

4.12 FUEL

Q1 My used oil vendor discourages putting gasoline in the used oil tank, but the EMS Manual says it's allowed. Which one do I follow?

Follow your vendor's preference. There is no law against mixing gasoline and used oil. However, many used oil recyclers will not accept used oil mixed with gasoline. Diesel is usually ok.

Contact your used oil recycler to find out if they allow mixing gasoline with used oil. If mixing is not allowed by the recycler, either the recycler or Regional HazMat may have other disposal options for unusable gasoline.

Q2 Can I store portable gas cans next to propane cylinders?

No. A gas fire could cause the propane cylinders to explode. However, portable gas cans may be stored in the same area as other flammables (such as paint and solvent).

Refer to the ODOT Safety and Health Manual for additional information on the storage of flammables and/or compressed gases.

Q3 The EMS Manual says, "Spills must be cleaned up immediately and that fuel spills larger than 42 gallons have to be reported." I have been told not to touch gasoline spills. What should I do if I spill gasoline?

It depends on the situation. ODOT's first concern is safety. Spills should be cleaned up within the training of the employee. Be familiar with the spill response procedures for your yard. Typically, the cleanup guidelines used for the road are the same ones used at the yard.

If you have been told not to clean up gasoline spills, implement response procedures within your training (such as blocking storm drains before they are affected). Notify appropriate ODOT and hazardous response people.

All spills must be cleaned up; only some spills have to be reported. Refer to Appendix I – Reportable Spills for additional information.

Q4 Do I have to 'report' oil or fuel spills that are fully contained within a secondary containment structure?

No, if you meet all the following conditions. According to Oregon regulations, spills or releases that exceed the reportable quantity (greater than 42 gallons of oil including fuel) **do not** have to be reported to the Oregon Emergency Response System (OERS) if **all** of the following conditions are met:

- (a) It occurs within an **engineered** containment area with an impervious surface designed to contain such a release (this includes containment slabs, pads, and bays);
- (b) It does not penetrate any surface of the containment area (it hasn't reached the ground surface);
- (c) The spilled material does not and will not escape the containment;
- (d) It is completely cleaned up in less than 24 hours; and
- (e) The cause of the spill or release is repaired.

You must notify your supervisor. Notify the Office of Maintenance and Regional HazMat if a large spill (greater than reportable quantities) occurs at the yard.

4.14 LIGHTING

Q1 Do I need to keep track of used incandescent bulbs?

No. In almost all cases, used incandescent bulbs may be tossed in the trash.

Some really old or some specialty bulbs may have lead solder in the base. If you have an unusual incandescent light bulb contact Regional HazMat prior to disposal.

Q2 Do I need a special container for storing used fluorescent bulbs?

No. Used fluorescent bulbs can be stored in a cardboard box, fiber barrel, or any other container that minimizes breakage.

There must be a label on the container that describes the contents (e.g. "universal waste - used bulbs" or something similar). The label must also include the date when you started putting bulbs into the container.

Q3 I've collected three used fluorescent bulbs this year. How do I get rid of them?

- Some landfills collect universal waste, including used bulbs. Contact your local facility for availability.
- DAS maintains a contract for the disposal of certain universal wastes, including fluorescent light tubes. The current contract is with EcoLights NW. The current contact at EcoLights NW is Michelle Minstrell; her number is 888-214-2327. There is no minimum pick up amount though the company prefers you accumulate a reasonable amount of waste before arranging for pick up. Billing is done by units (piece, pound, or foot). Remember that universal wastes, such as waste lamps, can only be stored onsite for 1 year.
- Some hazardous waste haulers pick up waste lamps. A partial list of companies is included on the DEQ Fact Sheet - Waste Lamps and Ballasts in Appendix K of the EMS Manual.

In addition, some Districts have created centralized accumulation center to make off site shipping more economical.

4.15 OIL

Q1 Do I have to keep track of how much oil I take out of each vehicle?

No. ODOT is choosing to track how much used oil is generated and recycled each month.

Estimate the monthly generation of used oil by 'dipping' the tank, using a level gauge, or any other consistent method that works for your yard.

For systems that are direct connection from the grease pit to the used oil tank, it may be easier to divide the amount picked up for recycling by the number of months it took to accumulate. The estimated amount should be projected for the upcoming months and modified every time the used oil tank is emptied.

Q2 I have a used oil burner at my yard, how do I record used oil generation and disposal?

On the Waste Generation Log, record the approximate amount of used oil produced at your yard.

The average monthly amount can be estimated based on the total amount placed into the burner minus the amount accepted from other yards. The monthly oil generated can also be estimated by multiplying the number of vehicles serviced by the amount of oil required in the vehicle or any other consistent method that works for your yard. Used oil can be tracked in gallons and does not have to be converted to pounds.

