

Household Hazardous Waste Collection Days

And Service Departments

Household Hazardous Waste Collection

Many cities are trying to provide citizens with extra services, including accepting household hazardous waste –

- some have special collection days
- some allow drop offs anytime

Waste is often collected at the local service departments.

Household Hazardous Waste Collection

Ohio EPA wants to encourage these efforts.

But, service departments are worried about what environmental regulations would apply.

What are their obligations and liabilities?

There are rules which apply.

Household Hazardous Waste at Service Departments

- Household hazardous waste is specifically EXEMPT from the RCRA rules (hazardous waste rules). Rules such as keeping containers closed and label DO NOT apply to household hazardous waste. However, you should consider managing household hazardous waste the same way you manage the service dept. hazardous wastes (labeling, dating, containment, spill kits, segregating non-compatibles, *etc.*)
- So, what rules do apply?

Household Hazardous Waste Collection

Key to compliance when collecting household hazardous waste is to NOT TO ACCEPT wastes from non-households. These include:

business, schools, camps, churches, charity, organizations, government facilities, *etc.*

Household really means household.

Household Hazardous Waste Collection

Accepting hazardous waste from non-households makes your facility an **illegal TSD**, a major violation.

DHWM is presently sorting out a city which took its hazardous waste to its own household hazardous waste collection day.

Household Hazardous Waste Collection

How can you guarantee that you do not collect waste from non-households?

Ohio EPA recognizes it is impossible to make this guarantee. However, you should have a SOP outlining what you look for to try to determine if the waste is from a non-household and what you do if you suspect a case of non-household waste.

Household Hazardous Waste Collection

Another issue: DO NOT mix municipal hazardous waste with house hazardous wastes coming to your site. If you do this, it ALL BECOMES HAZARDOUS WASTE. The household exemption disappears.

Again, Ohio EPA has just cited violations for a city that mixed their own waste with household hazardous waste.

Household Hazardous Waste at Service Departments

What rules do apply? Storm water and solid waste rules apply.

Service Departments must have a Storm Water Pollution Prevention Plan (SWP3) (good housekeeping).

All drop off and collection areas must be included in the SWP3.

Household Hazardous Waste at Service Departments

Best Management Practices (BMP) have to be employed eliminating the contact of precipitation with the waste materials. Snow and rain should NOT become contaminated by household hazardous wastes.

The best BPM is to manage the wastes inside a building.

Household Hazardous Waste at Service Departments

Service departments always accepting wastes should have a dedicated building for hazardous waste management.

Service departments having limited day events could arrange to have room inside a building, erect a tent or awning, or have a trailer where wastes can be stored.

Household Hazardous Waste at Service Departments

Ohio EPA realizes permanent and temporary “housing” for wastes may be difficult for service departments to provide.

First question to ask: is there an unused municipal (township, etc.) building that can be used instead of the service department?

Remember, this building should be secure from vandalism.

Household Hazardous Waste at Service Departments

If there are no buildings:

The key to solving the problem: don't allow precipitation to come in contact with the waste. Don't forget, you need a secure area, free of vandalism.

You may have to find a solution for each waste stream.

Household Hazardous Waste at Service Departments

Small bottles of wastes, which are compatible and in good containers, can be “lab packed” into drums. The small containers are wrapped or placed in a second container. The containers are placed into a 55 gallon drum, usually cushioned with vermiculite.

If you do this, have overpack drums available in case a 55 gallon drum leaks, spill kits, and a person having the knowledge to determine compatibility.

Household Hazardous Waste at Service Departments

Car batteries can be placed in plastic boxes with tight fitting lids until you have enough to take to a recycler. If you have a store that takes car batteries, encourage people to take them there instead. Provide address and telephone number to make it easy for your citizens.

A similar approach can be used for electronic wastes.

Household Hazardous Waste at Service Departments

Fluorescent bulbs and batteries can be collected inside and placed in some type of water proof container. Once the container is full, it can be moved outside until transport can be arranged.

Household Hazardous Waste at Service Departments

Examine the waste containers (paint, cleaners, solvents, *etc.*) look for leaks which have contaminated the outside of the container and damaged containers which might leak.

Place the undamaged and clean containers on a pallet. Tarp or shrink wrap the containers and pallet.

Household Hazardous Waste at Service Departments

Tarping and shrink wrapping may be a solution for short time management of household hazardous waste.

The problems arise when wastes are kept for months.

Household Hazardous Waste at Service Departments

Oil, gasoline, and oil/gasoline mixtures can be consolidated into 55 gallon drums. Make sure you:

- keep them separate,

- are sure that the material is ONLY oil, gas,
or an oil/gas mixture,

- keep the drums closed and labeled,

- have a spill kit handy and make sure you use it,

- use a funnel, and

- have containment.

Household Hazardous Waste at Service Departments

Last issue for Ohio EPA's Storm Water program:

How are wastes managed when dropped off?

Do they sit outside until someone comes
back?

Household Hazardous Waste at Service Departments

It would be best if someone were present at drop off times. However, if this is not possible, have drop off in an area which is out of the rain and snow.

Tires and Service Departments

There is NO exemption for tires from homes. Tires dropped off at your service department must be managed according to Scrap Tire rules.

The most important management practice you should observe, not allowing water to accumulate in the tire.

Tires and Service Departments

As with household hazardous waste, scrap tires it is best for scrap tires to be managed under roof.

If tires are stored outside, water can not accumulate in them OR you will need to apply larvaecide. Please note, there are other rules as well. I can send you these.

Household Hazardous Waste at Service Departments

- A release is a release.
- If big enough you have to call the emergency hotline You don't want to have to do this.