



The HazWaste Quarterly

WINTER 2011

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Providing useful information to businesses licensed by the Ramsey County Environmental Health Section to generate hazardous waste.

Annual Reporting – Help for Getting it Right the First Time!

Winter's here – once again!

Time to think about getting the family together, picking out those special gifts, and filling out your Ramsey County Hazardous Waste Annual Report/License Renewal Application (Annual Report).

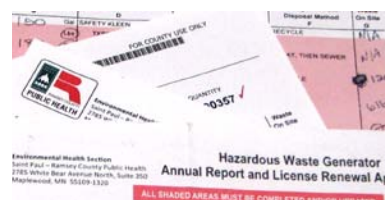
Your Annual Report will be mailed in late December. Watch your mail! It must be completed and postmarked no later than January 31, 2012. If it's postmarked after this date, you will be subject to a late report penalty, equal to 10% of your total license fee.

Before submitting your report, do a careful review to be sure it's complete. If you have any questions, call your inspector. Their name and phone number are at the bottom of the Annual Report. Make a copy for your records. If we contact you about your report, having a copy handy will help resolve any questions.

Your Annual Report undergoes two reviews.

The initial review checks for the following items:

- Has the form been signed?
- Have numerical values been entered in Column C – Waste Generated in 2011?
- Has a Worker's Comp form been submitted?



If any of these items are missing, the report is immediately returned along with a letter identifying the problem. Your report is not logged as having been received and the January 31, 2012 due date still applies. If the resubmitted, completed form is not postmarked by the due date, the 10% late report penalty will be assessed.

After passing the initial review, the report is logged in as received and is given to your hazardous waste inspector for the final review.

What does your inspector look for?

The first item reviewed is the business information at the top of the form. Have you changed owners or locations? If so, a new generator license application must be filled out. If not, the inspector's review will continue.

Here are some common mistakes and ways to avoid them:

Not providing numerical values for Column C – Waste Generated. The number provided must be the actual amount of waste that was generated in 2011, which may differ from the volume shipped. Don't write "same as last year", "no change", "yes", etc. Report accurately and be able to back it up with logs, receipts, or shipment records.

Not circling "Gal" or "Lbs". Designate the unit of measure for your waste by circling either Gallons (Gal) or Pounds (Lbs). Some common conversions are included on our instruction sheet. Call your inspector with any questions.

Not providing any information in Column D – Transporter Name and EPA ID # or Column E – Facility Name/Address and EPA ID #. Supply this information for any hazardous waste transporters or facilities you used. Some wastes are exempt from this requirement. Exempt wastes are generally shipped using a bill of lading or waste-tracking invoice.

Providing EPA ID #s that do not match the Transporter or Facility. Ensure that the EPA ID #s are correct. This information can be found on your hazardous waste manifest or by contacting the companies used.

Not providing any information in Column F – Management or Disposal Method. Indicate what method was used for each waste; the instruction sheet has a list.

Not providing numerical values in Column G – Waste On Site. Provide the actual amount of waste remaining onsite at the end of 2011. Don't write "same as last year", "no change", "yes", etc.

Not completing the Worker's Comp/Tax ID Form. Words like "same as last year", "no change", "yes", etc. will not be accepted as a substitute for the form.

If your inspector finds any of these problems, they may call or visit you to obtain the information.

Remember to be considered "on time", the signed, completed Annual Report must be postmarked no later than January 31, 2012. Call with any questions!



County Environmental Charge? What does that have to do with my business?

If you have taken a close look at your trash bill lately, you may have noticed a line item called the County Environmental Charge (CEC) and thought “Whoa. What is that about!?”

Since 2003, Ramsey County Ordinance has required trash haulers to bill their customers the CEC on the cost of trash service. The CEC replaced the Waste Management Service Charge, which appeared on the property tax statement once per year. It is a service charge collected by your hauler and remitted to the County each month. The CEC applies to the cost of your waste collection service, as well as to most add-on fees such as extra pick-ups or fuel surcharges.

There are two CEC rates:

- 28% for residential customers, and
- 53% for non-residential customers (e.g., a business, non-profit, government, etc.)

For example, for trash service costing \$100 per month, a business would pay the \$100 for trash service PLUS \$53 in CECs. It can add big costs to your trash bill, so it pays to understand a few key points, so you can look at ways to lower your trash bill (and pay less in CECs).

First of all, the CEC applies only to the cost of trash service and related extras. It does not apply to costs for recycling programs or equipment, or to costs to dispose of construction and demolition waste or hazardous waste. Second, State law requires haulers to

charge volume-based fees for trash service. This means the more trash you throw away, the more you pay your trash hauler (and the more CECs you pay). With these points in mind, here are a few ways you might be able to lower your trash bill and pay less in CECs:

- Start a recycling program or add to one already in place;
- Work with your suppliers to reduce packaging, or to take back packaging or other wastes;
- Contact Minnesota Waste Wise for help with reducing waste. This service is free of charge, because Ramsey County has a contract with Waste Wise to work with businesses to reduce waste. To learn how Waste Wise can help you, contact Karen Reilly at 651.266.1186.