On the Waste Disposal Log, record how much used oil goes into the holding tank for the burner each month. Where it asks for 'method of disposal' write something like "burned onsite." The Waste Disposal Log will include all oil burned at the yard regardless of where it was generated.

Q3 We take our used oil to another ODOT yard so they can burn it in their used oil burner. Can either of the yards use the EMS Waste Generation and Disposal Logs instead of the Used Oil Transfer forms?

Sometimes.

If you are transporting less than 55 gallons, you don't have to use the Used Oil Transfer forms. The Waste Generation and Disposal Logs can be used to document transfers of less than 55 gallons per trip.

The yard that produced the used oil should list the yard with the used oil burner in the 'disposal company' column of their Waste Disposal Log. The receiving yard should not include used oil brought from other yards on their Waste Generation Log, but the total amount of used oil burned at the yard should be included on their Waste Disposal Log.

If transporting more than 55 gallons per trip, the receiving yard (the yard with the used oil burner) must use the Used Oil Transfer form. However, the sending yard (the yard that generated the used oil) can document the transfer on their Waste Disposal Log.

According to Oregon's used oil management regulations, a facility that accepts used oil for burning must keep track of each shipment over 55 gallons. The records must include the transporter, the generator, the DEQ/EPA used oil identification number, the quantity of used oil accepted, and the date the used oil was accepted. The Waste Generation and Disposal Logs are not setup to document all the information required for accepting used oil for burning.

If the sending yard is using the Waste Disposal Log to document disposal/transfer (instead of the Used Oil Transfer form), the entry in the 'method of disposal' column should be something like "picked up by Jon Smith and transported to ODOT - Brothers" or "Jon Smith delivered to ODOT - Brothers." Write ODOT's used oil transporter number (ORQ000021683) in the 'manifest or receipt number' column.

Q4 The vendor doesn't want extra writing on the empty drums we return. Are there other ways to label them?

Yes. Empty drums that are stored on their sides with the bungs horizontal don't require 'empty' labels. Store empty drums in an area signed for empty drum storage. Use magnetic labels.

Q5 Can we give used oil to a government agency or municipality for burning?

Yes, if they are registered with DEQ. According to ODOT Property Surplus, used oil may be given to another government agency or municipality for burning in their used oil heaters provided the transfer is documented on the Waste Disposal Log. According to used oil regulations, only DEQ registered facilities may burn used oil from offsite generators. Record the receiving facilities' registration number on your Waste Disposal Log in the 'manifest or receipt' column.

Q6 Can I accept used oil from non-ODOT agencies or individuals to burn in the used oil burner at my yard?

No. ODOT is not registered to burn used oil generated by non-ODOT facilities.

Q7 The used oil management company in our area burns the used oil they pick up from us in their used oil heater. Is that ok?

Yes, so long as they are registered with DEQ. DEQ has approved some used oil management companies to burn the used oil they pick up.

Used oil management companies may (or may not) require testing or other proof that the used oil has not been contaminated.

Make sure you know what will happen to your used oil when it leaves the yard and that the recycler or used oil management company is properly registered.

Q8 If a non-ODOT agency or individual (another agency, municipality, or used oil management company) is properly registered with DEQ can we deliver the used oil?

Yes, provided you meet certain conditions.

If you are transporting used oil to a non-ODOT company for burning you must be able to prove (either through testing or knowledge of process) that the used oil contains less than 1,000 ppm total halogens. Keep the information used to provide proof for at least 3 years. Fill out the Used Oil Transfer form for Transporting Used Oil. Fill in the receiving company's DEQ/EPA registration number and their address.

For questions on placarding and required CDL endorsements for transporting used oil refer to the chart titled Waste Hauling located in Appendix D – Questions and Answers from the Rollout – September 27, 2005.

Q9 Do I have to report oil or fuel spills that are fully contained within a secondary containment structure to OERS?

No, if you meet all the following conditions. According to Oregon regulations, spills or releases that exceed the reportable quantity (greater than 42 gallons of oil including fuel) do not have to be reported to the Oregon Emergency Response System (OERS) if **all** of the following conditions are met:

- (a) It occurs within an **engineered** containment area with an impervious surface designed to contain such a release (this includes containment slabs, pads, and bays);
- (b) It does not penetrate any surface of the containment area (it hasn't reached the ground surface);
- (c) The spilled material does not and will not escape the containment;
- (d) It is completely cleaned up in less than 24 hours; and
- (e) The cause of the spill or release is repaired.

You must notify your supervisor. Notify the Office of Maintenance and Regional HazMat if a large spill (greater than reportable quantities) occurs at the yard.

