

Here's how to handle auto repair shop hazardous waste

Used oil

What are my options for used oil?

You can take oil you generate at your shop and oil received from do-it-yourself oil changers and burn it in an oil-fired space heater. You cannot take oil from another shop. Don't mix any solvents, paints or anything else with your used oil. That waste needs to be managed separately.

Some companies specialize in handling waste oil. Most of those are set up to re-refine the oil and use it for its intended purpose.

Mixing other waste into your oil creates a potential problem for your recycler or fuel blender. It is very important from a safety perspective not to mix anything else into the waste oil. If you mix hazardous waste into your used oil, you are potentially just creating a larger quantity of hazardous waste, which means more expense to you.

Remember that used oil is not considered a hazardous waste in Kansas. You must dispose of it properly, but it is not subject to hazardous waste requirements.

What about oil filters?

Oil filters should be punctured and drained 24 hours (or crushed) prior to disposal in the local landfill, if allowed by the landfill. Landfills may require a special waste authorization from the Kansas Department of Health and Environment (KDHE) to dispose of oil filters. Although crushing may not be required, it is a more effective way to remove oil. Up to six ounces of oil can be recovered by crushing a filter that has been hot-drained. Even though oil filters may be disposed in the landfill, the casings can be recycled; but there will usually be a fee associated with this service. Liquids of any sort are prohibited in landfills; make sure there is no "free" oil in your discarded oil filters.

Antifreeze

I've been putting used antifreeze down the drain.

My competitor has an antifreeze recycling machine. Can he recycle my antifreeze? What disposal requirements are there for the filters from that machine?

Antifreeze is a toxic material and can be a hazardous waste, depending on whether metals or other contaminants are picked up during its use. KDHE encourages businesses involved with the use of antifreeze to consider recycling. Antifreeze recycling machines are available and, when properly used, can render waste antifreeze completely reusable.

KDHE will allow users of antifreeze recycling systems to share these systems, provided the equipment, rather than the used antifreeze, is moved from place to place. By moving the equipment rather than the antifreeze, you avoid dealing with hazardous waste transportation and treatment issues.

Many recycling systems rely on filtration. If you share recycling equipment, keep your own filters on site. Spent filters do have the potential to be hazardous waste and, if so, need to



be managed accordingly.

Never pour used antifreeze into a septic system. If you have permission from your local publicly owned treatment works (POTW), you may be able to dispose of small amounts by pouring it down the drain. Keep written proof at your facility that the POTW has given its permission.

Hazardous waste

How does the hazardous waste generator status work? If I have waste picked up less often than once a month, how do I track it? Does it have to be removed physically from the machine in order to be classified as waste?

- **Example: A solvent sink holds 14 gallons of solvent (weighing 7.3 pounds/gal.). We get it replaced every two months. Am I considered a small quantity generator or a Kansas generator?**
- **What if I remove seven gallons every month and store it in a separate container? Can I accumulate up to 2,200 pounds and still be a small quantity generator? Are there special labeling requirements if I do that?**
- **What if I switch to a solvent with a flash point above 140°F?**

A number of factors come into

play in determining the appropriate hazardous waste generator status for a Kansas business. The main thing to keep in mind is that you make the hazardous waste determination when the material becomes a waste. In determining your generator status, keep track of the total quantity of all hazardous waste generated during every calendar month.

Using your example, you'd generate 102.2 pounds of waste solvent every two months. Assuming you know the solvent waste is hazardous, the 102.2 pounds would classify you as a "Kansas generator." Note that averaging the waste generation over the two-month period is not allowed. The entire quantity is counted at the time it becomes waste.

Assuming you're generating no other hazardous waste, you could remove seven gallons of solvent waste every month and store it. Then your generator classification would be a "small quantity generator." "Small quantity generators" can accumulate up to 2,200 pounds of hazardous waste without changing their generator status. However, if you generate a total of more than 55 pounds of hazardous waste in any calendar month, you become a "Kansas generator."

Once you accumulate more than 55 pounds of hazardous waste as a "small quantity gener-

ator," you must clearly label or mark each container with the words "Hazardous Waste", and the date you started accumulating the waste in that container.

Finally, if you switch to a solvent with a flash point above 140°F that is not a "listed" hazardous waste or "characteristic" hazardous waste (i.e., pH, metals content, etc.), you don't consider it a hazardous waste. Don't include accumulations of such a waste solvent in determining your correct generator classification.

Solvents with a flash point above 140°F are not classified as ignitable, so they are not hazardous on that basis. Those materials can be recycled. Some people have in-house distillation systems for dealing with those solvents. The stills evaporate the solvent, recondense it, and leave a residue or sludge. Just because you are using a high flash point solvent that is not classified as hazardous waste does not automatically mean the sludge accumulated in the distillation system is not hazardous waste. Through the course of degreasing automotive parts, for example, significant concentrations of lead or other heavy metals can accumulate in your sludge. The solvent is evaporated and recovered, but the sludge concentrates the dirt and metals that might be present.

Unless you know that in your situation you are not dealing with

something that will potentially contribute heavy metals to that residue, you should evaluate the sludge periodically, using toxicity characteristic leaching procedure (TCLP) tests for some of the more common metals that can be found in your type of business.

