except when adding or removing wastes**
- **in good condition**

A container holding hazardous waste in excess of 55 gallons must be marked with the date the excess waste begins to accumulate. Within 3 days, the container or containers must be moved from the satellite accumulation area to the central storage area, where it is subject to the 90 or 180 day accumulation requirements.

Refer to the Yellow Ink Room for a diagram of waste storage and accumulation sites.

IMPORTANT: Store all ignitable and reactive wastes at least 50 feet from the property line, if possible.

Contact the **SBCAAP** at 608.264.6153.

7a	Do you have satellite accumulation stations?	<input type="checkbox"/> Yes. Go to 7b. <input type="checkbox"/> No. Go to 7d.
7b	Do you know the volume limit for your satellite areas?	<input type="checkbox"/> Yes. Go to 7c. <input type="checkbox"/> No. Re-read this section or contact SBCAAP for help.
7c	Do you know how long you may accumulate all waste on your site?	<input type="checkbox"/> Yes. Go to 7d. <input type="checkbox"/> No. Re-read this section or contact SBCAAP for help.
7d	Is the start date of accumulation marked on containers in the storage area?	<input type="checkbox"/> Yes. Go to question HW.7. <input type="checkbox"/> No. Correct the problem.
	Question HW.7: Are you following all of the waste accumulation requirements? (Answer No if you haven't corrected the problem in 7.d)	<input type="checkbox"/> Yes. <input type="checkbox"/> No. Submit a RTCP.