Q10 I have a double-walled oil tank. Do I have to install anything else to provide secondary containment?

No. A double-walled tank is secondary containment. The second wall keeps the product contained if the first wall fails.

Other examples of secondary containment include building concrete walls and floor around a single-walled tank and placing a single-walled tank inside a plastic tub or sump that holds the entire capacity of the tank.

4.16 PAINT

Q1 Can I leave paint out to dry and then throw it in the trash?

Sometimes. Air dry non-hazardous paint and throw it in the dumpster. It is essential to complete a Waste Profile to confirm paint is non-hazardous before proceeding with this option.

Do not air dry hazardous paint. DEQ considers solidifying hazardous paint (with the intention of throwing it away) to be treatment of a hazardous waste. DEQ does not allow the treatment of hazardous wastes prior to disposal (except under complex, expensive permits). Arrange to have hazardous paints picked up by a hazardous waste hauler.

4.17 PAVEMENT MARKING PRODUCTS

Q1 Who is responsible for striping paints seasonally stored at yards?

The Maintenance Regional Traffic Line Manager is responsible for implementing (or arranging for implementation of) the EMS Pavement Marking Procedure at each temporary location.

The Traffic Line Manager should coordinate responsibility for the monthly visual inspection of pavement marking products with the District Manager for the compound. Inform the Traffic Line Manager of paint storage issues that affect the yard.

Q2 The Regional Striping crew uses our yard during part of the year. Do we have to include their waste on our yard's Waste Generation Log?

Yes. Wastes are recorded where they are generated. Include hazardous waste generated by any crew operating out of the yard at the time of generation on the yard's Waste Generation Log. Use the total amount of hazardous waste generated by all crews at the yard to determine if the yard is under the 220-pound Conditionally Exempt Generator hazardous waste limit.

The Traffic Line Manager is responsible for working with each TMM on waste generation and disposal issues that affect the yards where they store products.

Q3 Can we mix two-part pavement marking products to form an inert material and then throw it in the trash?

No. If either of the components are considered a hazardous waste (such as a product with more than 10% methyl methacrylate), then mixing the products with the intention of throwing it away is considered treatment of a hazardous waste. DEQ does not allow the treatment of wastes prior to disposal (except under complex, expensive permits).

Complete a Waste Profile for each of pavement marking product to determine if it is a hazardous waste. If you don't want to complete a Waste Profile, pavement marking products can be 'assumed' hazardous and disposed of appropriately. Complete a Waste Profile to prove a material or waste is non-hazardous.

Pavement marking products that are hazardous (either known or assumed) must be stored in covered container until a hazardous waste hauler picks it up or you take it to an approved landfill.

Include the amount of hazardous waste generated each month on the yard's Waste Generation Log. For example, if you flush material from the lines into a five-gallon bucket at the end of each shift, at the end of each month you must include the weight of the waste product on the Waste Generation Log for the yard where the waste was generated. The generation of hazardous waste counts toward the yard's 220-pound Conditionally Exempt Generation limit.

Q4 Are MMA (methyl methacrylate) pavement marking products considered a hazardous waste?

Yes. Waste pavement marking products (e.g. from line flushing) that contain 10% or greater MMA are considered hazardous waste. Hazardous waste must be stored in a closed, labeled container without intentionally causing the product to become solid and disposed of as hazardous waste.

4.19 PROPANE

Q1 Can I store small propane cylinders next to portable gas cans?

No. A gas fire could cause the propane cylinders to explode.

Refer to the ODOT Safety and Health Manual for additional information on the storage of flammables and/or compressed gases.

4.21 ROADWASTE

Q1 Do I have to record litter bags on the Waste Generation Log?

No. Litter collected from the highway and right-of-way does not count as waste generated by the yard.

As long as litter bags (that are brought in from the road) are not opened, they can be placed in the dumpster with the rest of the trash going to the landfill.

Follow District sorting protocol, if litter bags are opened for sorting.

Q2 How do we store needles that are brought in from the road?

Needles should not be brought back to the yard. According to the ODOT Safety and Health Advisory on Hazardous Roadway Litter and Debris, hypodermic needles should be flagged where they are found along the road or the position should be marked in some other manner. Needles found along the road should be avoided unless the employee is trained to collect and dispose of these items properly.

The exposure control plan found in the ODOT Bloodborne Pathogen Program, PRO97006 should be followed.

The storage, handling, and disposal of biological wastes are not part of the EMS Program.

4.22 SAND, GRAVEL, AND CLEAN FILL

Q1 Do the gravel pits, crushing and screening operations, and cinder sites need to follow the EMS Procedures?