Depending on the solvents used in your business, they can be “listed” waste rather than a “characteristic” waste. You need to know exactly the types of solvents you are using. If the solvent is a “listed” waste, you always consider it a hazardous waste.

For more information, call the Kansas Small Business Environmental Assistance Program (SBEAP) or KDHE and ask for the Kansas Hazardous Waste Generator’s Handbook.

What are the labeling requirements for hazardous waste storage?

Each “EPA generator” and “Kansas generator” must label or clearly mark each container or tank of hazardous waste with the words “Hazardous Waste.” Also, you must mark each container with the “accumulation start date” (the date the waste is first placed in the container).

You can use a “satellite accumulation container” to collect hazardous waste from a process in the shop. You must mark containers being used for satellite

accumulation with the words “Hazardous Waste,” but you don’t need to mark the accumulation start date on the container until you have accumulated more than 55 gallons of hazardous waste (or one quart of acutely hazardous waste). For a 55-gallon drum, mark the date the drum is full. You must cap and transfer the full drum from the satellite accumulation area to your hazardous waste storage area within three days of filling it.

Empty container disposal

What do I do with empty containers?

Just about everything you use in your business as far as industrial chemicals, paints, and automotive supplies comes in some kind of container. Use as much of the material for its intended purpose as you can. When you believe the container is empty, the rule-of-thumb is to leave no more than one inch of residue in the bottom. Then it’s considered empty.

If the contents of the container were a pesticide or “p-listed” waste, for example, you need to do a better job of removing those residues by triple rinsing with water or whatever would be an appropriate solvent to wash out the remaining material. Whenever possible, save rinsate to use as make-up water for

future use. Unused rinsate is considered hazardous waste and can only be sent to the local sewer (POTW) with written permission.

If the container meets the one-inch definition and did not contain a p-listed waste, you do not need to manage it as hazardous waste. Normally you can send it to your local sanitary or solid waste landfill or solid waste management transfer station.

If you can crush the containers, that is even better. If not, solid waste facilities usually will ask for a special waste authorization. Richard Bronaugh at KDHE issues special waste authorizations. He will ask for some documentation from you. If you can provide that, he will complete an authorization and send it to you and a copy to the landfill.

Note that landfills have the final say in what they accept. Check with them in advance.

If you are using pesticides, consider the container a hazardous waste until you triple rinse it. Again, you’re encouraged to collect the rinsate and use it for make-up water for future batches whenever you can.

Cities are responsible for waste they accept or allow to be introduced into their sewer systems. Talk to your local utilities people before you pour rinsate down the sewer. If they approve it, then you are authorized to dispose of rinsate that way. A lot of

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the facilities take rinsate, but small municipalities usually have small lagoon systems that may be adversely affected by these wastes. In those areas, there may be restrictions on disposal of rinsate into sanitary sewers.

Do I have to get a special authorization for empty drums only if the landfill requests it?

It is always best to find out the procedure of the landfill. Most have a screening procedure to stop some of the trucks coming in to check their loads for inappropriate waste streams. If they see 55-gallon drums aboard, they become more suspicious. They don't know if those drums contain liquids or are completely empty. If possible, crush the containers before you put them in a dumpster to alleviate that concern. It is always best to make contact with your landfill operators to find out the procedure they want to follow. That way you are not surprised when your load gets there and they reject something.

A better disposal method is to use a drum reconditioner, if there is one within reasonable distance from your business. A drum reconditioner or oil service company might be able to reuse the drums or get some money out of them. Look for alternative han-

dlers of the drums as well.

Does the special authorization rule apply to paint cans too?

It applies to 55-gallon size or less, but the same rule-of-thumb holds. Get out what you can. If you can still pour some out, there is probably enough that you could continue to use it.

Provided there are no free liquids, and it is an empty container, (no more than one inch of residue in the bottom), then a paint can is not considered a hazardous waste and can go to the landfill, with the permission of the local authorities.

Aerosol cans are considered empty if you can't spray anything more out of them. There are some aerosol can-puncturing devices available commercially, if you want to go to that extent. But as long as you've sprayed out what you can, you can consider them empty and manageable as solid waste.

Liability

If a waste hauler removes my waste and there is a spill, who is responsible for paying the cost of clean-up?

Usually the service company would be expected to deal with the cost associated with cleaning up any kind of spill. If the spill

resulted in significant environmental damage, and the service company didn't have enough resources, you are still liable. That is why it is a very important part of doing business to ship hazardous waste with someone that you know is reputable and complies with existing federal and state laws.

Make sure your contract with your waste hauler specifies who is responsible for any spills.

For more information, contact:

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The Small Business Environmental Assistance Program's (SBEAP) mission is to help Kansas small businesses comply with clean air regulations. SBEAP operates through a consortium of the University of Kansas, Kansas State University and Wichita State University. This fact sheet was published by Kansas State University's Pollution Prevention Institute. For more information, call 800-578-8898 or send e-mail to SBEAP@ksu.edu. The University of Kansas, Kansas State University and Wichita State University are EEO/AA providers.