Once you reduce the amount of waste you throw away, you can work with your trash hauler to “right-size” your service. This could mean smaller containers and/or fewer pick-ups, and a lower bill. The bottom line here is: If you can reduce the amount of trash you produce, you will lower your trash bill, and pay less in CECs.

And what happens to the CECs you pay to the County?

All the money goes to programs to support the processing of waste into fuel, to promote recycling and waste reduction efforts, and to offer sites for yard waste and household hazardous waste to County residents. For more information on the CEC, contact Joe Wozniak at 651.266.1187.



Pharmaceutical Waste: What you may not be thinking of...

Ramsey County has been taking a close look at pharmaceutical waste for more than ten years.

Most dental offices, pharmacies, clinics, hospitals and many other businesses with pharmaceuticals are licensed as hazardous waste generators. If your business hasn't been managing your pharmaceutical waste, you may be asking yourself, "what's the concern?" Much like other chemicals that are hazardous, studies are showing that what may help some folks' combat depression, fight pain or even cure disease, can be detrimental to others exposed to these very same chemicals. There is also evidence that many of these chemicals are persistent in the environment, meaning that they do not degrade or decompose. Some are showing signs of impacting wildlife and have even been found in our drinking water!

Whether you're in a school setting or in a factory setting, a property management



company managing abandoned waste or a retail store that sells these items, start thinking about what kinds of pharmaceuticals you might have. There are literally thousands of different medications that may be hazardous.

Here are a few pharmaceuticals that may have hazardous characteristics:

Cold medication, cough syrup, asthma, allergy or pain medications, eye drops, antidepressants, antibiotics, topical creams

and lotions, expired medications, nicotine containing patches or gum, first aid kits or crash carts. Stop and think about how your business is currently managing these wastes.

Unevaluated pharmaceuticals are considered hazardous waste and shouldn't be dumped down the drain or thrown in the trash.

They should not be placed in any infectious waste (sharps) container unless truly contaminated with blood or other bodily fluids; this is not considered proper disposal. Please note that not all pharmaceuticals have been found to be hazardous. The Minnesota Pollution Control Agency (MPCA) estimates that only about 20% of medications may be hazardous. Check their website at www.pca.state.mn.us for fact sheets that will aid in evaluating this waste. Or, contact us for assistance with the evaluation process or if you are having trouble managing this waste.



P2 Tip – Information & Insight: Rags, paints, inks, solvents... What do these all have in common?

Generated by many industries, some maybe hazardous and some may not. Are yours?

Take this opportunity, as you fill out your Annual Report, to really review your wastes. Has anything in your operation changed – processes or products – since you were first licensed that would have an effect on the waste you produce? Review the waste codes associated with your wastes to ensure that they accurately reflect the hazard.

Relics from the past

Over the years, formulations for various products have changed. Paints and inks are a good example of this. Many of these products used heavy metals, like lead or cadmium, for pigments. They were a toxic hazardous waste; the waste codes for the heavy metals run from D004 to D011. The industry has evolved over time, eliminating a lot of the heavy metal use. It may be worth investigating; you may be no longer generating a hazardous waste.



Solvents used on rags are another situation worth examining. It was common practice, in the past, to use “F listed” solvents – chemicals like toluene or benzene.

When discarded, the rag became an “F listed” hazardous waste. Has your solvent use changed? Check into it, your rags may not be “listed” anymore, maybe not even hazardous!

Re-evaluate

Even if these specific examples don't apply to your situation, it's a good idea to review your wastes. This simple practice could end up saving you money: in disposal costs, license fees and personnel expenditures. Feel free to give us a call for assistance in re-evaluating your wastes.

Questions, Questions (and some answers!)

Our hazardous waste broker has provided labels for our Universal Waste. She also suggested we use labels that say “Non-regulated” for our non-hazardous waste. We already have “non-hazardous” labels from past years. We don't know which to use. What is appropriate for labeling waste containers?



Labeling containers, an important task for your business

The labels used often have an audience beyond what we might consider when choosing to label a particular container. OSHA and the Fire Department, for example, require labels on containers whether they are wastes or not. It may help to remember that labeling communicates contents and relative hazard of the material for safety and usage purposes.

Universal Wastes

Can be labeled as either “Universal Waste” or “Hazardous Waste”. They should never be labeled as non-hazardous or non-regulated. Fluorescent lamps can also be labeled as “Fluorescent Lamps for Recycling”.

Used Oil, Filters and Absorbents

Should be labeled as “Used Oil”, “Used Oil Filters” or “Used Oil Absorbents”. They can be labeled as “Non-Haz” if the generator can show they are non-hazardous (usually through testing). They should never be labeled as “Non-Regulated”, even if non-hazardous.

Industrial Solid Waste

If you choose to label your solid waste, we suggest you not use the “Non-Regulated” label. This waste is regulated by Solid Waste regulations. A better alternative to the “Non-Regulated” label is to use one that reads “Non-RCRA Regulated”.



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