Yes. According to one of the assumptions made in the development of the EMS program, relevant procedures will be implemented in locations other than the Maintenance yards, where appropriate. In this instance, EMS Procedures for Fuels (4.12), Oils (lubricants) (4.15), and Equipment (4.10) should be reviewed and implemented, where appropriate, at temporary and permanent rock crushing and screening operation sites.

4.23 SOLVENTS

Q1 I pre-wash parts in a solvent container. I reuse the same solvent for about six months before I get rid of it. Can I divide the amount of waste generated over the period of time I was using the solvent?

No. When you decide a solvent is no longer effective and replace it with new solvent record the entire amount of old solvent removed from the parts washer or other container on the Waste Generation Log. If a large quantity of waste solvent is generated in a single month, it may push the yard over the 220-pound Conditionally Exempt Generator (CEG) hazardous waste limit (30 gallons is about 210 pounds).

Small amounts of waste solvent may be collected in a drum until enough has been accumulated to be cost effective to have it picked up. Remember to label the waste solvent drum. The label must say "hazardous waste" and include a hazard warning and the accumulation start date. Only the amount generated each month (not the entire amount in the drum) counts toward the 220-pound CEG limit.

Q2 We use a water-based parts washer. Does that mean we can assume the waste solution is non-hazardous?

No. Although most water-based parts washer solutions are nonflammable and nontoxic when purchased, the solution can qualify as hazardous waste after extended use because it may contain toxic metals from cleaning parts and equipment. Water-based cleaning solutions may become hazardous waste if you apply a listed hazardous solvent or other toxic organic compound (e.g. some aerosol sprays) to the parts before washing. High levels of toxics are less likely if the parts washer is cleaned frequently.

Q3 How do we determine if used solvents or other parts washer liquids are hazardous or non-hazardous?

Used parts washer solvents (water-based and/or solvent-based) can be either assumed hazardous or sent to a lab for testing.

- The easiest thing to do is to 'assume' the used solvent is hazardous. If you assume the waste is hazardous, you do not have to complete a Waste Profile or any other waste identification. If you assume the solution is hazardous waste it must be recorded on both the Waste Generation and Waste Disposal Log and it must be picked up by a hazardous waste hauler. Assumed hazardous waste counts toward the 220-pound CEG hazardous waste limit.
- If you choose to do testing, have a sample of the used solution sent to a lab for analysis. Have the used solution tested for selected 'D-listed' compounds that are likely to have gotten into the solution from dirty parts (e.g. benzene, lead, and trichloroethylene). In general, the used solvent should be tested for metals and for volatile organic compounds. Complete a Waste Profile using a combination of the MSDS and lab results. This waste it is considered a mixture (even though there is only one MSDS) because of the unknown component added by cleaning parts. If needed, contact Regional HazMat or the Office of Maintenance for assistance with sample collection and analysis.

If the waste is determined hazardous, keep the Waste Profile on file. Record the generation and disposal on the Waste Logs and have the waste picked up by a hazardous waste hauler.

If the waste is determined non-hazardous, it may be disposed of as liquid trash. The next time the solution is changed, have the used solution tested a second time. If the used solution is determined non-hazardous both times you don't have to have the used solvent tested again unless something changes in the washing process (different solvent, clean twice as many parts, start cleaning paint lines instead of truck parts, etc.) Keep both sets of lab results on file to show you have built a non-hazardous waste 'history'. The generation of non-hazardous solvent waste **does not** count toward the 220-pound CEG hazardous waste limit.

Q4 Do I have to include sludge from the parts washer on the Waste Generation and Disposal Logs?

Yes. Sludge (from both solvent-based and water-based parts washers) is usually hazardous because it contains toxic metals and solvents from the parts cleaned. Typically, the vendor servicing the parts washer tests the sludge. If the vendor doesn't perform testing, assume the sludge is hazardous.

Write the total weight of the sludge generate from periodic cleaning of the parts washer on Waste Generation Log. When the hazardous waste disposal company picks up the sludge, logged the disposal on the Waste Disposal Log.

Some parts washers are 'self cleaning' and generate small quantities of sludge while 'cleaning' the solvent. Remove the sludge from the parts washer on a daily or weekly basis and store in a labeled drum. If the yard is a CEG, the amount of waste sludge can be estimated each monthly by dividing the total amount of sludge generated by the number of months it took to accumulate it. For example, if it took 6 months to generate 120 pounds of sludge, you would record 20 pounds for each of the 6 months it took to generate the sludge (120 divided by 6 equals 20). This amount is then 'projected' for the next accumulation period. Change the 'projected' amounts to the 'actual' amount each time the sludge is picked up by a waste disposal company.

Q5 How do we document solvent waste generation and disposal?

