

## **Environmental Checklist**

### I. Hazardous Waste

- A. Properly identify all waste streams and,
- B. whether they are hazardous, universal, or non-hazardous

#### 1. Hazardous Waste

- a. Ignitable
- b. Corrosive
- c. Reactive
- d. Toxic
- e. Listed

#### 2. Universal – must be handled according to state and federal law

- a. Batteries
- b. Computers
- c. Florescent and other Mercury containing light bulbs
- d. Other Electronics
- e. Mercury containing devices such as thermostats or switches
- f. Pesticides

#### 3. Non Hazardous - anything not deemed Hazardous or Universal waste

- C. Determine the amount of hazardous waste that is generated per month and your Hazardous Waste Generator Status.

There are tiers of compliance responsibilities dependent on volumes of hazardous waste generated per calendar month. How much is generated and does it fluctuate? If so, does this fluctuation unexpectedly place you in a category of hazardous waste generator whose requirements are more stringent? If so, you need to plan for the additional responsibilities entailed.

- 1. Conditionally Exempt Small Quantity Generator (CESQG): Generates no more than 220 pounds of hazardous waste per month and does not store over 2,200 pounds of hazardous waste at any time. A CESQG does not have to have an EPA RCRA ID number, does not need to use a hazardous waste manifest form, and does not need to submit an annual report. A CESQG must not let waste accumulate over 2,200 pounds or they become the next tier, a Small Quantity Generator and are subject to the requirements below.
- 2. Small Quantity Generator (SQG): Generates between 220 and 2,200 pounds of hazardous waste per month and at any time store no more than 13,200 pounds of hazardous waste. An SQG may store hazardous waste on-site for up to 180 days. Storage over that time limit makes them subject to permitting requirements of a Treatment, Storage, and Disposal facility. This is something you do not want to

have happen. An SQG needs an EPA RCRA ID number, needs to use the Hazardous Waste Manifest and needs to submit a copy of the Manifest to DEC. An SQG does not need to submit an Annual Report.

3. Large Quantity Generator (LQG): Generates more than 2,200 pounds of hazardous waste per month. An LQG can store hazardous waste on site for up to 90 days. A Generator that is an LQG needs to acquire an EPA RCRA ID Number, needs to use a Hazardous Waste Manifest form, needs to submit a copy of the Manifest form to DEC and needs to submit an Annual Report. Further, an LQG needs to comply with the requirements for personnel training, preparedness and prevention, contingency plans and emergency procedures.

Note: 220 pounds of hazardous waste is roughly half of a 55 gallon drum.

D. Review hazardous waste storage and disposal practices.

Make sure hazardous wastes and universal wastes are collected in proper containers that are closed and labeled with required information and disposed of properly and in a timely fashion. Review your storage procedures for hazardous waste, both satellite areas (areas near the point of generation that are away from the main hazardous waste storage area where waste is stored for a short period of time until it is moved to the main hazardous waste storage area) in plant and main storage area. Are drums secure, not leaking and labeled properly? What are your contingency plans for a spill? Do you have a spill kit that is adequate for the size and type of any potential hazardous waste spills? Can a spill potentially make its way into a drain? Are drums with flammable materials (flashpoint <100°F bonded and grounded? Are you in compliance with volume and time limitations based on your Waste Generator Category status?

- E. Obtain EPA ID number up-to-date permits, insurance certificates, etc. from your hazardous waste hauler and/or waste disposal company if they are not one in the same.” Google” their name to see if they have been involved in any problems and check EPA’s ECHO ([www.epa.gov/echo](http://www.epa.gov/echo)) website using their EPA ID number to see if they have any compliance history problems. Make sure you are indemnified in the event of environmental contamination. Run a credit report on them .Remember, if your hazardous waste hauler has a problem (accidents, bankruptcy, etc.) you have a problem. If you are only sending out a few barrels of hazardous waste a year, it doesn’t make sense to shop for the cheapest cost. When they start having a problem, you can get caught in a cleanup and not even know it until you hear from a regulator.
- F. Are waste manifests including land ban forms all accounted for, organized and accessible? Each shipment of hazardous waste requires two copies of the manifest – generator and return copy with all appropriate signatures, dates, waste descriptions and volume, etc. Each waste stream requires one land ban form.
- G. Are employees who handle hazardous waste trained in spill containment and other hazards? Do you have spill kits in places they may be needed?
- H. Check non-hazardous waste streams to be sure that hazardous materials are not

inadvertently entering waste stream. If you change materials such as cleaning solvents, make sure they are properly classified as to their status as being hazardous or nonhazardous.