The scenarios below describe how to document waste solvent that is either known or assumed hazardous. Used solvent and the sludge that forms from using the solvent are typically hazardous waste. Refer to Q3 of this section for more information on how to determine if a used solvent is hazardous or non-hazardous. Q7 of this section addresses onsite solvent recycling.

- **Used solvent is 'counted' on the Waste Generation Log when it is determined unusable (too dirty to be effective).**
- **Sludge is 'counted' on the Waste Generation Log when it is removed from the parts washer (when the parts washer is cleaned).**
- **Record used solvent and sludge on the Waste Disposal Log when they are taken offsite.**

Here are several solvent waste generation and disposal scenarios:

- A 20-gallon parts washer of hazardous solvent is serviced twice a year by a hazardous waste company. The company takes the used solvent directly from the parts cleaner and runs the solvent through a recycling unit, tops it off with fresh solvent, and takes the sludge away.*

Write the number of pounds of sludge the company removed on the Waste Generation Log in the column that matches the month the parts washer was serviced. The weight of the sludge counts toward the 220-pound CEG limit. Write the same weight on the Waste Disposal Log. On the Waste Disposal Log, also include that the solvent was 'recycled onsite' and the sludge was 'removed by the vendor.' Fill in the company's name and the manifest number.

- b. *A 30-gallon parts washer is used for a year. Solvent is added, as needed, to maintain the 20-gallon optimal operating level. At the end of the year, all the solvent and sludge is disposed of as a hazardous waste and fresh solvent is put in the washer.*

Write the total weight of waste solvent and sludge removed from the parts washer on the Waste Generation Log in the column that matches the month the solvent and sludge were removed from the parts washer (20 gallons of solvent plus 5 gallons of sludge is about 175 pounds). When the waste solvent and sludge are picked up, write the both weights on the Waste Disposal Log. The hazardous waste company can give an accurate weight.

The weight of the waste solvent and the sludge counts toward the 220-pound CEG limit for the yard. Be very careful about generating this much hazardous waste in a single month. If the yard generates more than 220 pound of hazardous waste in any one month it will reclassify the yard as a Small Quantity Generator (SQG) for an entire year.

If you have a 50-gallon parts washer in this same scenario, it will likely push the yard into a SQG status. Investigate other parts cleaning options. Contact the Office of Maintenance or Regional HazMat for assistance.

Note: Usually, the operating level of solvent in a parts washer is not the same as the capacity.

- c. *A 20-gallon parts washer has a 12-gallon operating level. Every three months the old solvent is placed into a 55-gallon drum (labeled "waste solvent") and fresh solvent is put into the parts washer. Once a year a solvent company picks up the drum of waste solvent and delivers a drum of fresh solvent.*

Each time the solvent is changed (every three months) write the weight of waste solvent removed from the parts washers on the Waste Generation Log. For example if you started putting 'old' solvent in the 'waste solvent drum' in January, you would write 84 pounds (12 gallons times 7 pounds per gallon) on the Waste Generation Log in January, April, July, and September. The weight of the 'old' solvent counts toward the 220-pound CEG hazardous waste limit.

At the end of the year, when the hazardous waste company picks up the drum of 'waste solvent', write the weight of the entire 'waste solvent' drum on the Waste Disposal Log. For example, 84 pounds every 3 months (or four times a year) is about 336 pounds. Write the vendor information, the date of the pickup, and the amount of waste on the Waste Disposal Log. The weight of the drum does not count toward the 220-pound limit. We are getting rid of it; not generating it.

- d. *Solvent is never removed from the parts washer. Fresh solvent is added as needed to maintain the correct level of solvent to clean parts.*

If the parts washer is not designed to 'burn-off' dirty solvent, shut the lid when the washer is not in use. Evaporation is not an acceptable way to dispose of waste solvent.

The sludge that collects in the bottom of the drum must be disposed of as hazardous waste. Record the weight of the sludge on the Waste Generation and Disposal Logs when the washer is cleaned.

- e. *Spent solvent is removed from the parts washer and recycled in an onsite 'still' specifically designed for solvent recycling. Fresh and recycled solvent is added to the parts washer as needed to maintain the correct level of solvent to clean parts.*

If the solvent is taken from the parts washer and 'immediately' transferred to the onsite still for recycling, do not include the solvent Waste Generation Log. Taking the solvent out of the parts washer and leaving it unattended (for any period) is not 'immediately.' The container must be closed while moving solvent from the parts washer to the still. When the still is cleaned, record the weight of the sludge on the Waste Generation Log in the column that matches the month the sludge was removed from the unit.

Record the weight of used solvent that is not 'immediately' moved to the onsite still on the Waste Generation Log. On the Waste Disposal Log, write "recycled onsite." Count the weight of the sludge as hazardous waste on the Waste Generation Log when it is removed from the still.

Refer to the DEQ Policy on Counting Recycled Hazardous Waste and the Solvent Recycling Counting Guidance located in Appendix K for additional information. Contact Regional HazMat or the Office of Maintenance for assistance.

Q6 Our yard operates a solvent recycling 'still'. Do we need a DEQ permit?

No, but you must to notify DEQ of the activity. If you are operating an onsite solvent recycling unit, you must notify DEQ even if the yard is a CEG. If your yard already has an EPA/DEQ hazardous waste generator number, you just need to update DEQ's information for your yard to include 'onsite recycling'. If your yard does not have an EPA/DEQ hazardous waste generator number, you need to apply for one. Check the box on the application that says "recycling onsite."

If you have questions regarding your yards EPA/DEQ hazardous waste generation number, contact the Office of Maintenance.

Q7 We send our used solvent to another ODOT yard for recycling in a solvent 'still'. Do we have to write it on the Waste Generation and Disposal Logs?

Yes. If you send spent solvent to another ODOT yard for recycling, write the entire amount of solvent removed from the parts washer on your yard's Waste Generation Log (the yard generating the waste). Write the name of the yard where you took the spent solvent (the yard with the still) on the Waste Disposal Log. Also write on the Waste Disposal Log that the spent solvent was 'recycled.'

For questions on placarding and CDL endorsements for transporting used solvent refer to the chart titled Waste Hauling located in Appendix D – Questions and Answers from the Rollout – September 27, 2005.

4.24 TREATED TIMBER

Q1 We throw un-usable pieces of treated timber into the dumpster. Can we continue to do that?

Yes, if it is ok with your local landfill. Accepting treated timbers is at the discretion of the local landfill. Some landfills require testing before they accept treated timbers. Some landfills will accept treated timbers but want them separated from general trash. Contact your local landfill for their policy on accepting treated timbers.

4.25 WINTER MAINTENANCE CHEMICALS

Q1 The documentation section for Winter Maintenance Chemicals doesn't include the Fire Marshal Inventory. Are deicers supposed to be included on the annual report of hazardous substances?

Yes. Even though winter maintenance chemicals are non-toxic, they should be included on the annual report to the Oregon State Fire Marshal. The State Fire Marshal's Office should not assess a hazardous material storage fee for winter maintenance chemicals. The fee exemption was authorized based on the necessary role of these chemicals in helping ODOT meet State and Federal road safety and environmental mandates.

If you are assessed a fee for winter maintenance chemicals, contact the Office of Maintenance. A 'Fee Review Request' letter will be sent to the State Fire Marshal's Office. The revised fee may go up or down depending on what other materials are stored at the yard.

Q2 We used our truck-mounted tank for deicer in the winter and water in the summer. Do we have to re-label it every few months?

Yes. Change signs when you change activities (e.g. deicer, non-potable water, or herbicide).

The label must identify the contents of the tank. Find a labeling method that you can change easily. Suggestions include hanging a sign on the mounting frame, using a flip sign, or using duct tape.

MONTHLY FIELD AUDIT AND CORRECTIVE ACTION SHEET

Q1 We have multiple crews at our yard. Who is responsible for the paperwork?

The Maintenance TMM for the complex or an equivalent manager from another crew located onsite is responsible for compiling information from the Monthly Field Audit and completing the yard's Corrective Action Sheet. The designation of a responsible manager is at the discretion by the District Manager. Communication at multiple crew yards is crucial for successful implementation of the EMS program. The EMS program applies to all crews located at an ODOT Maintenance yard.

The intent is to have one 'point' person that can provide a single view of the yard as a whole. Individual managers are responsible for complying with the EMS in their areas. The 'point' person is responsible for compiling notes and recording progress. Internal disputes and irresolvable issues should be rolled up to the appropriate management level.

Q2 We use more than one Monthly Field Audit sheet at our yard. Do we have to combine all the information onto one sheet?

No. Large yards with multiple crews or multiple audit locations may staple all the Monthly Field Audit sheets together instead of creating a single audit sheet. However, **ONE** Corrective Action Sheet should be filled out for the entire compound based on the information from the various crews/location audits.

The intent of the audits is to identify what needs to be addressed for the entire compound. Maintaining one Corrective Action Sheet involves looking at all the yard audits and transferring the actions to represent the yard as a collective. A single Corrective Action Sheet allows the DM/TMM at the yard to identify what issues (type, frequency, etc.) occur and to track the solutions.

Q3 Am I supposed to be collecting wastewater or stormwater samples (Question 8 on the Monthly Field Audit)?