- I. Properly manage universal wastes (fluorescent bulbs, lamps, batteries computers, etc.). You need to be able to document your recycling of these materials and there is a one year time limit to accumulate these wastes. The wastes need to be collected in proper containers that are closed and labeled with required information and picked up by companies who are licensed to handle universal wastes.

## II. Storm Water Discharge

- A. Review your plant outdoor storage procedures and know where the storm water from the facility is discharged – either to the municipal system, a holding pond, dry well or to a waterway or conveyance to a waterway. If you store incoming chemicals or outgoing waste outdoors or other sources of waste such as uncovered dumpsters, old equipment, unprotected storage tanks, bag house, or visible emissions of spray power on the roof, you may have to file a storm water discharge permit if your storm water discharges anywhere but to the municipal system. If discharged to municipal system, then you need to notify the municipality and if there are no sources of contamination, you need to submit a storm water No Exposure Certification. If sources of contamination cannot be eliminated, then a stormwater discharge permit is required.

## III. Shop Towels

- A. All laundered solvent soaked shop towels should be stored in a safety can with lid closed at all times. They should be transferred to a larger container with a lid and false bottom to allow free liquids to drain from the towels and accumulate at bottom of can where they can be transferred into waste container. It is a violation to have towels that are dripping wet with solvent or sitting in a puddle of solvent in the bottom of the shop towel collection container when the shop towels are sent off site for laundering.
- B. If you utilize disposable towels for cleaning presses, they should probably be handled as a hazardous waste, especially if the solvent being used is itself a hazardous waste.
- C. Ask your shop towel company for their environmental compliance information permits, insurance, etc. “ Google” them and check EPA’s ECHO web site using their EPA ID number to see if they have had any problems. Run a credit check. Same issues pertain to them that pertain to your waste hauler.

## IV. Waste Water

- A. Obtain a copy of the local sewer code and determine if a permit, testing, or other requirements such as an Industrial Wastewater survey is required. If a permit is needed and one cannot be found, obtain one from the local municipality. Review current wastewater going into the system to make sure you are in compliance with the discharge limits and/or permit. Generally MSDS sheets for the chemicals

being disposed of will give you a starting point for information on acceptability to enter wastewater system, but may not be representative of the final chemistry being discharged. Nothing of a flammable or hazardous nature should be poured down the drain, even if diluted.

- B. If you are on a septic system, no chemicals of any kind should be disposed of through your drain.

## V. Air Permitting

- A. Locate and review air permit if you have one. Ensure that all conditions in the permit are understood and are being met including any recordkeeping requirements. Any addition of equipment, significant change of chemistry being used, significant increase or decrease in work volume or change in plant ventilation system will change your permitting specifications.
- B. If you do not have a permit, determine why one has not been obtained. Do not assume that since one had never been obtained one is not needed. Over the years, the threshold for permitting has decreased and is now very low. If you are in upstate New York, any facility with VOC emissions 3 tons per year or more, a permit is required. All printers in the New York City metro area and Long Island require a permit, regardless of emissions. Printers in Northern New Jersey need a permit if they use more than a ½ gallon of ink, fountain solution, coating, and/or cleaning solvents per hour.
- C. Perform annual VOC/HAP inventory. You should conduct an annual inventory of your Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP). This information is critical to being able to document that you are in compliance with your air permit or that you do not need one. An employee can be trained to do this if they have the proper background. Printing Industries Alliance has fact sheets available and a source to do it for a reasonable fee.

## VI. Tier II Reports

- A. Your company must submit a Tier II report if you store over 500 pounds of a chemical listed as an “Extremely Hazardous Substance” or over 10,000 pounds of any product requiring an MSDS. These reports must be filed the appropriate state agency along with your local emergency planning committee and local fire/police department.

The listing of chemicals can be found at the US EPA website and is called the “Consolidated List of Lists”.

## VII. Contingency Planning

- A. There are things you need to do in the event of a chemical spill. A large quantity generator must have a written contingency plan and it must be submitted to the appropriate state and local authorities. If you are a Small Quantity Generator or Conditionally Exempt Small Quantity Generator, it may still be a good idea to have a written plan as there are planning requirements mandated by OSHA. All spills must

be reported to the state and the responsible party/property owner is responsible for cleanup of the spill.

**One Final Word:**

Many of these regulations have been in place in, one form or another, for a number of years. If your review indicates that you may not have properly addressed a particular regulation, please contact Tim Freeman, President, Printing Industries Alliance before any type of action is taken with any of the regulatory agencies. Reach Tim at (716) 691-3211 or [tfreeman@PIAlliance.org](mailto:tfreeman@PIAlliance.org).