Only if required by a DEQ permit. Yards that have a site-specific DEQ permit for discharge of oily water or vehicle washing have monthly monitoring requirements for the permit. If you do not have a site-specific discharge permit, you do not need to collect wastewater or stormwater samples. This question does not include the collection of drinking water samples. Contact the Office of Maintenance if you have questions about site-specific permits.

Q4 What is a publicly accessible cabinet (Question 3 on the Monthly Field Audit)?

A cabinet that can be easily opened by non-ODOT personnel without special knowledge or keys.

The goal of the security questions on the Monthly Field Audit is to discourage unauthorized people from causing a spill or release at an ODOT yard.

Storage cabinets, such as flammable storage cabinets, that are located outside of locked buildings or locked compounds are considered publicly accessible and should be locked when the yard is unattended.

Q5 Shouldn't the shaded box for Question 25 on the Monthly Field Audit be in the "yes" column?

Yes. The corrected copy of the Monthly Field Audit has been sent electronically to all document holders. The latest version is dated May 9, 2005. Contact the Office of Maintenance for additional copies or if you are unsure have the current version.

Q6 I've contacted Facilities about fixing a problem at the yard. Do I have to check the shaded box on the Monthly Field Audit every month until they get it fixed?

No. If you have done everything you can at the crew level to get the problem resolved, you do not need to continue to check the shaded box unless the problem reoccurs. Note unresolved issues on the top part of the Monthly Field Audit under 'items carried over from last month.' Note progress, resolution, or roadblocks on the Corrective Action Sheet as they occur.

Q7 We have employee housing at our yard. Do the residences have to be inspected during the Monthly Field Audit?

No, except large tanks used to store fuel. Include heating oil, propane tanks, and/or fuel tanks associated with residences in the Monthly Field Audit inspections. These tanks are owned by ODOT and are the Agency's responsibility, as landlords, to keep maintained. Personal property areas, such as homes and garages, should not be included.

Q8 Do I have to record things that were fixed while performing the walk around for the Monthly Field Audit on the Corrective Action Sheet?

Yes. Recording items that are fixed as they are found (no time loss) shows progress in implementing the EMS program.

Q9 How do I know when it is appropriate to install secondary containment (Questions 18 and 27 on the Monthly Field Audit)?

In some cases, secondary containment is required. For example, all oil containers (55 gallons or larger) must have secondary containment at yards with Spill Prevention Control and Countermeasure (SPCC) Plans. The EMS Procedures identify situations where secondary containment is required by using the word "must."

When secondary containment is not required, use best professional judgment. Base the decision on the quantity of product stored, the likelihood of spill or failure, and the potential impact to resources. If you can pass the 'straight face' test with your answer, it should be ok. The EMS Manual contains product specific information about when containment is required or recommended; refer to the appropriate section of your EMS Manual for additional guidance.

Q10 What do I do with Question 42 on the Monthly Field Audit when I have unwanted products and I'm waiting for somebody to pick them up?

If you are actively managing the waste, check the non-shaded box. The intent of the question is to reduce 'pack rat' issues.

For example, storing used lead-acid batteries onsite and returning them quarterly to the vendor is considered active management of waste. There should be a specific location for storing the batteries, but no other action is required.

Another example of active management is if you are trying to get rid of items you no longer need, but they still have value (to either Surplus Property or another yard). When you identify valuable items you no longer need, write on the Corrective Action Sheet who agreed to take them from you. If the items aren't picked up right away, note on the next month's Field Audit that Question 42 was carried over from the previous month. When the items are picked up, note that the action is completed on the Corrective Action Sheet.

Q11 Does Question 37 on the Monthly Field Audit mean that I have to write the date when the waste is supposed to be picked up on the container?

No. The only date required on waste container labels is the 'accumulation start date'. The accumulation start date is when waste was first placed in the container.

Q12 What does 'treating' equipment wastewater mean (Question 35 on the Monthly Field Audit)?

'Treating' refers to removing pollutants that may be present in the water, such as oil and grease.

Removing pollutants from wash water is recommended (and usually required) when wash water flows offsite. Oil/water separators are often used to remove pollutants from wastewater. Other pollutant removal methods, such as directing wash water to a grassy swale, may also be appropriate.

Section 4.10 - Fleet and Equipment has additional information on washing requirements.

WASTE GENERATION AND DISPOSAL LOG

Q1 I'm taking our universal waste to the local landfill. Do I still have to track it on the Waste Disposal Log?

Yes. Write the date, what you took (e.g. box of nickel cadmium batteries), and where you took it (e.g. local landfill for universal waste collection day) on the Waste Disposal Log. Record whether they gave you a receipt.

Q2 Can we transport hazardous and universal waste from rural yards to a centrally located yard for more economical disposal?

Yes. Waste regulations specifically allow collecting waste from multiple locations within the same company and storing it at one location.

No placarding or CDL endorsement is required when hauling wastes from one yard to another. Districts and or crews may choose to follow stricter transporting requirements. Refer to the chart titled "Waste Hauling" (below) if you have questions regarding when placarding and CDL endorsements are required.

All containers should be marked with the name of the product, hazard information, and the name of the yard generating the waste. Write the Waste Codes on the container, if known. The information can be written on a standard labels like the ones below or in any other manner that provides the same information.



A yellow rectangular label with a red border and a diamond pattern. The text reads: **HAZARDOUS WASTE**. Below this, it states: "FEDERAL AND/OR STATE LAWS PROHIBIT IMPROPER DISPOSAL. IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AGENCY, THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY." It then asks for "GENERATOR INFORMATION:" and provides fields for NAME, ADDRESS, PHONE, CITY, STATE, ZIP, EPA ID NO., and MANIFEST DOCUMENT NO. It also asks for "STATE MANIFEST DOCUMENT NO." and "EPA WASTE NO." with "ACCUMULATION START DATE" and "NO." fields. At the bottom, it says "HANDLE WITH CARE!" and "DO NOT REOPEN WITHOUT NAME AND OR OR TALKED WITH PEOPLE".



A purple rectangular label with the text **UNIVERSAL WASTE** in large white letters. Below this, it has a white box with the following fields: CONTENTS, ACCUMULATION START DATE, SHIPPER, ADDRESS, and CITY, STATE, ZIP.

Shipping papers and/or manifests are not required when transporting wastes from one ODOT yard to another. However, it is recommended that the driver carry a list of the wastes being transported in the drivers' side door in case of an accident.

Transport containers in a manner than minimizes spills and/or damage.

Q3 We are taking all our hazardous waste to one yard in our District for easy pickup. What do we record on the Waste Disposal Log?

The yard that is getting rid of the waste must write a description of the waste and the name of the where they are taking the waste on their Waste Disposal Log (see the example below).

Date of Disposal	Product(s) Disposed	Quantity Disposed	Method of Disposal (e.g. recycled on-site, re-used, collected by vendor)	Disposal Company	Manifest or Receipt Number
5/15/05	Used batteries	Small box	Took to The Dalles for centralized accumulation		
	fluorescent bulbs	2			

The 'District waste storage yard' should write the total amount of hazardous waste picked up their Waste Disposal Log. The 'District waste storage yard' should make copies of disposal paperwork received from the hazardous waste hauler for all yards that contributed to the load.

Yards that transport their hazardous wastes to another yard for centralized pickup should work with the receiving yard on District labeling expectations.

Each yard must keep track of the amount of waste generated by their yard. Waste generated by other yards should not be included on the Waste Generation Log at the 'District waste storage yard'.

Q4 What things have to be included on the Waste Generation and Waste Disposal Logs?

Include hazardous waste, universal waste, and selected excluded wastes. The generation and disposal of all **hazardous waste** created at the yard must be included on the logs. Hazardous waste includes known hazardous waste (like un-popped aerosol cans or most solvents), assumed hazardous waste (like mixed can popper residue), and hazardous waste identified by a Waste Profile. Hazardous monthly waste generation must be record in pounds. Only hazardous waste counts toward the monthly 220-pound limit for Conditionally Exempt Generators (CEG).

ODOT is also choosing to track the generation and disposal of universal wastes and selected excluded wastes to show appropriate waste management.

There are four universal wastes:

- **pesticides,**
- **batteries,**
- **high intensity discharge lamps** (fluorescent, mercury, etc.), and
- **mercury thermostats.**

The six excluded wastes that ODOT has decided to track are

- **used oil,**
- **fertilizer,**
- **petroleum contaminated soil,**
- **tack/emulsion mixtures,**
- **anti-freeze,** and
- **used oil filters.**

Estimate the amount of waste produced each month of these 10 universal and excluded waste items. Record the monthly recorded in whatever units (e.g. gallons, bulbs, and batteries) make sense for the material. Remember to record the units you are using.

Excluded and universal wastes do not count as hazardous waste so long as they are managed according to the EMS procedures. **When universal wastes and some excluded wastes are not managed according to the EMS Procedures they are considered hazardous waste and must be included in the monthly hazardous waste generation total.**

WASTE HAULING

Use this flow chart when there is a question about whether a hazmat endorsed CDL or placarding is required for transporting waste. Examples of transporting activities where there may be questions include transferring used oil to a yard with an used oil burner; moving waste to another yard for future pick up by a hazardous waste hauler; and/or transporting hazardous waste or used oil burner to a non-ODOT facility such as a local landfill, another agency or municipal, or a commercial facility.

